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

Perth and Kinross Council,  
  
Department of Planning and Regeneration  
  
Pullar House  
  
35 Kinnoull Street  
  
Perth  
  
PH1 5DG  
  
Email : DevelopmentManagement@pkc.gov.uk

**Objection to Creag A Bhaird Wind Farm**

The John Muir Trust wishes to object to the application by Force 9 Energy Partners LLP and EDF Energy ER for Planning Permission to construct the proposed Creag A Bhaird Wind Farm comprising 13 wind turbines with a blade tip height of 115 metres on an area of woodland to the North of Strathbraan and approximately 8km west of Dunkeld and 8.5km south east of Aberfeldy.

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. The distribution of Scotland's wild land is closely associated with peatlands which plays 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. The Scottish Government has said that wild land is a resource of national importance and indicated that it wishes to adopt Scottish Natural Heritage's proposed core areas of wild land map (April 2013), as part of proper consideration and protection of wild land in planning policy.

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 and does not believe that it is necessary to allow such developments to achieve emissions targets.

The Trust has considered the impact the Creag A Bhaird Wind Farm application would have against its :

- Wild Land Policy (2010)
- Built Development Policy (2013)
- Energy and Wild Land Policy (2013)

The applicant in their ES Summary in part state :

*1.11 The Creag a' Bhàird Wind Farm site was selected by Force 9 Energy for a number of reasons, including the following*

- **the site is at distance from the nearest residential receptors – there are individual houses less than 1 kilometre from the proposed development. Scottish Government guidance suggests 2km from the nearest settlement;**
- **it has a good wind resource and is available for wind energy development; - the existing Griffin development which is higher up than this proposed development operates on average only 17.5% of the time. This does not indicate a good wind resource.**
- *with appropriate mitigation and proposed compensation measures there was no indication of likely significant bird or other environmental concerns on site – the ES Summary states 1.32 Black Grouse 'During construction, it is considered likely that activities will displace black grouse from foraging areas, and this is considered to represent an effect of minor-moderate significance. ....It is anticipated that a minor residual effect will remain once committed mitigation is implemented, including the commencement of construction works prior to the breeding season, visual deterrents to exclude breeding attempts and pre-construction surveys on the site to determine breeding and the implementation of a 500m exclusion zone around construction activities until breeding is complete'. **We view this as a significant issue which will severely impact on an endangered species and the developers statement does not address concerns but rather adds to them.***
- **the landscape is, in part, defined by the existence of the nearby Griffin Wind Farm – the developer seems to acknowledge the impact of the existing developments and view this as a positive whilst ignoring cumulative impact.**

Visual, Landscape and Cumulative impacts :

The proposed development would visually have an impact on the view from the Breadalbane – Schiehallion Core Area of Wild Land as identified by Scottish Natural Heritage and from Schiehallion itself which is one of Scotland's most iconic mountains. Although the view from the CAWL/Schiehallion is already compromised by the Calliacher and Griffin Wind Farms to the south of the mountain and the Beauly – Denny pylons and power lines to the East, North and West this latest proposal compounds the problem of cumulative, visual pollution.

Although the Creag A Bhaird development would not be sited *within core wild land*, the Trust is objecting to the development as it would visually have a negative impact. Scottish Natural Heritage's 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 Creag A Bhaird application would have a detrimental effect in both terms of '*Combined Visibility*' and '*sequential impact*'. The cumulative effect of this development which the developer has not addressed added to the existing windfarms (scoping, application or installed/operational/approved) has a strong visual impact on the nearby Wild Land to the North.

Currently there are :

Scoping

Crossburns 40 turbines

Application

North Calliachar 7 turbines

Creag A Bhaird 13 turbines

Operational

Griffin 68 turbines

Calliachar 14 turbines

The Scottish Government's, national planning policy in SPP p26 para 128 notes that 'Areas of wild land character in some of Scotland's remoter upland, mountain and coastal areas are very sensitive to any form of development or intrusive human activity and planning authorities should safeguard the character of these areas in the development plan'.

This is supported by the Governments statement in NPF2 para 99 which states 'The cumulative effects of small-scale changes require as much attention as large developments with immediately obvious impacts. Some of Scotland's remoter mountain and coastal areas possess an elemental quality from which many people derive psychological and spiritual benefits. Such areas are very sensitive to any form of development or intrusive human activity and great care should be taken to safeguard their wild land character'.

