



Fraser Wallace
Policy Officer
Tower House
Station Road
Pitlochry
PH16 5AN
(01796) 484 931
fraser.wallace@jmt.org
17th August 2012

**Energy Consents and Deployment Unit
Scottish Government
4th Floor
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU**

representations@scotland.gsi.gov.uk,
planning@angus.gov.uk

Objection to the application for Planning Permission to construct and operate a 17 turbine wind development at Garrogie Estate, located due west of Nathro Hill, on the Careston Estate, at the head of Glen Lethnot.

‘Nathro Hill’ Wind Development objection:

Summary

The John Muir Trust objects to this application.

In sensitive landscape areas like that to the West of Nathro hill, which is on the periphery of high quality Wild Land, the John Muir Trust opposes the development of insensitively sited large scale energy schemes. The Trust bases its objection on our Wild Land and renewable energy policies (see website- www.jmt.org).

The Trust does not believe that the application sufficiently addresses the requirements of either the National Planning Framework for Scotland (NPF2) or Scottish Planning Policy (SPP) with regards to the sensitivity of the landscape to accept the level of change proposed.

The suitability of the site for development has not been adequately proven, with the landscape and visual impacts being unwarranted within the area and having significant levels of intrusion in

surrounding areas. The proposal is next to an area depicted on Scottish Natural Heritage's 2012 Wildness map as having a notable wildness value. (Version 2; interim phase 1 map).

Objection:

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 wishes to lodge an objection to the aforementioned application for planning permission as submitted by SSE on the grounds that the proposed development would have a significant detrimental impact to the landscape, visual amenity and wild land characteristics of an area in close proximity Loch Ness and the Cairngorm National Park.

In considering this application, the Trust has assessed the proposal against the following issues, which are material considerations within the Scottish planning system:

- National Planning Framework for Scotland (NPF2)
- Scottish Planning Policy (SPP);
- Suitability of the site for the proposed development;
- Visual appearance of the proposed development and its relationship to its surroundings;
- Economic benefits and compatibility with existing uses;
- Impact on nature conservation;

Impacts on Wild Land Characteristics:

The John Muir Trust considers the developer's assessment is disappointing and lacking proper weighting of the value of wild areas. The John Muir Trust notes the applicant acknowledges '*There are a number of sites covered by statutory and non-statutory landscape designations within the overall 35 km landscape study area. These include the Cairngorms National Park, Deeside and Lochnagar National Scenic Area (NSA), three regional Areas of Landscape Significance (ALS) and twenty-three Gardens and Designed Landscapes.*' However, the developer has inappropriately downplayed the significance of these labels. The John Muir Trust would like to see the Local Authority and the Energy Consents Unit give the correct weighting to the value of Wild Land by rejecting this planning application.

Scottish Planning Policy (2010) paragraph 126 states: "*Planning authorities should seek to prevent further fragmentation or isolation of habitats and identify opportunities to restore links which have been broken.*"

Scottish Planning Policy (2010) paragraph 128 states: "*The most sensitive landscapes may have little or no capacity to accept new development. 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.*"

Scottish Planning Policy (2010) paragraph 132 states that: "*Planning authorities should apply the precautionary principle where the impacts of a proposed development on nationally or internationally significant landscape or natural heritage resources are uncertain but there is sound evidence for believing that significant irreversible damage could occur.*"

National Planning Framework 2 states: *'Scotland's landscapes are a national asset of the highest value... 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.'*

Assessment of Wild Land:

The application falls close to areas described as 'high value' wild land in the phase 1 mapping of wild areas by Scottish Natural Heritage, which is the latest and most detailed assessment of our special wild places. The John Muir Trust's own mapping emphasises the Wild Land value of this notable mountain area. Protection of Wild Land is the subject of a Petition before the Scottish Parliament and the Scottish Government response to that petition notes that *'the question of how we identify and protect Scotland's wild land is one which the Scottish Government and its agencies have been actively considering.'* Allowing development to occur which would greatly affect this precious resource before due protection for these areas has been fully laid out would be a significant loss for Scotland's reputation as a country with large landscapes.

