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Windy Standard 3 - Brockloch Rig 3

The John Muir Trust wishes to object to the S36 application for the construction of the Windy Standard 3 - Brockloch Rig 3 Wind Farm by Brockloch Rig III Ltd (BR3) which is a subsidiary company of Fred Olsen Renewables Ltd (FORL). The application is for 20 wind turbines consisting of 8 turbines of a maximum height from base to tip not exceeding 125 m and a capacity of up to 3 MW and 12 turbines of an overall height from base to tip not exceeding 177.5 m each with a capacity of up to 3.6 MW. We are of the view that these excessively tall structures which would be significantly higher than any other wind turbines in Dumfries and Galloway and possibly Scotland are inappropriate to the landscape of the area, will have a detrimental impact on the peat on site and will have a negative socio economic impact.

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 it's:

- 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

1. **The Scottish Government's National Planning Framework 3 (NPF3) states:** *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."* and in section 4.4 it states *"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 believes that this proposal as it currently stands is contrary to the spirit and principles stated above.
2. **Scottish Planning Policy (SPP2):** 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"*. The Trust believes this is a crucial statement against which the proposal must be judged. It goes on to say on p49 section 215: *"In areas of wild land (see paragraph 200), development may be appropriate in some circumstances. Further consideration will be required to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation."* Whilst this applies to developments within WLAs it must surely also apply to impacts from outwith.
3. **Scotland's Economic Strategy** March 2015 p45 recognises that investment in natural capital is *"fundamental to a healthy and resilient economy"* it also states p11 *" We will also protect and enhance our natural capital, our brand and reputation as a country of outstanding natural beauty"*. The Trust is of the view that this development, by contributing to cumulative overload in the area, will not support this aspiration.

4. **Scottish Natural Heritage (SNH):** SNH in their document ASSESSING THE IMPACTS ON WILD LAND, INTERIM GUIDANCE NOTE, February 2007 (with note below added October 2014) state that *“Development should ideally be sited so as to avoid adverse impacts upon wild land (our emphasis).”* It goes on to say:

*“Where detractors cannot be avoided their impact upon the condition of wild land should be minimised. Detractors include anything that: –*

- adds an artificial element to the vegetation pattern (i.e. reduces perceived naturalness);*
- results in new visible structures;*
- makes contemporary land use more obvious;*
- makes access to the area easier; or*
- reduces the remoteness of the area.”*

The Trust is of the view that the proposed Wind Farm would be a significant detractor and is therefore contrary to SNH’s Guidance as stated above.

5. **Impact on Wild Land Areas (WLA):** The proposed wind farm is clearly within view of Wild Land Area 1, Merrick, as identified by SNH in June 2014 and turbines of 177.5m to tip will have a significant visual impact on the WLAs qualities. The visualisations and wirelines produce by the Applicant from Merrick, show a significant additional impact eg ES Figure: 6.45i VP15, ES Figure: 6.45j VP15 and ES Figure: 6.45b VP15. The impact of the proposed onshore wind farm must be considered on the basis of the whole WLA. Massive vertical structures of the nature, colour and height proposed would not naturally fit into this area and as such would conflict with SPP.

6. **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.

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

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 14% increase from 2002 to 2013 with the dominant factor being operational wind turbines. This development would further reduce the percentage of Scotland's landscape unaffected visually by any form of built development and in our view is a material consideration.

7. **Cumulative Impact:** the Trust is 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 Windy Standard 3/Brockloch Rig 3 Wind Farm would have a significant and detrimental effect both in terms of 'combined visibility' and 'sequential impact'. The developers plan 20 wind turbines of up to 175.5m tip height; no matter what they do by way of mitigation a development of this scale will make a major contribution to cumulative overload. The highest proposed turbines are only a few metres short of the supporting columns of the new forth crossing. If I was to suggest that putting 20 of these towers in this area would have a negligible additional impact I don't think my view would be given any credence. This area is already subjected to an exceptionally high level of industrial scale, energy related developments and proposed developments.
8. **Cumulative Wind Farms within 10 miles or 16 kilometres:** According to the developers own analysis in the ES Ch6: Landscape and Visual assessment, there are already 200 turbines existing or consented, within 10miles/16kilometres of the proposed site. By any standard this must be considered to be excessive overload. In addition another 229 including Windy Standard 3 are proposed.

9. **Socio Economic Impact:** If approved this wind farm would contribute to the further visual degradation of the wider landscape potentially resulting in a negative socio-economic impact. Dumfries and Galloway relies heavily on tourism in its broadest sense for employment and income. Anything which could affect this must be seriously questioned and properly evaluated.
10. The Trust believes 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 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.
11. 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)'.
12. However studies into tourist/visitor perception of wind farms and their impact on Tourism have not specifically addressed remoter areas such as this and the most recent by BiGGAR Economics Limited, July 2016, '*Wind Farms and Tourism Trends in Scotland*' is a highly flawed analysis. The Trust is of the view that no credence can be placed on such reports and that in order for a definitive view to be reached the only way forward is for a fully independent study to be commissioned.
13. **Peatland impacts:** The proposal would involve the excavation and reuse of 92,000m<sup>3</sup> of peat. Most of the development would be on deep peat as defined by SNH ie 0.5m deep or more. The Trust considers that the development will result in considerable damage to peatland, with negative impacts on biodiversity, ecosystems and greenhouse gas emissions. If the application is approved we would strongly urge that micro siting should not be allowed. Although this is a standard request in this type of application 50m – 70m 'micro siting' in any direction is a massive distance. It would not be considered acceptable to vary the location of a road, bridge, house or factory by such a distance and we see no reason why a wind farm should be an exception.
14. **Peat reinstatement:** Reinstated means to return something to a previous effective state (Definition <http://www.merriam-webster.com/dictionary/reinstated>) which is not in actual fact possible when the structure of the peat will be lost during the excavation, transportation, storage and reuse process. Therefore we are of the opinion that excavation of this volume of peat is environmentally unacceptable.
15. **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”.*

16. **The IUCN assessment** supports our view that anything which potentially damages peat in any significant quantity should not be considered or permitted. In the context of the proposed wind farm this applies to the excavation and reinstatement of peat where no matter how carefully this is done the structure cannot be preserved. Essentially dig it up, transport it, dump it somewhere else and landscape it, then what you get is a haplotelmic bog (see above).

17. 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.

18. **A 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 strongly support the statement above ie the risk is not worth taking.

For the reasons given above the John Muir Trust believes that this application as it currently stands should be refused.

Yours sincerely

John Low

Policy Officer

John Muir Trust