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### **Crossburns Wind Farm**

The John Muir Trust wishes to Object to the Application by West Coast Energy and Crossburns Wind Farm Ltd to construct a 25 turbine windfarm at Crossburns, Urlar Estate, near Aberfeldy. We note that in effect this would be to all intents and purposes an extension to the consented Calliachar Wind Farm which would significantly add to the visual impact on the surrounding landscape and Wild Land Areas. Further this is an application to override the decision of the Public Local Inquiry of 2004 into the original Calliachar Application. The site of the current application occupies much of the original land space which was ruled against by the Reporter and subsequently the Scottish Government in their decision letter to Mr Scott Brown, Managing Director, I & H Brown Ltd, PO Box 51, Perth, PH1 3YD, 10 September 2007, ref: IEC/3/101. In reality this is an application to overrule a PLI and extend the footprint of a previously failed application using a different name for the development.

### ***“The Scottish Ministers' Decision***

*7. The Scottish Ministers have carefully considered the application, the addenda, the PLI report, the objection from the Council all other representations. They have concluded that they accept the Reporter's findings of fact, conclusions and recommendations on the proposed application for a 27 turbine wind farm development. The Scottish Ministers conclude the proposals would not be in accordance with the relevant provisions of the Perth and Kinross Development Plan and also consider the proposal would not be fully consistent with national planning policy, due to the unacceptable visual impact on Glen Quach and on Loch Freuchie.*

8. The Scottish Ministers have also considered the caveats raised by the Reporter that mitigation of the unacceptable visual impact affect could only be secured by the omission of the southern array of turbines, which would in effect, reduce the number of turbines from 27 to 14. The Scottish Ministers have concluded it would be outwith their competence under section 36 of the Electricity Act 1989 to grant consent below the 50 MW generating capacity threshold outlined in the Act.

9. Scottish Ministers have therefore concluded that consent under section 36 of the Act should be withheld and accordingly do not direct that planning permission be granted”.

**The Trust is of the view that this decision following a PLI was final. Although the Applicant has changed the name and some of the detail has been altered on an enlarged site this cannot be grounds for overturning the original ruling.**

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. Wild land plays a vital role for carbon storage in trees and peatland, 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 Trust is committed to policy principles which 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 considered 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

### **Cumulative impact**

We are seriously concerned about the cumulative impact of the proposed development. Scottish Natural Heritage’s own 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 Crossburns Wind Farm would have a significant and detrimental effect both in terms of ‘**Combined Visibility**’ and ‘**sequential impact**’. The developers suggest in their Environmental Statement and Non Technical Summary that as the proposal is beside an existing development then it will have a ‘negligible’ impact; how they can draw this conclusion is incomprehensible – they plan 25 wind turbines of up to

115m tip height, with a rotor blade diameter up to 93m - no matter what they do a development of this scale will have a major visual impact. The statue of Liberty is 93metres high if I was to suggest that putting 25 of them in this area would have a negligible additional impact I don't think my view would be given any credence.

The landscape in this general area is already subjected to a very high level of industrial scale, energy related developments and proposed developments:

- The Beaully Denny Powerline
- Operational windfarms : Calliachar 14 turbines, Griffin 68 turbines
- Appeal : Calliachar North 7 turbines
- Application : Creag a Bhaird 13 turbines, Crossburns 25 turbines
- Scoping : Elrick 13 turbines
- A potential total of 140 turbines

For the reasons stated above and as an additional contributor to 'cumulative impact' as described in SNH Guidance the Crossburns Wind Farm would be significantly detrimental to the area and should be refused.

#### **Landscape impact:**

Whilst the application lies outwith designated landscape area types it is within view of Wild land areas as identified by SNH and will without doubt have a significant and negative visual impact on them. These are areas 10 Breadalbane – Schiehallion, 11 Lyon – Lochay and 12 Ben Lawers. Other landscape related designations include the Loch Rannoch and Glen Lyon National Scenic Area (NSA) 8km northwest of the site, Loch Tummel NSA 8km north and the River Tay (Dunkeld) NSA 10km east.

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*"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 is particularly pertinent to this application due to its proximity to Aberfeldy and also due to the cumulative impact.

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".*

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 considering this application. The fact that a consented wind farm ie Calliachar adjoins this land is not a reason for approval but rather is a reason to refuse permission based on cumulative impact.**

The Crossburns Wind Farm Application has made no attempt to minimise the impact of access roads and tracks by proposing to utilise the network of access roads and tracks of the adjacent Calliachar Wind Farm (which was originally planned to extend across the Crossburns site). Instead the plan for access is, if approved, to create another additional series of significant access scars across the landscape. This in itself raises a real question regarding the thoroughness of those entrusted with developing the proposal and the concern they have for the environment of the area.

In their Non Technical Summary they state on page 8 *‘The Development will result in some major effects on the landscape of the Development Site, and on local landscape character. The upland moorland character of the Development Site will be replaced by a wind farm landscape of turbines, access tracks and other ancillary development across the extent of the Development Site’.* This is surely a matter of enormous concern and one which the developer apparently agrees they cannot mitigate.

### **Wind Resource**

The value of the site as a wind resource must be questioned. The developer estimates an Annual Load Factor of 25.7% based on their own research. The statistics for the Griffin Wind Farm located nearby does not support this projection. Griffin Wind Farm has a rolling load factor of 18.3% since 2011 and Annual Load Factor to date for 2014 of 21.9% (Source : Renewable Energy Foundation). It would appear from this that the developer is ‘anticipating’ a wind resource 17.35% higher than that experienced so far by the Griffin Wind Farm; this is speculative and misleading at best.

