

AVICH & KILCHRENAN COMMUNITY
COUNCIL

**Planning Application under Section 36 of the
Electricity Act**

**Amended Proposal to construct 20 Turbines each of
3.00 MW (60 MW total) and of 110 to 125 Metres in
height together with miscellaneous Works
At**

**CARRAIG GHEAL on Farmland at
Fernocho**

**Above Loch Awe, Argyll
By Green Power of Alloa**

**Objections to this Development
contrary to the Argyll & Bute
Development Plan**

And

**The Town and Country Planning
(Scotland) Act 1997**

November 2005

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1 Visual Amenity

a) This site is located in an area of high landscape quality and sensitivity and is situated on a plateau that encroaches onto the Loch Awe “Area of Local Landscape Significance”.

The landscape around Loch Awe is of the craggy uplands type¹ which are large scale, open, exposed, sweeping, elevated, quiet, still landscape and very beautiful. The skyline is an important feature and the ES acknowledges that the windfarm would be seen on the skyline from many view points.

The windfarm development on the skyline would introduce a very large scale dominant and uncharacteristic feature which would radically change the landscape character of Loch Awe and its environs. The amended application does nothing to address these concerns.

b) As outlined above, the proposed windfarm would introduce an extensive, dispersed group of large scale (110 - 125 metre), man-made, vertical, moving structures on the skyline which would not fit well with the topography of this site. We regard this as a high magnitude of change. We conclude that the proposed windfarm would have a substantial adverse effect on the landscape character of Loch Awe and its environs and thus a serious loss of visual amenity to which we strongly object.

c) The EIS is very poor in respect of its choice of viewpoints, for example in that there is no VP from the designed garden at Ardanaiseig. Others, such as VP4² seem to have been selectively placed such

¹ Assessment of the sensitivity of landscapes to windfarm development in Argyll & Bute
Land use Consultants report prepared for SNH and Argyll & Bute Council

² See red ringed area on the enclosed map – ref 2

as to minimise the effects from what is described in the local plan as “a sensitive settlement”; a few hundred metres along the B845 all 20 turbines will be visible; the chosen Viewpoint is the **only** point on this stretch of the B845 from which turbines cannot be seen. Green Power admitted to this blunder, which is compounded by the fact that three senior Green Power employees stayed at a B&B along this stretch of road so they could not have been ignorant of the facts outlined above. Further, there is no VP at the prestigious hotel of Taychreggan.

d) Some landscape assessments are patently absurd to anyone who loves this piece of countryside. For example, paragraph 10.6.4 includes the remarkable statement "there would therefore be a moderate landscape effect on the local landscape character close to and within the site boundary, but this is considered to be acceptable".

Again in paragraph 10.6.7 - "The combination of all four sites (Carraig Ghael, Beinn Ghlas, An Suidhe, Inverliever)... would provide a greater diversity to what is an extensive landscape character type of low sensitivity".

Again in Table 10.19 - "The overall visual effects would be moderate for Loch Awe and slight/negligible for Loch Avich and not significant. The development would not significantly detract from the quality or character of the landscape".

No one who knows and cherishes these areas could possibly agree with those conclusions.

Avich & Kilchrenan Community Council object to this development on grounds of loss of visual amenity and the effects on local communities contrary to RE1 of the Structure plan as briefly outlined above.

2 Effects on People

The main effects on people are on those living at Inverinan, 13 properties, where noise may be a problem as many properties are on the 34 dB(A) contour. There is a high potential for pollution of their **private** water supply. The developer seems to think (para. 9.4.5) that Inverinan is on the public water supply, it is not. Its source is in the Inverinan forest just 1.5 to 2 km below the proposed site (see sections 4 & 6 of this document). At a recent meeting (7th November) Green Power stated that the aqueduct will take all the water away from the SE corner of the site. This is untrue; many burns drain the site in this direction towards the Inverinan water supply.

