



Scottish Natural Heritage Dualchas Nàdair na h-Alba

All of nature for all of Scotland
Nàdar air fad airson Alba air fad

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Dear Mr MacKay,

SECTION 36 APPLICATION FOR THE PROPOSED TALLADH-A-BHEITHE WIND FARM, APPROXIMATELY 25KM SOUTH OF DALWHINNIE AND 14KM WEST-NORTH-WEST OF KINLOCH RANNOCH THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2000.

Thank you for seeking the comments of Scottish Natural Heritage (SNH) in respect of the above Section 36 application and supporting Environmental Statement (ES).

1. Summary

A wind farm in this location would result in significant adverse impacts on a range of nationally and internationally important natural heritage features.

We object on account of the impacts upon an area that epitomises the essence of the Highlands. The individual components interact to create a landscape that is greater than the sum of its parts. This is recognised formally in two National Scenic Areas and a mapped Wild Land Area, resulting in 3 objections in principle.

We also submit an objection in principle relating to impacts upon golden eagle as a notified feature of a SSSI; two objections, concerning protected areas, subject to review once further information has been provided by the applicants and two objections subject to conditions regarding the Rivers Tay and Spey Special Areas of Conservation.

In addition, we reserve our advice on the impact on carbon rich soils, deep peat and priority peatland habitat until further information is provided to allow a more thorough assessment.



1.1 Objections in principle

The proposed wind farm would have significant adverse impacts upon four nationally important features as listed below. We advise that these impacts cannot be mitigated through siting or design and we object in principle to this proposal in relation to impacts upon:

- **Loch Rannoch and Glen Lyon National Scenic Area**
Due to the significant adverse impacts on the integrity of the Loch Rannoch and Glen Lyon National Scenic Area
- **Ben Nevis and Glen Coe National Scenic Area**
Due to the significant adverse impacts on the integrity of the Ben Nevis and Glen Coe National Scenic Area
- **Wild Land Area 14 Rannoch - Nevis - Mamores - Alder**
Due to the significant adverse impacts on a nationally important area of wild land
- **Coire Bhachdaidh Site of Special Scientific Interest (SSSI) - Golden Eagle**
Due to significant adverse effects on golden eagle, a notified feature of the Coire Bhachdaidh Site of Special Scientific Interest and a natural heritage interest of national importance. The potential impacts upon other qualifying features of the Coire Bhachdaidh SSSI are considered below.

1.2 Objections subject to further information

We consider that there is the potential for significant adverse effects upon other nationally important natural heritage features. We are at present unable to assess these in full because of a lack of information. Owing to the potential seriousness of these impacts we object until we can reassess our position in the light of detailed information to be provided by the applicant. These are:

- **Rannoch Moor Special Area of Conservation (SAC)**
The proposal could affect internationally important natural heritage interests. The information required to enable us to assess the impacts further is set out in our appraisal below. Once this information has been provided we will be able to give this proposal further consideration.
- **Coire Bhachdaidh Site of Special Scientific Interest**
This section refers to the notified features of the Coire Bhachdaidh SSSI other than golden eagle.

There are natural heritage interests of national importance on the site, which could be affected by the proposal. Further information, detailed below, is

required to determine whether the proposal would be likely to damage the natural features for which Corie Bhachdaidh SSSI has been notified.

1.3 Conditioned objections

In the event that this proposal was given approval, we advise that we would object to this proposal unless it is made subject to conditions which would avoid significant impacts on the following internationally important designated sites:

- **River Tay Special Areas of Conservation**

In the event that this proposal was given approval, we advise that we would object on the grounds of impact upon the River Tay Special Area of Conservation. We would be able to remove this objection if any approval was made subject to the conditions set out in section 2.7 below.

- **River Spey Special Areas of Conservation**

In the event that this proposal was given approval, we advise that we would object on the grounds of impact upon the River Spey Special Area of Conservation. We would be able to remove this objection if any approval was made subject to the conditions set out in section 2.8 below.

1.4 Further assessment required

- **Carbon Rich Soils, Deep Peat and Priority Peatland Habitats**

Owing to its location, the proposal is situated on, and could cause significant damage to areas of deep peat and peatland, habitats recognised as being of national importance under Scottish Planning Policy 2014 (SPP). We consider the impacts to be underplayed in the ES and are unable to adequately assess the scale of impact in relation to SPP until further information is obtained from the applicant. If you are minded to seek this information we will be happy to provide further advice.

2. Appraisal of the Impacts

Landscape and visual

Here in the centre of Scotland some of our finest landscapes come together to engender a scenic experience that epitomises the essence of the Highlands. Iconic landscape features such as the highest and most famous mountains, unique and remote wild moorland, and diverse glens and lochs can be experienced in a single panoramic view. The individual components interact to create a landscape that is greater than the sum of its parts, which are formally recognised in two National Scenic areas, seven Wild Land Areas and a part of the Cairngorms National Park..

