

Energy Consents Unit
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

Date: September 2023
ECU Ref: ECU00004830

Dear Sir / Madam,

PROPOSED BACK FELL INDUSTRIAL WIND POWER PLANT

I wish to express my deep concern over the proposed industrial wind power plant at Back Fell, Straiton, South Ayrshire (ECU Ref: 00004830). I appreciate that the scheme is only at the scoping stage, and that no formal planning application has yet been made. However, I feel compelled to raise my concerns at this point in time as the impacts on Straiton and surrounding communities will be so serious, that my belief is that the proposal should not proceed beyond the current scoping assessment.

The Back Fell proposal would be partly on the site of a previous wind power plant application in the Glenalla forest for 11 x 126m turbines, known as Knockskae, which was refused planning consent by South Ayrshire Council (Ref: 15/01216/APPM) in 2017. The applicant did not appeal the decision such was the strength of opposition.

This new proposal also takes in Dalmorton forest and would comprise 14 x 200m turbines. The applicant states that the village of Straiton will be approximately 900m from the site which is much nearer than any of the 3 schemes (Knockcronal, Carrick and Craiginmoddie) that are currently the subject of a public inquiry. The nearest turbines will be approximately 1km from the residences of Knockskae, Little Garroch, Balbeg (a holiday complex), Dyke, and Knockgardner, and the application area bounds with the Straiton, Dyke and Knockgardner road.

My main concerns relating to the current Back Fell proposal are:

- 200m turbines on high ground will have a significant impact on the landscape. The South Ayrshire Wind Capacity Study in 2018 recommended that turbines over 130m could not be accommodated in this landscape. For the former Knockskae application SNH (now NatureScot) advised that the nature and scale of the proposal in this highly sensitive location would result in significant adverse landscape and visual effects.
- This proposal and the other schemes are very close to the Merrick Wild Land and will impact significantly on the setting of the wild land designation by introducing man made and moving features in the landscape.
- Residences in the local villages will have dominating views of turbines from multiple schemes. For the former Knockskae application it was noted that the LDP policy on wind energy states that the Council will support proposals if: *'they do not have any other significant detrimental effect on the amenity of nearby residents, including from noise and shadow flicker'*. An assessment of the residential visual amenity was undertaken for all properties within a 2km radius of the outermost turbines of the Knockskae scheme

and identified 16 properties (or clusters) within this area and concluded that 9 (or clusters) of these properties would experience significant and adverse visual effects.

- All of the currently proposed wind power plants are close to residences and the potential for noise and shadow flicker leading to a deterioration of the enjoyment of properties and potential health impacts. For the former Knockskae application South Ayrshire Council's advisers, ACCON, advised that based on the information provided, the noise limits at nearby properties would require to be mitigated by the provision of a range of conditions and would require the introduction of a condition which addresses amplitude modulation and the requirement to curtail the operation of certain turbines to ensure South Ayrshire noise guidance can be met.
- For the former Knockskae application an assessment had been undertaken which concluded that no dwellings would be affected by shadow flicker 10 x rotor diameters' distance of turbines. At the time this extended to a distance of 870m. The current Back Fell scheme proposes 200m turbines where this distance would extend to 1.4km. South Ayrshire Council considered that recent evidence has however highlighted that shadow flicker can be experienced at greater than 10 x rotor diameter distances and that modelling of residences with 10 x rotor diameter may not capture all homes where people experience shadow flicker effects. It is the Council's policy to minimise the impact on residential property ensuring neighbouring property would not experience the effects for more than 10 hours per year.

In addition to the above South Ayrshire Council were concerned that the former Knockskae application would have adverse impacts on:

- the designed landscapes of Blairquhan, Kilkerran and Craigengillan,
- landscape character types in particular the Intimate Pastoral Valley of the Girvan valley
- the views from Colonel Hunter Blair's monument
- private water supplies and the water resources, and
- the cumulative impact with the operational Dersalloch wind power plant

The reasons for refusal for the Knockskae application are still valid and the current Back Fell proposal for turbines with an increased height of 200m will only exacerbate the issues.

I therefore urge you to conclude that no industrial wind power plant development should be permitted at this site.

Yours sincerely,

Name:

Address:

Signature: