



1st June 2025

OBJECTION

Carn Fearn wind farm application ECU00004851

Members of the Garve and District Community Council - GDCC urge Ministers to refuse this application and we list our principal reasons for this below.

- Visual negative impact.
- Cumulative negative impact with existing and planned windfarms, BESS, pylons and associated infrastructure.
- Negative impact on nature and wildlife.
- Volume of construction traffic and impact on roads.
- Long term effects of the bases being left in situ.
- No demonstrable need.

Visual effect

Tourism Impact – Visual Intrusion on Ben Wyvis and NC500 Route (Policy 11 Violation)

Turbines will be clearly visible both near and far. Views from Gorstan, the South end of Loch Garve, Contin, Little Garve Bridge SM2720 and from Ben Wyvis summit and approach routes and surrounding hills. Some of those turbines, including the one proposed bang centre above Little Garve Bridge requiring aviation lighting. We are a known and much-loved dark sky area, night time aviation lighting is not at all compatible.

These turbines will be seen from as far away as the Culloden Battlefield site, 35 KMS from the proposed site. From Culloden all 9 turbines can be seen looming large in the distance.

It should be mentioned here that some of the turbines proposed are up to 85M taller than those proposed on the same site under the name Carn Gorm back in 2014 the reference for that application was 13/0479/FUL. It was refused; the developer then launched an appeal in 2015 under reference PPA-270-2117 which was also refused.

The community here in is utterly dumbfounded to find themselves fighting the same battle a decade or so on and for a bigger scale application.

The A835 running through our area forms part of the route known as the NC500; - now a world-renowned tourist driving route, will suffer immense negative visual industrialisation.

Highlands' economy depends on nature-based tourism directly threatened by this proposed development. **NPF4 Policy 11 demands safeguarding tourism assets this proposal contradicts it.**

Cumulative visuals with existing and planned wind farms, BESS, pylons, substations and expansions.

Cumulative Over-Industrialisation – Breach of NPF4 Policy 20 (Community Wellbeing)

Garve and District and surrounding communities are already burdened by several existing wind farms, BESS proposals, major overground cabling, underground cabling, pylon expansions and new substation proposals in the planning pipeline at various stages.

Meanwhile we note that in the developer's cumulative impact assessment for this project that not all materially pertinent other projects and applications have been mentioned. This is wholly questionable as it gives the impression the cumulative impact is less than it actually is or indeed potentially will be. To this end the Carn Fearn project would, without doubt, tip the balance toward an industrial energy landscape especially given the associated pylons and cabling infrastructure that would need to follow - these are subject to further separate applications. Lived experience shows us BESS and further turbine extensions applications would be highly likely if this site is granted permission. This application is for 9 turbines and the developer intended on 14 to begin with.

Local residents' environment, health, and wellbeing are being sacrificed along with the value of their properties. People are also experiencing difficulties selling their properties with offers being withdrawn time and time again.

Other sites in the GDCC area which are operational, approved, under application or under scoping;

- Lochluichart Wind Farm – operational 17 turbines 125M tall
- Lochluichart Wind Farm Extension – operational 6 turbines 125M tall
- Lochluichart Wind Farm Extension on the Extension - 5 turbines 149.9M tall approved yet to be built.
- Corriemollie Windfarm - operational 17 turbines 125M tall.
- Lochluichart BESS Energy Storage 50MW – approved yet to be built 23/05905/FUL.
- Lochluichart East BESS Energy Storage 37MW 25/00953/PAN.
- Corriemollie BESS Energy Storage Facility 200MW under application ECU00005155.
- Kirkan Windfarm 17 turbines 175M tall approved yet to be built.

- Western Isles HVDC {High Voltage Direct Current} Link cable - some 83 KMs of onshore underground cabling 25/00176/MLCON passing through farm land and woodland in the GDCC area to join 81KM subsea Marine Licence MS-00008738.

In close proximity to the GDCC area projects in neighbouring areas are adding to the overall negative cumulative impact: -

- Abhainn Dubh Wind Farm under application for 9 turbines 149.9m tall + 30MW BESS - ECU00004732.
- Fairburn Wind Farm Extension on the operational windfarm which has 20 turbines 100M - the extension under scoping is for 14 more turbines 200M - twice the height of those on the original site ECU00004542.
- Tarvie Wind Farm would be 2 km from the proposed Carn Fearna site. 11 turbines under scoping ECU00005126.
- Glasa Windfarm - Strathvaich 27 turbines 250M tall under scoping ECU00006127 - this site was entirely omitted from the Carn Feana application and it is a staggering size!

