

06 January 2015



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

Planning and Development  
Pullar House,  
Kinnoull Street,  
Perth  
PH1 5GD

Sent by email :

[DevelopmentManagement@pkc.gov.uk](mailto:DevelopmentManagement@pkc.gov.uk)

[planning@angus.gov.uk](mailto:planning@angus.gov.uk)

### **Saddle Hill Wind Farm**

The John Muir Trust wishes to Object to the Application by Wind Prospect Developments Ltd to construct a 14 turbine windfarm at Saddle Hill (approximately 10km North of Blairgowrie) on land within Perth & Kinross Council and Angus Council .

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 and believe that the developer's Environmental Statement, Ch 8 Landscape and Visual is at best a very optimistic interpretation of the facts.

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 Saddle Hill 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 as the proposal is beside an existing development then it will have a 'negligible' impact; how they can draw this conclusion is incomprehensible – they plan 14 wind turbines of up to 115m tip height, with a rotor blade diameter up to 90m - 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 14 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.

However in contradiction in section 8.5.26 of the ES they state '*The viewpoint analysis indicates that significant and cumulative visual effects would result from the proposed Saddle Hill Wind Farm viewed in combination with other existing, consented or application wind farm development within approximately 6.8km from the nearest turbines*'. The Trust would agree with this statement and consider it to be one of the reasons to refuse the application.

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
- Green Burn (Drumfork) - Scoping
- Macritch Hill 18turbines – scoping

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

### **Landscape impact:**

Whilst the application lies outwith designated landscape area types it is within view of the Cairngorms National Park and The Cairngorm Mountains National Scenic Area, 11km to the North. 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.

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) 17km to the North, the River Tay NSA 15km to the northwest, the Lochnagar and Mount Keen Wild land area (WLA) and the Cairngorm WLA.

In addition the development would impact on the Cateran Trail which in the words of the Environmental statement is *'one of Scotland's Great Trails'*. In their ES Ch8 8.9.27 they further state that *'Significant visual effects from the Cateran Trail would be limited to 2 areas (8% of the total route)'* The Trust believes, unlike the developer, that a significant visual effect to 8% of the trail is a huge concern. In 8.9.31 they further state that *'There would be significant visual effects from part of 3 Core Paths'*.

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 Glenmorie 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 National and Local Authority Policy and Guidance this development should be refused.

Yours sincerely

John Low

Policy Officer

John Muir Trust