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

Energy Consents Deployment Unit
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

Sent by email to EconsentsAdmin@scotland.gsi.gov.uk

Allt Duine Wind Farm

The John Muir Trust wishes to respond to the Further Environmental Information submitted by RWE Innogy Ltd on 14 November 2014 in support of the proposed Allt Duine Wind Farm, Kincaig.

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 which 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. The distribution of Scotland's wild land is closely associated with peatlands which play a vital role in retaining carbon in the ground. Wild land gives us clean air, water and food and is home to valuable wildlife. Wild land also plays a vital role in contributing to well-being, supporting tourism and a wide range of other economic and leisure activities. This view is supported by the Scottish Government in NPF3 page 42 Section 4.4.

In preparing this response the John Muir Trust have scrutinised the further information submitted on the developers behalf and also taken into consideration the following documentation :

- Scottish Natural Heritage, Wild land Area Map May 2014
- National Planning Framework 3 (NPF3) June 2014
- Scottish Planning Policy June 2014

We view the 'Further Environmental Information submitted by the developer and produced by their agents to be flawed and biased. The further information submitted attempts to contradict, denigrate and dismiss fully consulted and properly researched government and government agency work and

policy and use the developer's analysis to justify their stance. The Wild Land Area Map, National Planning Framework 3 and Scottish Planning Policy (SPP2) are the high level policy tools and guidelines by which this application is to be judged and the developer's attempt to cast doubt on, in particular, the Wild Land Area map and the methodology used in its development – of sub-dividing the WLA into smaller land areas for assessment is to be highly regretted. It does not respect the scientific and democratic process of policy and guidance development.

The methodology used by SNH in identifying the Wild land areas is world leading and clearly uses criteria which include a variety of levels of wildness and wild land which together make up such an area. This is a holistic and inclusive approach and methodology which the developer attempts to dismiss by challenging some individual areas and aspects of the wild land area, suggesting that due to some lower levels of wildness the area is not really a WLA. This is a general approach being seen from developers with such applications.

For clarity, the proposal is to build on WLA 20 where currently there are no other industrial scale developments. Furthermore, access for the development is from WLA 15 Cairngorm which is within the Cairngorm National Park. In the SPP page 39 Table 1 it clearly states **Group 1: Areas where wind farms will not be acceptable: National Parks and National Scenic Areas**. Access roads and tracks are part of a wind farm. This proposal would impact not only on wild land but also the National Park.

The consenting of Stronelaig in May 2014 and the removal of the area from a proposed Wild Land Area clearly sets a precedent showing that if an area which is wild land has a wind farm built on it, the area will be removed from the WLA. In the case of Stronelaig this meant that a massive area of wild land was removed from the original proposed Core Area of Wild Land map resulting in two much smaller Wild Land Areas being established - one to the south west WLA 19, Braeroy – Glen Shirra – Creag Megaidh and one to the north east WLA 20 Monadhliath with the Stronelaig industrial development spread between.

The developer attaches significant comment to the siting of the Allt Duine development in a 'bowl'. However this is not sufficient mitigation in siting since the turbines of Allt Duine would be visible from areas of WLA 20 where none were before. In other words, more wild land than before would be impacted.

To avoid needless repetition we would take this opportunity to fully endorse and support the representation, comments and views expressed in :

- The submissions on behalf of PITMAIN ESTATE by Ian Kelly, Graham & Sibbald and the associated MSC Wild Land Assessment Review by Mark Steele of Mark Steele Consultants
- The Representations for The Highland Council ("THC") and The Cairngorms National Park Authority ("CNPA") on additional information (FEI) provided by the applicant by Rod McKenzie, Harper Macleod LLP

The Trust deplores this opportunistic partial analysis submitted as FEI on an application which is clearly now contrary to current national policy and guidance. We believe that the FEI justified re-opening the Public Local Inquiry. The Energy Consent and Deployment Unit of Scottish Government does not have the specialist expertise to fully analyse the further technical evidence on the WLAs. Therefore, the only way forward for the Scottish Government on this development is to use their own natural heritage advisor, SNH's, advice. SNH are quite clear. This development must be refused if Wild Land Areas are to do the job they exist for – protect Scotland's remaining wild land.

For the reasons stated above the John Muir Trust believe that permission to build should be refused without further delay,

Yours sincerely

John Low
Policy Officer
John Muir Trust