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Macritch Wind Farm

The John Muir Trust wishes to Object to the Section 36 Application by Eneco Wind UK to construct an 18 turbine windfarm at Macritch, 9km to the north of Alyth, 13km to the north west of Kirriemuir and immediately to the south of the Cairngorm National Park boundary. The proposed 1200 hectare site is set within Scottish Water's Backwater and Lintrathen Estates, within Angus Council. The turbines will be 125 metres high.

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

Cumulative impact

We are seriously concerned about the cumulative impact of the proposed development. 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 Macritch Wind Farm would have a significant and detrimental effect both in terms of '**Combined Visibility**' and '**sequential impact**'.

The developers suggest in their Environmental Statement (ES) and Non Technical Summary (NTS) that the proposal will have a negligible impact; how they can draw this conclusion is incomprehensible – they plan 18 wind turbines of up to 125m tip height. No matter what they do a development of this scale will have a major visual impact. The statue of Liberty is 93metres high; if I was to suggest that putting 18 of them in this area would have a negligible additional impact on the landscape I don't think my view would be given any credence.

By clever use of language they infer that impact of these 18 very large turbines will be minimal for example in 3.2.7 of the NTS they state

'In the wider context, the effects of the turbines upon character would be restricted by the size and scale of the landscape. The series of hills and ridges that form the foothills of the Cairngorms and which enclose the Angus Glens would restrict the views of the proposed turbines and hence reduce their influence upon the surrounding landscape. Additionally, the scale of the landform is such that where visible, the turbines would appear smaller than, and subservient to the hills that surround them and which form a backdrop to any such views''.

This statement can be reworded to say the same thing but the nuance is significantly different :

In the wider context, the turbines will impact on the landscape. They will be visible from the hills and ridges which form the foothills of the Cairngorms and which enclose the Angus glens. Although the views of the turbines have been reduced by careful design and mitigation they will still have an influence on the surrounding landscape. The turbines although smaller than the hills and mountains that form the backdrop to the proposed development will have a visual impact.

'3.2.8 There would be a localised reduction in the degree of wildness experienced from the southern edge of the Lochnagar – Mount Keen Wild Land Area. This would result from the visibility of the proposed turbines and the resultant increased influence of built development. However, effects would not be significant as the chief aspect of wild land in this area, namely the vast views across a mountainous

landscape would remain the predominant influence. The Proposed Development would be viewed set against a non-wild landscape in the Cairngorm foothills, where the on-going influence of human intervention is already obvious”.

Alternatively they could have phrased 3.2.8 in the following manner :

There will be a negative impact on the degree of wildness experienced from the southern edge of the Lochnagar – Mount Keen Wild Land Area caused by the visibility of the proposed turbines. This increased influence of built industrial scale development would be significant. It would be different from other types of human intervention in the area such as farms due to its overall scale and the stark dominance of the individual 125 metre high to tip turbines. For scale we would point out that the tallest of the Red Road flats in Glasgow are 89 metres high. This is 36 metres or 118 feet lower than the tip of the turbines.

“3.2.9 Significant visual effects would occur as a result of either the prominence of the proposed turbines at short-range, or in longer-range views from more elevated viewpoints, from the contrast between the turbines and existing features visible. From the majority of the assessed viewpoints, significant visual effects would not occur due to a combination of the screening effects of landform and the scale of the receiving landscape, which would dwarf the proposed turbines and reduce their apparent scale in the view”.

3.2.9 could have been phrased as :

Significant visual effects would occur as a result of either the prominence of the proposed turbines at short-range, or in longer-range views from more elevated viewpoints including the National Park and Wild Land Area. We only assessed a limited number of viewpoints, and believe that significant visual effects would not occur due to a combination of the screening effects of landform and the scale of the receiving landscape. However this would only be true if people viewed them from the south towards the National Park. The landscape to the north could give the impression of reducing the turbines apparent scale in the view.

Essentially in this case as in many other aspects of the application it is not what you say it is how you say it that matters. The landscape will be visually impacted, the Wild land area will be negatively impacted as will the National Park and views round the development.

