

5 February 2014



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

Ken McCorquodale
Principal Planner
Planning and Building Standards
Highland Council
Glenurquhart Road
Inverness
IV3 5NX

Sent by email : eplanning@highland.gov.uk

Objection to Carn Gorm Wind Farm

The John Muir Trust wishes to object to the application by P I Renewables Ltd for planning permission to construct the Carn Gorm Wind Farm comprising 14 wind turbines with a blade tip height of 125metres on land 4km to the north east of Garve.

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 which 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. The distribution of Scotland's wild land is closely associated with peatlands which plays a vital role in retaining carbon in the ground. Wild land, gives us clean air, water and food and is home to valuable wildlife. Wild land also plays a vital role in contributing to well-being, supporting tourism and a wide range of other economic and leisure activities. The Scottish Government has said that wild land is a resource of national importance and indicated that it wishes to adopt Scottish Natural Heritage's proposed core areas of wild land map (April 2013), as part of proper consideration and protection of wild land in planning policy.

The Trust is committed to policy principles that 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 and does not believe that it is necessary to allow such development to achieve emissions targets.

The Trust has considered the impact the Carn Gorm Wind Farm application would have against its :

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

Visual, Landscape and Cumulative impacts :

Wild land areas – Search Area of Wild Land (SAWL), Core Area of Wild Land (CAWL), National Scenic Areas (NSA), Special Landscape Area (SLA).

The Scottish Government's, national planning policy in NPF2 para 99 which states 'The cumulative effects of small-scale changes require as much attention as large developments with immediately obvious impacts. Some of Scotland's remoter mountain and coastal areas possess an elemental quality from which many people derive psychological and spiritual benefits. Such areas are very sensitive to any form of development or intrusive human activity and great care should be taken to safeguard their wild land character'.

This is supported by the Government's statement in SPP p26 para 128 which notes that 'Areas of wild land character in some of Scotland's remoter upland, mountain and coastal areas are very sensitive to any form of development or intrusive human activity and planning authorities should safeguard the character of these areas in the development plan'.

Environmental impact :

The planned development sits partially within a proposed Core Area of Wild Land and close to two Search Areas of Wild Land to the North and West and threatens peatland on the site. Peatland stores a huge amount of carbon and this development poses a real threat. The authors of the Scottish government commissioned carbon calculator have stated that, "*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.

In addition the development is located on a visually sensitive site for both the residents of Garve and Tourists.

Economic impact :

Tourism makes a major contribution to the local economy and is vital to employment and the areas economic well-being. Visually the development will be seen from the A835 heading south and also heading North West and Northwards, it will also be visible to travellers on the A832 heading Eastwards. Additionally the Lochluichart and Corriemoillie wind farms will be visible from the A832 and A835 a few miles further on adding to a cumulative effect. The proposed site is visible to rail travellers on the iconic 'Kyle Line' between Inverness and Kyle of Lochalsh, the terminus for rail travellers to Skye. The majority of travellers on this route are tourists.

Scottish Natural Heritage's 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 Carn Gorm

application would have a detrimental effect in both terms of 'Combined Visibility' and sequential impact. The cumulative effect of this development added to the existing windfarm at Lochluichart could have a severe economic impact.

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.

This industrial scale development would also have a significant visual impact on an area of high landscape and scenic value and is significant in the national context. The fact that Garve is at a focal point for rail and road leading to the Highlands and Islands means that it is particularly important to preserve this area from visually intrusive developments.

We note that the Highland Council in its guidance contained in the 'Highland Wide Local Development Plan' p115 states that 'New developments should be designed to reflect the landscape characteristics and special qualities identified in the Landscape Character Assessment of the area in which they are proposed. This will include consideration of the appropriate scale, form, pattern and construction materials, **as well as the potential cumulative effect of developments where this may be an issue.**'

In addition Highland Council in their Renewable Energy Strategy state that Key aspects of a Renewables Vision for Highland are the '**Retention of the regional diversity, scenic qualities and local distinctiveness of landscapes which are also vital underpinnings of tourism.**'

Relevant Council Policies

- 57 Natural built and Cultural heritage HWLDP p 111 &
- 67 Renewable Energy Developments HWLDP p 123

This large scale development is counter to both national and local development plans, policies and statements with regard to its visual impact on the landscape and potential economic impact on Tourism. Individually and as an additional contributor to 'cumulative impact' the Carn Gorm development would be significantly detrimental and, as such, should not be approved.

Yours sincerely

John
Policy Officer
John Muir Trust
john.low@jmt.org

Low