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Dulater Hill Wind Farm
The Electricity Act 1989 Section 36 Application
Objection

The John Muir Trust wishes to comment on and formally record our objection to the application by Ecotricity (Next Generation) Limited for consent under Section 36 of the Electricity Act 1989, to construct and operate a 17 turbine Wind Farm on land near the village of Butterstone in Perth and Kinross.

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.

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

The Trust has considered the impact the Dulater Hill Wind Farm application would have against its

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

Landscape and Cumulative impacts :

The proposed development would have a significant negative visual impact on the view from the Tay National Scenic Area as identified by Scottish Natural Heritage. The NSA is the second smallest in Scotland and as such is much more susceptible to the visual impact of nearby industrial scale developments than larger areas. The proposed development is only 2 kilometres outwith the NSA boundary.

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 Dulater Hill wind farm would have a detrimental effect in terms of 'Combined Visibility' and 'sequential impact'. The cumulative effect of this development has not been addressed. This development added to the existing windfarms (scoping, application or installed/operational/approved) would have a very strong negative visual impact on the surrounding landscape. This is an impact which is not addressed adequately within the Environmental Statement.

Currently in addition to the 17 turbines of Dulater Hill there are :

Scoping

Tay Forest District, Elrick Wind Farm 13 turbines

Crossburns 40 turbines

Application/consented

North Calliachar 7 turbines

Creag A Bhaird 13 turbines

Operational

Griffin 68 turbines

Calliachar 14 turbines

Potentially there would be a total of 142 intervisible turbines stretching from Dulater in the east to Calliachar & Crossburns in the west and this must be taken into consideration when a decision is being made.

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. Closer to settlements landscapes have an important role to play in sustaining local distinctiveness and cultural identity, and in supporting health and well-being".

Scottish Planning Policy section 169 states that :

*“Proposals for energy infrastructure developments should always take account of spatial frameworks for wind farms and heat maps where these are relevant. Considerations will vary relative to the scale of the proposal and area characteristics but are likely to include **(the relevant bullet points below are extracted)**:*

- *cumulative impacts – planning authorities should be clear about likely cumulative impacts arising from all of the considerations below, recognising that in some areas the cumulative impact of existing and consented energy development may limit the capacity for further development;*
- *landscape and visual impacts, including effects on wild land;*
- *the need for conditions relating to the decommissioning of developments, including ancillary infrastructure, and site restoration”;*

We do not believe that the proposed development sufficiently addresses these issues in its Environmental Statement nor can they be mitigated sufficiently so as to overcome these points.

Economic Impact :

Tourism is of crucial importance to the economy and employment of the local area and anything which would negatively impact could have a catastrophic effect. There is growing evidence that Wind Farms are not attractive to, or popular with, visitors. 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)’ and only 2% would be more likely.

For the reasons stated above the John Muir Trust believe that permission to build should be refused.

Yours sincerely

John Low
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John Muir Trust