Cumulatively, the proposed development when added to the existing Calliachar and Griffin windfarms would contribute to a contiguous grouping of wind farms running roughly northwest to southeast for approximately 8 kilometres resulting in a significant, negative cumulative impact. The John Muir Trust believes that the Creag A Bhaird application would have a significant and detrimental effect in terms of both 'Combined Visibility' and sequential impact. As a consequence we are seriously concerned that the proposed development, if approved, would be visually intrusive and significantly and adversely impact on this wild landscape.

At this point I would refer you to Appendix 1 which was our submission to the proposed Calliachar extension last year.

Peatland impacts

The Trust also considers that there is the potential for considerable damage to peatlands, with negative impacts on biodiversity, ecosystems and greenhouse gas emissions. 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.

The developers propose phased and ongoing disturbance of the peat through clear felling, construction of access tracks and the windfarm and then ongoing harvesting of trees once they reach 10 metres. We could not find any mention of the total volume of peat which would be disturbed/removed however from the 'Peat Stability Assessment' by Mouchel it can be expected that the volume will be considerable thus releasing significant quantities of stored carbon.

#### Economic Impact

The effect of this development could also have a severe economic impact. 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)'.

In addition the gain to the local economy through employment is minimal with according to the ES Summary point 1.60 *'During construction of the wind farm it is anticipated that 2-4 FTE (full-time equivalent) jobs will be created. This is considered to represent a temporary minor (positive) effect to the local economy'*.

Highland Perthshire in general and Aberfeldy and Dunkeld in particular rely very heavily on tourism for employment this should not be put at further risk.

The proposed Creag a Bhaird Wind Farm site is not appropriate for this type of development for the reasons stated above and below and as such should not be approved. Relevant and integral to our objection is Appendix 1 below which although submitted for a previous application in the area it is entirely relevant now. It is presented here so as to give clear context and detail related to our objection..

Yours sincerely

John Low  
Policy Officer  
John Muir Trust  
[john.low@jmt.org](mailto:john.low@jmt.org)

Appendix 1

23<sup>rd</sup> May 2013

Development Management  
Planning  
Perth and Kinross Council



**Head of Policy**  
**John Muir Trust**  
Helen McDade  
Tower House  
Pitlochry  
Perthshire  
PH16 5AN  
**01796 484935**  
**helen.mcdade@jmt.org**

**Dear Planners,**

Re 13/00653/FLM | Erection of seven wind turbines at Calliachar North

**The John Muir Trust is lodging an objection to the application for another seven turbines at Calliachar.**

### **Planning process**

The Trust asks the Council to take into consideration that this area has been the subject of two Public Local Inquiries (PLIs). The development which was considered appropriate after both those Inquiries was fourteen turbines of a height of 100metres. A further application to increase the height of the turbines by another 9.8 metres was approved by the Council.

### **The Trust objects on visual, landscape and cumulative effect**

There is a simple point here about the social and environmental injustice which would occur if the Council now approved another seven turbines which would be a significant increase, in visual, landscape and cumulative effect, to the Calliachar development which was reduced in number at those Inquiries, to make acceptable the visual, landscape and cumulative impacts.

### **Background to Trust consideration and objection**

The John Muir Trust did not oppose the original application for 27 turbines at Calliachar which was considered at the first Public Local Inquiry. The Trust's written submission to that Inquiry stated "*The John Muir Trust is not objecting to the Calliachar proposed wind development if consent is given to this proposal only.*" At that conjoined Inquiry, the Trust objected to the Griffin wind development (on excessive size of development and therefore visual and landscape impact) and, at another Inquiry, the Trust objected to the Beaulieu-Denny 400kV transmission line which passes through the development area. In the Highland Perthshire area, the Trust specifically raised concerns about the impacts of the Beaulieu Denny line as it passed Schiehallion and then led the eye towards the Griffin and Calliachar area. The Trust stated that we would object to Calliachar, if Griffin proceeded.

As the Griffin wind power development was given approval in the first Calliachar/Griffin PLI, the John Muir Trust then opposed the revised Calliachar application for fourteen turbines - on visual and landscape grounds and on the cumulative effect with the Griffin development and the Beauldy-Denny 400kV transmission line, currently under consideration. That application was approved by Scottish Ministers.