The landscape in this general area is already subjected to a high level of industrial scale, energy related developments and proposed developments the main ones being :

- Drumderg 16 turbines - Operational
- Tullymurdoch 7 turbines - Application
- Saddlehill 14 turbines – Application
- Macritch Hill 18 turbines – Application
- Green Burn (Drumfork) - Scoping

For the reasons stated above and as an additional contributor to ‘cumulative impact’ as described in SNH Guidance the Macritch Wind Farm would be significantly detrimental to the area and should be refused.

Landscape impact:

Although this planned development is not within the National Park or NSA it will be clearly visible from these highly sensitive landscapes and will therefore have a detrimental impact on it. It will also be visible from the Deeside and Lochnagar National Scenic Area (NSA) to the North, the Lochnagar and Mount Keen Wild land area (WLA) and the Cairngorm WLA.

In Scottish Planning Policy (June 2014) p39 Table 1 Spatial frameworks it states : ‘Group 1: Areas where wind farms will not be acceptable: National Parks and National Scenic Areas’. On a macro scale a review of the number of wind farms (Application, Consented or Operational) around the

Cairngorm National Park highlights the increasing 'ring' of Industrial Scale wind farms which are visible from much of this most iconic landscape.

This includes:

• Stronelairg	67 turbines
• Dell	14 turbines
• Corriegarth	20 turbines
• Allt Duine	31 turbines
• Dunmaglass	33 turbines
• Aberarder	12 turbines
• Kyllachy – at appeal	20 turbines
• Farr	40 turbines
• Moy	20 turbines
• Poll Lochaig	9 turbines
• Tom Na Clach	17 turbines
• Tom Na Clach Ext (plus complete redesign of original consented)	16 turbines
• Cairn Duhie	20 turbines
• Berry Burn	29 turbines
• Hill of Glaschyle	12 turbines
• Pauls Hill 1	28 turbines
• Paul's Hill 2	14 turbines
• Rothes 1	22 turbines
• Rothes 2	18 turbines
• Rothes 3	45 turbines
• Meikle Hill	9 turbines
• Kellas	8 turbines
• Hunthill	3 turbines
• Dornell (now proposed 53)	59 Turbines
• Dornell Ext	10 turbines
• Clashindaroch	18 turbines
• Cairnmore Farm	3 turbines
• Cairnmore Farm Ext	5 turbines
• Kildrummy	8 turbines
• Cushnie	7 turbines
• Mid Hill	33 turbines
• Mid Hill ext	8 turbines
• St Mary's Well	4 turbines
• Macritch Hill	18 turbines
• Drumderg	16 turbines
• Saddle Hill	14 turbines
• Tullymurdoch	7 turbines
• Green Burn (Drumfork)	14 turbines
• Dulater	17 turbines
• Tay forest (Elrick)	13 turbines
• Griffin	68 turbines

- Creag a Bhaird 13 turbines
- Calliachar 14 turbines
- Calliachar North (at Appeal) 7 turbines
- Crossburns 25 turbines
- Talladh a Bheithe 24 turbines
- **Total (scoping, application, approved & operational) 912 turbines or 906 if Dornell reduces to its proposed 53.** Incidentally this would need roughly 2,147,760 metric tonnes of reinforced concrete for the bases of the turbines alone which will only ever be grassed over when we have finished with the turbines.

We would suggest that this is too much and that the ‘ringing’ effect on the National Park alone is reason enough to refuse permission.

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 peat land, 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 Scottish Governments 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..... Closer to settlements landscapes have an important role to play in sustaining local distinctiveness and cultural identity, and in supporting health and well-being”.

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”.

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 account when considering this application.

Socio-economic Impact

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 which 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 large increase in the numbers of Objections to applications to construct wind farms from members of the public, visitors from across Scotland, the UK, Europe and the rest of the world. Without doubt there would be significant environmental and economic consequences should this Application be approved.

If approved this wind farm would contribute to the further degradation of this landscape resulting in a negative socio-economic impact. The area relies heavily on tourism in its broadest sense for employment and income. Anything which negatively impacts on this must be seriously questioned and properly evaluated. This development would be visible from key recreational and tourist routes.

In conclusion on the basis of the reasons stated above we believe that this development should be refused.

Yours sincerely

John Low

Policy Officer

John Muir Trust