As this proposed development is on a local farmer's land, the proposal is already causing social division and conflict. The atmosphere in the local Kilchrenan Inn is very tense and will surely affect the business of this establishment. This conflict will be seriously exacerbated if the proposal to use the B845 for access is approved³.

Avich & Kilchrenan Community Council object to this development as affecting local communities contrary to clause RE1 of the structure plan, as briefly outlined above.

³ See letter and maps from Avich & Kilchrenan CC dated 13 November 2005

3 Environment & Ecology

a) Wild life

It is admitted by the developer that otter spraint is present on the windfarm site. Culvert construction will affect the otter's food source by restricting fish migration.

This development is contrary to the Argyll & Bute local Biodiversity Action Plan Paragraph 2.47 on the Otter and we quote: "The otter is on the UK Biodiversity long list of globally threatened and declining species"

b) Fish spawning grounds in the mouth of the River Ab hainn Fionain and its tributaries could be badly affected during the construction phase by silt, forestry brash contamination and other pollutants entering the water courses on the site. The effect on migratory fish and brown trout is particularly significant. There are important redds (spawning grounds) on all the burns and tributaries which flow into Loch Awe. Redds are critically dependent on pure, gently flowing water and clean gravel. Excavations on the scale of the proposed development, with the consequent ingress of soil, forestry brash and pollutants entering the water courses on this very large site, are absolutely certain to affect the redds.

c) Even using the so called "best practice" , who will check that the Contractor is addressing all the environmental concerns? Do the Executive/Council and/or SEPA have sufficient qualified manpower to check every few days that the ecological mitigation measures and any conditions, of a possible part 75 agreement, are being correctly applied on the ground and not just as a desk exercise? We think not.

d) Destruction of peat lands, blanket bog and dependent flora is contrary to many European Directives which the UK and Scotland have signed up to observe; the EIS highlights large areas of blanket bog on this site. This development also breaches the Argyll & Bute local Biodiversity Action Plan Paragraph 2.12 from which we quote “Peat lands (blanket and raised bogs) are listed as both Key and Broad Habitats in the UK Biodiversity list of **globally** threatened/declining habitats”. See included photographs of possible peat damage.⁴

e) Peat Slides. The EIS states (para 9.6.2.3 of the main report) that there is a possibility of peat slides c.f the disastrous slide in Ireland at Derrybrien; large mature trees circa 40 feet high were swept downhill along a small burn destroying bridges and roads for a distance of several kilometres from the site. Some of the peat depths on the SE edge of the site are 3 metres thick, while the settlement of Inverinan is only 3 km away. The likely course of such a slide would be along the Ab ha inn Fionain burn, which flows through the centre of Inverinan, and/or its tributaries.

f)
Avich & Kilchrenan Community Council object to this development on Environmental and ecological grounds contrary to clause DC7 of the structure plan as briefly outlined above.

⁴ Photographs of peat-land damage at a windfarm site in Wales

4 Noise

We have many reservations about the methodology adopted in the noise survey and interpretation, and in particular the use of ETSU-R-97 to justify the lack of baseline noise measurements at the considerable number of properties in the settlement of Inverinan. Inverinan is 3 km away from the nearest three turbines and is just on, or just outside, the 35 dB(A) contour. The developer's approach relies heavily on the calculated contour map which is obviously subject to some level of error, e.g. the noise power output of the turbine is not yet known as the choice of turbine manufacturer has not yet been made.

We are dismayed to find that there is no assessment of low frequency noise which is sometimes felt rather than heard rather like the longest pipe (32 or 64 foot) on a church organ. At these low frequencies, resonance effects occur which can magnify or decrease the sound level at the observation point. It is unfortunate if the maximum occurs at your favourite seat close to a window. These very low frequencies are totally unrepresented by measuring sound levels using the weighted dB(A) scale.

Low frequency sound can also have deleterious effects on health. Research is currently under way to assess such effects and their impact on people's health. The developer should be required to carry out a low frequency noise assessment.