A planning application was subsequently made to increase the height of the 14 turbines (which were approved previously but not yet constructed) at Calliachar from the height discussed at the 2009 Public Local Inquiry – 100metres - to a height of approximately 110metres. The John Muir Trust lodged an objection on the grounds of increased landscape and visual impacts and on the increased cumulative effect which the 109.8metre turbines would have - **over and above the impacts which were considered at the Calliachar Public Local Inquiry in 2009**. The Trust also objected on the grounds of loss of amenity to local residents and impacts on businesses dependent on tourism. The Council passed that application.

## **PUBLIC LOCAL INQUIRY PROCESS**

Huge amounts of time, effort and expense have been used at several Public Local Inquiries (PLIs), regarding the effects on the Amulree and surrounding area, of Calliachar and other wind developments and also the 400kV Beauldy Denny transmission line. Much was made, when the decision for approval of the Griffin wind development was announced, of the reduction of the number of turbines to sixty-eight due to the impact of a bigger scheme. Much was also made by the Calliachar Applicant at that time, I&H Brown, of the fact that they were applying for turbines of a lower height, 100m, than the Griffin turbines and the Applicant told the John Muir Trust that this was due to the impact bigger turbines would have on the landscape.

Indeed, that decision to apply for 100m turbines was presumably in recognition of the significance of a 10% increase in height. Although the increase in total turbine height is 9.8%, the increase in swept path of the larger turbine blades is a much greater 28%. So not only are the turbines currently being installed at Calliachar taller in the landscape than the visualisations showed, they are going to take up a much increased space in the field of view, with the moving parts, the blades, being, proportionally, a more significant component of the view. This will, therefore, have a much increased visual and landscape impact on all areas, in comparison to the impact of the consented 14 turbine proposal. This means that the wind farm is a more prominent feature than it would be with the smaller diameter rotors on lower hubs, and is therefore more damaging to the landscape, and the experience of those living in and enjoying the landscape.

The Trust agrees with the view given by the then developer, I & H Brown, in the first application lodged that turbines over 100 metres would have an unacceptable impact visually, on the landscape and cumulatively with other consented developments. Unfortunately, the Council approved the height increase – possibly influenced by the costs awarded against them by the Scottish Government Reporter for triggering the second Calliachar Inquiry. The Trust believes the Council was right to object to the 14 turbine proposal and that justice is not served by awarding costs against parties acting in good faith.

**The situation now is that developers may feel they can push through further extensions and the Council will feel constrained to accept them.** This new application is perhaps the result of this thinking. Regardless, if this further detrimental extension is allowed, this would seem to render the expensive, time-consuming and recurring PLI process gone through for this development and immediate area pointless.

## LANDSCAPE, VISUAL AND CUMULATIVE EFFECTS

It is instructive to this application to refer to relevant findings of the 2009 Calliachar PLI Report.

### 2009 Calliachar PLI Report conclusions

On overall landscape impact, the Report stated,

In 12.59, *“There would be a high impact on the Calliachar valley.”*

In 12.92, *“Taking these findings together, I find that the proposal would have a significant impact on views from the Kenmore road.”*

On the Rob Roy Way

In 12.97, *“I find that the proposal would have minimal impact on the affected parts of the Rob Roy Way in Glen Lochan and between there and Amulree. There would be a more significant effect between the summit of the Kenmore road and Urlar. The overall length of this latter part of the route is some 8 km and **distance from the nearest turbines would vary from about 2.5 km to 4 km. The turbines would be a prominent feature from much of this part of the route.**”*

### IMPACT ON NATIONAL SCENIC AREAS

#### Loch Rannoch and Glen Lyon National Scenic Area

The John Muir Trust owns and manages the East Schiehallion estate, within the Loch Rannoch NSA, and an estimated 20,000 visitors a year walk up the mountain. This is one of many key viewpoints from the north within a National Scenic Area, towards Calliachar.

