


Paper 2

APPENDIX 5

Community Council Comments
to Scottish Government
(for information)

Kincraig & Vicinity Community Council

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Kincraig
Kingussie
Inverness-shire
PH21 1QE


The Scottish Government Energy Consent Unit
4th Floor, 5 Atlantic Quay
150 Broomielaw
GLASGOW
G2 8LU

8 April 2011.

Dear Sirs,

Kincraig CC response to Allt Duine Planning Application

Summary

Kincraig & Vicinity Community Council is on balance, supportive of this application.

Background

Kincraig CC has been in regular contact with the developers REW npower over the last four years. From an early stage it became clear that there would be divisions of opinion in the community. It also became a matter of CC policy that we would not hold a Community meeting until such time as the application came forward and we had definitive information to review. This meeting was held as recently as 4 April, 2011.

Community feedback

Feedback on opinions expressed at various times are summarised on the attached table and clearly show the division of feelings, but also a significant number of 'undecided' people at all stages. The 'show of hands' at the Community meeting, being the latest expression of interest, has perhaps greatest merit. The overall response level however remains a fraction of the Kincraig and surrounding area population when viewed against the number of letters (2,500) sent out by the Company in August 2010.

During the Community meeting concern was raised with regard to the volume of south-bound site traffic (including from Inverness or Invergordon) on the A9 and having to sit in the south-bound lane till traffic conditions allow vehicles to turn right into the access road at Leault Farm. This because the EIA is understood to have been required to reflect the 'worst case' scenario for site-bound traffic, where in addition to all turbine etc. equipment, the material for the access tracks and the turbine bases would also have to come into the site from elsewhere.

In making the case for a traffic island on the A9 at Leault to ensure safe turning to the right at the height of the tourist season when concrete pouring is most likely to be happening, we suggest that traffic flows on the A9 south of Aviemore seem likely to be substantially greater than the traffic flows at the equivalent entry point to the Farr windfarm further north. This because the traffic volume at Leault includes tourist traffic going to both the Aviemore area and onwards from there to Grantown-on-Spey via the A95. North of Grantown, we have the Moray Firth towns stretching from Nairn in the west, to Keith in the east, with Forres, Elgin and Lossiemouth in between, while there is the added substantial heavy commercial vehicle movement associated with the whisky industry.

Visibility

The montages provided by the Developer which show the visibility of the windfarm from many locations confirm that generally speaking, unless one goes up to a high vantage point on the Cairngorms or looks in from the north or south of the proposed development, it will be out of sight. This may have a bearing on the lack of apparent concern amongst the general non-responding community. Clearly for those who regard wild places as being sacrosanct, the intrusion would however be totally unacceptable.

Given that most of the montages indicate that the turbines will be silhouetted against the background hills rather than the sky, a change to a darker colour should be considered. Visibility to aircraft and birds may however limit the options available.

Employment and economic benefit

We would hope that as many local people as possible can be employed during both the construction and generation phases, should the application be approved.

Conclusion

Reiterating the content of the opening paragraph above, Kincaig & Vicinity Community Council is on balance, supportive of this application.

Yours sincerely,

John L Anderson,
Secretary & Treasurer.

Copied to Mr A Brien (Chairman).

Balances of opinion re proposed Allt Duine Windfarm

	Exhibition questionnaires 3-4 Sept. %	Postal responses to 15 Oct. %	Community meeting 04-Apr-11 %	Total %
Newsletters distributed Numbers present	106	2500	57 **	
Supportive	29 46	66 42	25 51	120 45
Undecided	21 33	18 11	10 20	49 18
Opposed	13 21	74 47	14 29	101 37
Total responses	63* 100	158 100	49 100	270 100

(59% of visitors)


** Incl. two Press &
several 'non-voting'

Note: There is potential for overlap (double counting) between the three indicators of sentiment (exhibition, postal, meeting).

KINGUSSIE AND VICINITY COMMUNITY COUNCIL

The Scottish Government Energy Directorate
Renewable Energy Division
5 Atlantic Quay
150 Broomielaw
Glasgow G2 8LU

Address for correspondence:
KVCC Secretary
Drumlins
Newtonmore Road
Kingussie PH21 1HD



12th April 2011

Response to Section 36 Application for the proposed Allt Duine Wind Farm north of Kingussie

Dear Sir/Madam

While not currently objecting nor supporting the proposal for a 31 turbine wind farm at Allt Duine, Kincaig, we have serious reservations regarding such a development. We are aware of the exhaustive surveys carried out by RWE on the proposed site, and also of the extensive consultation carried out by them. Our concerns are as follows:

Efficiency:

(a) While appreciating the importance of renewable energy especially given the current situation surrounding fossil fuels, we remain sceptical as to the effectiveness of wind generated energy. We understand that the predicted efficiency of the turbines will be approximately 34%. The fact that in the winter months there are often periods with no wind means that there will be no electricity generation, at the very time when it will be most needed. This begs the question as to how frequently the turbines will be "off line".