Whilst we have considered the impacts upon each of these separately, their characteristics and qualities are interlinked and enhanced with the result that the impacts on the wider region as a whole would be greater than the sum of those described individually.

2.1 National Scenic Areas

National Scenic Areas (NSAs) are designated for their outstanding scenic value and are Scotland's highest and most valued landscape designation. Scottish Planning Policy 2014 states that development that affects a NSA should only be permitted *“where the objectives of designation and the overall integrity of the area will not be compromised; or any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.”*

Two NSAs are affected.

Loch Rannoch and Glen Lyon National Scenic Area

The proposed Talladh a' Bheithe turbines are located approximately 1300 metres from the edge of the Loch Rannoch and Glen Lyon National Scenic Area. We consider the proposal would have a significant adverse effect on eight of the Special Qualities for which the NSA was designated. **The impacts on the NSA special qualities would be such that the objectives of the designation and the overall integrity of the area would be compromised. This proposal is contrary to Scottish Planning Policy and we object to it in principle.**

Ben Nevis and Glen Coe National Scenic Area

The proposed wind farm is located approximately 10 km from the edge of the Ben Nevis and Glen Coe National Scenic Area. We consider the proposal would have a significant adverse effect on four of the Special Qualities for which the NSA was designated. **The extent of the impacts on the NSA special qualities is such that the objectives of the designation and the overall integrity of the area would be compromised. This proposal is contrary to Scottish Planning Policy and we object to it in principle.**

Further detail on the landscape and visual impacts, including National Scenic Areas is provided in Annex 1.

2.2 Wild Land Area 14

Wildness is a key quality of Scotland's landscapes which is widely appreciated and recognised as a nationally important asset in National Planning Framework 3.

The proposed wind farm is located entirely within a Wild Land Area as identified on the 2014 SNH map. In addition to the significant adverse effects on wild land identified in the Environmental Statement (ES), we consider that the siting of a wind farm within this Wild Land Area would result in the loss of wildness qualities as perceived across a large section of Wild Land Area 14, including that part which extends into the Cairngorms National Park. It is a landscape free from wind farm development and other large modern structures and **in our opinion the significant adverse effects cannot be substantially overcome through siting, design or other mitigation. We therefore object to the principle of a wind farm in this location.** Please note that we would object to this proposal on wild land grounds even if there were no National Scenic Areas nearby.

Further detail on the impacts on wild land is provided in Annex 1.

Ecology

2.3 Coire Bhachdaidh Site of Special Scientific Interest (Golden Eagle)

The Corrie Bhachdaidh Site of Special Scientific Interest (SSSI) is located immediately to the west of the proposed development site. The SSSI is notified for its upland habitats, vascular plants and its assemblage of breeding birds, which includes golden eagle. This section refers specifically to the impacts on golden eagle. Our advice on the remaining qualifying interests of the SSSI is covered below in this consultation response.

The proposed wind farm is located within the typical foraging range of a pair of breeding golden eagles. The Environmental Statement concludes there would be a collision mortality rate of 0.62 birds per year (including adults and sub adults). This equates to approximately 1 collision every 19 months. This rate of mortality would result in adverse effects on this notified feature of the Corrie Bhachdaidh SSSI in contravention of SPP policy. **We therefore object to this proposal in principle.**

Further information on ornithology including golden eagle is provided in Annex 2.

2.4 Carbon Rich Soils, Deep Peat and Priority Peatland Habitats

Scottish Planning Policy 2014 recognises carbon rich soils, deep peat and priority peatland habitat as a nationally important environmental interest.

The proposed development is located almost entirely within an area of deep peat and priority peatland habitat. Based on the information provided, we consider that there would be significant adverse impacts on deep peat and peatland habitats. We believe, however, that the ES has underestimated the scale of these impacts as it has paid insufficient regard to indirect effects upon peat outwith the immediate physical footprint of the development's built components. We advise that there needs to be a much more thorough assessment of the likely impacts upon the hydrology of the peatland throughout the development area. We request that the Energy Consents Unit seeks this information so that the proposal can be considered in relation to the new SPP policy on wind farms and peat.

In Annex 2 we have provided details of the information required to allow a more complete assessment of the possible impacts on carbon rich soils, deep peat and priority peatland habitats and in relation to the objectives of the SPP policy. If you are minded to request this information, we would be willing to provide further advice once it has been received. In light of the potential significance of the impacts, **we wish to reserve our position** until this information is available.

2.5 Rannoch Moor Special Area of Conservation

The proposal includes a turbine set down *area* located within the Rannoch Moor Special Area of Conservation (SAC) designated for its blanket bog, depressions on peat substrates, dry heaths, wet heathland with cross-leaved heath, otter, fresh water pearl mussel, clear-water lakes or lochs with aquatic vegetation and poor to moderate nutrient levels and acid peat-stained lakes and ponds.