### **Socio-economic Impact**

**NB For information please ignore Employment Table 13-4 Employees in Employment by Sector: Structure 2012 Page 425 of the Environmental Statement the figures do not add up eg Total Employment in P&K equals 184.5%.**

The Environmental Statement page 435 quotes four studies into the impact of wind farms (see ES Table 13-15 Studies Assessing Potential Impacts of Wind Farms on Tourism). We would suggest that the first three need to be discounted as being totally out of date and that only the Biggar Study holds any validity. The ES states that *‘Based on the evidence from previous surveys and reports it is likely that the majority of general tourists will not be adversely affected by the Development, given the limited intervisibility between the primary focus of tourism around the Tay Valley and Aberfeldy with the Development’.* This is a purely fanciful, inaccurate and unsubstantiated statement.

There is increasing evidence that as the number of wind farms and turbines increases so does the negative view of these developments by resident and visitor alike.

We would cite for example a YouGov poll, commissioned by the John Muir Trust in September 2012, of 2269 people throughout the UK which found that 43% of the respondents would be less likely to visit a scenic area which has a large concentration of wind turbines whilst only 2% would be more likely to visit such an area.

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)'.

A further indication is the significant increase in the numbers of Objections to applications to construct wind farms from members of the public, visitors from across Scotland, the UK, Europe and the rest of the world. Without doubt there would be significant environmental and economic consequences should this Application be approved.

The developers have conducted their own surveys on visitor/walkers opinions however the timescale over which these were conducted and the resulting number of respondents **make their conclusions and extrapolation of figures statistically invalid.**

The figures they have quoted have not been factored in to the **Summary of Economic Impacts** Section 13.7, page 433 of the Environmental Statement. The Economic Impacts Section therefore must be discounted as it is one sided and does not consider or attempt to quantify any potential economic loss. All of Section 13.8 pages 433 to 440 needs to be wholly discounted as fanciful and ill researched.

For example : **Rob Roy Way**: Questionnaires were used to gather the opinions of walkers on the Rob Roy Way and were conducted on a total of two days, over two weekends and totalled 8 people. The developers own estimate is that around 2190 people per annum use the path therefore this statistically means they surveyed 0.365% of the estimated user population. **This is not anywhere close to being statistically valid.** If the total number of people who could potentially have been surveyed over a year was 2190 then to ensure validity of conclusions you would need 326 respondents and on this basis the results would be expected be 95% accurate plus or minus 5%. See the following links for explanation of statistical validity.

<https://www.surveymonkey.com/blog/en/blog/2011/09/15/how-many-people-do-i-need-to-take-my-survey/>; [http://www.greatbrook.com/survey\\_statistical\\_confidence.htm](http://www.greatbrook.com/survey_statistical_confidence.htm)  
<http://www.surveysystem.com/sscalc.htm>

However should the figures be accepted as being valid it would show according to the developers research that 37.5% of people who use the Rob Roy Way would not return.

The Official Rob Roy Way website states '*This walk follows the tracks and paths used by Rob Roy MacGregor in the 17th & 18th centuries as he worked fought and lived the life of Scotland's most notorious outlaw. ....Sense the history of Scotland as you travel through glens, along rivers & burns and past mountains & lochs. Soak up some of Scotland's greatest scenery*'. The Way will be temporarily diverted during the construction phase but will, once the Wind Farm becomes operational, **go straight through between turbines.** This will result in a walker/tourist experience totally at odds with the quote above.

**Ben Lawers**: The National Trust for Scotland visitor statistics for the year 2013/14 including the period surveyed, were 21,360 (source National Trust for Scotland by email). The developers survey was conducted on Sunday 1<sup>st</sup> Sept 2013 and a total of 22 people were interviewed (statistically

invalid) of whom 27% said that seeing Crossburns would affect their decision to visit this area in the future. That is just over a quarter who would not come back to the area.

**Schiehallion The John Muir Trust who own East Schiehallion estimate around 15,000 visitors per annum. On Tuesday 24<sup>th</sup> and Wednesday 25<sup>th</sup> September 2013 a total of 61 people were interviewed by the developers agents (statistically invalid) of whom 31% said that seeing Crossburns would affect their decision to visit this area in the future. That is almost one third who would not come back to the area.**

In the Environmental Statement page 14 the developer states '*Public Consultation Feedback. Approximately 50 people attended the exhibition held on the 23 September 2014. Of those who attended, 18 people completed the exhibition feedback form. Given the relatively low attendance rate at the exhibition and limited number of completed feedback forms means it is not possible to truly understand the views of the local community, and any statistical analysis of the 18 forms is of limited merit*' (our emphasis).

**The Trust agrees with this statement and would suggest that this must also apply to all the statistics quoted by them regarding the views of walkers and visitors and also to any conclusions drawn by the developers from these figures. The results of the developer's surveys are statistically meaningless.**

**If approved this wind farm would contribute to the further degradation of this landscape resulting in a negative socio-economic impact. Aberfeldy and the surrounding area rely very heavily on tourism in its broadest sense for employment and income. Anything which negatively impacts on this must be seriously questioned and properly evaluated. This is a key recreational and tourist route. The developer's assessment of the impact on tourism and recreation is wholly inadequate, one sided, based on exceptionally limited or outdated research and uses statistics which are invalid.**

**In conclusion this is a vexatious and speculative Application which as part of the original Calliachar Application in 2004 was refused permission following a PLI. As such it should not be granted S36 approval.**

Yours sincerely

John Low

Policy Officer

John Muir Trust