

Electricity Act 1989  
Town and Country Planning (Scotland) Act 1997  
RESPONSE TO THE HADYARD'S HILL EXTENSION  
WIND FARM PROPOSAL  
  
SUBMITTED BY  
SAVE STRAITON FOR SCOTLAND

5 June 2015

<http://savestraitonforscotland.com/>

Save Straiton For Scotland Limited is a company limited by guarantee

Registered Company Number SC442516

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# 1. Introduction

## **Save Straiton for Scotland**

Save Straiton for Scotland (SSfS) is a campaigning organisation formed by the community of Straiton, South Ayrshire in order to protect and defend the conservation village of Straiton and surrounding countryside. The remit of SSfS is to defend against any and all inappropriate development that would seek to undermine the uniquely special landscape, environment, heritage and ecosystem which define Straiton and its environs.

SSfS was constituted with an overwhelming mandate from the community. SSfS is neither anti-development nor anti-wind. Indeed, SSfS recognise the compelling need to find ecologically appropriate energy generation solutions and recognise the value of commercial and industrial development to the wider Scottish economy, to South Ayrshire and to our community. SSfS believes, however, that such developments must be consented only in accordance with planning guidelines, only if properly and appropriately sited and only with genuine consultation with, and respect for, the communities impacted by them.

Our concern is for the preservation of the heritage, scenery and amenity of the village of Straiton, the Upper Girvan Valley, the Galloway Forest and the Merrick Wild Land. SSfS recognise that those who live in this environment have a duty to act as its custodians.

Straiton is a precious amenity – for South Ayrshire and for all of Scotland – the features that make Straiton and the Upper Girvan Valley special are recognised nationally and internationally; an area of outstanding natural beauty, benefiting from sites of special scientific interest and historical importance, it is nestled at the foot of the only area of Wild Land in all of southern Scotland and is one of only two places on earth where the rare and invaluable designations of UNESCO biosphere and Dark Sky Park coincide.

The economy of Straiton and indeed South Ayrshire relies heavily on tourism. All who visit Straiton – from holidaymakers and day trippers to ramblers, anglers, cyclist and motor-bikers, bird watchers, wildlife watchers, star-gazers, photographers, dog walkers and families – understand why we seek to protect this beautiful place.

## **The Developer**

SSE Renewables already own and operate the existing Hadyard's Hill wind farm. Since it was commissioned in 2006, there have been a number of issues causing serious concern;

- Lack of Liveability. Shadow Flicker and Noise have caused homes to become uninhabitable and forced residents to abandon their houses.

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- Lack of demand for the energy generated. SSE Renewables have been reported as receiving £6.5million in constraint payments for the existing Hadyard's Hill site between 2011 and 2015. (<http://www.carricktoday.co.uk/news/local-headlines/hadyard-hill-company-pockets-6-5m-in-constraint-payments-1-3701176>)
  - Lack of jobs. Despite having promised to create jobs in the local economy at the time of constructing the original Haydard's Hill site, no evidence exists of any permanent jobs having been created. At the time of writing, SSE have 116 job roles advertised on their web site, of which only one job is based in Ayrshire (of only two jobs in renewables nationally).

It is the opinion of SSfS that the existing Hadyard's Hill Wind Farm is a blight on the Ayrshire landscape and on the lives of Ayrshire residents. It has neither generated the power envisaged nor has it created the jobs promised. In this context, SSfS would question the appropriateness of any further extension to this wind farm.

In addition, SSfS have specific objections to the proposal when considered in-and-of itself, those objections are set out in this submission.

## The Application

SSfS and our supporters have reviewed the planning application lodged by SSE Renewables and have significant concerns. It is the view of SSfS and our supporters that our concerns represent valid and substantial planning considerations.

**SSfS respectfully requests that consent under section 36 of the Electricity Act 1989 should be refused and a direction should not be given that planning permission be deemed to be granted under section 57 of the Town and Country Planning (Scotland) Act 1997 (as amended).**

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## 2. Objection Points

### Ecology and Hydrology

The development has the potential to detrimentally affect the local wildlife, vulnerable bird and bat species, ecology and environment.

The environmental statement states that there would be total woodland removal of 915 hectares to accommodate the wind farm. Total removal of the woodland is put forward by the developer as a 'landscape benefit' by clearing woodland planted at a time when woodland design was not as comprehensive as current standards and restoring it to moorland. However, SSfS have found that a substantial area of this woodland has been restructured following felling to introduce more species diversity including native broadleaves with more open space and increased wildlife habitats. The other areas of woodland are approaching this phase and will within the near future be felled and replanted to meet current standards of design. The redesigned woodlands will create improved wildlife habitats and recreational opportunities as well as continuing to provide the timber to support the forest industry which is so important to Ayrshire. The re-design will meet current standards of design and meet the forest industry's certification standards for well managed and sustainable forest, the UK Woodland Assurance Scheme.

