

26th January 2004

Lesley Thomson
Scottish Executive Consents Unit
2nd Floor, Meridian Court
Cadogan Street
Glasgow G2 6AT

Dear Lesley Thomson,

Planning Application by Airtricity Development Ltd for a Windfarm on the Kilpatrick Hills

Clydebelt is a voluntary organisation dedicated to retaining and enhancing our heritage and the Green Belt status of the Kilpatrick Hills and their surrounding environment in Clydebank, Dumbarton, Milngavie, Bearsden and Glasgow. Clydebelt is concerned with other undeveloped areas nearby, including the north bank of the River Clyde, and in the "villages" of Old Kilpatrick, Dalmuir, Duntocher, Hardgate, Faifley, Drumchapel, Craigton, Carbeth, Gartocharn, Jamestown, Bonhill, Milton and Bowling. Clydebelt tries to influence public policy, on planning, access etc. Clydebelt was formed in 1990, and details can be seen at <http://www.clydebelt.org.uk>

Following visiting Airtricity's exhibitions, an open presentation and discussion meeting with Airtricity, our May 2003 AGM, a public meeting on 20th January 2004, many committee meetings, a considerable amount of email and web based correspondence and other consultations, I am writing with Clydebelt's objections and reservations on the application under the Electricity Act 1989 and Town & Country Planning (Scotland) Act 1997 for a windfarm on the Kilpatrick Hills. An electronic copy of this text has been sent to Lesley.Thomson @scotland.gsi.gov.uk. We wish to have our objections heard at any public inquiry, attend any site visit and wish to be notified of the decision on the plan.

Clydebelt objects to the above application Our objections are given in detail later. Here is a summary:

Summary of Clydebelt's objections

1. Need for this site not established (doesn't need to be on this most sensitive site, will set a precedent for many more nearby, Council can strategically pursue renewable energy and energy conservation targets in other ways)
2. Contrary to planning policy (national, and especially regional, local)
3. Damage to the landscape visual amenity of this Regional Scenic Area (conspicuous from almost all over the hills, between 5 and 24 turbines will be visible closely from much of Clydebank, Hardgate, Duntocher and Faifley, major adverse effect on the landscape character, roadways, large concrete bases over open moorland)
4. Adverse effect on recreational amenity (hills provide vital retreat for the huge population of Clydebank, Dumbarton, Milngavie, Bearsden and West Glasgow; significant adverse effect on the use and enjoyment of the natural heritage, visitors from Glasgow and beyond will be deterred from coming)
5. Disturbance to natural heritage and loss of wildlife (especially birds)
6. Public anxiety over disturbing low-frequency noise, pollution and safety
7. Social & economic impacts (perceived harm to housing values, TV reception, unsatisfactory economics and employment)
8. Doubts about effects on archaeology, traffic & transport, telecommunications and aviation
9. Concerns over Environmental Statement's methodology and its inadequate consultation

Our objections are detailed below, and are based as far as possible on relating our members attitudes to planning policy and on a number of criticisms of the Environmental Statement - on factual accuracy, interpretation and inadequate consultation.

References to numbered paragraphs are to the Environmental Statement, unless otherwise stated.

1. Need for this site not established

1.1 Choice of site

Airtricity considered 250 potential sites in Scotland.

4.12. Airtricity is committed to the development of wind energy as a renewable resource. Therefore, if the Kilpatrick Hills site is not developed for this purpose, an alternative site in Scotland will be selected for windfarm development

4.17. Scores for each site were calculated using the sum of the scores for each decision criterion. This then allowed the 250 potential sites to be sorted and a list of the top 25 sites obtained if a site scored zero against any of the decision criteria, it was considered a 'no-go' site and was removed from the top 25 listings. A number of the top sites were then taken forward to the detailed design and EIA stage. This included the Kilpatrick Hills site.

The turbines do not need to be on this very sensitive site. It is clear that Airtricity does not need to be on this site - it is just the easiest one for them to develop. Because of our serious objections, they should try a site that is less easy.

4.19. The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations (2000) require an outline of the main alternatives studied by the applicant and an indication of the main reasons for the final choice, taking into account environmental impacts. It is the applicant's opinion that following the review of alternatives outlined above, the detailed work undertaken for the EIA has confirmed that the Kilpatrick Hills is an acceptable site for windfarm development.

