

12 November 2014



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Strathy South Wind Farm

The John Muir Trust Objects to the Application by SSE Generation Ltd for S36 consent under the Electricity Act 1989 to construct Strathy South Wind Farm, Strathy, Sutherland. We wish to submit to the PLI the following comment and information. We note that the Applicant has indicated that they have reduced their proposal from 47 turbines down to 39 turbines. The proposed site is environmentally sensitive and the latest submission in the 'Further Information Report' does little more to mitigate its impact.

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
- Scotland's National Peatland Plan Consultation 2014
- IUCN UK Committee Peatland Programme Briefing Notes 2014

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 Strathy South Wind Farm would have a significant and detrimental effect both in terms of '**Combined Visibility**' and '**sequential impact**' when taking into consideration Strathy North, Strathy Wood and other developments in the area. . If approved it could create a contiguous grouping of wind farms running north/south for approximately 11.6 kilometres ie Strathy North, Strathy Wood and Strathy South. Our objection in part is based on this cumulative impact which when added to Strathy North and Strathy Wood would total 98 turbines. The development would also have a significantly detrimental impact on ecologically sensitive and vital peatlands .

This landscape is already subjected to a high level of industrial scale, energy related, developments and proposed developments:

- Baillie 21 turbines Scoping
- Dalchork 45 turbines Scoping complete and S36 Application awaited
- Strathy North 33 turbines Consented and in construction
- Strathy Wood 26 turbines Application
- Creag Riabach 22 turbines Application
- Strathy South 39 turbines PLI
- Limekiln 24 turbines PLI

For the reasons stated above and as an additional contributor to 'cumulative impact' as described in SNH Guidance the Strathy South Wind Farm would be significantly detrimental to the area which the revised plan does little to mitigate and it should therefore be refused.

Peatland:

The developers 'Further Information Report' estimates that 242,359 m3 of peat will be excavated.

The First Minister (Alex Salmond) in his address to the World Forum on Natural Capital, 21 November 2013 in Edinburgh stated :

“... I am pleased to announce a new Scottish Forum on Natural Capital, which will bring together public, private and voluntary sectors to help protect and rebuild Scotland’s natural capital. It will also offer leadership in the hope of increasing action both in Scotland and beyond. An early focus for the Scottish Forum will be on peatlands, which is especially fitting since they form a substantial part of the Scottish landscape and are widely recognised as important in climate change mitigation, biodiversity and water quality. The Scottish Government has long acknowledged the benefits of peatland restoration and is making every effort to conserve this vital and valuable resource.”

Peatland stores vast amounts of carbon and this development poses a real threat. 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.

From the above two statements by Alex Salmond and Jo Smith et al it would appear to be contrary to political and scientific understanding to continue with and approve this application. The proposed development would negatively affect the integrity of the adjacent Caithness and Sutherland Peatlands Special Protection Area (SPA), Ramsar site and SSSIs. The proposed development is inappropriate and insensitive with regard to its impact visually and environmentally on the Flow Country. It is not acceptable to claim that because the area has already been damaged by non native tree plantations that it is acceptable to contribute to further damage. The infrastructure including tracks, the concrete turbine foundations which will remain after decommissioning and the damaged peatland hydrology will all contribute to an environmental tragedy which is at odds with the aims of developing renewable energy. This must be given serious consideration.

In Scottish Natural Heritage’s Consultation document *“Scotland’s National Peatland Plan: working for our future it states. By 2020 we want to see no further loss of peatlands, with their condition improving rather than deteriorating. They need to be valued by government policies, developers, land managers and the wider public and no longer seen just as special interest habitats. We will have in place a network of demonstration sites for good management, a Peatland Code governing private funding of peatland conservation and restoration, and peatland management included in national carbon accounting. All of our protected areas should be in, or moving towards, favourable condition – an exemplar of good management in rural Europe. The Flow Country will have moved from the UK Tentative List towards being a fully inscribed World Heritage Site”*. Although this is consultative it is indicative of direction and so it should be recognised that there is a huge need and desire nationally and internationally to restore damaged peatlands not to further damage them. It also indicates that we should be acting now if we are to achieve the suggested 2020 target.

Landscape impact:

Whilst the application lies outwith designated landscape area types it is within view of National Scenic Areas and Wild land areas as identified by SNH and will without doubt have a significant and negative visual impact on them. These are areas 38 Ben Hope – Ben Loyal and 39 East Halladale Flows. To the west and north are the Assynt – Coigach and Kyle of Tongue National Scenic Areas. Without doubt visitor and resident perception of these areas will be influenced by such a large scale industrial development.

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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". This is particularly pertinent to this application due to the cumulative impact and impact on peat and the landscape.

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. The fact that a consented wind farm ie Strathy North is close by it is not a reason for approval but rather is a reason to refuse permission based on cumulative impact.

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.

In 2013 a YouGov poll of 1119 Scots adults for the John Muir Trust 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 to applications to construct wind farms in or near areas of wild land 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.

In conclusion the Trust believes that this Application should not be granted approval due to its cumulative, environmental and socio-economic impact which outweighs any benefits.

Yours sincerely

John Low

Policy Officer

John Muir Trust