The SPP seeks to protect existing woodland and where it is in the public interest to clear woodland there is would be a requirement for compensatory planting. Paragraph 218 states *'The Scottish Government's Control of Woodland Removal Policy includes a presumption in favour of protecting woodland. Removal should only be permitted where it would achieve significant and clearly defined additional public benefits. Where woodland is removed in association with development, developers will generally be expected to provide compensatory planting'*.

The proposal to remove this substantial area of woodland is required simply for the operation of the wind farm. It ignores the negative impact on the public benefit of the existing substantial area of woodland in terms of landscape, wildlife habitats, recreation, creation of further native broadleaved woodland and the contribution of timber to the established timber using industries in Ayrshire.

The replacement of the woodland area with 'moorland' which has not been clarified in the application cannot be seen as creating additional public benefit.

Furthermore, SSfS have found that two of the proposed turbines are located where groundworks pose serious risk of pollution of the Penwhapple Reservoir, both a popular fishing spot and the water supply to Grant's Distillery.

SSfS note the concerns that have been raised elsewhere where major groundworks such as those proposed have seriously affected water quality. Scottish Water require that potential effects from the proposed development on the Penwhapple Reservoir and Penwhapple Reservoir Water Treatment Works are avoided.

SSfS content that groundworks would also affect the River Stinchar, well-known as an excellent trout and salmon river.

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## Residential Amenity

The developer admits that '26 properties would undergo a significant effect'. Others would have their amenity destroyed.

Eight properties come within 1km with the closest only 720m from a turbine. It is the opinion of SSfS that siting WTGs this close to homes would be completely unacceptable.

It is worth noting that two properties were vacated close to the existing Hadyard Hill wind farm as the residents found living in them intolerable. At the time of the original application, SSE failed to properly and fully calculate the effects of either shadow flicker or noise and did not recognise the impact and distress that would be caused, nor have they introduced any meaningful or effective mitigation in the intervening years.

SSfS are dismayed to note that, once again, no adequate shadow flicker or noise assessments have been carried out with regard to the Hadyard's Hill Extension proposal. It is the opinion of SSfS and our supporters that this application cannot be properly considered until such assessments are completed.

## Landscape / Visual amenity

There are already 52 turbines erected at Hadyard's Hill: another 31 would result in an immense area dominated by wind turbines which would be totally out of scale in this landscape. The turbines would dominate views of the Stinchar Valley, designated an Intimate Pastoral Valley LCT, and which must be protected from intrusive, overbearing structures.

The developer admits that the effects on road users on the B734 would be significant.

Taken with other proposed and consented wind farms in the area the cumulative effect could be a wall of wind farms stretching from Cumnock in the east to Girvan in the west.

The Non Technical Summary (NTS) comments that the '*Landscape and Visual Impact Analysis (LVIA) identifies potential significant effects on physical elements of the landscape and on landscape character, on any areas designated for their scenic or landscape related qualities, and on views from various locations such as settlements, routes, hilltops and other sensitive locations*'. SSfS finds that such significant effects are contrary to national and local planning guidance.

Scottish Planning Policy (SPP) seeks to protect Scotland's landscapes and any development should be in accordance with local landscape character designations. Paragraph 202 of the SPP states '*The siting and design of development should take account of local landscape character. Development management decisions should take account of potential effects on landscapes and the natural and water environment, including cumulative effects*'. Paragraph 194 requires the planning system to '*facilitate positive change while maintaining and enhancing distinctive landscape character*'.

The National Planning Framework (NFP) further identifies the value of Scotland's landscape to the people who live in Scotland, visitors and the communities. NFP 4.4 states '*Scotland's landscapes are spectacular, contributing to our quality of life, our national identity and the visitor economy. Landscape quality is found across Scotland and all landscapes support place-making. National Scenic Areas and National Parks attract many visitors and reinforce our international image. We also want to continue our strong protection for our wildest landscapes – wild land is a nationally important asset. Closer to*

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*settlements landscapes have an important role to play in sustaining local distinctiveness and cultural identity, and in supporting health and well-being’.*

At the local level the South Ayrshire Landscape Wind Capacity Study (SALWCS) designates the area of the proposal as landscape character type 17c: Foothills with Forest and Wind. The Guidance for Development comments as follows:

- There is very limited scope for the large typology (turbines >70m) to be accommodated within this landscape. Turbines should be well set back from the more sensitive outer edges of these foothills to avoid significant impact on the ‘landmark’ hill which form highly visible containing edges to the smaller-scale settled Stinchar and Girvan Water valleys and to reduce cumulative effects on these valleys
- All turbines should be sited to avoid intrusion from the minor public road/National Cycle Route 7 to the south of the Carrick Hill and the dramatic pass of Nick of the Balloch.