We believe that noise will be a problem under certain conditions. Scottish Power (CRE) assured residents close to the Cruach Mhor windfarm in Argyll that there would not be a noise problem. This has not turned out to be the case as considerable noise distress, of which the Argyll & Bute environmental health officer is aware, has been caused to local residents when the wind is from the East. A similar scenario could easily occur at Carraig Gheal/Inverinan when the wind is from the NW, not an uncommon direction.

Baseline background noise measurements should have been carried out at Inverinan. There is also a possibility of increased noise at night, above the amenity limit, as outlined in the research paper by G.P van den Berg of the University of Groningen⁵. This effect could add a further 5 – 10 dB(A) and thus require baseline noise measurements to be performed.

The method of assessing noise in PAN 45 is flawed as pointed out in the New Acoustics paper⁶. Please note the paragraph 2.2 concerning noise limits set by Argyll & Bute Council for the Vestas factory at Macrahanish.

Avich & Kilchrenan Community Council objects to this development on the grounds of possible noise nuisance and the possible effects on the health of individuals. This development contravenes clause RE1 of the structure plan in failing to demonstrate that it will have “no significant adverse effect on the local communities”.

⁵ Effects of the wind profile at night on wind turbine sound by G.P van den Berg, University of Groningen.

⁶ “ETSU-R-97 Why it is wrong” by Dick Bowdler of New Acoustics July 2005

5 Tourism

Tourism is unquestionably very important to Argyll as it is the major industry and employer. Tourism is worth £300 million to Argyll every year. Surveys on tourist attitudes to windfarms have been carried out by a number of bodies giving varied results often depending on the sponsor of the poll and the design of the questionnaire together, as with all statistics, with the interpretation of the results. The most authoritative and robust of the recent surveys is the one carried out by NFO System 3 for Visit Scotland⁷. This survey shows that 26% of repeat visitors would avoid an area with Windfarms. If only half that number do not come back this would be a loss to the Argyll economy of £39 million. The number of jobs in peak season supported by tourism in Argyll is 20,000; again if the drop is only 13% this is a loss of 2,600 jobs. That is a high price to pay for 180 jobs at Vestas in Macrahanish and 2 or 3 peripatetic jobs on windfarm maintenance at Carraig Gheal.

The Local economy of the Loch Awe and Loch Avich area is dependent on two activities: tourism and forestry. Dalavich with its 40+ holiday cabins is particularly vulnerable. The upmarket hotels at Ardanaiseig (a designed garden listed in the “Inventory of Gardens”) and Taychreggan rely upon their setting to attract high-spending customers. This setting will be highly compromised by the Carraig Gheal wind farm. The local pub/restaurant in Kilchrenan and the Dalavich shop/Café/Post Office will be severely affected as a lot of their customers stay at the Dalavich cabins. These establishments rely on passing trade as do countless B&B establishments in the area.

Other tourism surveys such as the one carried out by Highland Heritage Coach Tours, a nationally known prestigious company, indicates that 44% of coach tour customers would be unlikely to return if the present proliferation of wind farms in Argyll, and in the wider

⁷ “Investigation into the potential impact of windfarms in Scotland” by NFO System 3 on behalf of Visit Scotland – November 2002

Scottish context, continues. Every area has its saturation point for windfarms as has Scotland as a whole where there are currently 271 proposed or operational windfarms (SWAP Gazetteer)⁸ with a further 250 potential applications known to SNH. The area around the Loch Awe “Area of Local Landscape Importance (ALLI)” has been until recently subject to SEVEN wind farm proposals at various stages in the planning cycle. This reduced to six with the refusal of the Inverliever proposal.

