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

Scottish Government
Energy Consents and Deployment Unit
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU
0300 244 1247
Application Case Reference EC00002088

Sent by email : econsentsadmin@scotland.gsi.gov.uk

Cc eplanning@highland.gov.uk

Caplich Wind Farm

Subsequent to the submission of the Caplich Wind Farm Environmental Statement Addendum September 2015 the John Muir Trust wishes to continue its objection to the application by Muirhall Energy to construct a 20 turbine windfarm on land at Caplich in Sutherland. This application is made by Caplich WF Ltd, a project company of Muirhall Energy Ltd. The site is located within the administrative boundary of The Highland Council and is approximately 5 kilometres (km) from Oykel Bridge, 10km from Rosehall, 20km from Lairg, 25km from Ullapool, 27km from Ardgay and 28km from Bonar Bridge.

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

Our evaluation against the above has identified significant issues.

1. 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 Caplich Wind Farm would have a significant and detrimental effect in both terms of '**Combined Visibility**' and '**sequential impact**'.

The landscape in this general area is already subjected to a high level of windfarm development:

Wind Farm	Number of Turbines
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A potential total of 187 turbines.

For the reasons stated above and as an additional contributor to 'cumulative impact' as described in SNH Guidance the Caplich Wind Farm would be significantly detrimental to the area and in particular to Wild Land Areas 29 Rhiddoroch – Beinn Dearg – Ben Wyvis, 32 Inverpolly – Canisp, 33 Quinag and 34 Reay - Cassley.

2. 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 peat land, 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.

3. 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** (our emphasis). Closer to settlements landscapes have an important role to play in sustaining local distinctiveness and cultural identity, and in supporting health and well-being".* The Trust is of the view that this clearly applies to the land areas surrounding and impacted visually by the development including Wild Land Areas 29, 32, 33 and 34.

4. 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".

Whilst this application lies outwith designated landscape area types it is within view of a number and will without doubt have a significant and negative impact on them.

Also relevant to the application in Scottish Planning Policy (2) is Page 36 Section 154 which states that The Planning system should: *"guide development to appropriate locations and advise on the issues that will be taken into account when specific proposals are being assessed;"* Taking NPF3, as mentioned above, into account we do not consider this to be an appropriate location. On page 40 section 169 it 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:*

- *net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities*
- *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;*
- *impacts on communities and individual dwellings, including visual impact, residential amenity, noise and shadow flicker;*
- *landscape and visual impacts, including effects on wild land;*
- *effects on the natural heritage, including birds;*
- *impacts on carbon rich soils, using the carbon calculator;*
- *public access, including impact on long distance walking and cycling routes and scenic routes identified in the NPF;*

- *impacts on the historic environment, including scheduled monuments, listed buildings and their settings;*
- *impacts on tourism and recreation;”*

The above bullet points are extracted and include only those we believe this application is contrary to.

5. Previous relevant decisions: Glenmorrie.

Wholly relevant to this application is the Scottish Government Minister’s refusal of consent for the construction and operation of Glenmorrie 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 Ministers views as stated above must be recognised and taken into consideration when considering this application.

- 6. Stronelaig :** The approval of this wind farm necessitated the removal of a significant area of wild land from Core Area of Wild Land 17 Monadhliath, when the final Wild Land Area map was produced by Scottish Natural Heritage in June 2014. SNH acknowledged that the approval to construct the wind farm on land which would have been included in Wild Land Area meant that the land could no longer be considered as wild land. This is directly relevant to this application to construct Caplich in part within WLA 34.

- 7. The decision of July 30 2015 to refuse the application to construct the Allt Duine Wind Farm highlighted the fact that Ministers “consider that the introduction of vertical manmade structures into views and the introduction of such a reference point where currently there is none of note would alter the perspective in the landscape and bring an unwelcome focus to views in the direction of the wind farm.**

These summits and associated ridgelines are extremely sensitive receptors, and Ministers consider that on clear days the wind farm would bring manmade features into views from these popular and iconic mountains, and therefore have a significant detrimental impact on the experience there. Although backclothed against a vast landscape, that landscape is one of successive horizontal forms, and turbines would appear as pale, vertical structures, so Ministers have concluded that the effect would be significantly adverse.” The Ministers view is wholly applicable to geography of this application.