The Study specifically comments on the existing Hadyard Hill wind farm and its possible extension as below:

- Potential effects on the design rationale of the operational Hadyard Hill wind farm which is set within a shallow basin contained by a rim of higher hill which limits the visual intrusion of this development from parts of the Stinchar and Girvan valleys, Girvan and the coast. Turbines sited on these higher hills would diminish the integrity of this wind farm and result in cumulative effects.

The SALWCS identifies the Stinchar valley as Character Type 13: Intimate Pastoral Valley and highlights the potential cumulative issue if the existing Hadyard Windfarm were to be extended *‘potential extensions to the existing wind farms of Hadyard Hill, ..... and/or new wind farm developments located in adjacent uplands which could extend visibility and intrusion of turbines on sensitive skylines which contain the Intimate Pastoral Valley’*. It further lists as a constraint *‘The rim of high, steep-sided hills lying on the north-western edge of the upper Stinchar Valley, including Auchensoul, Mull of Miljoan and Daldowie Hills, which form a prominent and scenic backdrop to this valley but are also important in providing a degree of visual containment of the operations Hadyard Hill wind farm’*, and warns of the potential for cumulative effect to the existing wind farm.

The South Ayrshire Local Development Plan supports development *‘that encourages sustainable economic growth, improves the quality of the environment and creates sustainable communities (Page 4) and would support development in the Carrick Investment Area if ‘wind farm developments are directed to preferred wind farm search areas’.*

SSfS conclude that this application would, therefore, contravene both national or local planning policy.

The developer asserts that the proposal would not impact on the Merrick Wild Land Area which is 7.5km away. SSfS take issue with this assertion - the proposed extension would be *significantly* closer to the Wild Land Area with the turbines on higher ground *and* 25% taller than the existing ones. The wild land area has been designated for its value and sense of wildness and the setting should be protected. Industrialisation of the landscape at this distance will reduce the value and sense of wildness.

The SPP seeks to protect the recently designated ‘Wild Land Areas’. Paragraph 200 states *‘Wild land character is displayed in some of Scotland’s remoter upland, mountain and coastal areas, which are very sensitive to any form of intrusive human activity and have little or no capacity to accept new development. Plans should identify and safeguard the character of areas of wild land as identified on the 2014 SNH map of wild land areas’.*

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SSfS and its supporters believe it is vital to protect South West Scotland's only remaining area of wild land especially as it is situated within the UNESCO Biosphere.

SSfS is deeply concerned to note that the developer fails, at any point, to recognise that the proposed wind farm would be situated within the Buffer Zone for the Biosphere or indeed to assess the impact on the Galloway and Southern Ayrshire UNESCO Biosphere.

Biospheres are described as "places with world-class environments that are designated by the [United Nations](#) to promote and demonstrate a balanced relationship between people and nature. Biospheres are created to protect the biological and cultural diversity of a region". Biosphere reserves are established through the United Nations Educational, Scientific, and Cultural Organization (UNESCO) Programme on [Man and the Biosphere \(MAB\)](#). The Galloway and Southern Ayrshire Biosphere is the first in Scotland - recognising the unique combination of wildlife, landscape and culture within the area - and one of only 580 biosphere's worldwide.

The Biosphere Partnership is clear in its aims and has published a "Sense of Place" toolkit describing the features and characteristics of the biosphere: a place of wildlife and natural beauty; a place of heritage and culture; a place of inspiration, a place of tranquility; a place of recreation and enjoyment; a place of local produce.

The Buffer zone of Galloway Forest Park is described as '*a working landscape managed to protect the natural heritage of the core areas. The area offers tremendous recreational opportunities in dramatic landscapes. Activities compatible with good ecological practices are encouraged*'. SSfS is of the view that industrial-scale windfarm development would not fall within the activities deemed compatible with good ecological practices as defined by UNESCO. Indeed, whilst renewable energy projects are encouraged within the Biosphere buffer zone, they are clearly described as micro renewables only.

