

Carn Fearna application comments ECU00004851

Summary

Contin Community Council objects to this application on the grounds of:

- Unacceptable visual impact;
- Unacceptable effect on traffic during construction;
- Adverse ecological effects;
- Lack of local socio-economic benefit;
- Cumulative impact.

These are detailed below.

Visual impact

We note that Chapter 7 was not loaded on to the ECU web-site.

We are particularly concerned about the visual impact at locations within the Contin Community Council area, which includes Tarvie and Jamestown.

We note that a number of impacts are described as ‘intermittent’. In the present context, the word ‘intermittent’ does not mean discontinuous in time, but indicates that the view of the turbines is obscured in some locations by nearby objects, such as trees or buildings. ‘Localised’ would be a better word than ‘intermittent’. We note that perception is not linear; something that is localised can be perceived as ‘everywhere’ above a certain threshold, and that the eye is particularly drawn to unusual and moving objects – this is how humans escaped predators. Therefore, we do not consider that the description of visual effects as ‘intermittent’ reduces the significance of the effects.

We are particularly concerned with certain view points, where effects are summarised in the table.

Number	Location	Effect	Comment
3	Tarvie	Significant	Tarvie will be impacted by other proposed developments also, should they go ahead.
4	Little Wyvis	Major and significant	Although not as popular as Ben Wyvis, Little Wyvis is sufficiently well-visited that it has tame deer. It has good parking and has an easy track to the summit. The blade tips of T1 and T2 will be at around 640 m elevation, compared with the summit height of 763 m. We consider this to be a significant intrusion and diminution of the stature of the hill, which is a Corbett.
5	An Cabar	Major and significant	As the nearest Munro to the city of Inverness, Ben Wyvis is a very popular hill and there are parking problems all

Number	Location	Effect	Comment
			summer. The main route to the Ben Wyvis summit, Glas Leathad Mòr, passes over An Cabar, which increases the significance of impact at An Cabar.
6	Glas Leathad Mòr	Significant	Views of the turbines are reduced by the presence of An Cabar, <i>q.v.</i>
7	View Rock	Potentially significant	Currently no visibility because of forestry. However, Contin CC is resolved to discuss selective felling with FLS, to restore the value of this historic view point, established as part of the Victorian spa experience. There is no significant effect 'as is', but this is likely be different when the forest is cleared, as illustrated in Figure 7.22. There will also then be cumulative effect in multiple directions.
9	Jamestown	Not significant	Most houses face in a different direction.
22	A835 junction	Not significant	We dispute this assessment. The A835 is the gateway to the whole of the NW Highlands and therefore there is substantial tourist traffic along this route. The orientation of the road is such that people driving N will have a clear view of the proposed development for several minutes, all the way down to Maryburgh roundabout. We consider the visual effect at this location to be significant. The turbines will first have been seen from the A9 south of Inverness, e.g. viewpoint 18. This is not a good introduction to the NW Highlands. Reminders occur sporadically on the rest of their journey until it will be behind them.
23	Contin	Significant	
24	Loch Garve	Significant	

Locations 3, 7, 9, 23 are within our designated area, and the remainder are visited regularly by residents within and visitors to our area. In particular, view point 22 will be the introduction to the north-west Highlands for many visitors.

It is clear that the visual effect on our interests of the proposed development is significant and negative. There is also cumulative impact from several other actual and proposed developments.

We note that Figures 7.7a,b show no blade tip visibility in locations where the detailed analysis shows substantial visibility. We therefore believe that Figure 7.7 is inaccurate and cannot be relied upon.

We note that the proposed site was previously deemed unsuitable for wind farm development. In 2014, a prior project at this location, the Carn Gorm Wind Farm (Planning Ref: 13/0479/FUL), was refused, upheld on appeal (Reference: PPA-270-2117) in 2015. The rejection was based on the understanding that the development would have an unacceptable and significantly detrimental impact on the Ben Wyvis Special Landscape Area. We do not consider that the changes made in this proposal, viz. fewer, larger turbines, significantly reduce the visual impact, which arises from the nature of the location itself.

Traffic

We accept that traffic implications are limited to the construction phase, and that less significance should be attached to decommissioning, for the purpose of traffic assessment.