Impact on nature and wildlife

Severe Risk to Protected Birds and Mammals – Breach of NPF4 Policy 3 (Biodiversity)

Golden Eagles Regular flight activity recorded; confirmed suspected breeding territory nearby.

Eagles are Annex I and Schedule 1 protected.

Red Kites: High levels of foraging activity recorded; probable local breeding within 6 km according to EIA - locally it is well known that Red Kites nest less than 2 kms from the proposed site.

Listed as Schedule 1 and Annex I.

Hen Harriers, Ospreys are known to have been living and breeding at Lochluichart for years now.

White-tailed Eagles, Peregrines, Short-eared Owls, and Merlin all recorded many are Red Listed and/or under Schedule 1 protections.

Black Grouse, confirmed lekking within site and within 1.5 km buffer.

Despite some fieldwork, critical species were missed or under-surveyed, especially smaller raptors and nocturnal species like Barn Owl. Risk of collision mortality from turbine blades is acknowledged but severely downplayed.

The Developer's proposed turbines are shown on their map and highlights the flight path of Golden Eagles - which currently is in the midst of the where they plan to site the turbines.

Inadequate Ornithological Surveys – Flawed Evidence Base

Survey effort missed key sensitive periods for raptors despite stated compliance. Desk studies relied heavily on old data some from 2010–2015. Bird collision risk modelling was based on limited flight data for some species. Limitations section admits that coverage of steep hollows was incomplete.

Wild cat, pine marten, badger, otter, and bat species were barely considered or surveyed properly. Yet locally are well known to live, breed and forage close to and within the proposed site.

Bats are protected because their numbers have dropped year on year due to loss of safe roosts and foraging habitats - this is well documented fact.

Community members are aware of two maternity roosts, two kilometres or so from the proposed Carn Fearn site. These are Common and Soprano Pipistrelle bat roosts and home to 350 – 400 bats a year. The foraging range of these bats is approximately a 5KM range from their roost.

Direct impact on legally protected species violates NPF4 Policy 3 requiring habitat and species protection.

Destruction of Deep Peat and Blanket Bog – Breach of NPF4 Policy 5 (Soils)

The site contains extensive areas of deep peat in part 4.5 metres deep and blanket bog. Construction of turbines, tracks, and infrastructure will cause permanent loss of peatland, releasing stored carbon. Developer proposes “mitigation”, but this does not compensate for the irreplaceable carbon loss. **Building on carbon-rich soils should be avoided, not “mitigated” (NPF4 Policy 5)**

This proposed development asks for the nine turbines to be in place for up to 50 years - arguably the ruination of the Ben Wyvis masiff. There is currently only one turbine globally that has been in place for 50 years and operational for 47 years, it is considerably different to the nine being proposed for Carn Fearn. The world’s oldest turbine is Tvindkraft in Denmark, which has been operational since 1978 - construction work began in 1975. That turbine was designed for 2 MW output but has mostly operated at half the capacity; - 1 MW thus allowing it to have a much longer operational life and is just 54M tall.

Carn Fearn turbines are proposed to be up to 200M tall requiring thousands of tonnes of concrete poured over rebar, into excavated deep peat craters for each of the turbine bases. After turbine decommissioning / end of life that concrete and rebar remain in the ground. The service life of concrete can be expected to be affected by various deterioration mechanisms, such as corrosion, cracking, freeze-thaw, alkali-aggregate reaction, etc. To this

end over time there is a risk of concrete leaching into the water table. The developer makes no mention of how the concrete would be managed or maintained and we can see no possible way that they could manage or monitor it to mitigate the concerns we have.

The report, scoping and opinion entirely neglects to mention or reference the very real risk of **Cs-137 - Caesium-137** and the contamination of peatlands in the Highlands and Islands of Scotland by radioactive fallout following the Chernobyl disaster in 1986.