It is the opinion of SSfS that the UNESCO Programme on MAB and the Galloway and Southern Ayrshire Biosphere Partnership should have been consulted on the proposals prior to the submission of the planning application. Furthermore, SSfS objects to the proposal on the grounds that there is no inclusion of any consideration on the impact of the proposed development on the biosphere (or indeed the continued biosphere status). Whilst SSfS asserts that the proposals should be withdrawn and the ecological impacts of the proposed development on the biosphere be considered, studied and reported-upon. SSfS is of the view that the proposals are completely incompatible with the designation and purpose of the Galloway and Southern Ayrshire Biosphere.

The South Ayrshire Landscape Wind Capacity Study designates the area of the proposal as Landscape Character Type 17c: Foothills with Forest and Wind and states that '*there is very limited scope for the large typology (turbines >70m) to be accommodated within this landscape. Turbines should be well set back from the more sensitive outer edges of these foothills to avoid significant impact on the 'landmark' hills which form highly visible containing edges to the smaller-scale settled Stinchar and Girvan Water valleys and to reduce cumulative effects on these valleys*'. It goes on to say that '*all turbines should be sited to avoid intrusion from the minor public road/National Cycle Route 7 to the south of the Carrick Hill and the dramatic pass of Nick of the Balloch*'.

### **Economic Impact / Tourism**

It is the view of SSfS and our supporters that the local adverse impacts would be considerable, not merely to amenity, landscape and ecology, but also threatening local tourism initiatives and jobs.

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Views from National Cycle Route 7 would be significantly affected - this is part of the Ayrshire Alps Road Cycling Park, the first of its kind in Scotland, and is quickly becoming an important tourist attraction in the area. A proportion of cyclists would be discouraged from visiting again as the turbines would have an overwhelming presence as some turbines are located very close to the route. Important and spectacular views from Nick O' the Balloch would be detrimentally affected.

The development would be visible from the Carrick Hills, Penwhapple Reservoir, Bargany Gardens and Designed Landscape, Seasons Holiday Village at Brunston Castle and Brunston Castle Golf Club, all popular with visitors and residents of South Ayrshire who wish to enjoy the outdoors.

SSfS have found that the Environmental Statement seriously understates the importance of tourism in this area. Their study area completely ignores Seasons' 57 lodge holiday village and the Brunston Castle Golf facility at Dailly.

The proposed development would also be visible from Turnberry Golf Course, a national tourist asset, and from the Ayrshire Coastal Path. All routes in and out of Barr would either pass next to turbines or have intrusive views of them, which would deter a significant percentage of visitors from visiting this picturesque conservation village, using the local facilities and undertaking walks in the area. This in turn would have a negative effect on tourism.

Views from Shalloch on Minnoch, Cornish Hill and many other hills, popular with walkers, would also be adversely affected.

There can be no doubt that the whole experience for the visitors to the locality and the wider area will inevitably be devalued.

The NTS sets out the potential employment opportunities which could result from the construction and operation of the wind farm. It does not factor in the loss in employment following the removal of the woodland. The woodland would support jobs for forest management services, felling, timber haulage, planting and maintenance contractors. The productive potential of the lost area of woodland might be calculated at 178,000 tonnes which represents a significant employment potential. If the application receives approval the timber production will be realised during the construction phase which will put pressure on the forest industries to utilise it in very short period of time. If the woodland were retained and the production planned in conjunction with normal felling and restocking it would be realised over a 10 to 15 year period. With timber production forecast to decline around 2020 the loss in timber volume at this time would be detrimental to the wood industries of Ayrshire.

SSfS and our supporters fully endorse the opinions of Visit Straiton, who's response to the Hadyard's Hill Extension application is reproduced below:

We believe the Extension to Hadyard Hill wind farm would damage the existing tourism offering, deter future enterprises, spoil the natural beauty of the area, reduce the attractiveness of the area to those undertaking outdoor pursuits, leading to a reduction in visitors numbers. Local businesses, which rely on both visitor as well as local support to thrive, would suffer as a result and the local economy harmed. Although VisitStraiton is primarily concerned with the area surrounding the village of Straiton and the Straiton Hills we recognise that this development will have an impact on visitor numbers to the Girvan and Stinchar valleys and the surrounding area which will in turn impact this area. Chapter 12 of the Application "identifies and assesses the potential socioeconomic and tourism effects", the assessment was carried out by BiGGAR Economics. We believe the Assessment methodology to be flawed. Figure 12.1 shows the area studied for their socioeconomic assessment of the local area. The area highlighted is roughly extends 12km to the south of the development but, bizarrely stops before the Water

