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Cairngorms National Park Authority
14, The Square
Grantown-on-Spey
Highland



Save Our Dava
Greengates
Grantown-on-Spey
Highland
PH26 3PR

Dear Matthew

26th. August 2009

Tom nan Clach windfarm planning application, Nairnshire

Many thanks for sparing your own time to come to Greengates the other evening and explain the C.N.P.A.'s stance regarding the above. This is appreciated – Save Our Dava welcomed the opportunity to debate the subject.

You will be aware from the meeting that we do not agree with the Park's draft decision not to object to this planning application.

For the record, our reasons are as follows:

Tom nan Clach and Glènkirk windfarm applications are linked geographically and are entering the planning determination process contemporaneously, and may yet be determined simultaneously. This is significant in as much as consultee responses can for the first time be directly compared by determinants for each of these applications, especially if planning committees for both proposals convene on the same day.

The perimeter boundary of the Cairngorms National Park is at present conservatively estimated to total over 250 miles in broad terms. We find it surprising, therefore, that the CNPA should choose to sustain formal objection to one of these applications; whilst not objecting to another that is actually located directly alongside the boundaries of the first – the landscape acceptability criteria within this "whole Park" scale we feel are too similar to warrant this stance. Should either of these applications happen to be rejected by Highland Regional Council (either as consultees or determinants), the ensuing Public Enquiry we feel would leave the Park Authority facing uncomfortable scrutiny on the following grounds:

Distance of a windfarm application from the Park boundary does not appear to be a relevant issue, given past CNPA objection to the likes of Dunmaglass, which lies at greater distances than Dava Moor from the Park.

We accept your view that Tom nan Clach's location provides screening from low-lying areas of the Spey valley by topography – these areas, however, in Glenkirk's case, are only subject to views of this windfarm in very limited locations and at most only by minimal turbine blades visibility. This is substantiated in the Glenkirk ES Addendum, which focuses on any significant visibility of this windfarm being at higher and more distant locations in the northern Park's area, such as the Cromdale Hills, Gorton Hill near Grantown, and Ptarmigan Lodge in the Northern Corries. The fact of this albeit distant visibility focuses highly in the CNPA formal objection to Glenkirk in 2006.

Tom nan Clach retains broadly similar visibility to Glenkirk from these particular locations within the Cairngorms National Park.

The 2006 CNPA objection to Glenkirk also directs significant focus on "gateways" impact upon the Park by this development proposal, not least by the B9007. Despite its acknowledged lesser usage than the A9 or the A939, this road is unique in its 'wild' feel by users. The visual impact posed by Tom nan Clach upon the B9007 is basically the same as that of Glenkirk, in terms of accessing the National Park. The road's presence, and that of Tom nan Clach windfarm, is also totally within a Highland Region AGLV which directly bounds the Park for over 20km, unlike Glenkirk's only partial location within it. (Loch Ness, by comparison, also lies within an HRC AGLV designation). Your draft response to Tom nan Clach sees no "gateway" issues arising.

Our conclusions drawn from the meeting with you is that the difference in tone between the robust, even feisty, objection to Glenkirk windfarm of less than three years ago and the present low-key, (dare we suggest) acquiescent non-objection to Tom nan Clach adjacent poses a dichotomy of view that would not stand up to detailed scrutiny of either application at Enquiry. It also begs query that strategic instruction or other factors presenting themselves in the interim have clouded the basic requirement for sound independent comment by consultees, who may ultimately be bound by stricture and finance issues to Government policy.

Yours sincerely,

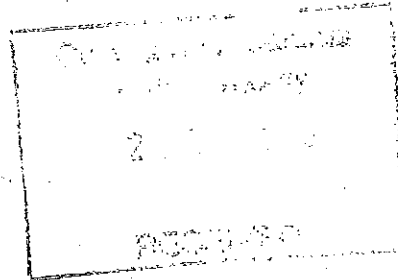


Mr K A and Mrs E J Urquhart
Lilac Cottage
Carrbridge
Inverness-shire
PH23 3BX

17 September 2009

Your ref: AT/Windfarms/Tom nan Clach

Mr Andrew Tait
Cairngorms National Park Authority
Ground Floor
Albert Memorial Hall
Station Square
Ballater
Aberdeenshire
AB35 5QB



Dear Mr Tait

Thank you for your letter of 16 July 2009.

Enclosed is a further letter dated 22/8/09 sent to Highland Council Planning Department, and a short review on the planning application for a windfarm at Tom nan Clach on the Cawdor estate which represents the majority view in the area and surroundings.

Whilst we appreciate that you are not a campaigning organisation we do believe that the entirety of the Cairngorms National Park is affected by this and similar developments and as such you should be appraised of local concerns, including our own.

Our concern is also that the wider issues should be addressed.

There is a need for a coherent national strategy on sustainable power generation which takes into account the damage to the environment of the few remaining wild areas of the Highlands, the damage to tourism which is an industry on which Scotland depends and the significant transmission loss from power generation in these remote places and its transmission to the areas of Britain and Europe where the power is needed.

Wind farms are being allowed to be constructed in this random way with each application being assessed individually without the reference to the cumulative effect many applications for wind farms in the same area, and this should be stopped.

The coherent strategy should include all options for renewable and "green energy" generation and also industrial zoning for what are industrial developments, and also where appropriate should move towards small scale local generation near the point of power use.

We have no idea who, if anyone, is working towards this overall strategy, and the prevention of the destruction of wild places in the Highlands of Scotland.

Neither do we have any idea where within local, national or EU law it is permissible to use areas which are clearly zoned otherwise, for industrial development without the necessary consultation process being entered into.

But it seems unacceptable for there to be breaches of established planning procedures, and there is no doubt that wind farms are industrial developments on a massive scale.