8. **Visual Impact** : Evidence from the Scottish Government’s natural heritage advisor Scottish Natural Heritage shows the rapidly increasing extent to which the Scottish landscape is affected visually by any form of built development. In 2008 SNH Scientific Advisory Committee Report SAC/2008/10/13 stated that “between 2002 and 2008; The extent of Scotland unaffected by any form of visual influence declined from 41% to 31%; during that time, a dominant change was wind farm development (from 18 operational in 2002 to 47 in 2008).

In their Natural Heritage Indicator (<http://www.snh.gov.uk/docs/A1064015.pdf>) published November 2014 SNH highlight that “The area of Scotland from which one or more types of built development can be seen increased to 73% in 2013, an 11.6% increase from 2008. Examined individually, most of the different types of development showed no change (Table 1). The largest change in visual influence comes from wind turbines; increasing from 41.7% (2012) to 45.9% in 2013; this is more than double the 2008 baseline of 19.9%. Minor roads showed a further 0.2 percentage point increase, mainly in areas of forestry or associated with wind turbine construction. Overhead lines showed a 0.6 percentage point increase, which appears to be mostly related to more complete mapping of networks on Skye and Shetland.

Table 1. The visual influence of the individual indicator features from 2008 to 2013 (excluding 2011) based on the percentage of the area of Scotland they can potentially be seen from.

Note 1: Building density is split into low and high – the data are from the same dataset.

Note 2: As a result of overlapping indicator features the individual values do not add up to the total value in each year.

	2008	2009	2010	2012	2013
Airfields	7.1	7.1	7.1	6.9	6.9
Major bridges	0.7	0.9	0.9	0.9	0.9
Extraction industries	7.6	7.6	7.6	7.6	7.6
Offshore surface structures	0.1	0.1	0.1	0.1	0.1
Wind turbines (operational)	19.9	31.6	35.6	41.7	45.9
Tall structures without wind turbines	46.3	46.2	46.3	46.1	46.1
Building density (low)	34.2	34.4	34.4	34.5	34.5
Building density (high)	2.7	2.7	2.8	2.8	2.8
Motorways	0.5	0.5	0.5	0.5	0.5
runk roads	2.6	2.7	2.7	2.7	2.7
Non trunk A roads	5.4	5.3	5.3	5.3	5.3
B roads	4.5	4.5	4.5	4.5	4.5
Minor roads	12.7	12.9	13.1	13.3	13.5
Railways	1.7	1.7	1.7	1.7	1.7
Overhead lines	7.1	7.1	7.1	7.1	7.7
Overall visual influence	65.4	68.6	70.6	71.4	73

Taking into account the 2002 figure in SAC/2008/10/13 of 41% of Scotland unaffected by any form of visual influence or conversely 59% affected, we can give a comparison from 2002 to 2013.

2002 59% visual influence of built development

2013 73% visual influence of built development

This equates to a 23% increase in from 2002 to 2013 with the dominant factor being operational wind turbines. Caplich would further reduce the percentage of Scotland’s landscape unaffected visually by any form of built development (**see map appended to the end of this objection**). The original visualisations show that the development would be

clearly seen from Stac Pollaidh, Suilven, Canisp etc and endanger the wild land qualities which identify and define our iconic scenery and which attract visitors from across the UK, Europe and the world. To address the concerns expressed the developer proposes to change the colour of the turbines using a variety of matte paint shades which would possibly reduce the visibility of the turbines in some circumstances and therefore their impact on the National Scenic Area and the wild land area 34 thereby lessening the visual impact. They do acknowledge that this would make the turbines stand out more against the sky. Our view is that no matter what you do you cannot make these massive structures blend in to the landscape. To approve this development would result in a further visual degradation of our iconic wild landscape, nothing in the addendum would mitigate the impact to a sufficient level to make it acceptable for inclusion in a wild land area.

9. Peatland impacts

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

In their original Environmental Statement, Non Technical Summary the applicant states :

“Peat

Conservative calculations of the volume of peat that will require to be excavated for the installation of site infrastructure predict a total volume of peat of about 89,000 m³, this is comprised of about 8,600 m³ of the upper highly vegetated layer of peat and about 80,100 m³ of the lower highly decomposed peat”.