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of Girvan to the north. It excludes much of Kilkerran, Turnberry, large sections of the Girvan valley and the area just north of Dailly. They have omitted a 57 lodge resort and that a luxury hotel, golf course with clubhouse, houses and holiday accommodation is in the planning system. We feel that because of this their assessment is fundamentally flawed and the conclusions they have reached cannot be relied upon. The Developer refers to The Moffat Report (The economic impacts of wind farms on Scottish tourism) 2008

We agree with the Moffat Report's comments that large-scale wind farms can represent an effective industrialisation of what was hitherto wild or semi-wild landscape: "The basic problem of location in a scenic area is exacerbated because efficient energy production and transmission requires very large turbines, spaced across a relatively concentrated location. The economic ideal for the wind-energy producer is a development involving a large number of turbines sited on exposed ground. In effect some large wind farm developments may industrialise large areas of wilderness or semi wilderness." We welcome comments made in several places in the Moffat Report stressing the importance of continuing to adhere to past local planning policies which have so far acted to prevent wind farms from being built in scenic areas: it is important to note too that the continuance of such protection is taken as a given by the report.

We welcome the comment in the Moffat report that "The evidence is overwhelming that wind farms reduce the value of the scenery". However, the report then goes on to say "(although not as significantly as pylons)" – this latter conclusion is based on poor methodology, which, as the report is currently so influential, is worth analysing.

The basis for the comparison on visitor perceptions of the potential reduction in scenery value of wind farms as opposed to pylons is based on a series of photographs of hypothetical hotel-window views of three types: open countryside, countryside with pylons (or telegraph poles), and countryside with wind turbines. Five photos show open country, five show country with wind turbines, two show country with pylons and one with telegraph poles (see page 45 for two of the pictures). From the point of view of accurate visual analysis, the photographs of the wind turbines should never have been compared with those of the pylons and poles. The latter are all engineered to show the lines of pylons in an axis which is perpendicular to the viewer: in other words an axis which comes from behind the viewer, passes in two cases directly overhead, and then disappears into the distance. In other words the viewers, seeing the perspective, knows that the pylons and poles pass very close or in two cases right over the hotel room in which they are staying. Consequently they occupy a much larger proportion of the visual field.

By contrast, the photographs which show wind turbines all show the turbines in a horizontal axis parallel to the viewer's window, at a considerable distance: four in the far distance (est. 4 miles) and one in the middle distance (est. 1 mile).

Aesthetics are a combination of what people see and what they know. Perceiving that a line of electricity pylons passes right over their hotel bedroom, people are highly unlikely to want to stay there. If you ask people whether they would prefer to have pylons at a distance of 50 feet, or turbines on a hillside several miles away, it is hardly surprising that they choose the turbines. It is not a valid like-for-like aesthetic comparison.

This undermines the report's evidence on the scenic loss in value accruing from wind turbines.

We regret that the Developer has not conducted any research into the type of tourist that this area attracts. From local knowledge we know many come to enjoy the outdoors and outdoor activities and include; walkers, golfers, sailors, cyclists, bird and wildlife enthusiasts, fishermen and women, canoeists, stalkers and beachcombers. These visitors are more receptive to the scenic value of landscape than those who choose to visit, say a city for its nightlife or shopping.

The development is contrary to: the South Ayrshire Local Development Plan (LDP), the South Ayrshire Wind Capacity Study 2013 (SAWCS), and Ayrshire & Arran Tourism Strategy 2012-17 (A&ATS).

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The LDP “recognises that the area’s high-quality natural environment and cultural heritage are some of its economy’s main assets.” and goes on to state “South Ayrshire is blessed with a rich natural and cultural heritage, boasting beautiful rural landscapes, an outstanding scenic coastline, historic towns and villages, important nature conservation sites and attractive, well laid out parks and open spaces. The plan tries to strike a balance between growing South Ayrshire’s economy and protecting those important environmental assets on which it is founded.”

As shown on the Developer’s map, Figures 5.7-5.8 this development would be plainly visible from large parts of South Ayrshire including the towns of Ayr and Prestwick. The natural, rural landscape of the Girvan and Stinchar valleys would be severely affected where the turbines would form a dominant feature.

P4 of the LDP mentions the Carrick Investment Area within which this proposal would fall. They will encourage development if it would promote rural diversification and tourism, the Galloway and Southern Ayrshire Biosphere and Galloway Forest Dark Sky Park. This development would damage tourism and does not promote either the Biosphere or Dark Sky Park.