Airtricity has not given an *outline of the main alternatives studied*. It therefore leaves it impossible for objectors to comment on the suitability of the next most suitable alternative sites. We claim that the regulations have been disregarded too much. We would like this additional information to be published to enable comment to be made.

1.2 Council's responsibility for renewable energy and energy conservation

West Dunbartonshire Council does not need to approve of this application. The Council can strategically pursue renewable energy and energy conservation targets in alternative ways. Ways that have been suggested include:

- energy efficiency savings through planning conditions on the specifications of the large number of new buildings to be erected along the Clyde river front and schemes for public buildings (eg PFI)
- biomass electricity generation on a Clyde riverside site, with material delivered by boat
- wind turbines on brown field Clyde riverside sites
- electricity generation from tidal power or from fast flowing rivers

1.3 Precedent

If planning consent is granted, it will set a precedent for a multitude of similar windfarms throughout the Kilpatrick Hills and the surrounding green belt.

2. Contrary to planning policy

2.1. Planning guidelines on location

The Glasgow and Clyde Valley Structure Plan, the Dumbarton Local Plan, the new Clydebank Local Plan and the National Planning Policy Guidelines on Renewable Energy discourage windfarm development in a Regional Scenic Area such as the Kilpatricks, or outwith designated preferred places (which are to the south and east of Glasgow).

2.2 Local Plans

6.5. It is a strategic aim of the Dumbarton District District Wide Local Plan (Adopted 1999) 'to recognise 'the heritage and landscape value of the Plan Area and provide for the preservation of these resources. 'Policy NHLI8 states that 'the Council gives overriding priority to the conservation and enhancement of the intrinsic landscape character of the Loch Lomond National Scenic Area' Although the development is not within this policy area, the assessment of the setting of this designated area remains a consideration.

6.6. Policy NHL19 states a general presumption against proposals for prominent or sporadic development which would have an adverse effect on the Loch Lomond Regional Scenic Area (RSA) (which is distinct from the Loch Lomond NSA), and the Kilpatrick Hills RSA.

It is clear that these turbines will damage the setting of, and views from within the Loch Lomond national and regional scenic area, and the National Park. This is of great importance to our members, as well as to many visitors. We also note that the access route to the site goes through the Green Belt, which should be protected from the vast construction phase and daily visits by Windfarm staff.

6.7. Policy SAI: Scenic Areas of the Clydebank Local Plan (Final Plan 2001) seeks to conserve the natural character (of the Kilpatrick Hills with a general presumption against proposals for prominent or sporadic development which would have an adverse impact on landscape quality, in relation to their designation as an RSA.

This proposal would have a devastating 'adverse impact on landscape quality, in relation to their designation as an RSA'.

6.8. Policy E8: Landscape Character of the Clydebank Local Plan Proposed Modifications (2003) states that proposals which are detrimental to the landscape character will not generally be supported unless there are mitigating circumstances which are not contradictory to other policies in this plan'.

This proposal would be 'detrimental to the landscape character so should not be supported. We strongly agree with Policy E8 that 'Clyde bank is heavily influenced and physically contained by elements of the landscape character of the Kilpatrick Hills and the council consider it important to offer general protection to the character of the landscape around Clydebank and the wider countryside'. This landscape should be left as a wild buffer to the town. The Kilpatrick Hills provide a vital retreat for the huge population of Clydebank and Dumbarton, where folk can quickly get away into unspoiled wild land.

A modification to the Clydebank Local Plan (Final Plan 2001) provides local criteria for the siting of wind farms.

Policy DC6 Renewable Energy Policy

Favourable consideration will be given to renewable energy development in those locations of the plan where they can be established without detriment to the nature conservation interest of designated Sites and protected species, landscape character of areas designated for their landscape value, the heritage interest of archaeological Sites, conservation areas or listed buildings and providing it does not have a significant visual impact.