The wind industry’s own MORI poll carried out in Argyll and sponsored by the BWEA and SRF indicated that 8% of visitors were negative to windfarms. Even this percentage drop in tourist income could spell disaster for Argyll. A further 43% were undecided, and this with Beinn an Tuirc and Deucheran Hill being reasonably sensitively sited wind farms. How many would still be undecided if they saw Beinn Ghlas, An Suidhe, Stacain, Ederline, Brackley Farm (adjacent to Stacain), and the current Carraig Gheal proposals circling Loch Awe, given that they are certainly not sensitively or reasonably sited?

On an individual basis, Georgina Dalton of Moalachy who depends on her holiday lets for a considerable part of her income has carried out a private survey of her customers. Her findings are that 36% would “definitely not visit the area” and a further 40% would “probably not visit the area” if the windfarms proposed for around Loch Awe and Loch Avich were constructed.

Another more recent poll by MORI on behalf of the Scottish Executive confirmed the highly dubious findings of a previous survey that had to be withdrawn on grounds of unprofessional sampling techniques: “That the closer people live to windfarms the more they like them”. In fact the above poll talked to only a handful of people living within 5 km of a wind farm⁹.

⁸ Report by the Scottish Wind Assessment Project.

⁹ See Views of Scotland analysis “All Froth and no Substance” attached

Avich & Kilchrenan Community Council therefore object to this proposal on the grounds that local businesses will be economically disadvantaged contrary to RE1 of the structure plan.

6 The effects on the local private water supply for Inverinan

The source for this private supply is located in the Inverliever forest above Inverinan¹⁰ and approx. 1.5 km from the closest turbine workings 2, 3, 4 & 5. The re-siting in the amendment of turbines 4 & 5 will not change this situation. The developer's Hydrology Chapter 9 admits that the impact on this high sensitivity environment of accidental spillages into burns (streams) on the site could be high and that the significance could be major. There is also a high potential for interruption of this water supply due to changes in the hydrology of the area from track and turbine base construction.

The developer continues to deny any potential problem on the grounds that the drainage from the site to the SE would be diverted by the SS&E Nant power station aqueduct. One look at the map shows this to be completely untrue. This would be the case for properties to the NE of the site. If Inverinan's private water supply is compromised the developer should be required to correct the situation, if possible, or failing that, as was the case at Scottish Power's Cruach Mhor Argyll windfarm, to contract with Scottish Water to put all Inverinan properties onto the public water supply.

Avich & Kilchrenan Community Council therefore object to this development because of the potentially serious effects on the Inverinan private water supply.

¹⁰ See map showing location of the water tank serving Inverinan Residents

7 The effect on the setting of the SAM at Innis Chonell

This castle is correctly designated as Ardchonnell Castle and Island of Innis Chonnell, Loch Awe ref: AHM/291.

Discussion of this historic monument has been buried in the detail of the Environmental Impact Assessment. The developer may claim that at 8 km it is outside the study area. However:

- a) The historical importance of this site is that it is the 13th century birthplace and original home of the Campbells of Loch Awe, who in the course of time migrated to lands in Glen Aray to become the famous and powerful Campbells of Argyll.
- b) Due to the large size (125 metres) and visibility of 5 to 8 of the turbines in this proposal they will have a dominant impact (ST Matrix refers) with substantial magnitude of change, and will have a significant impact on the immediate and wider setting of this historic site. This development is clearly in contravention of Strat DC 9 of the approved Structure Plan which states: “Development that damages or undermines the historic, architectural or cultural qualities of the historic environment will be resisted; particularly if it would affect a Scheduled Ancient Monument or its **setting**,”. (our emphasis added). AMH/291 is such a SAM.
- c) There is no discussion on this SAM in the text of the EIS; details can only be found by diligent searching of the visibility map figure 20b and the listings of SAMs in the appendices.

Therefore on the basis of the above discussion Avich & Kilchrenan Community Council object to the proposed development because of the impact on the setting of this SAM contrary to section DC9 of the Structure Plan.

