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**Allt Duine Wind Farm : Additional comment in support of our original Objection dated 04/11/2011**

The John Muir Trust wishes to add comment to our original objection in light of the publication of the National Planning Framework (3) and the Scottish Planning Policy (2) in June 2014.

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.

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.

The Trust has reconsidered the proposal against its :

- Wild Land Policy - 2010
- Built Development Policy - 2013
- Energy and Wild Land Policy - 2013
- National Planning framework (3) – 2014
- Scottish Planning Policy (2) – 2014
- Scottish Natural Heritage Wild Land Areas Map – 2014

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. National Scenic Areas and National Parks attract many visitors and reinforce our international image. **We also want to continue our strong protection for our wildest landscapes – wild land is a nationally important asset** (our emphasis). Closer to settlements landscapes have an important role to play in sustaining local distinctiveness and cultural identity, and in supporting health and well-being".*

The application to construct the Allt Duine Wind Farm places all of the turbines within Wild Land Area 20 Monadhliath , as defined by Scottish Natural Heritage. The wind farm will also be close to and visible from Wild Land Area 15 Cairngorms, which includes the National Park.

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". We fully endorse this statement.*

Within SPP(2) page 39 Table 1: Spatial Frameworks : Group 2: Areas of significant protection include:

- *areas of wild land as shown on the 2014 SNH map of wild land areas;*
- *carbon rich soils, deep peat and priority peatland habitat.*

Both aspects identified in the two bullet points above apply to this site and nothing in the Environmental Statement suggests that these issues can be '*substantially overcome by siting, design or other mitigation*' – SPP(2) Table 1 page 39

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 statement is wholly applicable to this proposal and his views as stated must be recognised. The proposal to construct a wind farm in this location is totally contrary to the policy and principles stated in NPF3 and SPP2 and consequently permission to build should be refused.**

Yours sincerely

John Low

Policy Officer

John Muir Trust