The International Union for Conservation of Nature (IUCN) Peatland Programme Briefing

Note states *“ In a damaged bog the acrotelm has often been lost because of drainage, burning, trampling, grazing, atmospheric pollution, afforestation or even agricultural inputs such as fertilizer and seeding. **This exposes the unprotected catotelm peat to the effects of oxygen, sun, wind, frost and rain and so it begins to degrade, losing carbon back into the atmosphere and into watercourses** as it does so, much as a defoliated tree may stand for a century or more, but with its trunk and bare branches slowly rotting away. A peat bog in this state is termed a haplotelmic bog (i.e. a single layered bog). It may still have a vegetation cover, often of a heathland character, but this vegetation is not adding fresh peat because it is not a wetland vegetation and is more likely to be causing further degradation of the peat through the aerating and drying action of its root systems. Neither is this vegetation capable of altering the natural pattern of microtopography and thus provide ecosystem resilience. Indeed any such pattern is likely to have been lost, degraded into a tussock - dominated micro - erosion complex, or developed into a full -blown erosion complex dominated by hags and gullies”.*

This assessment supports our view that anything which potentially damages peat in any significant quantity should not be considered or permitted.

10. 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.*

11. The Peat Management Plan will at best mitigate some of the damage to the peat but a significant amount of carbon could still be released. We do not see how this supports the government's emissions target and strongly support the statement above ie the risk is not worth taking. Nothing in the updated PMP changes our view.

12. Socio-economic Impact

The Trust is of the view that if approved this wind farm would contribute to the further degradation of this landscape resulting in a negative socio-economic impact. The developer's assessment of the impact on tourism and recreation is based in particular on outdated research. The developer states in the Environmental Statement "**5.2.4 Evidence for Tourism Impact Assessment**

Tourism impacts have been assessed using evidence from existing studies on the effects of wind farm development on tourism and experience from existing and proposed developments elsewhere. The key findings of these reports are summarised below. In particular, this chapter draws on the conclusions of work commissioned by the Scottish Government in 2008 on the effects of wind farms on tourism (our emphasis), which remains by far the most robust and comprehensive source available". We contend that much has changed in the seven years since the research was conducted and that to rely on this very outdated research would be a significant error of judgement. Nothing in the Addendum alters this view. As indicated below they rely on partial interpretation of dated statistics and weak analysis of current findings.

13. Despite the comments in the Addendum 1.5.2 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 cited for example a YouGov poll, commissioned by the John Muir Trust in September 2012, of 2269 people throughout the UK 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.

And 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)'. The applicant also states in the Addendum that :

- *"the Department of Energy and Climate Change (DECC) undertakes a regular survey of the public to measure their attitudes to different energy options and the latest survey, undertaken at the end of 2014 found that 68% of people supported onshore wind^{iv};"* **Alternatively this can be read as 32% of people do not support onshore wind. A 32% reduction in visitors to this area would be catastrophic.**
- *" survey by YouGov published by Scottish Renewables in March 2015 also confirms this public support with 62% Scots generally for large scale wind projects in their local council area (compared with 24% for shale gas and 32% for nuclear)^v."* **Alternatively this can be read as 38% of Scots are against large scale wind projects. The reference to shale gas and nuclear is entirely irrelevant as neither are involved in this planning application.**

The BiGGAR Economics study 1.5.2 quoted in the addendum is outdated as it covers the period between 2008 and 2011. Since then there has been a massive increase in the number of windfarms applied for, consented, in construction and operational. According to their own figures the increase is 68.2% which excludes developments not yet operational. The increase in wind farm construction related activity would employ significant numbers of temporary construction workers which may well account for the increase in employment in

the service sector. The increased employment may well not relate to tourism but could relate to construction/windfarm development related activity.

- 14.** A further indication of the potential socio/economic impact is the significant increase in the numbers of Objections from members of the public and visitors from across Scotland, the UK, Europe and the rest of the world. The original application for this proposed wind farm received 890 responses. Of these 800 were objections and around 70 were in support.
- 15.** The Trust continues to believe that there would be significant environmental and economic consequences should this Application be approved.