8 Impact on Birds

The proposed site and its environs are breeding and foraging areas for a number of protected and/or endangered species. The list is long but includes Golden Eagle, Osprey, Hen Harrier, Black Grouse, Golden Plover, Merlin and Red Throated Diver (which breeds on lochans close to the site), Ravens, Whooper Swans (which have been observed traversing the site), and the White Tailed Sea Eagle (a schedule 1A species of which three have been observed on Loch Avich recently by an independent witness). A single Sea Eagle has also been observed fishing on Loch Awe; they are spreading out from their original breeding site on Mull and we understand that they are breeding on an off-shore island and from there ranging to Loch Avich and Loch Awe.

The ornithology survey is superficial in that the amount of hours, 150 hours total, noted in appendix 8b, spread over two years, has not put enough emphasis on the Golden Eagle.

We are also unconvinced about the predicted low risk of collision for all bird species.

Golden Eagles are well known for ridge soaring; the proposed site contains many ridges. Young Golden Eagles range over a very wide area to the SW and the N of the site. The AKCC secretary observed a juvenile Golden Eagle perched in a neighbour's garden, in Kilchrenan, in early September 2004. It took off in the direction of the proposed site.

There is no study of juvenile Golden Eagles in the EIS. There are no flight line maps or a map of the vantage points in the ES. Grid references are given for the vantage points but this makes for slow interpretation, and with only 28 days to respond, almost impossible even for a trained ornithologist.

There is also no mention of the Golden Eagles whose range centre is 6.7 m NE of the rejected Inverliever wind farm and therefore approximately 3 km SW of Carraig Gheal. This pair of Golden Eagles successfully fledged a chick in the 2005 season.

The removal of four turbines from the core range on the SE edge of the site may give some relief to the adult resident Golden Eagles but will do nothing for any juveniles. It is known and accepted that Golden Eagles spend 50% of their time in their core area and the other 50% wide-ranging to forage or to repel intruders. This activity may well take them over the revised layout of the wind farm.

The Golden Eagle range centre is no more than 3 km south of turbine number 4 and 5 km from numbers 3 and 5. These Golden Eagles will obviously be at risk from this development.

The section that follows is an extract from a Predicting Aquila Territories (PAT) report¹¹ by Natural Research Ltd. carried out around the site originally proposed for the Inverliever wind farm, the relevance being that the centroid of the NE Golden Eagles is as described above. Context clarifications are in italics:

“The PAT predicts that the open ground north of the *Inverliever* wind farm is not important to eagles. However, eagles can fly beyond the 6 km boundary set by the PAT and some do so to forage or to defend their territory.

A PAT model run on the eagle home range to the NE does not predict that this open area *to the North of the Inverliever windfarm* is important to that pair because it is too distant from their range centroid. The centroid of the NE neighbour is **6700** m (*n.b*) from the *Inverliever* wind farm. In addition,

¹¹ Modelling eagle ranging behaviour at the proposed Inverliever Wind Farm – 10th January 2005

in most cases Loch Avich probably acts as a barrier to this *NE* pair moving *SW* to the open ground between Loch Avich and the proposed *Inverliever* wind farm. If this area is used by eagles from that range, it is more likely during weather that allows them to overcome the barrier posed by the loch and during interactions with its neighbour at *Inverliever* or with non-territorial intruder eagles”.

The Carraig Gheal proposal is at variance with the Argyll & Bute Local Biodiversity Action Plan sections 2.23 Black Grouse, 2.35 Golden Eagle, 2.57 Skylark, 2.39 Hen Harrier. Merlin is also present on the site. Ospreys have been observed feeding on Loch Awe just 2 km east of the Carraig Gheal wind farm.