P5 of the LDP outlines the policy on sustainable development stating “We will support the principles of sustainable development by making sure that all development meets the following standards.

- Is appropriate in terms of its amenity impact, layout, scale, massing, design and materials in relation to its surroundings.
- Is designed to maximise energy efficiency through building siting, orientation and materials.
- Respects the character of the landscape.
- Respects, protects, and where possible, enhances natural, built and cultural heritage resources.
- Helps mitigate and adapt to the effects of climate change.
- Protects peat resources.
- Is appropriate to the local area in terms of road safety and effect on the transport network.
- Does not have a negative effect on air and water quality.
- Wherever possible, is in an accessible location, with opportunities for the use of public transport, and other sustainable transport modes including cycling and walking.
- Includes the use of micro-renewables, wherever appropriate and feasible.”

We feel the proposed development is not appropriate in terms of its amenity impact, is not in scale to its surroundings, is poorly designed as it is a prominent alien feature constructed (in part) from non-recyclable carbon.

It does not respect the character of the landscape, rather it degrades it. The development doesn’t respect, protect or enhance the natural, built, and cultural heritage. The conservation village of Barr would have extensive views as would Dailly, the development would detract from the natural beauty of the Girvan and Stinchar valleys, the settings of Old Dalquharran Castle and Killochan Castle would similarly be spoiled.

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The development could have a severe negative effect on water quality where recent studies have shown that major groundworks can contaminate water supplies. This proposal is in the catchment area of two salmon rivers and a reservoir which supplies Grant's whisky distillery nearby.

p18 Deals with Tourism and it recognises that this "is very important to South Ayrshire and employs around 11% of the population. We are committed to promoting sustainable tourism development and will make sure that new development makes the best use of the area's environmental and natural assets, which support local and rural economies."

The LDP goes on to say "We will look favourably on proposals which will provide or improve tourist and leisure facilities and we will support keeping and improving existing significant leisure, recreation and tourist facilities."

"When considering applications for planning permission, we will take account of the Ayrshire and Arran Tourism Strategy."

Clearly this development does not promote sustainable tourism development and would damage the local and rural economy. It would damage existing leisure, recreation and tourist facilities.

The Developer states that within a 5km radius there are 5 self catering properties and 7 B&Bs. For some inexplicable reason they have omitted to mention Season's 57 lodge resort at Brunston Castle, Dailly which brings thousands of visitors each year to enjoy the area. The resort is adjacent to Brunston Castle Golf Club and employs 19 people one of whom organises guided walks in the surrounding countryside. Some of the comments include:

"A beautiful and well equipped cottage. Staff very efficient and friendly. Great views from the cottage. Shops down in the village which was just a short walk away. Various places to visit a few miles away from the cottage."

"Beautiful location. I'd return anytime. Although ideal for walkers as there is much to explore, I am disabled but could still delight in exploring the countryside by car."

Also within 5km is Dalquharran Castle (designed by Robert Adam) now a ruin but is the subject of a major development. Planning permission for a golf course, 40 houses and 40 fractional houses has been granted, an application for a clubhouse/restaurant and 5 star hotel has lapsed but will be re-applied for. The course, houses and castle all face south and would have extensive views of up to 28 turbines. The proposed wind farm would be a dominant feature as not only is it on an elevated position but it would also be a moving one.

Dr Wright is investing tens of millions in this development and Dalquharran would undoubtedly become a major employer in the area. Again thousands of visitors can be expected. Visitors who support other local businesses such as hairdressers, shops, taxis, and use services such as banks and post offices helping keep these facilities open for local people and providing employment.

The Developer states that Brunston Castle Golf Course is a "local leisure resource rather than a tourism asset." Perhaps it is because they failed to notice Season's 57 lodge holiday resort next door (and visible from the main road) that they have not properly assessed the impact their proposal may have on this. They also failed to mention the restaurant with its stunning views of both the course and hills where the proposal would be only too visible. The Golf Course is marketed to tourists as well as locals with leaflets printed and available in holiday accommodation. Many of the restaurant customers are non-golfers who come for good food and superb views.

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With a 10km radius are the conservation villages of Kirkmichael, Straiton and Crosshill and the town of Girvan, all popular with tourists. Straiton and the area immediately surrounding the village offer 166 beds alone. Blairquhan Castle is ranked as one of the top 50 places to get married attracting people from all over the world. On arriving at Straiton from the

south most motorists would travel along the B741 from Dalmellington. The proposed development would be clearly visible from this road detracting from the spectacular view of Straiton, the Girvan valley all the way to Ailsa Craig. Along this road they would pass Dersalloch wind farm, a little further along the view opens up and they see this development giving the impression of one wind farm after another. A significant proportion of Straiton's visitors come specifically to undertake the waymarked walks; the most popular is the Monument Bennan Circuit. Again there would be extensive views of this proposal.

