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John Low
Policy Officer
Tower House
Station Road
Pitlochry
PH16 5AN
Tel: 01796 470080
john.low@jmt.org

Scottish Government
Energy Consents and Deployment Unit
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU
0300 244 1247

Sent by email : econsentsadmin@scotland.gsi.gov.uk

Cc eplanning@highland.gov.uk

Caplich Wind Farm

The John Muir Trust wishes to object to the application by Muirhall Energy to construct a 20 turbine windfarm on land at Caplich in Sutherland. This application is made by Caplich WF Ltd, a project company of Muirhall Energy Ltd. The site is located within the administrative boundary of The Highland Council and is approximately 5 kilometres (km) from Oykel Bridge, 10km from Rosehall, 20km from Lairg, 25km from Ullapool, 27km from Ardgay and 28km from Bonar Bridge.

The John Muir Trust is the leading wild land conservation charity in the United Kingdom. Working with people and communities to conserve, campaign and inspire, the Trust is a membership organisation that seeks to ensure that wild land is protected and enhanced and that wild places are valued by and for everyone.

Scotland's wild land is an asset of national and international significance but it is a finite resource. Wild land plays a vital role for carbon storage in trees and peatland, gives us clean air, water and food and is home to valuable wildlife. Wild land also plays a vital role in supporting tourism and a wide range of other economic and leisure activities.

The Trust is committed to policy principles which support the current targets of the UK Government and devolved governments for greenhouse gas emissions reduction as these are the primary public policy tools directed at climate change mitigation. However, the Trust does not support the construction of industrial-scale wind energy developments on wild land or developments that would impact adversely on wild land.

The Trust has considered the application against its :

- Wild Land Policy 2010
- Built Development Policy 2013
- Energy and Wild Land Policy 2013

and

- National Planning Framework (3) 2014
- Scottish Planning Policy (2) 2014
- Scottish Natural Heritage Wild Land Areas Map 2014

Our evaluation against the above has identified significant issues.

Cumulative Impact :

We are seriously concerned about the cumulative impact of the proposed development. Scottish Natural Heritage's own guidance on cumulative impact (March 2012) states that two wind farms '**need not be intervisible**' to have an impact. The John Muir Trust believes that the Caplich Wind Farm would have a significant and detrimental effect in both terms of '**Combined Visibility**' and '**sequential impact**'.

The landscape in this general area is already subjected to a high level of windfarm development:

Wind Farm	Number of Turbines
• Operational : Rosehall	19 turbines
• Operational : Achany	19 turbines
• Operational : Lairg	03 turbines
• Application : Sallachy	22 turbines
• Application : Glencassley	23 turbines
• Application : Braemore	18 turbines
• Application : Croick	02 turbines
• Application : Creag Riabach	22 turbines
• Application : Caplich	14 turbines
• Scoping : Dalchork	45 turbines

A potential total of 187 turbines.

For the reasons stated above and as an additional contributor to 'cumulative impact' as described in SNH Guidance the Caplich Wind Farm would be significantly detrimental to the area and in particular to Wild Land Areas 29 Rhiddoroch – Beinn Dearg – Ben Wyvis, 32 Inverpolly – Canisp, 33 Quinag and 34 Reay - Cassley.

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The Scottish Government's National Planning Framework 3 June 2014 states :

"We will respect, enhance and make responsible use of our natural and cultural assets.

*"4.4 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** (our emphasis). Closer to settlements landscapes have an important role to play in sustaining local distinctiveness and cultural identity, and in supporting health and well-being".* The Trust is of the view that this clearly applies to the land areas surrounding and impacted visually by the development including Wild Land Areas 29, 32, 33 and 34.

Scottish Planning Policy (2) page 47 section 200 states that :

"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".

Whilst this application lies outwith designated landscape area types it is within view of a number and will without doubt have a significant and negative impact on them.

Wholly relevant to this application is the Scottish Government Minister's refusal of consent for the construction and operation of Glenmorrie Wind Farm in August 2014. In section 7.134 of his decision letter he states *"Having taken all of the above into consideration, I conclude that the benefits of the proposed development in making a significant contribution to national renewable energy targets, a modest contribution to the local economy during operation with a more substantial contribution during construction and possible improvements to recreational access, would not outweigh the significantly detrimental landscape and visual impacts on the local environment and community. The overall scale of the proposed wind farm and its associated infrastructure would accentuate the adverse impacts on the environment and community to a degree which would be unacceptable. Although the applicant has fulfilled the duties required by Schedule 9 of the Electricity Act by having due regard to those relevant matters and mitigation in the Environmental Statement, Addendum and Supplementary Environmental Information, the environmental impacts of the proposed development would not be acceptable. In a balance of benefits against disbenefits, the proposed development would be contrary to both national planning policy and the local development plan".*

The Minister's views as stated above must be recognised and taken into consideration when considering this application.