(b) It is interesting to note that on the BBC news of 6th April 2011 it was announced that the John Muir Trust have just produced a detailed report based on a two-year survey of all existing wind farms in Scotland. Using data provided by the National Grid, they discovered that there were 51 continuous days when there was insufficient wind to generate power. They found that wind farms produce below 10% capacity for more than one-third of the time and overall at below 20% capacity for more than half the time. It should also be of concern that both Denmark and Portugal have decommissioned large numbers of wind farms due to their poor efficiency, and that the figures quoted are roughly in line with those of the John Muir Trust.

The amount of construction traffic and effects on the A9 and surrounding villages:

(c) This is a major concern. As the proposed construction period will be phased over two years with a 4 month break during winter, it means that construction will effectively be concentrated into two eight month periods, probably less if access to the hill is restricted by adverse weather conditions. This will

result in most of the construction taking place during the busy tourist season. As the concrete for each base is to be poured in a day this will entail fifty four slow ready-mix lorries per day negotiating the A9, with vehicles crossing the carriageway of the A9 at a temporary junction which does not appear to have a suitable central reservation or turning lane, thus significantly increasing the danger at an existing accident black-spot. As the concrete lorries will be spread over 31 days (probably not consecutive because each load equals two trips) this will entail nearly 3500 "concrete journeys" on the A9. As construction of the bases for each of the 31 turbines will require 54 lorry loads of ready-mix, this equates to a total of 1674 lorry loads.

We understand that the plan is to access as much stone as possible from the hill and build a ready-mix plant on site, but if that is not possible serious consideration will need to be given with regard to the massive amount of lorry movement entailed by having to transport concrete down from Inverness or Daviot. This raises a further concern, for although assurances have been given that construction traffic will only use the A9, the owners of the quarry at Daviot also own a quarry at Meadowside, adjacent to the Highland Wildlife Park. Should a plant be set up there, this will obviously have implications for further large amounts of traffic using minor back roads plus the likelihood that extra stone will inevitably have to come in by road plus all of the cement etc.

(d) In addition it has been estimated that there are likely to be another 150 lorries and vans visiting the site daily over the whole period, i.e. probably at least another 300 construction traffic movements a day.

(e) The proposed working hours are 7a.m to 7 p.m., not Sundays meaning that the locality can expect a good 12 hours of vehicular movement each day. Assuming this will be in the region of 300 construction vehicle movements a day per day that equates to more than 30 an hour or put another way, one every two minutes entering or leaving the site. These figures do not include the possible concrete vehicle movements, and in consequence there is the likelihood that on some days there could be in excess of 400 movements on/off the A9.

(f) The turbine masts and blades will be coming from Europe, arriving at either Invergordon or Inverness docks. Depending on how big the pieces are, that could mean a significant quantity of low loaders. We do not have the information regarding how many low loaders will be required for each turbine, nor at what time transportation down the A9 is likely to occur. As there is a high probability that these components will require stretch/rear wheel steering trailers these movements should occur overnight, to allow for safer manoeuvring and to minimise disruption and risk to other road users travelling on the A9.

It is obvious that all of the above will generate a vast amount of slow lorry movements up and down the A9 for two years, most of which are likely to take place during the tourist season. Great concern has been expressed by our residents that this will cause driver frustration, ultimately leading to serious accidents. Given all of this, we are surprised that no provision appears to have been made for a traffic island or turning lane on the A9 at the entrance to Leault Farm, the main access to the proposed site. At this point the track from Leault Farm onto the A9 will be widened to 5m using the existing track as far as it goes, with re-worked gradients as it progresses up the hill. New roads will also need to be constructed generating yet more traffic with the potential to create yet more congestion and delays on

the A9. There is no mention of a wheel wash to prevent departing lorries from depositing potentially hazardous mud and dirt on the road, nor what other steps are proposed to minimise this eventuality.

(g) As all of the works will be subcontracted and go out to tender, there is no guarantee that firms from the west (Fort William area) and the south will not also require access to the site, as well as firms from the north. This raises the possibility of construction traffic using the A86 through Newtonmore and Kingussie in the summer months. If vehicles are coming from the west they will need to be directed to access the A9 as soon as possible ie: to join the A9 at Dalwhinnie, and not to use the narrow back road from Laggan into Newtonmore and on to Kingussie. There is also concern that vehicles visiting the transport cafe near the Eilan at Newtonmore should be directed back onto the A9 at Ralia and not allowed to travel via Newtonmore and Kingussie.

(h) Concerns were raised regarding the potential eyesore created by roads and tracks onto and surrounding the proposed site. While assurance was given that attempts will be made to landscape these roads, at the end the main road to the site will remain 5m wide and while probably not visible from the valley, will still be very visible in places from slopes and tops of mountains creating industrial views from the National Park.

Restoration After 25years – the predicted life of the wind farm:

(i) When this question arose, we were advised that if the turbines were removed and not replaced at the end of their life span, "restoration" would be the removal of the concrete bases to about one metre below the existing land surface, which would then be covered with soil and turf. This is not really restoration at all, merely camouflage. The turf and vegetation will never be as original because the drainage and pH will be different over the remaining concrete and around it. The pristine nature of the site would be effectively destroyed/changed forever.