The village of Crosshill would have views of 15-21 turbines, there are two hotels (currently closed) but whose rooms would look across to where the development is planned. Just outside Crosshill is Dalduff, which comprises a farm shop specialising in meat, a kitchen and venue. The venue is very popular as a wedding location and currently booked up until 2016. Again couples come from far and wide to get married here along bringing families and guests who usually stay in local accommodation such as the B&B in Dalhowan Street, Crosshill which faces the proposed development.

The LDP (p18) states "We will not usually allow development which we consider may negatively affect the status of Turnberry and Royal Troon as venues for the Open Championship."

The developer acknowledges that Turnberry is of national importance and that existing turbines can be seen. The existing development is positioned in a shallow dip in the hills. The proposed development consists of 31 turbines which are 25% bigger than existing ones and positioned much higher. They would be far more prominent than the existing turbines. Furthermore when Turnberry hosted the Open in 2009, there were several occasions when the camera panned across to the hills to the south and the Girvan valley, giving viewers the opportunity to admire the beautiful countryside inland.

To the south, near Ballantrae, Glenapp Castle Hotel with its Michelin starred restaurant would have views of most of the turbines. This hotel is renowned and attracts international as well as more local custom. Guests are encouraged to explore the hotel's 36 acres from which this proposed development would be visible.

Recently the Ayrshire Alps Road Cycling Park has been created, Scotland's first. [www.ayrshirealps.org](http://www.ayrshirealps.org)

The routes have been mapped and graded and are increasingly popular. The Ayrshire & Arran Tourism team facilitated a visit by cycling journalist, James Spender, which resulted in an 8-page article in the highly regarded Cyclist magazine. The article describes the rides plus the beautiful scenery and the author is photographed on Nick of the Balloch. The South Ayrshire Wind Capacity Study 2013 states "All turbines should be sited to avoid intrusion on views from the minor public road/National Cycle Route 7 to the south to the Carrick Hills and the dramatic pass of the Nick of the Balloch." In fact this development proposes to locate 4 turbines within 1,000 metres of the Route on an elevated position which

would mean they would tower over the Route creating an overwhelming presence. Emerging from Nick of the Balloch virtually all turbines would be clearly visible.

In the Ayrshire & Arran Tourism Strategy 2012-17 (A&ATS), three of the principle objectives are to "Increase the annual number of visitors to Ayrshire & Arran by 10% to 3.85 million" and "Grow the employment supported by the tourism sector by 10% to 9,800 jobs" and "Enhance and conserve the region's natural, heritage and cultural assets." Clearly if tourists are deterred from visiting an area these

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objectives cannot be achieved. A survey by TNS for Ayrshire & Arran found that over 50% of visitors cited “to see the scenery/landscape of Scotland” as the reason for their trip here.

A&ATS recognises that Ayrshire and Arran have particular strengths including Activities and Natural Environment, Golf and Sailing. In nearby Girvan the local council has invested heavily in providing 35 new berths with water and electricity supplies and facilities for crews. One of the areas identified by AT&T as a growth opportunity is to encourage those, such as sailors (or golfers) who are already here, to venture inland on day trips. This is especially attractive to non-sailing and non-golfing companions. The proposed development is very visible from sea, deterring a percentage of potential visitors from making a trip inland. The Waverley paddle steamer regularly makes trips during the summer months and those making the trip around Ailsa Craig would again be deterred from visiting this part of Ayrshire either for a ‘run out’ or a longer stay. Views of Girvan with the landmark hills as a backdrop would be ruined as the turbines would be even taller than the few which are visible at present. The cumulative effect would suggest to the viewer a forest of turbines stretching into the distance rather than a more modest number in a smaller area.

17 Community Councils have come together to form Carrick Community Councils’ Forum (CCCF). In 2013 the CCCF set up a sub group to oversee a 200k Tourism Project. The aim of this was to increase awareness of the Carrick area, increase visitor numbers and encourage people to move around the area and explore the different villages and towns. An identity was created, a website produced with links to villages’ websites and a huge amount of information is available to visitors. A Heritage Trail has also been created to encourage people to visit all the communities and a long distance path, The Carrick Way, is in the process of being established. Local people have contributed their time and effort freely to this project to promote their community, encourage visitors and foster a sense of pride in their unique village or town. This development, in the very heart of Carrick, undermines all this hard work and commitment.