13.1.7 Traffic W of Goirtean Junction is less of an issue, because it is a better road. It is traffic from Contin to Goirtean Junction that is the issue, because of poor road quality.

13.3.12, 13 noted, but inappropriate in an area dependent on seasonal tourism. It is necessary also to consider bunching of traffic caused by the Stornoway ferry into Ullapool. This can lead to a queue of traffic that takes several minutes to pass through Contin.

Since Transport Scotland are responsible for the A835, all agreements that would otherwise be with THC need to be made with TS.

13.6.8 Note that the speed limit through Contin is now 20 mph.

13.6.10 Note that the footway from Craigdarroch to Contin is incomplete and the traverse requires crossing the A835 at a bend with limited visibility. There is a school bus waiting area at Craigdarroch, which requires school-bound children to cross the road. This is within the 60 mph zone and is already regarded as unsatisfactory by residents.

Note that the A835 from Contin to Garve is part of the NC500 route and is used as such by cyclists. The road is insufficiently wide for two cars + cyclist and has many blind bends and summits. It is dangerous and local cyclists avoid it, starting their rides at Goirtean. There is currently no satisfactory alternative – the forest trail on the other side of the valley is too rough for many bikes. This forest trail will be severely affected by the construction of the SLBB overhead line, should that be consented.

Note that most facilities in Contin are on the W side of the road, and the majority of residents live on the E side, and must cross it to access the facilities, thus we consider that the risk of severance noted in Table 13.8 should be assessed as High.

Note also that when the A835 trunk road from Contin to Garve of road is closed by an accident, the next shortest route from Contin to Garve is approximately 100 miles. Contin has the nearest general shop to Garve.

Footpaths adjacent to the A835 through Contin are narrow or very narrow.

Categorisation of traffic impact does not allow for the non-linear relationship of journey times to traffic load – a critical tipping point can be reached when traffic starts to queue. Queues are then slow to disperse. This already occurs at times.

We dispute the assessment of the current HGV traffic through Contin. We read this table as saying that there are around 660 HGVs through Contin every day, between 7 am and 7 pm, that is 55/hour, or one every 1 min 6 secs, on average. Our subjective impression is that the HGV traffic is far less than this. Crossing the A835 can be difficult, but not that difficult. We have therefore undertaken some 30 minutes counts of HGVs through Contin, during the working day. The maximum number recorded was 20, and the minimum number recorded was 7. The average was 11. Assuming a Poisson distribution, the probability of no more than 20 HGVs being in 30 minutes is 10.15%, and the probability of no more than 7 HGVs being recorded is <0.01%. We conclude that it is unlikely that there are as many as 660 movements per 12 hours. The number may be around 260. This then leads to the conclusion that the proposed development will result in a 60% increase in HGV traffic, which is a substantial increase.

We regard this increase in traffic as excessive and consider that more detailed assessment is needed, given the need by many to cross the road to access the village services, the narrow pavements, not fully continuous, and the need for school children to cross the road at Craigdarroch.

We note that 81 AIL movements are anticipated. This will cause extensive disruption, since the next alternative route to the A835 is a detour of up to 100 mi, along single-track roads unsuitable for large vehicles. No details are yet provided of how this will be managed. We note that significant modifications along the route are needed, including removal of road safety furniture, tree felling, road widening and the use of third party property. We are unhappy about these proposals, which will add to the disruption. Any modifications will also need to consider the possibility of subsequent construction projects using this road. There is an application for even larger turbines at scoping stage. The road safety furniture is there for a reason – how quickly will it be replaced?

Other projects are proposed that would increase the traffic on the A835, with connection dates 2030-2031, including Tarvie wind farm and Corriemoillie BESS, neither of which have been considered in the assessment. We regard the possible cumulative transport effect as significant.

Ecology

Residents have raised concerns about ecological issues, given recent observations, but we have no professional expertise in this area to comment. We defer to the opinions of the expert bodies in this area.

Socio-economics

We note that the community benefit rate of £5000 /MW/y was established in 2014 and has not been indexed since then. Using the Bank of England's inflation calculator from 2015 to 2025, the equivalent rate should now be £6800 /MW/y, subject to further indexation as time passes. Each installed MW can be expected to generate around 0.3 MW averaged over the year, 2600 MWh. So the cost of this community contribution is only 0.26 p/unit, negligible.

