

Glasa scoping comments, ECU00006127

These comments have been agreed as joint comments by Contin, and Strathpeffer, and Marybank, Scatwell and Strathconon Community Councils

The BESS will be an essential aspect of the EIA, which need to consider management of fire water, spread of fire to peat and heathland, inaccessibility of the area to fire fighting crews.

The BESS must be for buffering to ease transmission load only. Will the existing local transmission network be able to accept all of the proposed generation from this and other schemes, or are we going to see a request to upgrade the existing 132 kV line through the valley to 275 kV?

‘Consultation’ needs to be collaboration, i.e. decisions that affect communities are taken by involving communities in the decisions.

The Planning context should also consider the Chief Planner’s letter about transitional arrangements into NPF4.

The citation of NPF4 policy11 ignores all of the caveats attached to this policy.

We are happy that the planning policy is discussed in a document separate from the EIA, as long as it is discussed, and that it considers all aspects of the planning policy, not just those that selectively support the development.

Visual impact, add viewpoints:

- Little Wyvis, likely to be cumulative impact here if Carn Fearna is consented
- Meall Gorm
- Somewhere in the Tarvie area (café?), selected to give the clearest view of the development
- Beinn Dearg / Con a’Mheall – retain whichever is the worst impacted – not possible to identify this from the map. These hills are usually climbed together.
- Seanna Bhraigh – the worst impact will be seen from the subsidiary summits to the east

We consider that this development will have a disastrous effect on the Rhiddoroch-Beinn Dearg-Ben Wyvis Wild Land Area and it will be visible from others. Undoubtedly, an assessment is required. We see no reason why the assessment of visual impact of any kind should be limited to 20 km. The problem is the increasing cumulative impact, so that there are increasingly few upland summits from which there is not a rotating wind farm on the horizon.

It would be interesting to see a map that is the ZTV for all schemes waiting determination, as part of the cumulative impact assessment.

Although this development is stated to be within a topographic bowl, it is a shallow bowl only some 100 m deep, and the proposed turbine height is 250 m, so all of them protrude from the bowl.

We note that the proposed tip height of 250 m is currently without local precedent – existing turbines are no more than half this height.

If visible aviation lighting is requested, given that the proposed turbines are over 250 m tall, its impact must be assessed.

We note the scope for peatland restoration and the promise that this will be addressed in the EIA.

We have no further comments on Ecology or Ornithology, assuming that comments from relevant experts will be taken into account.

The construction project will require the import of very large quantities of cement. Leaching from cementitious materials into water during construction activities is unavoidable and may have a deleterious effect on naturally acidic groundwater and surface water. Additional measures will be necessary to deal with washings from concreting activities, to ensure that these cannot cause alkaline pollution.

We note that not all of the rock formations found within the project area are likely to produce usable aggregate. This will constrain the location of 'borrow pits'. We note that 'borrow pit' is a euphemism – there is no intent to return any material to the pits; they are quarries.

Traffic assessment will need to take into account seasonal variability in traffic, and the episodic nature of traffic along the A835 driven by the arrival of the Stornoway ferry into Ullapool. There are times when the A835 already reaches critical loading, leading to slow-moving SE-bound queues.

Contin has concerns about the traffic that will be generated during the construction phase. Parts of the A835, particularly from Contin to Garve, are sub-standard for a trunk road, and we anticipate major problems transporting AILs. The proposed turbines are not described beyond tip height, but on a proportionate basis from smaller turbines, we suspect that blade lengths will be of the order of 100 m. It is unclear that it will be practicable to transport these to the site along the A835 from the east. It should be appreciated that the A835 is a regionally critical route; all traffic to the NW Highlands uses this route and there is no practicable alternative route for larger vehicles.

We have seen A835 traffic monitoring data used by another project, and we doubt its accuracy. Recorded existing traffic seems to us to be a substantially over-estimated.

There is the potential for construction traffic for this project to overlap with construction traffic for a number of other projects, potentially producing unacceptable cumulative impacts.

NPF4 policy 11 imposes a socio-economic test and therefore it is essential that there is a socio-economic assessment. Our general perception is that any local benefits are limited to the construction phase, and even then they are marginal. Accommodation providers may benefit from off-season occupancy, but then lose peak season trade. We would expect to see proposals to generate a nett benefit to local communities. There is also potential for cumulative impact, since there are already a number of proposals with similar construction timescale. We do not consider the £5000 MW/yr, first adopted in 2014, to be adequate. It should, at the very least, be indexed from 2014. Certain needs, for example improvements to the A835, cannot be resolved by community councils.

We do not see wind farm development as having a positive effect on tourism! We consider that the Scottish Government is conflicted in its views. At the very least, disruption of accommodation and traffic during the construction phase will have a negative effect.

Certain aspects of this development are probably permanent. It is assumed that turbines and other equipment will be removed at the end of their operational lives and that access tracks will remain until this is complete. However, it is unclear whether ground engineering (access tracks, turbine bases) will be removed, or whether their removal might cause more harm than good. A preliminary assessment of this is required, and the EIA may need to consider the consequences of the concrete bases remaining in place permanently.

This development is on Wild Land. While the concept of Wild Land accepts that it may be necessary to intrude into it for renewables projects, our understanding is that this is primarily in the context of transmission lines, where the linear nature of these and fixed ends, may leave no practicable alternative. It is far from clear that developing a wind farm in this Wild Land area is **essential** to achieving Scotland's renewables targets, and therefore the EIA must seek to make a case that it is essential.

JOHN HEATHCOTE MA PhD CGeol FGS

Secretary, Contin Community Council

15 WOODLAND PARK

CONTIN

STRATHPEFFER

IV14 9EU

J_a_heathcote@hotmail.co.uk

21 May 2025