Cs-137 is a radioactive isotope, of Caesium with a half-life of approximately 30.17 years. This means that every 30.17 years, half of the initial amount of Cs-137 will decay into other elements, releasing radiation in the process. The decay of Cs-137 is a complex process that involves the transformation of the unstable Caesium nucleus into a more stable form, emitting ionizing radiation as it decays. It is harmful to human beings and animals. It can be released into the atmosphere and waterways during excavation. Large parts of the Highlands and Islands were subjected to some of the heaviest fallout from Chernobyl across the UK - this is well documented fact. To this end the potential risk that this radioactive material remains beneath the surface of Highland peatland areas is a very real threat and of major concern because once exposed to air and rain it can become dangerous to health. The large excavations of peat for turbine bases in potentially radioactive-contaminated areas have been completely omitted from EIAs. There are existing UK Regulations to protect the environment and people from potential radioactive hazards.

These regulations are being ignored in the implementation of Electricity Act Consents and related deemed Planning Permissions. Relevant legislation includes: Ionising Radiations Regulations 2017 (IRR17) – requiring radiation risk assessments, dose monitoring, and worker protection where artificial radionuclides may be present; -

Radioactive Substances Act 1993 (RSA93) – regulating the keeping, use, and disposal of radioactive materials, including soil or peat with significant Cs-137 activity;

Environmental Protection Act 1990 (Part IIA) – imposing duties to investigate and manage land contaminated with substances likely to cause harm, including radiological contaminants;

EIA (Scotland) Regulations 2017 – mandating that all likely significant effects on human health and the environment (including radiation exposure) are included in Environmental Impact Assessments.

It is therefore blatantly obvious that exposing site workers, residents, the environment, wildlife, watercourses and water supplies to Cs-137 could pose very serious health risks. Potential legal repercussions should not be under-estimated or overlooked. Following the recent documentary 'Toxic Town' the lived experience account of the people of Corby, England and the tremendous horrors to health inflicted upon them and their unborn children, in which the local council were found to be complicit, leads us to the insistence that deep peat analysis is essential and non-negotiable. The fact that it is not mandatory in

this area of Scotland already speaks volumes and highlights that the current process is woefully inadequate.

Road Infrastructure Risks Unsuitable for Construction Traffic

Volume of construction traffic and impact on the main trunk road - A835.

A835 Tarvie to Silverbridge section is already damaged at Check Rail Corner by a standard HGV in January 2024. Only one side of that major trunk road has been passable for the last 18 months. Turbine lorries are much longer and heavier than standard HGVs, risking: Further collapse and longer-term closures.

Serious road safety hazards; - No realistic road upgrade or road repair / reinstatement plans are in place despite 18 months of only having one operational lane, faulty traffic lights, many near miss accident situations and one crash with vehicle written off.

There has been no actual physical visit along the route, to this end the route mapping is in no small part guesswork at best. This guesswork has highlighted the likelihood of road widening, tree removal / cutting, sign removal and land acquisitions all being required – not only with in our area but along the entire route from the port of Nigg to the proposed site.

Using the developer's own traffic figures and project duration, an additional 39,000 HGV lorries and 10,500 additional cars and vans travelling the route during the 16-month construction period. Add this to the possible cumulative traffic impact of all the other sites in the area which we have listed in above the risk and negative impact is absolutely colossal.

The turning circle proposed at Inchbae crosses the A835 / NC500 route risking blockage of a key artery route to the ferry port at Ullapool and the far North. A road which local people and business rely as do the emergency services. Meanwhile no mention or reference whatsoever has been made of the fact that this is a well-known ancient Drover's Road and no photomontage has been made from Inchbae. This is wholly neglectful.

Then we come to need -

No Proven Energy Need – Breach of NPF4 Policy 19 (Energy)

Scotland already produces far more electricity than it uses.

Scotland exported over £1.5bn worth of electricity last year.

Renewables generated a record amount of electricity in 2024 - up 13% from 2023. This project serves export markets, not for Scotland's energy security it is arguably for England's need.

NPF4 Policy 19 requires clear proof of local or national need, none is provided.

Local is Highland, National is Scotland. The Union is not mentioned in NPF4.

Meanwhile Scotland has already exceeded the 20GW onshore 2030 government target.

Project is proposed by Statkraft a company owned by the Norwegian Government.

Scotland's natural environment is being sacrificed to generate profits for a foreign country. This is inconsistent with a "Just Transition, and with NPF4's focus on community empowerment

For all of the reasons mentioned above, for and on behalf of the community of Garve and District, we the Garve and District Community Council object in the strongest possible terms to Carn Fearna application **ECU00004851** and urge Ministers to refuse permission.

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