The total contribution of £16.2 million over the project lifetime will presumably be split across at least three community councils. A rough guess is that it might take of the order of £3 million to bring Contin's houses up to modern energy efficiency standards. Looking at Contin's wish list, there are two projects to provide cycle routes to avoid riding on the A835. These could easily cost of the order of £1 million, each. It could be nice to upgrade the forest roads, to provide a vehicular alternative when the A835 is blocked for some reason. This might be an 8-figure sum. In this context, the financial offer is not overly generous.

The offer of shared ownership is noted. It is unclear how this might work – Contin has no institution that could facilitate this and the amounts of money involved are beyond the resources of most if not all residents.

We believe that an excessively rosy picture is painted of the benefit to the UK of replacing current fossil fuel generation with renewables. The principal aim is to replace existing generation, rather than to add new capacity. Wind farms employ very few people after the construction phase. Most sources of renewable energy, and especially wind, are intermittent. There is currently no storage technology at TRL 9 that is suitable for buffering wind generation over periods of anti-cyclonic weather during winter and therefore no price can be attached, but it is likely to be substantial. Buffering via seldom-used fossil fuel generation is very expensive. There is no reason to believe that renewable energy will be cheap, once all factors are taken into account. See <https://dieterhelm.co.uk/natural-capital-environment/net-zero-realism/>

The applicant states that three new jobs are expected to be created directly, with 8-10 indirect jobs. This is a very small positive impact, reduced by being in an area with substantially full employment.

Although there will be some economic benefit during the construction period of less than two years, this is very short compared with the 50 year project life. Paragraphs 14.8.4, 14.8.14 assess the overall effect as low.

The overall socio-economic effect of the development is assessed as small, some positives, especially for accommodation businesses during the quiet season, but some negatives too.

All of the positive economic benefits are short-term, during the 2 years construction period. We perceive persistent negative effects, especially should all proposed projects transpire, when the rural nature of our area will have been transformed completely. We do not consider it reasonable to attribute any long-term economic benefit to replacing fossil fuel generation with renewable generation, since it is merely replacement of an energy source, and it is far from clear that the lifetime cost of renewable power and associated support infrastructure is less than for fossil fuel power. The driver is averting climate change, not money.

We note that the proposer is a company owned by the Norwegian government, so it would seem that at least part of the economic benefit from the scheme will not be to any UK person.

Cumulative impact

Just a few years ago, the views from An Cabar and Glas Leathad Mòr – the twin summits of Ben Wyvis – were expansive with little in the way of development visible, other than in the direction of Inverness and the Moray Firth. It's different now, with Corriemoillie and Fairburn wind farms visible in the middle distance. There are now another six close-by developments in the application process, of which the present application is the closest. The area will be changed from one that is basically untouched, to one that is basically industrial. There are also

applications for BESSs, all targeted with a connection date around 2030 to coincide with proposed upgrades to the transmission infrastructure, so it is probable that construction will be quasi-simultaneous. There may also be the construction of the proposed Spittal-Beaully overhead line on the same timescale. The potential of these simultaneous projects to cause disruption to the road system and to the local economy is enormous.

All of these projects will require consent from ECU, who can therefore assess the degree of cumulative impact, both visual and from construction traffic.

The result is going to be a fundamental change to our area, that will persist for at least a generation. These projects have a planned lifetime of 50 years. These projects bring no long-term benefit to our area – they employ very few people – and we already have a local surplus of renewable energy, with Scotland's second-largest hydro-electric scheme. Contin CC does not want this change, and no-one has even asked us about it.

Overall conclusion

- The proposed development has significant negative visual impact on the receptors of concern to Contin CC.
- Construction work will represent a substantial increase in heavy traffic through our village and movement of 81 AILs will be highly disruptive, since there is no reasonable alternative route to the A835.
- There is no long-term socio-economic benefit to the Contin area from this scheme. The perception is that there will be a dis-benefit, especially if a number of schemes proposed for the area are implemented and therefore there is a cumulative impact, changing the fundamental character of the area. It is unclear whether there is any benefit during construction – economic benefit during winter may be offset by loss of tourist business in the summer.

Contin Community Council objects to this proposal.