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Jane Robertson
Scottish Government
Directorate for Planning and Environmental Appeals
DPEA case reference PPA-270-2117 (Planning Permission Appeal)

Dear Ms Robertson

Carn Gorm Windfarm Farm Appeal Against Refusal of Planning Permission by The Highland Council (Planning Authority Reference: 13/04791/FUL)

The John Muir Trust wishes to reaffirm its objection to the proposed Carn Gorm Wind Farm.

Our original objection is attached so as to ensure you have all of our documentation. We are taking this precautionary measure since we were not to our knowledge informed of the Appeal by Highland Council. Despite their assurances that we would have received either an email or letter we have no record of any such communication. The Trust only became aware of the deadline for comment on the appeal yesterday, the 7th of January 2015 as a consequence this comment is not as detailed or comprehensive as we would have liked. In light of this should the Reporter decide that further procedures are necessary with regards to landscape and visual impacts and impacts on wild land or any other aspect of our objection we would wish to be afforded the opportunity to provide further evidence. Should a pre-examination meeting be held we would wish to be invited.

The Trust has reconsidered 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

In light of the National Planning Framework (3), Scottish Planning Policy (2) and the SNH Wild land areas map being published subsequent to our original objection we would wish to add comment.

The proposed wind farm would result in loss of part of Wild Land Area 29 within the immediate vicinity of the site. This in turn would necessitate the removal of further significant areas of land from the Wla due to the impact on the landscape of the wind farm. The precedent for this was established by the consenting of Stronelaig by the Minister. This consent resulted in the removal of vast areas of wild land beyond the boundaries of the wind farm from SNH’s original proposal. There would also be significant effects on the Wild land area from more elevated view points. These effects are inter-related and are additional to the other significant effects we have highlighted in our original objection.

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”. This proposal is counter to the view expressed above and there is no evidence submitted by the developer which suggests that the impact of these massive turbines can be effectively mitigated so as to give minimal impact on the landscape or community.

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”. This proposal is contrary to the letter and spirit of SPP(2)

Also 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 reconsidering this application.

Some aspects of the Applicants additional evidence could not be scrutinised due to the Trust only becoming aware of the Appeal closing date for submissions on the 7th of January 2015 which is too late for scrutiny these are :

APP01.04 -Environmental Statement - Volume 01 - EIA Main Body Text’ has not been published due to sensitive information.

APP01.05 - Environmental Statement - Volume 02 – Appendices’ has not been published due to sensitive information.

Yours sincerely

John Low
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