

## Melrose J (Joyce)

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**From:** Rosie Simpson <rosie.simpson@johnmuirtrust.org>  
**Sent:** 03 December 2020 13:34  
**To:** Econsents Admin  
**Subject:** Kirkan wind farm  
**Attachments:** Kirkan Wind Farm Objection.pdf

Dear Energy Consents Unit,

It's come to our attention that our objection to the Kirkan wind farm development (ECU00001800) does not seem to appear on the Energy Consents Unit website along with other objections. We should have submitted this in May 2019 – sending a copy to the Highland Council and a copy to you. We thought it best to point this out in case it has been overlooked (in which case a copy is attached) but if it did not reach you for some reason then that is our error and we would not expect it to appear.

Hope you are all managing okay in this difficult year.

Yours sincerely,  
Rosie Simpson

**Rosie Simpson**  
Senior Policy Officer

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23rd May 2019



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Energy Consents

Reference : ECU00001800

Sent by email: [EconsentsAdmin@gov.scot](mailto:EconsentsAdmin@gov.scot)

Cc'd: [eplanning@highland.gov.uk](mailto:eplanning@highland.gov.uk) reference 19/01861/S36

Kirkan Wind Farm

The John Muir Trust wishes to object to the S36 application by Kirkan Wind Farm Limited which is a company owned by Coriolis Energy Limited ('Coriolis Energy') and ESB Asset Development Limited to construct a wind farm comprising of 17 turbines up to 175m high and associated access tracks, borrow pits, compounds, substation and 104m high met mast. It would be located on land approximately 3km SE Of Aultguish Inn, Garve and adjacent to the existing Corriemoillie wind farm Lochluichart wind farm, Lochluichart wind farm extension and the proposed Lochluichart Ext 2 wind farm.

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 our:

- 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

## Landscape and visual impact

1. In advance of our comments regarding the specific landscape and visual impacts of the proposal we would like to highlight the comments of the Reporter into the proposed Carn Gorm wind farm in his decision notice to Refuse permission.

*“ 27. Regarding the cumulative effect, I find that Lochluichart wind farm and, when constructed, Corriemoillie wind farm would have a considerable influence on those parts of Ben Wyvis from which they will be seen. They would present a considerable concentration of turbines and would be very eye-catching for anyone looking towards the west.*

*“29. I do not accept any suggestion that lack of combined visibility necessarily means there is little or no cumulative effect. A cumulative effect can occur from seeing wind farms in sequence. Such an effect occurs on the summit area of Ben Wyvis when one moves from an area with visibility of Lochluichart wind farm to an area with visibility of Novar wind farm.*

*“31. The main path to the summit of Ben Wyvis goes over An Cabar. From a short section of the path as it approaches An Cabar, some of the proposed Carn Gorm turbines would be visible at relatively close range. Visitors would thus be aware of their presence as they continued to the summit. From the summit, this awareness along with visibility of the Novar turbines (and of Lochluichart and Corriemoillie turbines) would, in my view, tend to give a feeling of being surrounded by wind farm development. It is for this reason that I conclude that the cumulative effect of the proposed development across the Ben Wyvis part of the Rounded Hills landscape character type would be significant.*

2. Kirkan Wind Farm Ltd is proposing a wind energy development of 17 turbines 175m high, which is significantly higher than any others currently existing in this area or in the Highlands and which to all intents and purposes will appear as an extension to the Lochluichart, Lochluichart Extension and Corriemoillie wind farms and, if approved, the Lochluichart Extension 2.
3. The Carn Gorm Reporter’s comments, listed in 1. above, must be borne in mind when considering this Application; especially as they are at odds with the developers Technical Appendix 4.6: Wild Land Impact Assessment, Table 4.6.2: Effects on Rhiddorochis, Beinn Dearg and Ben Wyvis Wild Land Area (WLA No.29) where they consider the impact to be slight.
4. SNH Visualisation Figure: 4.13a Viewpoint 6: Summit of Ben Wyvis exemplifies our opinion. It clearly shows that the construction of Kirkan would pull very tall turbines into the foreground of views from Ben Wyvis thus significantly devaluing the special qualities which make it part of the wild land area. This is also the case from the summit of Beinn Dearg

Figure: 4.21e and f, Viewpoint 14; and the summit of Meall à Ghrianain Figure: 4.22e and f, Viewpoint 15; and the summit of Meall Mor, Figure: 4.233 and f, Viewpoint 16. The list goes on. Essentially this is a highly obtrusive, visible and inappropriate development which is speculative and clearly at odds with the landscape of the area. It would stick out like seventeen 'sore thumbs'.

