

22 January 2014



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### **Objection to Creag Riabhach Wind Farm : THE ELECTRICITY ACT 1989 SECTION 36 APPLICATION**

The John Muir Trust wishes to object to the application by Creag Riabhach Wind Farm Limited for section 36 consent of the proposed Creag Riabhach Wind Farm comprising 22 wind turbines with a blade tip height of 125 metres forming part of the Altnaharra Estate.

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 Riabhach Wind Farm application would have against its :

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

Visual, Landscape and Cumulative impacts :

Wild land areas – Search Area of Wild Land (SAWL), Core Area of Wild Land (CAWL), National Scenic Areas (NSA), Special Landscape Area (SLA).

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 Government's 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'.

The proposed development is on the edge of a SAWL, as defined by SNH, to the west and close to another SAWL to the east. In addition it is mainly within the proposed Foinavon, Ben Hee CAWL. The proposal is close to the Kyle of Tongue, North West Sutherland and Assynt-Coigach NSAs and Ben Klibreck and Loch Choire SLA. The Trust's own mapping identifies this site as within the top 10% wildest land in the UK. These are all areas which have a high level of national protection.

Cumulatively, it could also create a contiguous grouping of wind farms running roughly northwest to southeast for approximately 20 kilometres if Dalnessie and Dalchork Wind farms are approved which would result in a significant, negative cumulative impact. The John Muir Trust believes that the Creag Riabhach 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.

#### Peatland impacts

The Trust also considers that there is the potential for considerable damage to peatlands, with impacts on biodiversity, ecosystems and greenhouse gas emissions. However, we have not been able to consider this fully, in the timescale for responses.

## 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 to the normal Highland Tourist activity, including nature based tourism, the proposed development is also on the route of the National Cycle Network. Heading north towards Creag Riabhach, cyclists and road users will have a full view for a number of miles of the development. As part of the cumulative effect, cyclists, local people and tourists will also experience the sight of Strathy South (at scoping), Strathy Wood (at scoping) and Strathy North (in construction) a few miles further North, potentially in excess of another 100 turbines.

We note that the Highland Council in its guidance in the 'Highland Wide Local Development Plan', p115 states that 'New developments should be designed to reflect the landscape characteristics and special qualities identified in the Landscape Character Assessment of the area in which they are proposed. This will include consideration of the appropriate scale, form, pattern and construction materials, as well as the potential cumulative effect of developments where this may be an issue.'

In addition Highland Council in their Renewable Energy Strategy state that key aspects of a Renewables Vision for Highland are the 'Retention of the regional diversity, scenic qualities and local distinctiveness of landscapes which are also vital underpinnings of tourism.' We believe that this development conflicts with these policy statements.

## Relevant Council Policies

- 57 Natural built and Cultural heritage HWLDP p 111 &
- 67 Renewable Energy Developments HWLDP p 123

This large scale development is counter to both national and LDP policies and statements with regard to its impact both singly and cumulatively.

The proposed Creag Riabhach Wind Farm site is not appropriate for this type of development and as such should not be approved.

Yours sincerely

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