Justification

Proposals for renewable energy development will be considered against the Key Goals of the plan and Policy GD1 and should have regard to:

- the quality and nature of the renewable resource;*
- the contribution to the national requirement for renewable energy;*
- the decommissioning requirements and the possible use of enforceable conditions and section 75 agreements to ensure restoration of the site;*
- power transmission requirements;*
- construction disturbance;*
- potential electromagnetic interference;*
- noise generation;*
- air emission and odour, and*
- other local plan policies.*

Such proposals will be subject to appropriate conditions to ensure there is no noise nuisance to residential and noise sensitive properties attributable to the development

In accordance with national and strategic policy, renewable sources of energy should be developed where appropriate opportunities arise. It is recognised that certain types of development such as wind farms may have a

detrimental impact on areas of nature conservation and landscape quality and it is appropriate that they be generally guided to other parts of the plan area. Where they are appropriate in principle it will be necessary to consider other material facts and if necessary take mitigating action. The above policy indicates the factors which require consideration when assessing renewable energy applications.

We believe that this application is **not** 'without detriment to the nature conservation interest', **does** 'have a significant visual impact', **contravenes** the need for regard to 'construction disturbance and noise generation'. and wind farms would 'have a detrimental impact on' this area 'of nature conservation and landscape quality'.

2.3 GCV Structure Plan

6.9. The Glasgow and Clyde Valley Joint Structure Plan (2000) states in paragraph 12.4 that 'the guideline principles of the plan explicitly recognise the importance of Environmental Resources, particularly in terms of a general presumption in favour of safeguarding the quality and extent of identified environmental resources'. Strategic Policy 7 and Schedule 7 of the Structure Plan identify the Kilpatrick Hills as a strategic environmental resource.

We strongly support this Structure Plan policy, and the location of windfarms elsewhere within the region than on 'the Kilpatrick Hills strategic environmental resource'.

2.4 National planning advice

Government targets for tens of thousands of turbines threaten much of our very finest landscape, which includes this location. But guidelines provide for siting windfarms away from sensitive sites.

6.10. NPPG6: Renewable Energy Developments and PAN45: Renewable Energy Technologies also provide guidance in relation to windfarms and landscape and visual impacts. NPPG14: Natural Heritage also refers to the upland ranges of the Kilpatrick Hills as an example of hills providing the landscape setting for towns and cities ... NPPG18: Planning and the Historic Environment and PAN60: Planning for Natural Heritage also provide guidance in relation to impacts on the landscape.

These guidelines again emphasis our position that the Kilpatrick Hills need to be left wild as a valuable landscape setting for towns.

Industrial structures such as wind farms should be in an appropriate location. Industrial estates are often good locations; they are close to users of power, and there is often sufficient background noise from the industry that the extra noise from the turbines is masked.

3. Damage to the landscape visual amenity

The landscape is of an extremely high quality - the wide upland views are a prime feature and these large, moving, wind turbines will seriously depreciate the character of the area. The turbines will be visible from almost all over the hills, and for many miles around, including from within the Loch Lomond & the Trossachs National Park, and from Loch Lomond itself, from the Mugdock Country Park, and from across the Clyde at Newark Castle and Hunters Quay.

This development would have a significant adverse effect on the landscape character and visual amenity. This landscape cannot absorb 24 turbines, buildings and roads, however well designed. 24 turbines of total height 100m with 80m diameter blades will be extremely conspicuous. The scale of the turbines will be overwhelming and will dominate the landscape to a quite unacceptable degree.

It is not acceptable that landscape of this quality should be used to site such conspicuous and inappropriate industrial development.

3.1 Visual impacts on the site and immediate surroundings

16.42. As detailed in Chapter 6, the key findings of relevance for recreation are that the visual impact of the windfarm on views within the site, assessed from Loch Humphrey and Doughnot Hill, will be major.

16.43. Overall, the visual impacts of the windfarm on recreational users of the site are considered to be major.

We consider that these major impacts are important enough alone for rejection of the application.

3.2 Visual impacts on the Kilpatrick Hills

The proposed windfarm will seriously affect the amenity of everyone living in the area or visiting the Kilpatrick Hills. We believe that the Kilpatrick Hills - especially this part - are too highly valued to locate a windfarm on them.