The Calliachar 2009 PLI Report states

In 12.56, *“From Schiehallion’s southern flank and summit, all the turbines would be visible, at a distance of some 15 km to 17 km.”* Whilst the Reporter concluded that distance would mean the 100m turbines were not significant in views from the summit, the increased height in the turbines has already increased their visibility. Moreover, the Reporter continued, *“On the descent ...I find that the proposal would have a noticeable effect on the **landscape of Schiehallion.**”*

And he continues in 12.69, *“The impact on the south flank of Schiehallion would be greater, for the reasons that I have given.”*

Regarding cumulative effect, the Reporter said,

*“12.149 I find that **Griffin and Calliachar together would reinforce each other’s presence in the view from Schiehallion.**”*

#### River Tay (Dunkeld) National Scenic Area

The 2009 Calliachar PLI Report stated:

In 12.74, *“The River Tay (Dunkeld) National Scenic Area is some 12 km and more east of Calliachar. Birnam Hill is on its west boundary, from the summit of which there would be views of the proposal”.*

In 12.78, *“From the foregoing considerations, **I find that the proposal would have a noticeable effect on persons visiting the summit of Birnam Hill.**”*

It is clear from these Report findings that the decision that the, acknowledged, landscape and visual impacts were not sufficiently severe for the development to be refused was not clearcut. The Report acknowledges that the 100m turbines will impact on National Scenic Areas, as well as valued local landscapes and viewpoints. **The increased height of**

**consented turbines to 109.8metre turbines has already increased the impacts over those considered at the Inquiry.**

### **Cumulative impact**

One argument which is sometimes put forward is that once a significant impact already exists - in this case the original Calliachar and Beaully Denny – then “the development extension might as well go ahead”. This is a completely mistaken interpretation of how landscape, visual and cumulative impact should be considered. Clearly, if cumulative impacts were weighed very carefully in previous consideration and the current development judged to be just acceptable, then further impact SHOULD NOT be consented.

Since there has not been a national debate about what **is** too much cumulatively, each application must be considered carefully to ensure it is not the tipping point. The conclusions of the Reporter for the Calliachar 2009 PLI which are quoted above demonstrate that the original consented development had some significant landscape, visual and cumulative impacts and so this application which will extend visibility from key tourist viewpoints will have too significant an adverse landscape, visual and cumulative effect.

### **Precedent and Principle**

There is a very important issue here, regarding both precedent and principle. If developers can come back after the whole planning process, including Public Local Inquiry, and get extensions in height and number easily consented without rigorous scrutiny, it makes a mockery of the planning system.

Developers are using the planning process as a game – get as much as you can in the first round, then come back and back again. Opposition will weary, councils will be scared of expensive legal process, “technology” can be used as an excuse to always go bigger or apply for more turbines for the “economies of scale”.

## **RECREATION AND TOURISM**

### **Scottish Government opinion**

The Scottish Government Decision letter on Calliachar stated, in Condition 66, that recreation mitigation was required because,

***“.... The development will have a significant adverse effect on local tourism and recreation mitigation proposals are necessary to offset this effect to an acceptable degree.”***

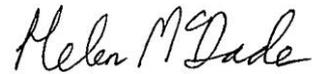
It is, therefore, beyond dispute that the approved application already has significant adverse impacts on local tourism and recreation. If the development is to be even more obtrusive, impacts will be more oppressive locally, will be felt further afield and the effects on local businesses will be even more severe. There is a major risk that Highland Perthshire will become known not for its beautiful natural landscapes but as an industrialised area. Tourists and visitors who want to experience the peace of nature will rush through this beautiful area to get further north in search of wild places. Allowing this further application - perhaps on the unspoken thought that “the intrusion has happened anyway so, so what?” - could well be the straw that breaks the camel’s back.

**Part of any consideration by the Council must include a site visit** - essential to see the impacts which have already occurred from previous consents and to compare the visualisations which were provided for the previous development by the Applicant with the actual sight. Conclusions might then be drawn about the reliability of the information

currently put forward and also on whether the area can accept any more development and still retain its rural character.

The John Muir Trust objects to this application and urges Perth and Kinross Council to do the right thing.

Yours sincerely,

A handwritten signature in black ink that reads "Helen McDade". The signature is written in a cursive, flowing style.

**Helen McDade**  
Head of Policy

SENT BY EMAIL

Company No. SCO 81620

Charity No. SCO 02061

Registered Office: Tower House, Station  
21, Perth, Perthshire, PH1 6 5SA