#### <u>Struan Community Council – ECU Planning Application Consultee Response:</u>

# THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017

## ELECTRICITY ACT 1989 : APPLICATION FOR SECTION 36 CONSENT FOR GLEN ULLINISH II WIND FARM IN THE PLANNING AUTHORITY AREA OF THE HIGHLAND COUNCIL

#### ECU Reference: ECU00004829

Struan Community Council would wish to make comment on the proposed Development, making it clear at the outset that the Community Council represent the whole Community, therefore, are of the opinion that we cannot either support or object to the proposal on the basis that there are members of the Community both against and in favour of the Development, we would strenuously request that in your deliberations on this matter you take full note of all opinions prior to coming to you decision on this matter.

Furthermore, as a Community Council we believe there are matters within the application that will significantly impact on the Community, therefore, require particular scrutiny prior to any consideration being given to consenting of this application, as outlined below:

Struan is a small community of approx. 250 residents in North West of the Isle of Skye, the whole area can be fairly stated as being "fragile", Struan particularly so, unlike its near neighbours, Struan has no school, no hotel, no pub, no community facility, no regular public transport services and extremely inadequate internet provision.

In addition to this Application for Glen Ullinish II, there are several other developers and operators of wind farms looking to upgrade, replace or build from new within the North West of Skye, on the basis all are consented this will result in there being in the region of 100/150 wind turbines of circa 140m to 200m in height, all in a small area in and around Struan fundamentally changing the whole look and feel of the area.

The build or replacement programmes are all expected to take place around the time that the new Skye Enhancement programme from SSE is taking place, on the basis that his is consented, with build times in the region of 2 to 3 years.

It has to be acknowledged that during the build phase it will result in some 1000 to 1500 AIL deliveries to the area (plus a further 1000 to 1500 empty return journeys) in total, all starting in Kyle or thereabouts and moving at a slow speed on the only road between the Skye Bridge and Sligachan, then onward via Portree or Struan to get to the specific site, a journey of some 39 miles. The AILs will move we understand at circa 8MPH, take in the region of 5 to 7 hours, due to the geography of the road will without doubt create a significant obstruction in both lanes of the highway.

#### **AIL Transit to Site & Traffic Management**

In relation to the Glen Ullinish II Planning Application the Developer has not fully taken into consideration the cumulative effect of the movement of AILs and HGVs throughout the Construction Phase of their Development in addition to the other consented and proposed Developments that will undoubtedly be ongoing within the same timeframe. It must be noted that from Kyle of Lochalsh

to Sligachan, the main arterial route through the Isle of Skye, there is no alternative diversion route. Therefore, in the event of an incident involving an AIL where the road could be closed for a prolonged period of time the delays would be significant, causing severe issues for other road users, travellers connecting to ferries to the Outer Isles & the Isle of Raasay and even more importantly Emergency Services movements around the island.

Therefore, it is our contention in relation to the movement of AILs and HGVs that all the Developers with intentions to repower or construct post the SSE repowering application being consented should be required to come together to submit a comprehensive Joint Traffic Management programme for scrutiny by Highland Council and/or the ECU, whichever ultimately has the decision on consenting any of these Applications, only on the submission of this can it be assessed if they are to be granted the opportunity to utilise the main arterial route on the island for the movement of the turbines.

### Struan Water Supply – Turbines proposed for DWPA

The Public Water Supply for Struan emanates primarily from the Voker Burn, in addition to a number of Private Water Supplies, at present there are proposed to be 3 Turbines sited within the noted DWPA along with 5 other Turbines on the periphery.

It is our contention that these Turbines cannot and should not be located in this area, it may be the contention by the Developer that most of Scotland is a DWPA, however, to think that excavations and ground disturbance on the scale of what is proposed to allow the Turbines to be sited will not cause issues with both the Public & Private Water Supplies is fanciful, there are no reasonable grounds or reasoning that can permit these Turbines being sited as proposed.

Furthermore, a number of community members have questioned the Developer in relation to why a full GPS survey of their development in relation to identifying the peat pipes had not been done, Muirhall advised they might carry out such a survey, but it would not be until the project had full planning & ECU approval, we would have expected that if the Developer was at all concerned with ensuring the protection of the Water Supplies in Struan this would they would be taking all possible precautions to ensure this was the case appears they are not.

Moreover, it does not appear that the Developer has provided any tangible mitigation or solutions to turbine failure causing irreversible contamination to Struan's drinking water supply, eg oil leakage, micro plastic contamination, have implied that a filtered drainage system around the turbines would possibly be needed, but no real details were offered to Community member, Developers representatives further comments that "turbines do not go wrong"

Consequently, taking all this into consideration we would vehemently request that should the Application be consented it should be on the basis of the turbines referred to be removed to ensure the continued protection of the water supplies within the Community, particularly taking into consideration that the siting often Turbines will contravene the Water Framework Directive and contravene legislation to protect Drinking Water Protected Areas.

In conclusion, no matter, in the event that there is temporary or permanent disruption to the Struan water supply at any point during the build or operation phases there should be an obligation on the Developer/Operator to compensate all residents and make good the supply by whatever means with

cost being no object and time being of the essence. This obligation should be underpinned by a surety bond (or similar) executable by the Struan Community as well as the Scottish Water.

The Community Council would once again request that you take due consideration of the points raised and again request that yu take full notice of all submissions from members of this Community in respect of this Application, prior to making your decision.

Alasdair Morrison
Secretary
On behalf of Struan Community Council