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Dell Wind Farm

The John Muir Trust wishes to Object to the Application prepared by Jacobs on behalf of Coriolis Energy Ltd (Coriolis, the Agent) on behalf of Dell Wind Farm Ltd (the Applicant) to construct a 14 turbine Wind Farm. We note that in effect this would be to all intents an extension to the consented Stronelairg Wind Farm which would significantly add to the visual impact on the surrounding Wild Land Areas.

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

Consequently 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 Dell 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 very high level of windfarm development:

- Operational windfarms : Millenium 1,2 & 3 - 20 turbines
- Approved windfarms : Beinneun 25 turbines, Corrie Garth 20 turbines, Dunmaglass 33 turbines , Stronelaig 67 turbines
- Application : Bhlaraidh 32 turbines, Beinneun Extension 7 turbines, Dell 14 turbines
- Scoping : Moriston up to 30 turbines, Culachy up to 25 turbines, Millenium South 10 turbines, Aberchalder up to 13 turbines
- A potential total of 296 turbines

For the reasons stated above and as an additional contributor to 'cumulative impact' as described in SNH Guidance the Dell Wind Farm would be significantly detrimental to the area and in particular to Wild Land Areas 19 Braeroy – Glenshirra – Creag Meagaidh and 20 Monadhliath.

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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. **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".* This is also true of the land on either side of the Great Glen.

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.

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 Minister’s views as stated above must be recognised and taken into consideration when considering this application. The fact that a consented wind farm ie Stronelairg adjoins this land is not a reason for approval but rather is a reason to refuse permission based on cumulative impact.

The Dell Wind Farm Application has made no attempt to minimise the impact of access roads and tracks by proposing to utilise the network planned for the adjacent Stronelairg Wind Farm and instead it intends 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.

Peatland impacts

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

The Non Technical Summary produced by the applicant states :

5.2.6. The most valuable habitats onsite were avoided where possible through site design, for example through the use of the existing estate track to reduce impacts on the M6 flush habitats where possible, but also by designing the turbine layout to minimise impacts on H13 montane heath. Due to the dominance of blanket bog within the wind turbine envelope, this habitat could not be avoided, however most areas of deeper peat and better habitat were avoided and track lengths and routing were kept to a minimum. Floating roads, where practicable, will be used at peat depths of over 1m deep. To offset the loss of peatland habitats, a Habitat Management Plan (HMP) will be implemented during wind farm construction/operation. The plan will involve the restoration of 10.5 ha of blanket bog within the Dell Estate as well as tree planting.

The Peat Management Plan Table 1-1 Excavation Materials Management Plan estimates a total volume of 34,910m³ of peat to be excavated, stored and reused.

The Internatuional 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”.

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.

The Peat Management Plan will at best mitigate some of the damage to the peat but a significant amount of carbon will still be released. We do not see how this supports the government’s target and strongly support the statement above.

Socio-economic Impact

If approved this wind farm would contribute to the further degrading of this once iconic landscape resulting in a negative socio-economic impact. The developer’s assessment of the impact on tourism and recreation is weak and based on selective and outdated research and reports. 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 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 from members of the public and 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.

Yours sincerely

John Low

Policy Officer

John Muir Trust