5. The proposed development does not take into consideration the Lochluichart Ext 2 Wind Farm with regard to cumulative impact and we consider this to invalidate their consideration of LVIA. Given that Kirkan is a submitted development which is less than 2km from the Lochluichart Ext 2 site it is not possible that the developer did not know of the proposal and therefore their lack of consideration of the combined impact shows a complete disregard for potential cumulative impact. The developers of Kirkan and Lochluichart Ext 2 should be required to collaborate and produce visualisations that incorporate both developments in advance of any decision. It is not acceptable that we are required to make a judgement on two adjacent developments which conveniently ignore each other's proposals/existence.
6. With regard to Kirkan we are of the view that these additional massive structures, which are significantly taller than anything else proposed, are inappropriate to the landscape of the area, will have a detrimental visual impact, will have a detrimental impact on the peat on site and may have a negative socio economic impact on tourism in the area.
7. As illustrated in the visualisations the turbines would also be highly visible from Wild Land Area (WLA) 28 Fisherfield – Letterewe – Fannichs to the west and WLA 29 Rhiddoroch – Beinn Dearg – Ben Wyvis to the North/North East and the A835 and as a consequence would negatively impact on the area's unique qualities and devalue visual amenity for local people and visitors alike. This includes tourists who view the wild land areas from the edge and also those who walk and climb in the interior of these areas. In some cases mountaineers could potentially spend hours looking towards wind turbines as they walk in a wild land area! Thus the WLA is significantly devalued. A true test would be to ask SNH to apply all the criteria which were identified in establishing the WLAs and see if any land would be lost.

## **Turbine Siting**

8. It is proposed by the applicant that when siting the turbines a leeway of 50m 'micro siting' in any direction be allowed. As no such allowance is considered for a road, house, bridge etc and therefore we see no reason why 'micro siting' of turbines should be any more acceptable. Proper planning and site investigation (as done for the new A9 for example) would obviate the need for this request. A radius of 50m from the original proposed location of the turbine equates to an area of 7850m<sup>2</sup> which is 0.785 hectares. If the requested 'micro siting' is approved and applied to all of the turbines then all we can say with certainty is that the developer is seeking permission to place 17 turbines somewhere within the general area. This would invalidate any visualisations. We view this as entirely unacceptable.

## **Cumulative Impact**

9. 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. This view is supported by the Carn Gorm decision. We are strongly of the view that the Kirkan wind farm, by itself or in conjunction with Lochluichart Ext 2, would have a significant and highly detrimental effect both in terms of ‘Combined Visibility’ and ‘sequential impact’. The landscape in this general area is already subjected to a high level of windfarm development or proposed development:

Wind Farm	Number of Turbines
• Operational : Lochluichart	17 turbines
• Operational : Lochluichart Ext	06 turbines
• Operational : Corriemoillie	17 turbines
• Application: Lochluichart Ext 2	09 turbines
• Application: Kirkan	17 turbines

This is a potential total of 66 turbines.

### Socio Economics

- 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, in this area, will not support this aspiration.
- 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.**
- 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)’.

### Peatland impacts

- Peat reinstatement/restoration:** Reinstated/restored means to return something to a previous effective state (Definition <http://www.merriamwebster.com/dictionary/reinstatement>) 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 (96200m<sup>3</sup>) is highly undesirable.
- 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 haplotelm 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”.*

15. **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 haplotelm bog (see above).
16. 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.
17. **The Peat Management Plan (PMP) Vol 2 Technical Appendix 9.4** : lacks any significant detail on which it can be judged. At the very best if implemented it could mitigate some of the damage to the peat but a significant amount of carbon would still be released. An evaluation of the PMP leaves real concerns. Although the applicants state that the PMP will be developed in greater detail at a later stage we are of the opinion that what is currently presented is inadequate even as a baseline.
18. In conjunction with the PMP and its intended ‘reuse’ of the excavated peat we have the **Habitat Management Plan Vol 2 Technical Appendix 6.4** which, at best, can be described as a plan to have a plan. The PMP and HMP make little attempt to ‘address’ the use of the excavated peat and suggest that 25000m3 will be used in peatland restoration with no substantive detail given.

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

Yours sincerely

John Low,

Policy Officer,

John Muir Trust