Wind turbines are known to be causing the deaths of many birds internationally. Migrant birds such as whooper swans, white-fronted geese and red-wing thrushes that pass through this area in the autumn and winter months (many at night), seem to have been ignored by the ES surveys. None of the three mentioned, all Schedule 1 protected species, are even considered in the Environmental Statement. This proposal will affect birds from Greenland to Africa, as well as those that live locally all the year round. The Ospreys that nest on the hillside opposite Eredine and can be seen from there, are almost certainly going to be driven away by these increasing proposals to build industrial-level power generation plants. Eagles will perish - in this day and age we are supposed to be concerned about such matters. The 2005 season saw Ospreys nesting on a site on the northern shore of Loch Avich close to the Golden Eagle nest that so greatly concerned SNH that they requested the removal of four turbines.

We fully endorse the objection of Mr Karl Pipes in respect of ornithology, which remains as relevant for Carraig Gheal as it was for the development at *Inverliever*¹².

¹² Paper on collision risk by Karl Pipes submitted regarding the *Inverliever* windfarm proposal which is adjacent to this proposed development

Avich & Kilchrenan Community Council object to this proposal due to the unquantified potential damage to protected and other birds and their habitat contrary to the Wildlife & Countryside Act, clause DC7 of the structure plan and the Argyll & Bute Local Biodiversity Action Plan.

9 The impact on the designed gardens at Ardanaiseig

The EIS has completely ignored this garden which is listed in the "Inventory of Gardens". The only such garden acknowledged in the EIS is that at Torosay on the Isle of Mull, a distance of about 30 km! The visibility of between 4 and 24 turbines at a distance of 13 Km will be of major impact with a moderate/substantial magnitude and with a potential for significant impact. This level impact will seriously affect the setting of this garden.

Therefore on the basis of the above Avich & Kilchrenan Community Council object to the proposed development because of the impact on the setting of this listed garden contrary to section DC8 of the Structure Plan.

10 The use of the “Life line” road, the B845 for access

The developer’s preferred route

Roadworks on the B845 proposed by Green Power to enable the transport of massive towers, generator nacelles, (see enclosed photographs showing the transport along the A41 in Wales compared to the single lane with passing places B845¹³), stone for internal roads, cement, large earth-moving machinery, giant cranes and sundry other vehicles are estimated to last for approximately 12 months. This duration is in addition to the admission, by Green Power, that the wind farm construction work will last a further 12 months. During the principle wind farm construction period alone, Green Power admits, in its proposal, to 450 to 500 vehicle movements per month.

Green Power proposes to carry out major roadworks along the length of the B845 from the main road to the Hydro gate above Kilchrenan. These roadworks have been specified in a Green Power consultant’s report, of which the Community Council had sight only at a meeting with Green Power in Taynuilt on the 7th November 2005. These proposals are commented upon in our letter of the 13th November (attached). The Environmental Statement airily states that “some horizontal and vertical alignments” will be required, not least major engineering works at the Taynuilt road end of the B845. The massive extent of such works, which in the case of the vertical re-alignments, are likely close the whole road for long periods far in excess of the 20 minute legal limit, are totally unacceptable to the Community Council.

This road is the lifeline for the villages of Kilchrenan, Inverinan and Dalavich. It is a school route, the only route for emergency vehicles, ambulance, doctors, fire engines, police etc. The local population has a very

¹³ Transport photographs

high proportion of retired and elderly people whose lives may be at risk due to delays whilst the roadworks are carried out. Even worse, during the transport of towers and nacelles, Green Power informed the Community Council that the road will be **closed** for as long as an hour at a time. This presents a serious threat to life.

Many rely on this road to get to work or to carry out their leisure activities. The local hotels, the Kilchrenan Inn, Dalavich social club, shop/post office & local firms rely on this road for delivery of supplies and materials. The local fish farm at Tervine, which employs 8 people and has tight schedules for the deliveries of live fish, would suffer economically.

The alternative western access proposal, apparently rejected by the developer, would be less intrusive as it runs on forestry roads and will not impinge on local people's health & safety as does the route preferred by the developer. Green Power stated categorically, at the November 7th meeting, after much pressure from the Community Council, that the costs of both routes are comparable, that they had approached all the landowners along the western route, and obtained full agreement to facilitate access. We understand, however, from one of the landowners on the western route that this is untrue as no approaches have been made to him or his agent.