16.44. As detailed in Chapter 6, the key findings of relevance to recreation are as follows:

- the windfarm will be visible from Auchineden Hill 3.4km from the site, from where the visual impact is considered to be major;*
- the windfarm will be visible from much of the Kilpatrick Hills Regional Scenic Area (RSA) and the overall visual impact on this area is considered to be major.*

16.45. Overall, the visual impacts of the windfarm on recreational users of the Kilpatrick Hills are considered to be major.

'Major visual impact' must not be permitted. The application should be rejected.

3.3 Visual impacts on the wider area around the Kilpatrick Hills

16.46. As detailed in Chapter 6, the key findings of relevance to recreation are as follows:

- the windfarm will be visible from a viewpoint in Mugdock Country Park, 7.3km east of the site, from where the visual impact will be moderate;*
- the windfarm will be visible from Carman Reservoir, 7.4km west of the site, from where the visual impact will be major;*
- the windfarm will be visible from Newark Castle, 12.6km south west of the site, from where the visual impact will be moderate;*
- the windfarm will be visible from Conic Hill, 14.2km north of the site, from where the visual impact will be moderate;*
- the windfarm will be visible from Ben Lomond, 26.3km north east of the site, from where the visual impact will be negligible;*

16.47. Overall, the visual impacts of the windfarm on recreational users in the wider area around the Kilpatrick Hills are considered to be major to negligible.

We consider that these particular sites (and also from Gartocharn) are more important than the other examples, and that it is also most important that these major to moderate impacts must not be permitted.

3.4 Important close visual impacts not presented by the ES

Fig 6.1 shows that between 5 and 24 turbines will be visible closely from much of Clydebank, Hardgate, Duntocher and Faifley. These are amongst the nearest densely populated areas to the turbines. Yet no viewpoint was chosen to illustrate the visual impact from them. Turbines will be conspicuous to anyone driving west along the A82 from Anniesland to the Kilbowie roundabout in Clydebank. Yet the ES only chose the most distant part of this road to study the visual impact. We believe that the impact will be very great to those in vehicles approaching Clydebank along this road, and will detract severely from the current appreciation of these hills as wild unspoiled land.

4. Adverse effect on recreational amenity

Many people value the existing state of the hills. One of the joys of the Kilpatricks is to walk in an area which is largely unspoilt.

Table 16.1

- *Mountaineering Council of Scotland: the Kilpatrick Hills are a popular location for walking, rock climbing (mainly the Whangie). Concern that the landscape of the Kilpatrick Hills is sensitive to development.*
- *West Dunbartonshire Council would be concerned about the visual impact of access tracks on recreational users of the Kilpatrick Hills (Telephone conversation with the Access Officer's Planning Line Manager, Sept 2002).*
- *Helensburgh and West Dunbartonshire Group of the Ramblers Association (Scotland): The Kilpatrick Hills are visited regularly by the group and they often see mountain bikers in the area. Many other walking clubs also visit the Kilpatrick Hills.*
- *The Kilpatricks Project: The Kilpatrick Hills are used for informal recreation and by anglers accessing the lochs.*

16.37. Most of the additional access track (approximately 9km) will be created within the Kilpatrick Hills themselves, beyond Loch Humphrey. Some user groups are likely to welcome these additional tracks as allowing easier access into, or across part of the Kilpatrick Hills. Others, who enjoy the rough character of the ground, will prefer to avoid such routes.

16.49. The windfarm will change the character of the current recreational resource. Whilst some users will view the creation of the access tracks as an enhancement to recreational opportunities, others, who particularly value the current absence of any development will perceive the introduction of the windfarm as a negative impact. Consequently, impacts on recreational use during operation are judged to be minor (positive) or moderate (negative).

We certainly view this development as having a negative impact. This development would have a significant adverse effect on the use and enjoyment of these natural heritage locations.

15.26. Any impacts of the windfarm on tourism will be indirect, since the windfarm will not directly prevent visitors from utilising areas or facilities. Such impacts are hard to predict as they are likely to be due to perceived changes in the landscape and the subsequent reactions of tourists to these changes. The windfarm will be visible from a number of locations in the vicinity of the site, as detailed in Chapter 6: Landscape and Visual Impacts.