The Developer has also failed to include the rail line from Ayr to Stranraer in their assessment. Prolonged and extensive views would affect this route. The route is promoted by Saylsa, The Community Rail Partnership for Carrick and Wigtonshire, and they produce timetables, maps, advertise local events along the route and suggest ‘days out’. The line already passes existing wind farms but again the cumulative affect of the proposed extension would be detrimental, particularly given the height and elevated position of the proposed turbines.

The proposed wind farm is within The Galloway and Southern Ayrshire Biosphere, the first in Scotland, one of its aims is “fostering a sustainable economy and society”. If small, local businesses are going to suffer and possibly fail this is in direct contrast with this aim.

The Non Technical Summary assesses the impact on tourism as not significant. South Ayrshire does not have large tourism providers or large tourist attractions after such attractions as Turnberry or Culzean. The providers of tourist services are therefore small in comparison such as small hotels, guesthouses and B&Bs. Therefore small reductions in tourism will have a significant effect on such small businesses and local shops.

The woodland removal proposed in the application will reduce the roe deer stalking opportunity for the area and those involved will not be taking accommodation in the B&Bs etc, and any additional spend on meals, local shops and garages will be lost. Again this will have an impact on employment, not only of those directly involved in providing stalking services, but for many other local businesses.

The Non Technical Summary sets out the potential employment opportunities which could result from the construction and operation of the wind farm. It does not factor in the loss in employment following the removal of the woodland. The woodland would support jobs for forest management services, felling, timber haulage, planting and maintenance contractors. The productive potential of the lost area of woodland might be calculated at 178,000 tonnes which represents a significant employment potential. If

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the application receives approval the timber production will be realised during the construction phase which will put pressure on the forest industries to utilise it in very short period of time. If the woodland were retained and the production planned in conjunction with normal felling and restocking it would be

realised over a 10 to 15 year period. With timber production forecast to decline around 2020 the loss in timber volume at this time would be detrimental to the wood industries of Ayrshire.

The following is a list of paths, attractions and accommodation providers which would be directly affected by this proposed development

Paths and popular walking routes affected;

Ayrshire Coastal Path

Barr Walks

Dailly Walks

Girvan Walks

Straiton Walks

Carrick Way (under construction) Cornish Hill

Shalloch on Minnoch Brown Carrick Hill Stinchar Bridge to Barr Merrick

Attractions;

Turnberry Golf Course

Brunston Castle Golf Course Ayrshire Alps Road Cycling Park Waverley Cruises

Bargany Gardens, near Dailly Ailsa Craig

Hotels and Accommodation;

Glenapp

Crosshill Arms

Royal Hotel, Crosshill

Seasons Resort, Brunston Castle

Dalduff, Crosshill

Dalquharran (planning has been consented) Local self catering properties and B&Bs

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## 3. Conclusion

SSfS have written this submission from the view point (both literally and figuratively) of the residents of and visitors to the community of Straiton.

It is the opinion of SSfS and our supporters that the proposed Hadyard's Hill Extension wind farm would have an unacceptably adverse impact on Straiton, it's environs and South Ayrshire.

SSfS submits that the proposal contravenes both local and national planning policy, particularly in respect of the landscape in which it would be situated. We further submit that the damage and detriment to the landscape itself and the enjoyment of the landscape would render the proposal untenable.

SSfS believes that the impact on the wider landscape character - especially in respect of both the Merrick Wild Land area and the UNESCO Biosphere - would be completely unacceptable.

SSfS is particularly concerned about the impact this proposal would have on the local economy. Straiton, and indeed South Ayrshire, relies heavily on tourists and visitors to underpin and support the local economy. A development such as this would further damage the attractiveness of this area to visitor without providing suitable replacement economic activity or jobs.

The people of Straiton also have deep concerns for our neighbours in Barr and Dailly. SSfS has established that the proposed development would have significant impact on homes and residents. Specifically in terms of the proximity of the planned turbines to homes, the overbearing aspect of the turbines, the noise generated by them and the shadow flicker which would blight homes. Furthermore, SSfS notes the heartbreaking damage caused to individual homes and indeed the community by the prior record of SSE Renewables at Hadyard's Hill.

**It is therefore respectfully submitted that Scottish Ministers should conclude that the Hadyard's Hill Extension application should be refused s.36 consent as the Electricity Act tests are not met and that, deemed planning permission should be refused on the grounds that the proposal is not in accordance with the Development Plan.**