We also understand from one of the landowners on the chosen B845 route that Green Power told him they had no intention of using the western route.

Green Power stated that they had not yet approached the land owners, presumably with the exception of the landowner referred to above, on the B845 proposed route.

The B845 passes through the Glen Nant National Nature Reserve as evidenced by the video which was

sent to Mr P. Smith of the Scottish Executive Consents Unit by Mrs. C. Metcalfe on behalf of the Community Council.

Avich & Kilchrenan Community Council are implacably opposed to the use of the B845 as an access route on the grounds outlined above and further urge that consideration of this project should await the satisfactory addressing of **all** the access concerns.

11 Cumulative Impact¹⁴

Following the refusal of the Inverliever application by Argyll & Bute Council there are now six wind farms proposed, approved or operational around Loch Awe/Loch Avich, an area of "Local Landscape Importance". These are:

Benn Ghlas	Operational
An Suidhe	Planning granted but no construction/generation after 2 years but an extension to the conditions has been granted.
Carraig Gheal	Exhibitions held – S36 application lodged. Amendment submitted October 2005, further exhibitions scheduled for 14 th & 15 th November.
Ederline	S36 -- Scoping submitted to the Scottish Executive, February 2004
Stacain	Application lodged with Argyll & Bute Council with NO consultation with the affected communities
Brackley	Meeting held with Community Council 3 rd February 2005. This application is by Fred Olsen Renewables. This S36 proposal is at Brackley farm adjacent to Stacain. Scoping report submitted to the Scottish Executive. Exhibitions were held at Loch Awe and Dalmally in September 2005.

This number of applications encircling Loch Awe/Loch Avich and the Lorn plateau will increase the risk to protected and migrating bird species, other flora and fauna and also will have a serious impact on tourism in the area and on the visual amenity of local residents and visitors alike.

With further reference to Cumulative Visual Effects, Viewpoint 5, an important Viewpoint on the edge of Kilchrenan, Paragraph 10.10.2 states: "no cumulative

¹⁴ See cumulative impact map attached

visibility at Viewpoint 5". This is not the case as the enclosed photograph¹⁵ shows. Five or 6 Beinn Ghlas turbines are certainly visible from the spot. This error was pointed out at the Green Power presentation in Kilchrenan on 25 January 05 and again on 16th November with no satisfactory response from Green Power Power personnel present. They insist that there is no visibility of Beinn Ghlas from VP5¹⁶. It, therefore, seems entirely possible that there may be other errors in favour of the Developer in other Viewpoints.

We have already represented (footnote 15) that 5 or 6 turbines of Beinn Ghlas are visible from this precise spot and that there is, contrary to the developer's assertion, some cumulative impact. We submitted a photograph in support.

We have spoken to the developer about this, most recently on 16 November at their presentation in Taynuilt. We were astonished to be told that the matter had been checked, no turbines were visible, and our submission was erroneous.

We would like to be absolutely clear on this: the Beinn Ghlas turbines are indeed visible from the exact spot, checked against the photograph in the amended EIS and by GPS. This is fact, not opinion.

It is a serious matter when the developers seem determined to deny facts which are not in their favour, even when mistakes are pointed out to them. A correct assessment of Cumulative Impact at this spot has an effect on many other assessments, as identified in our previous submission (reference February 2005).

In any case, the erroneous cumulative visual information on Viewpoint 5 alone invalidates paragraph 10.10.3, which states "Findings from the analysis of the cumulative visibility maps and cumulative visibility assessments have

¹⁵ Photograph taken at VP5 from which 5 to 6 Beinn Ghlas turbines are clearly visible at the position indicated. See also the footnote 2 viewpoint map which clearly shows this inter-visibility.