*15.35. As previously mentioned, the impact of the windfarm on tourism is difficult to predict as this is likely to be due to perceived changes in the landscape and the subsequent reactions of tourists to these changes. The windfarm will not directly prevent tourists from utilising any areas or facilities and may in fact encourage visits to the area. **Others however, consider wind turbines as degrading 'natural' landscapes and are discouraged from visiting the surrounding countryside.***

We believe that the majority of users of the hills fall into the category of this last sentence.

Once the novelty of windfarms has worn off the existence of one at a scenic area would be detrimental to the local economy. Visitors would spend their money going elsewhere. Tourists and visitors from Glasgow and beyond will be deterred from visiting this scenic area.

The proposed development will adversely affect efforts to encourage the tourist industry of the area as this is largely based upon the quiet appreciation of the countryside and its views by walkers and others. These are the people who are most likely to be upset and off-put by the intrusion of the turbines.

16.20. (ii) Improving links to other areas: The Kilpatricks form an important resource within the area. Given relatively low levels of car ownership in many parts of West Dunbartonshire, and the need to promote walking and cycling as an integral part of sustainable transport networks, it is important that the hills are easily accessible from peoples' homes. Scope for further improving links from local settlements into the hills, most likely to be achieved through better information and signposting should therefore be explored

The development would blight the establishment of a link to the West Highland Way from Clydebank (which just needs a few notices and some publicity).

Paragraphs 16,26, 16,27, 6.83 an. 6.84 agree that the current recreational activity on the site are walkers, bird watchers, mountain bike riders and angling clubs.

16.13. Policy R1 of the adopted Clydebank Local Plan (1994) states that there is a presumption against development which affects the use or alters the character or amenity of areas of open space. Policy R5 states that the Council will encourage access and pursue opportunities to establish recreational footpaths, with a special emphasis on access to the countryside and riverside areas. Paragraph 8.7 states that serious consideration will be given to linking existing recreational areas and extending the footpath network into the Kilpatrick Hills. The link with the Kilpatricks Project is also highlighted

16.14. Paragraph 11.67 of the Glasgow and Clyde Valley Joint Structure Plan (2000) refers to Strategic Policy 6; 'Quality of life and health of local communities' and the Provision of facilities for sport and recreation': 'Provision for and management of recreation in the wider area, particularly in ore as popular with visitors serves to protect sensitive environments and to strengthen local communities.' Paragraph 8.22 relates to inter regional transport network schemes highlighting that the network of longer distance walkways and cycleways has been set out by SNH as part of its Paths for All programme and by SUSTRANS as part of the Millennium National Cycle Way project The safeguarding of these networks, or any extension to them will be required through Strategic Policy 9B(iv).

16.15. Further context is provided by national planning policy guidance. NPPG11: Sport, Recreation and Open Space sets out the role of the planning system in protecting, promoting and balancing the needs of recreation. NPPG11 1 explains that 'in rural areas the aim should be to reconcile environmental, economic and sporting objectives through careful planning and appropriate management measures. NPPG14 Natural Heritage also discusses the importance of the natural heritage for recreation, and associated economic benefits, and indirect benefits, in relation to improving health and quality of life.

16.16. NPPG6: Renewable Energy Developments (para. 31) recognises that in many areas of Scotland recreation supports local economies, and that to varying degree's, such activities depend on the quality of the environment, in particular the landscape. NPPG6 advocates the use of sensitive siting to minimise adverse impacts, particularly visual impacts. Paragraph 31 also highlights the fact that 'opinions are divided as to whether some renewable energy developments such as wind farms or hydro schemes, may themselves be of interest to tourists and the extent to which their existence can be compatible with recreational pursuits such as hill walking'.

All of these policies have led us to believe that the Kilpatrick Hills should be left free of turbines or other industrial structures.

5. Disturbance to natural heritage and loss of wildlife

5.1 Habitat Conservation

The site is in the centre of an important wildlife site - there are within 2km five SSSIs, two actually bordering the site and one within 20m (ES 8.19-23). There are three SINCS, one on the site and another traversed by the access road (ES 8.24-27).

Table 8.4 of the ES shows that much of the site is of International or National Importance as Blanket bog or Mires. Criss-crossing this with access tracts between the turbines must result in radically changed drainage in order to prevent flooding of roadways.

8.57 & 8.58 describe habitat loss, some of national importance. The ES concludes that the loss is not of overall importance, but it is to the users of the hills.

5.2 Birds

The ES in Appendix 9.1 notes the 'Methodology Recommendations from the RSPB and SNH', but what was surveyed and how is unclear especially points 12, 13, 14 and several bullet points in 15. Four Red Data List species are affected. Table 9.4 does not record any of the species breeding outwith the site boundary, when it is well known to Clydebelt members and many others that they do.

Red throated divers visit the Kilpatrick Lochs and have nested. They fly back and forward to the sea and between lochs and traverse, at height, through the site proposed. They do not even appear on Table 9.4.

Peregrine have nested recently at Haw Craggs adjacent to the approach road, which is to have about 17000 traffic movements, most of heavy traffic, during construction. In Table 9,4 the effect on the peregrine is stated as 'minor'.

We cannot understand how the loss of even one of a pair of rare birds killed perhaps, in a turbine blade could be minor (see also 9.46).

Black grouse breed on the site and the study admits that the proposals could have a *Moderate Impact Significance* (table 9.40).

Hen harriers have attempted breeding within 3 km several times in recent years and feed over the site.

Whooper swan were surveyed at Inchinnan but no conclusion as to their flight patterns was made. They do visit the Kilpatrick Lochs.

No mention is made of Geese which visit and over fly the hills. We would like information on whether the recommendations in the last bullet point of 9.1.15 were carried out.

This year an Osprey was reliably reported as visiting the various lochs throughout the summer

Large numbers of Skylarks nest on the site. Construction work could badly affect breeding and the noise of the turbines (100dB) would have a serious affect on birds that sing to define their territories. They would be endangered by the turbine blades as they rise to sing above their nests.

5.3 Mammals

The survey shows that Otters regularly cross the site between the various surrounding lochs. We cannot agree with Appendix 8 that the mitigation would satisfactorily prevent damage to the habitats of otters, and therefore prevent their population decline.

6 Noise, pollution & safety

6.1 Noise impacts during construction and operation

16.31. The increased noise levels during construction, arising from traffic movements and machinery operation, could affect people's recreational experience if they are on the site or very close to it (e.g. on the site access track).

16.40. The noise assessment (Chapter 10) has not identified any significant impacts on-site or off-site. However, recreational users on the site will hear noise from the turbines and this may have an impact on their recreational experience.

We consider that this noise is unacceptable, and will deter visitors to this important part of the hills.

There have been reports that wind turbines produce penetrating low-frequency noise pollution, day and night, which makes some physically ill. One of our members is 'concerned over emission of low level noise as have lived near Largs for years and have experienced the 'hum' personally and found it detrimental to healthy living'. The ES recognises that there may be frequency related noise nuisance, but provides no evidence or analysis of the effects. We feel that this should be explored more thoroughly.

6.2 Fears of pollution incidents

7.121. There will be a number of potentially polluting activities associated with the windfarm development, such as fuel oil and chemical storage, refuelling, disposal of wastewater, foundations construction, maintenance operations, staff facilities, waste collection and waste disposal procedures.

7.122. Pollution issues may also be associated with sulphate attack of the concrete wind turbine bases, leading to alkaline substances leaching into the groundwater. This is likely to be highly localised around the turbine bases and will have a negligible impact on the general groundwater quality of the area.

7.123. Any pollution incident may cause ecological damage or deterioration in the quality of surface water and groundwater. Deterioration in water quality would be of significant concern in any of the feeder streams to the Scottish Water public water supply reservoirs. The sensitivity of the site is therefore considered to be high.

Our members consider that the risk of pollution not being kept under control is too high. The proposed development is among the watershed areas of the Fynloch/Loch Humphrey reservoirs and the Kilmannan/ Burncrooks water supply system. In 1997, 200 litres were accidentally spilled from a generator at the Burncrooks Filters, resulting in the dislocation of supply of drinking water In homes

- In West Dunbartonshire - in the Clydebank area from the Glasgow City boundary to Duntocher, Hardgate and Faifley.
- In East Dunbartonshire - in Bearsden and Milngavie.
- In Stirlingshire - some properties in Strathblane. This incident was the subject of a Scottish Office Inquiry Report.

While the incident at Burncrooks Filters is unrelated to the proposed development, the development lies in the watershed of the Burncrooks system, and harmful pollution to this water supply must be a very important consideration.