We would welcome anything further you have heard on consultation from Highland Council on this proposed development.

Note also that we have objected to the proposed development at Glenkirk although we know that is a decision of the Scottish Government.

Overall, we find it incomprehensible that such developments, and we understand there to be many others involving potentially hundreds of turbines, are planned and may be permitted so close to the boundary of the National Park. It seems to make a mockery of this national park that it can be ringed to the north and west potentially at least by huge turbines, pylons and power lines which are representative of industry not landscape conservation and all that this includes.

Yours sincerely



K A Urquhart



E J Urquhart

SAWD

STRATHDEARN AGAINST WINDFARM DEVELOPMENTS

Please reply to : Mrs. Pat Wells, Altchosach, Tomatin, Inverness-shire, IV13 7XZ

Cairngorms National
Park Auth

06 OCT 2009

Received by email

postal

copy to
Follow.

Mr Andrew Tait
Cairngorm National Park Planning Officer
Ground Floor, Albert Memorial Hall
Station Square
Ballater AB34 5QB

5 October 2009

Dear Mr Tait

Planning Application 09/00439/FULIN: Proposed windfarm at Tom nan Clach, Nairnshire

Further to our telephone conversation last week regarding the Cairngorm National Park Authority's (CNPA) response to the proposed Tom nan Clach windfarm, we ask that the following issues be given serious consideration as reasons why the CNPA should object to this proposed development.

1. To maintain consistency of approach to large scale windfarms around the Park boundary

The CNPA has objected to proposed windfarms at Dunmaglass, Glenkirk and Dorenell on grounds of negative impact on landscape, loss of visual amenity and/or proximity to the Park boundary. Tom nan Clach will be visible from a number of locations within the Park and highly visible from routes leading to and from it (such as the B9007 and the A9).

2. Cumulative effect and potential extension of the development

The proposed Tom nan Clach site is contiguous with the proposed Glenkirk site (for 31 x 110 metre high turbines). If Tom nan Clach was approved in addition to Glenkirk, it would initially add another 17 x 110 metre high turbines and the two developments would appear as one large development. We ask that the cumulative effect is taken into account when considering the CNPA response./

/It is also important to remember that the original plan from Infinergy was for fifty one turbines at Tom nan Clach and you will be aware of the common practice of windfarm developers to obtain planning approval for a reduced number of turbines and then continue to expand on the site. Even without the proposed Glenkirk development this would result in unacceptable visual intrusion from within the Park and from routes around it.

3. **Proposed site access road**

Originally Infinergy proposed to access the Tom nan Clach site from the A9(T) near Tomatin. However, this proved to be problematic and the developer hurriedly considered accessing the site from the east via the B9007 Glen Ferness to Duthil road.

The B9007 is very popular with both visitors and local people because it affords access to historic Lochindorb and because of the spectacular views across the wild, open moorland of the Dava Hills, virtually free from human impact. The road is also a much-used corridor route for tourists entering the CNP.

The proposal for site access from the B9007 is for a large bell-mouth junction with turning area and marshalling yard (for excavation plant, bulldozers, surfacing equipment etc.). From here an 11.7K access road will be constructed across the open moor to the west of the B9007. This will produce an ugly scar on an iconic corridor route into the Park and will ruin the special experience enjoyed by so many who travel this road.

There is a second and very important reason for objecting to the proposed Tom nan Clach development and its access route from the B9007 because if approved, **this route could provide access to the proposed Glenkirk windfarm to which the CNPA has already objected.**

Currently, Eurus Energy UK Ltd. (the developer for the proposed Glenkirk windfarm) has identified site access from the A9(T) at Invereen (just north of Tomatin). The plan is to cross the active floodplain and river channel of the Findhorn by a raised road and new bridge. However, there is very strong opposition to this route and if Highland Council (the determining body for the planning application for the access to this Section 36 development) refuses to approve the route, Eurus may well look to share the Tom nan Clach route from the B9007, thus allowing access to the proposed Glenkirk windfarm by default.

4. **Biodiversity issues**

It may be the case that the moorland area which will be impacted by the proposed windfarm developments does not currently support a large number of

/breeding upland birds, particularly raptors (due to land "management" as a grouse moor). However, there are several EU Annex 1 species located in the CNP, in particular golden eagle, and these birds (and other species resident in the Park) regularly use the areas adjacent to the Park boundary as hunting and feeding grounds. The birds themselves should be the subject of CNPA protection but so also should their wider habitats, including those outside the Park boundary. You will be aware of the recent study by RSPB Scotland* and the conclusion that windfarms have a detrimental effect on several endangered upland bird species over a much wider area than that previously acknowledged (especially by windfarm developers). We ask that due cognizance is given to the report's findings.

5. Grid connection

Infinergy has listed a number of options for connecting to the national grid but given no detail. Professional opinion we have received indicates that a 132kv line will be used to bring power from the site to the main grid. There is a possibility that the line will run through the Park and we ask that the CNPA applies the precautionary principle here, at least until the actual route is properly identified.

6. Windfarm traffic on the Park road network

During the construction phase there will be many thousands (estimated at 16,440 by the developer) of additional vehicle movements on the Park roads, including the popular tourist routes (for motorists and cyclists) and through a number of villages and settlements. Such heavy traffic volumes are out of character and conflict with the image and expectations of roads within the CNP.

In conclusion, we ask that the Planning Board submits an objection to the proposed Tom na Clach development because of the impact on the CNP itself and the corridor routes outwith the boundary. These impacts will arise from the Tom na Clach development alone as well as the potential cumulative effect arising from the adjacent proposed Glenkirk development.

Yours sincerely

Pat Wells (SAWD Convener)

**The distribution of breeding birds around upland windfarms. J.Appl.Ecology 1365-2664.2009*