Effects on breeding birds, especially the breeding golden eagles:

(j) The wind farm site is close to an active eyrie, and nearby estates were not permitted to go ahead with a tree planting scheme last year because of the eagles breeding close by. The developers have carried out a survey which indicates that eagles do not hunt over the site but use a ridge across from the site. When asked about the risk to young eagles and other birds they were not able to offer any reassurance that there would be no risks to these birds. Nor could they offer reassurance concerning possible risks to migrating birds, especially those migrating at night or in low cloud conditions. There is a special area of conservation further south on the ridge towards Newtonmore, designated because it is a rich area for breeding special waders. We hope that both SNH and the RSPB have picked up on this and made appropriate representations.

Employment:

(k) There are likely to be very few local employment opportunities, either during the construction phase or permanently. The developers have predicted that there will be employment for approximately one hundred workers with relevant skills during construction, and up to six full time equivalent positions once the farm is up and running. Since all of the work will be sub-contracted it is expected that the contractors will either bring their own workers with them, possibly recruiting supplementary workers locally where necessary, providing that they have the right skills.

To sum up:

We are concerned that the construction of a wind farm in such a sensitive area may have an adverse impact on the vital tourist industry upon which a great deal of our local economy depends, and are not convinced that the edge of a National Park is necessarily the most appropriate place for such a development to be sited. Although the site lies outwith the Cairngorms National Park and RWE have done their best to mitigate its appearance, this development would still be highly visible from the Cairngorm plateau, surrounding mountain tops and other areas.

Yet another piece of natural wilderness would be lost forever, as even when "decommissioned" its access roads and concrete bases would still remain. If permission is given for this development, we would hope that that any access roads (many of which *will* be within the Cairngorms National Park) are constructed in such a way as to minimise their impact upon the landscape.

We still remain to be convinced of any benefits to our community resulting from such a development.

Alan W Davidson

Chairman
Kingussie & Vicinity Community Council

AVIEMORE & VICINITY
COMMUNITY COUNCIL
"Stand fast, Craigellachle"



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PH22 1TH

Tel. No.
Email.



7th April 2011

Theresa McInnes,
Energy Directorate Renewable Energy Division,
5 Atlantic Quay,
150 Broomlielaw,
Glasgow.
G2 8LU

Dear Ms McInnes,

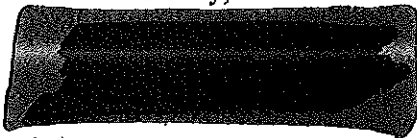
**ELECTRICITY ACT 1989
THE ELECTRICITY WORKS(ENVIRONMENTAL IMPACT ASSESSMENT)
SCOTLAND REGULATIONS 2000
SECTION 36 APPLICATION FOR THE PROPOSED ALLT DUINE WING
FARM, NORTH OF KINGUSSIE**

I refer to the application submitted by RWE Npower Renewables for a wind farm at Allt Duine. Aviemore and Vicinity Community Council do not object to or support the proposal but wish to make the following comments which we would like to be taken into consideration when coming to a decision about the development;

- i. We are concerned about the road safety at the junction leading to the development. A right turn lane should be in place on the A9. Given the number of vehicle movements predicted, omitting a right turn lane would result in traffic delays which leads to driver frustration and accidents. We find it odd that a right turn lane was needed to the wind farm south of the dual carriageway at Inverness but not deemed necessary at the Allt Duine development.

- ii. There should be a requirement for goods vehicles accessing the site to use the A9 and not the B9152 (old A9). Vehicles should not be permitted to drive through Aviemore. This should also apply if a local contractor is taken on for supply of materials or where the A9 is closed for any reason, such as an accident. Aviemore is a busy tourist resort at all times of the year and extra goods traffic would have a detrimental effect on the attractiveness of the village and the state of the road.
- iii. At consultation we were told that the road leading from the A9 to the site would have a hardcore surface and be typically 15' wide. It would obviously have to be wider in places to allow goods vehicles, which are typically 8'6" wide, pass each other. The road will be visible to anyone on the hills on the opposite side of the valley and will be a scar on the landscape that will be visible for some distance.
- iv. While not part of this application we are concerned about possible routes for the electricity cables going through the community council area. Any overhead cable will be visually unattractive.
- v. Although the site is out with the National Park the road to it is not and in any case the aims of the Park should not stop at its boundary. Developments outside the Park could impact on the aims. There will be visual impacts which will affect the landscape values for those in the Park. This would affect the understanding and enjoyment of the Parks special qualities. It would spoil the enjoyment of hill walkers who come to Cairngorm National Park and the Highlands for its qualities of quietness and remoteness.
- vi. We are not convinced that there would be any significant effect on the social and economic development of the area. There will be short term employment benefits, but not necessarily for locals. After the construction stage there will be minimal employment and that would appear to be part time. The estates involved will benefit from income which could be invested in the estates. There is, however, no guarantee that there will be any increase in employment.

Yours sincerely,

A large, dark, rectangular redaction box covering the signature of John Grierson.

John Grierson
Chairman