The site's status means that the requirements of the Conservation (Natural Habitats, &c.) Regulations 1994 as amended (the "Habitats Regulations") or, for reserved matters the Conservation of Habitats and Species Regulations 2010 as amended apply. Consequently, the Scottish Government is required to consider the effect of the proposal on the SAC before it can be consented (commonly known as Habitats Regulations Appraisal). The SNH website has a summary of the legislative requirements (<http://www.snh.gov.uk/docs/A423286.pdf>).

Chapter 14 of the Environmental Statement makes reference to the intention to utilise the rail facility at Rannoch Station (Chapter 14.9.1) and this is further elaborated in the ECS Transport Statement Report in Appendix 14.1, drawing 14009_009. This report shows possible set-down areas at Rannoch Station extending onto the Rannoch Moor SAC. The boundaries of the Rannoch Moor SAC and SSSI lie immediately to the west of the rail line and siding infrastructure at Rannoch Station. Works to the west of the rail line that are not in the curtilage of the station impinge on this protected area. There is no corresponding environmental information on baseline conditions or assessment of potential impacts on Rannoch Moor SAC. Therefore, in our view, there is insufficient information to determine whether the proposal is likely to have a significant effect on the qualifying interests of site. **We therefore object to this proposal until this further information is obtained from the applicant. Once we have been able to assess this information we may wish to amend our advice and position.**

2.6 Coire Bhachdaidh Site of Special Scientific Interest (non golden eagle)

This protected area lies directly to the west of the development site. In addition to golden eagle covered previously, the SSSI is notified for its upland habitats, vascular plants and its assemblage of breeding birds. The eastern boundary of the SSSI is largely marked by the Allt Ghlas and no work associated with the wind farm development is likely over the watercourse. The southern end of the SSSI is bounded by the private road to the Loch Ericht dam. Part 5 of appendix 8.1 in Chapter 8 Ecology describes the likelihood of (temporary) works associated with turbine delivery taking place at this location during construction. Neither the extent of the affected area, nor its constituent habitats are described other than to state that efforts should be made to restore them. This is not an appropriate approach for assessing potential impacts upon notified habitats in a SSSI. The extent and nature of habitats affected must be stated and described, together with any proposed restoration works so that the overall impacts can be assessed in full. **We object until this information is available, after which we shall review our advice.**

2.7 River Tay Special Area of Conservation

The proposed development site is within the catchment of the River Ericht which in turn flows directly into Loch Rannoch (within the boundary of the River Tay SAC) at Bridge of Ericht some 5 km downstream.

The qualifying interests of the River Tay SAC are Atlantic salmon, otter, river, brook and sea lampreys, and clear-water lakes or lochs with aquatic vegetation and poor to moderate nutrient levels.

The site's status means that the requirements of the Conservation (Natural Habitats, &c.) Regulations 1994, as amended, (the "Habitats Regulations") apply. See

<http://www.snh.gov.uk/docs/A423286.pdf> for a summary of the legislative requirements.

We consider there could be a likely significant effect on the 'clearwater lochs' feature of the SAC from the release of sediment into Loch Rannoch from construction work on turbines and tracks on the Talladh a Beithe estate. As a consequence the Scottish Government is required to undertake an appropriate assessment in view of this Site's conservation objectives for its qualifying interests. If however the proposal was undertaken in accordance with the following it would no longer be likely to have a significant effect and an appropriate assessment would not be required.

We advise that any consent must be subject to a detailed Construction Method Statement that described the measures that would eliminate the risk of sediment and other pollutants being mobilised and entering watercourses with connectivity to the SAC. It would be appropriate for these measures to be implemented through the Environmental Management Plan and the Construction Method Statement referred to in part 4.8 of Chapter 4. While this indicates the future production of a thorough and comprehensive set of documents, there is insufficient information to enable us to provide advice on likely effectiveness at this time. **We object until a detailed and effective CMS is provided, and unless any consent was subject to a condition requiring the implementation of that CMS.**

Further advice on the contents of a Construction Method Statement is provided in Annex 2.

2.8 River Spey Special Area of Conservation (SAC)

The proposal indicates an option for the delivery of turbines and other large plant/infrastructure to come via the A9 at Dalwhinnie and then be barged down Loch Erich. Work at Dalwhinnie to accommodate this option is described in chapter 14 Traffic and Transport. This indicates a reasonably large set-down area. While this area is separated from the River Truim (part of the River Spey SAC) by the Perth Inverness railway, there may be some connectivity.

The River Spey Special Area of Conservation (SAC) is designated for its Atlantic salmon, sea lamprey, otter and freshwater pearl mussel. The site's status means that the requirements of the Conservation (Natural Habitats, &c.) Regulations 1994 as amended, (the "Habitats Regulations") apply.