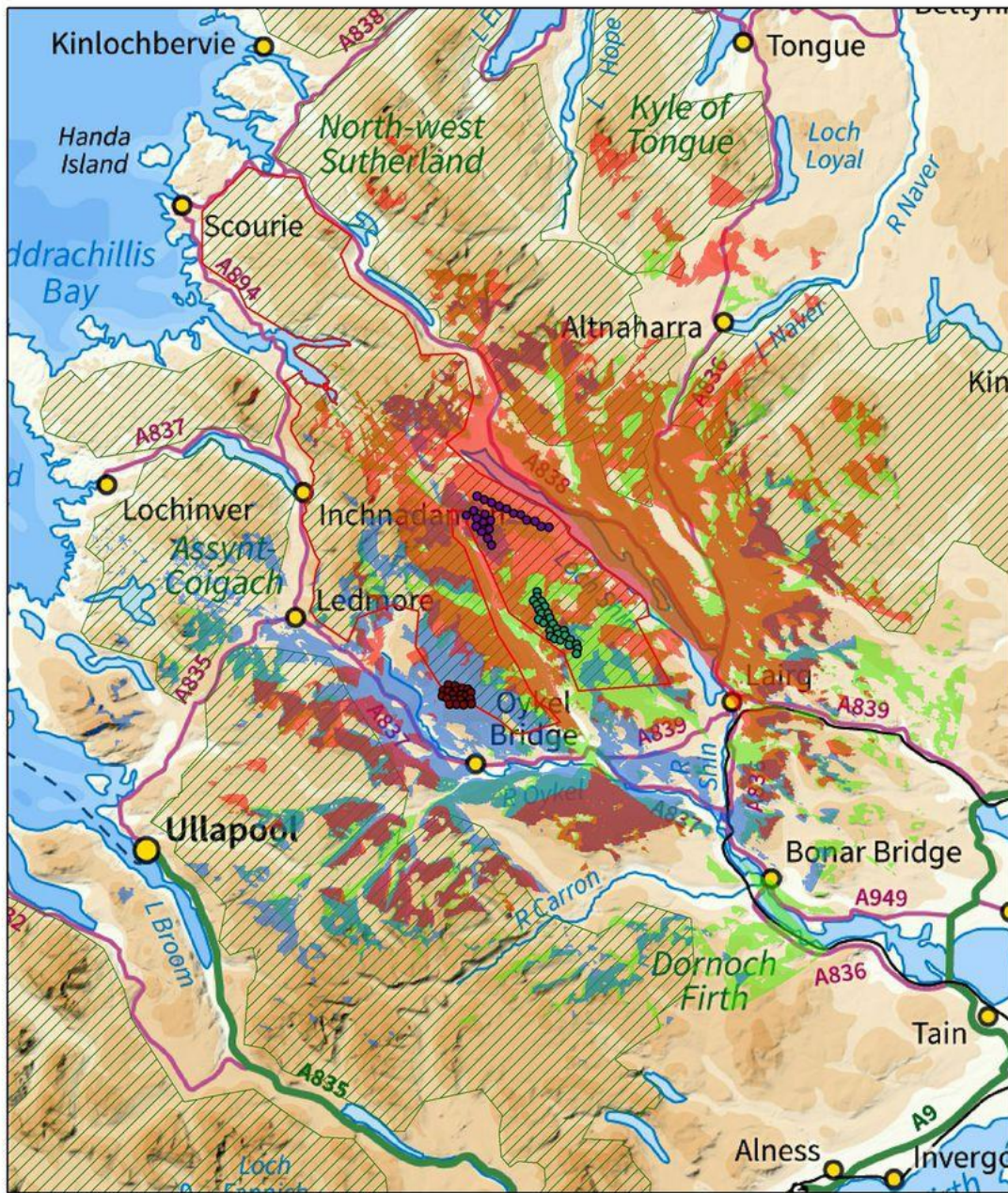
Yours sincerely

John Low

Policy Officer

John Muir Trust

Sallachy, Caplich and Glancassley Wind Farm ZVI



Legend

- 34. Reay - Cassley
- Wildland areas
- Sallachy ZVI
- Caplich ZVI
- Glancassley ZVI