Wild Land areas are important because they represent less disturbed habitats for our native biodiversity, and in that respect are valuable and important in their own right. They also provide provisioning services, such as raw materials (extracted in a sympathetic manner), and services, such as flood mitigation, water purification and benefits to public health.

The John Muir Trust contests the applicant's planning statement claim that: *'Given the extent of the areas which would remain unaffected by the proposals, it is considered that the overall impacts upon these national-level designations would not be significant.'* This demonstrates the applicant has failed to understand the importance of Wild Land, or the significance of the planning guidance designed to protect it.

Impacts on Tourism:

Risking these wild characteristics would represent a material hazard to the economic benefits associated with tourism. For example, in Visit Scotland's 2011 *'Wind Farm Consumer Research'* the statement: *'It would be an added attraction if wind farms were located in popular tourist areas'* was put to interviewees. The findings were that *'respondents would in general prefer not to see wind farms in popular tourist areas with 43% of respondents disagreeing with this statement.'* 36.2% of respondents answered 'did not know' and 20.9% agreed.¹

The fact that the Cairngorm National Park is Scotland's largest National Park means it is particularly important to preserve this area from intrusive developments. Nathro Hill is close to the Cairngorm National Park and the principle road north for tourists on the East Coast. Cumulative impact cannot be considered as simply a geographical concept; it must be considered as a temporal concept as well. Scotland has a pre-eminent attraction for tourists on a world scale, which has been created through cultural references 'advertising' the natural beauty of Scotland. Examples might be Walter Scott's poetry celebrating our landscapes, or the paintings of artists inspired by our hills, woods and corries. The result has been thousands of jobs in the tourism economy in Scotland. To risk famous landscapes, such as that of the Cairngorm National Park with industrial development risks this brand. Cumulative impact cannot just be considered in terms of whether there are too many visible wind

¹ http://www.visitscotland.org/pdf/Windfarm%20Consumer%20Research%20final_docUpdatedx.pdf

farms on one visitor's trip to Scotland; it must additionally be considered whether tourists are leaving Scotland, still with the impression that it has landscapes of great scale. The CNP must be considered sacrosanct in preserving this image. Tourism accounted for 14% of jobs in remote areas (Scottish Government, 2009) and the importance of Scotland's natural heritage to its tourism is demonstrated by the Visitor Experience 2008 survey that showed that 90% and 65% respectively of visitors stated that scenery and nature/wildlife were an important or very important factor when choosing Scotland as a holiday destination.

It appears that respondents would in general prefer not to see wind farms in popular tourist areas with 43% of respondents disagreeing with this statement [It would be an added attraction if wind farms were located in popular tourist areas] (Visit Scotland, 2011)

Visual Assessment:

Additionally, the Non-Technical Summary downplays the significance of the scenery in the area by fleetingly mentioning 'majority of significant visual impacts are assessed to occur within the Strathmore area, in the near vicinity of the site and on routes passing the hills, moors and glens close to the edge of the upland plateau.' The John Muir Trust would strongly emphasise the value of this area for its visually impressive nature.

The applicant infers the fact that the Wind Development would not be visible from the Glen Clova basin, yet shows blatant disregard to the fact there are hills of note surrounding the glen, which attract significant numbers of walkers.

Scottish Natural Heritage's own guidance on cumulative impact (March 2012) states that two wind farms 'need not be inter-visible' to have an impact. However, the John Muir Trust believes that the Stronelairg application would have a detrimental effect in both terms of '*Combined Visibility*' and '*sequential*' impact. Walkers in this area would have significantly reduced area where no wind farms would be visible. Were the Nathro hill application approved, a large enduring 'space' free of large scale, industrial development would be lost.

For these reasons, the John Muir Trust objects to the proposed development at Nathro Hill.