Visual Impact : Evidence from the Scottish Government's natural heritage advisor Scottish Natural Heritage shows that the extent of Scotland unaffected visually by any form of built development declined from 41% in 2002 to 31% by 2008 (that is, no obvious modern manmade structures are visible in the unaffected areas). It then declined to 28% by the end of 2009 (see [SNH Heritage Indicators, 2009](#)). Without a doubt this figure will have become significantly worse since then. SNH's analysis suggests that the most significant contributor to this decline is the development of wind farms, a consequence of their prominence and extensive visibility and siting in rural locations with little or no previous development. Caplich would further reduce the percentage of Scotland's landscape unaffected visually by any form of built development. The visualisations show that the development would be clearly seen from Stac Pollaidh, Suilven, Canisp etc and endanger the wild land qualities which identify and define our iconic scenery and which attract visitors from across the

UK, Europe and the world. To approve this development would result in a further visual degradation of our landscape.

Peatland impacts

The Trust also considers that there is the potential for considerable damage to peatland, with negative impacts on biodiversity, ecosystems and greenhouse gas emissions.

In their Environmental Statement, Non Technical Summary the applicant states :

“Peat

Conservative calculations of the volume of peat that will require to be excavated for the installation of site infrastructure predict a total volume of peat of about 89,000 m³, this is comprised of about 8,600 m³ of the upper highly vegetated layer of peat and about 80,100 m³ of the lower highly decomposed peat”.

The International Union for Conservation of Nature (IUCN) Peatland Programme Briefing Note states *“ In a damaged bog the acrotelm has often been lost because of drainage, burning, trampling, grazing, atmospheric pollution, afforestation or even agricultural inputs such as fertilizer and seeding. **This exposes the unprotected catotelm peat to the effects of oxygen, sun, wind, frost and rain and so it begins to degrade, losing carbon back into the atmosphere and into watercourses as it does so, much as a defoliated tree may stand for a century or more, but with its trunk and bare branches slowly rotting away. A peat bog in this state is termed a haplotelmic bog (i.e. a single layered bog). It may still have a vegetation cover, often of a heathland character, but this vegetation is not adding fresh peat because it is not a wetland vegetation and is more likely to be causing further degradation of the peat through the aerating and drying action of its root systems. Neither is this vegetation capable of altering the natural pattern of microtopography and thus provide ecosystem resilience. Indeed any such pattern is likely to have been lost, degraded into a tussock - dominated micro - erosion complex, or developed into a full -blown erosion complex dominated by hags and gullies”.***

This assessment supports our view that anything which potentially damages peat in any significant quantity should not be considered or permitted.

The authors of the Scottish Government commissioned carbon calculator have stated, *“We contend that wind farms on peatlands will probably not reduce emissions, unlike those on mineral soils..... Unless the volume of peat excavated can be significantly reduced relative to energy output, we suggest that construction of wind farms on non-degraded peats should always be avoided.” Letter in NATURE magazine, ‘Avoid constructing wind farms on peat’ 6th September 2012 - Jo Smith, Dali Rani Nayak, Pete Smith University of Aberdeen, UK.*

The Peat Management Plan will at best mitigate some of the damage to the peat but a significant amount of carbon could still be released. We do not see how this supports the government’s emissions target and strongly support the statement above ie the risk is not worth taking.

Socio-economic Impact

If approved this wind farm would contribute to the further degrading of this once iconic landscape resulting in a negative socio-economic impact. The developer’s assessment of the impact on tourism and recreation is based in particular on outdated research. The developer states in **“5.2.4 Evidence for Tourism Impact Assessment**

*Tourism impacts have been assessed using evidence from existing studies on the effects of wind farm development on tourism and experience from existing and proposed developments elsewhere. The key findings of these reports are summarised below. **In particular, this chapter draws on the conclusions of work commissioned by the Scottish Government in 2008 on the effects of wind farms on tourism (our emphasis), which remains by far the most robust and comprehensive source available***". We would contend that much has changed in the seven years since the research was conducted and that to rely on this outdated research would be a significant error of judgement.

There is increasing evidence that as the number of wind farms and turbines increases so does the negative view of these developments by resident and visitor alike. We would cite for example a YouGov poll, commissioned by the John Muir Trust in September 2012, of 2269 people throughout the UK found that 43% of the respondents would be less likely to visit a scenic area which has a large concentration of wind turbines whilst only 2% would be more likely to visit such an area.

A YouGov poll of 1119 Scots adults for the John Muir Trust in June 2013 found that 51 per cent of people in Scotland would be 'less likely to visit a scenic area which contains large-scale developments (e.g. commercial wind farms, quarries, pylons)'.

A further indication is the significant increase in the numbers of Objections from members of the public and visitors from across Scotland, the UK, Europe and the rest of the world. The Trust believes that there would be significant environmental and economic consequences should this Application be approved.

Yours sincerely

John Low

Policy Officer

John Muir Trust