



ramblers scotland
at the heart of walking

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Energy Consents & Deployment Unit
Scottish Government
4th Floor, 5 Atlantic Quay
150 Broomielaw
Glasgow G2 8LU

Dear Sir

Objection to application, Talladh-a-Bheithe wind farm, Loch Rannoch/Loch Ericht area.

Ramblers Scotland is writing to **object** to the application by Talladh-a-Bheithe Wind Farm Ltd to construct 24 turbines of 125m in height to the blade tip on moorland between Loch Rannoch and Loch Ericht. While Ramblers Scotland is in principle supportive of renewable energy, we object to this scheme on the grounds of its significant negative impacts on the landscape, which is of national importance to recreation interests, and in particular on a core area of wild land, as identified by Scottish Natural Heritage.

We believe this development is contrary to Scottish Government and Perth & Kinross planning policy. In terms of national policy, the proposed site of the Talladh-a-Bheithe wind farm is located wholly within Area 14 in Scottish Natural Heritage's map of core areas of wild land which has been adopted in Scottish Planning Policy (SPP) published in June 2014. Wild land is recognised by the Scottish Government as a nationally important asset, and SPP's guidance on appropriate locations for wind farms states that wild land is an Area of Significant Protection. While SPP recognizes that wind farms may be appropriate in these areas in some circumstances, it states "(f)urther 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." (SPP, p39)

At a local level, Perth & Kinross Council has designated this as a Strategically Sensitive Area in its planning guidance for wind energy developments, which has a presumption against wind farms in such areas unless it can be shown that the impacts will be slight or not significant.

Ramblers Scotland believes that the impacts of this proposal in this location would be very significant and could not be mitigated against in any effective way. We accept that the area is not devoid of any signs of human impact but the development of, for example, hill tracks and plantation forestry, are on a different scale to this proposal which would be a huge intrusion of an industrial character into a large tract of wild land. It is not an extension of an existing wind farm development, and lies 35km in distance from the closest wind farm. Fig 7.2 in the environmental statement clearly shows the isolated nature of this proposed wind farm which would be particularly striking, both in terms of the turbines which will be erected and the many miles of access roads which would need to be constructed. The approval of this wind farm would set a precedent which would undermine the Scottish Government's own policy guidance on wild land protection and would risk losing public support for renewable energy more widely, especially given that the environmental statement illustrates that there would be significant visual effects from 14 of the 25 viewpoints tested, which include the summits of such iconic mountains as Ben Alder and Schiehallion.

The proposed wind farm is also 2km north of the Loch Rannoch and Glen Lyon National Scenic Area (NSA), and SPP now states that wind farms will not be acceptable within these designated sites.

Although located just outside the boundary of the NSA, nevertheless it is our opinion that the proposed site would negatively impact on the setting and special qualities of the NSA, which, according to Scottish Natural Heritage:

‘... epitomise the exceptional landscape and scenery of Highland Perthshire. The enclosing mountains create a monumental backdrop, dwarfing the more intricate, human-scale and detailed features at loch side, glen floor and lower slopes.’

In addition, the site of the proposed wind farm is just 12km from the boundary of the Ben Nevis and Glen Coe National Scenic Area. It is obvious that public enjoyment of outdoor recreation within these two NSAs would be impaired if large wind turbines are constructed on land outwith the boundaries but clearly visible from within the NSAs.

Furthermore, all turbines would be visible from the A82, 24km away. This would detract from the experience of people driving on what is a major route for visitors to Scotland, and hugely important in terms of impressions of Scotland’s wild landscapes for tourists.

This area is very important for recreation, despite the inference otherwise in the environmental statement which notes there are infrequent visitors on specific paths. While the overall number of people using any particular path may be relatively low, Scottish access rights apply across the entire site of the wind farm, and the fact that a core path has been designated within the site demonstrates the importance of this area to the local community and visitors alike. In addition, there are numerous Munros, Corbetts and other hills within the 35km search area, which attract many walkers and mountaineers, especially given their proximity to centres of population in the Central Belt when compared to other mountainous parts of Scotland.

Scotland’s landscapes are extremely important to the economy, and this is especially the case in rural areas. A 2010 report by Scottish Natural Heritage, the Value of Nature-Based Tourism, looked at activities such as wildlife watching, walking, enjoying the landscape, adventure activities and field sports, and estimated their value to be worth £1.4bn to the Scottish economy, supporting 39,000 jobs. We believe that if this wind farm were to be given consent, it would massively impact on the enjoyment of people visiting the Rannoch and Ericht areas, with a subsequent impact on the businesses and communities in the area which currently benefit from tourism expenditure. Tourism in areas such as this depends on the maintenance of a reputation for unspoilt, natural beauty which would be seriously impaired by the proposed development.

We would be happy to discuss this matter further at your convenience.

Yours faithfully

Helen Todd
Campaigns & Policy Manager

cc: Perth & Kinross Council, developmentmanagement@pkc.gov.uk

Ramblers Scotland is the representative body for walkers in Scotland and recognised by **sportscotland** as a governing body of sport. Our charitable aims are to promote walking, secure and facilitate access to land, and to protect the countryside. We have around 6,400 members in Scotland and 54 local walking groups, all run by volunteers.

President: Dr Andrew Murray
Convener: David Thomson
Director: Dave Morris

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