¹⁶ See also digital map path profile Fig.16

been used to form a conclusion as to the level of overall cumulative effect on visual amenity during operation relating to people (receptors) and the significance of the visual effects in EIA terms." Conclusions with respect to Cumulative Visible Effects on Residents (10.10.3.1.), People Undertaking Recreational Activity (10.10.3.2), and People on Travel Routes (10.10.3.3), are therefore all based on misleading data and should be rejected.

For the same reason the Landscape Assessment (10.11.2), Cumulative Visual Effects (10.11.3.2), and Conclusion (10.12), all of which are based on faulty data, should all be rejected.

Moreover, it is noted from paragraph 10.4.2.7 that one of the factors that determined the proposed wind farm layout was "cumulative effect and visual composition when seen in conjunction with the Bienn Ghlas wind farm". Since the cumulative impact assessment is faulty, the layout has therefore been designed on invalid data and should be rejected.

In addition, with reference to paragraph 10.2.8.6 - "in general terms the Viewpoints themselves would represent the 'most visible views' ", this certainly does not apply to Viewpoint 5. A few metres up the road 12 -14 wind turbines are clearly visible.

Again in paragraph 10.6.7 - "The combination of all four sites (Carraig Gheal, Beinn Ghlas, An Suidhe, Inverliever)... would provide a greater diversity to what is an extensive landscape character type of low sensitivity".

Avich & Kilchrenan Community Council thus object To this proposal on the grounds stated above.

12 Site selection & other matters

This proposal at Carraig Gheal is contrary to the Argyll & Bute Structure plan (15th November 2002) in that this plan contains no “preferred” areas (contrary to the statement in the EIS) for wind farms; Preferred Areas are devolved to the Local Plan which is not expected to be published for some time, considering that these local plans still have to go out for further public consultation. The emerging local plan has been the subject of consultation with AKCC who were in basic agreement with the wind farm policy expressed therein.

The proposed wind farm has 20 very large turbines in an area designated in the emerging local plan as “limited opportunity for wind farms” and adjacent to a “very sensitive area for wind farms” The site chosen is also close to the Glen Nant “National Nature Reserve” and its neighbouring SSSI. This part of Argyll is a wildlife paradise which will be destroyed for ever by these inappropriate industrial developments.

The savings of CO₂ are wildly overstated in the EIS at 151,000 tons/annum. A more realistic figure would be 67,000 tons/annum, based upon the recommended mix of energies replaced as calculated by DEFRA and The Carbon Trust.

These calculations do not take account of the additional 50 to 60%¹⁷ “spinning reserve” required for safety margins existing in the grid system to cope with existing plant breakdown not to be seriously eroded. The scenario of the breakdown of a fossil fuel plant together with a nuclear plant would more than eat up the already slender safety margin – if at that point the wind collapses¹⁸ and the

¹⁷ Eon Netz Wind Report 2004, Page 3, 3rd Para.

¹⁸ Eon Netz Wind Report 2004, Page 6, 2nd Para.

output from the windfarms drops drastically – disaster!
Power cuts would be inevitable.

Sourcing of road stone for track construction and consequential transport movements is not addressed in the EIS. This is of great concern to local residents, who may be burdened with considerable disruption. The only relevant statement in the EIS is contained in the outline of the proposed development page 20 paragraph 3.9 which states: “Given the geological nature of the development site, it is unlikely that any borrow pits will be utilised. Any stone won on site will be from excavations related to turbine foundation construction.” This statement implies that the stone for the miles of tracks and roads will be sourced external to the site perhaps even from the quarry on the B845! This will add to the disruption that will be caused if the B845 is used for site access. We consider that an answer to this question is mandatory before any approval is granted. The sources of the road stone and any potential environmental effects should be considered with the project as a whole as required by the EU Habitats Directive Article 6(3) and EIA regulations 1999.

Avich & Kilchrenan Community Council thus object to this proposal on the grounds stated above.

Avich & Kilchrenan Community Council - November 2005