There is very serious concern regarding pollution to public water supplies from the proposed development site - during construction of the windfarm and maintenance during its working life. Diesel generators, pumps, site equipment and road vehicles could pose a very serious hazard to public water supply, through the seepage of diesel or other pollutants into the water table.

The nearby Lily Loch, north of Duncombe, sustains a variety of fresh water plant, fish, animal, bird and insect life. It has a unique and fragile ecosystem that needs to be protected.

6.3 Other feared dangers

Whether or not there is recent evidence to justify them, many of our members have strong fears that:

- The substation would need security lighting, causing light pollution.
- Broken blades, and ice blocks could be flung in winter, being hazardous to locals, visitors, and wildlife.
- The new road junction would be on a very dangerous fast stretch of the A82.

We would like these issues discussed and evidence supplied.

7. Social & economic impacts

Our members have told us that distress can be expected from noise (especially low frequency) at their homes, and that the value and saleability of surrounding properties will be diminished.

There will be little work for local people. After construction there will be only four permanent jobs, and in view of the likely disproportionate damage to the tourist industry, there will be a net loss of jobs in the area.

Others have pointed out that saving pollution by insulation is 55 times more cost-effective than saving it by wind turbines. Even such a huge development as this is too small to make any significant contribution to the national production of power - it is not an economic proposition without artificial, politically motivated, subsidies.

Members have said that this is one of the most expensive ways to generate electricity. It will all be for export from Scotland.

There are concerns that, despite any section 75 agreement, when the turbines come to the end of their natural life there will not be the resources to remove them.

8. Effects on archaeology, traffic & transport, telecommunications and aviation

We note that, as discussed in the ES, there may be objections on archaeology, traffic & transport, telecommunications and aviation.

9. Concerns over ES methodology and its inadequate consultation

9.1 Methodologies

6.4. (p23) *In summary, the objectives of the LVIA are to:*

- *understand and evaluate the current landscape of the site and the role of this landscape in the wider landscape setting and its contribution to landscape character;*
- *identify and determine the nature and extent of any direct impacts of the proposal on the nature and character of the existing landform and landcover;*
- *identify the extent to which the proposed windfarm may be visible in the wider landscape **using the ZVI techniques described above;***

However The ZVI techniques are hardly described above, or discussed critically elsewhere in the ES. This seems a very serious omission that makes it difficult to judge the application fully.

Fig 6.1 shows that between 5 and 24 turbines will be visible from much of Clydebank, Hardgate, Duntocher and Faifley. These are amongst the nearest densely populated areas to the turbines. Yet no viewpoint was chosen to illustrate the visual impact from them. Turbines will be conspicuous to anyone driving west along the A82 from Anniesland to the Kilbowie roundabout in Clydebank. Yet the ES only chose the most distant part of this road to study the visual impact. We believe that the impact will be very great to those in vehicles approaching Clydebank along this road, and will detract severely from the current appreciation of these hills as wild unspoiled land.

The ES methodology actually carried out as described in Appendix 9.3, does not map well enough to the RSPB methodology as described in Appendix 9.1. The ES in Appendix 9.1 refers to the ‘*Methodology Recommendations from the RSPB and SNH*’ but what was surveyed and how is unclear, especially points 12, 13, 14 and several bullet points in 15.

9.2 Consultation

Many people who enjoy the area, eg walkers, anglers and wildlife watchers, will not be aware of the planning application. It was only advertised in a small back page newspaper advert just before Christmas. We feel that more time should be given to gather their responses.

16.6. A number of organisations were contacted to obtain more in depth information on the type and level of existing recreation activity in the area. These national and local organisations were identified through the scoping process, desk study and Internet searches. Information on local use of the area was also gathered through the public exhibitions (see Chapter 2: Approach to the EIA).

We are particularly concerned that many organisations were not consulted by Airtricity or the ES team. In particular the ES team only had comments from Helensburgh and West Dunbartonshire Group of the Ramblers Association (Scotland) of local hill users. The remainder were national organisations, or others such as golfers who do not use these hills.

10. Conclusion

For all the above reasons, we urge the Scottish Executive to reject this application.

Yours sincerely