The absence of detailed information about these works and their possible environmental effects means we cannot advise on Likely Significant Effect. If however we assume there is connectivity, then we advise that a Likely Significant Effect could be avoided through the rigorous application of a CMS referred to in the preceding section of this letter, to prevent liberated sediments and other fines, fuels, lubricants and chemicals from getting into watercourses and hence to the River Spey SAC. As for the River Tay SAC, **we object until a detailed and effective CMS is provided, and unless any consent was subject to a condition requiring the implementation of that CMS.**

Further advice on the on the contents of a Construction Method Statement is provided in Annex 2. Annex 2 also provides advice on ecological interests including European protected species, freshwater and priority habitats.

3. Advice on the Environmental Statement

The LVIA contained within the Environmental Statement identifies visual impacts within areas of wild land, a national scenic area and from 14 of the 25 assessment viewpoints. In our view, the LVIA considerably undervalues the baseline and underestimates the significance of effects.

Additionally we consider there has been a significant underestimation of the impacts on golden eagle, deep peat and priority blanket bog habitats.

The Environmental Statement has also failed to assess the impacts of the access route on important natural heritage interests. We consider that the access route is an integral part of the application which should be fully assessed and its feasibility fully demonstrated prior to the determination of this proposal.

4. Concluding remarks

Please direct any further correspondence or requests for information to Matthew Burnett at matt.burnett@snh.gov.uk

Yours sincerely

[via email]

Dr David Bale
Area Manager
Tayside and Grampian

Annex 1 Landscape and Visual Impacts

As we explain in our cover letter, the proposed development sits in a location where identifiable components – two National Scenic areas, seven Wild Land Areas and Cairngorms National Park, interact to create a landscape that is greater than the sum of its parts. Whilst we have considered the impacts upon each of these separately, their characteristics and qualities are interlinked and enhanced with the result that the impacts on the wider region as a whole would be greater than the sum of those impacts described individually below.

Accordingly, and for clarity, our response below focuses on individual themes, but refers to the other issues where appropriate. This annex provides detailed advice on:

- National Scenic Areas
- Wild Land Areas
- Visual Amenity
- Cumulative impacts

National Scenic Areas

The 40 National Scenic Areas (NSAs) are Scotland's highest landscape designation, areas 'of unsurpassed attractiveness which must be conserved as part of our national heritage'¹ and recognised within Scottish Planning Policy as nationally important for their scenic quality².

The identification of 'Special Qualities' draws out the characteristics that individually or in combination give rise to an area's outstanding scenery, describe and define its scenic value and make each NSA distinctive. These Special Qualities underpin the reason for designation of an NSA, and it is the way that the qualities come together that makes the landscape of a given NSA nationally important.

The nature of views and the visual experience within an NSA are central to its scenic value. It is important to understand that views from within an NSA to areas beyond its boundary are also integral to the experience of the NSA and the Special Qualities that define it. This is especially so when, as in this case, the NSAs include and are located in the context of extensive areas of wild land.

Loch Rannoch and Glen Lyon National Scenic Area

This NSA is located between Scotland's two National Parks in an extensive landscape which epitomises the mountain grandeur and scenery of Highland Perthshire. The scenic experience of the area derives from long-range views both from within and across the mountains with glimpses of lochs and rivers in the glens between the ranges – an experience that is enhanced by views to iconic and clearly-recognisable mountains. The NSA includes 15 Munros and several Corbetts and is highly regarded by walkers and climbers from across Britain and abroad. The panoramic northward views from these high summits and the routes between them

¹ Scotland's Scenic Heritage, 1978, paragraph 3.1

² Scottish Planning Policy 2014, paragraph 212

are currently wind farm free. These views extend across wild moorlands to successive mountain ridges which recede into the distance to skylines over 60km distant, including the distinctive outlines of Ben Nevis, Ben Alder and the Cairngorms. The high quality of these distant views beyond the boundary, considerably enhance the character and experience within the NSA.

The application site is on an elevated rolling plateau 1.2 km to the north of the Loch Rannoch and Glen Lyon NSA. A wind farm development in this location would introduce tall, moving structures in an elevated position which would be conspicuous from across the NSA including from some lower-lying areas around Loch Rannoch. In particular they would be seen clearly from the majority of summits in all three mountain ranges within the NSA – including from the iconic peaks of Schiehallion and Ben Lawers.

The Environmental Statement (ES) has provided seven viewpoints from upland areas within the NSA including two of Scotland's most frequented mountain summits, Schiehallion and Ben Lawers, as well as other popular mountain summits within the NSA. Although the ES states that six of the seven viewpoints within the NSA would experience significant adverse effects and that there would be a significant effect on the landscape character within part of the NSA, it concludes that there would not be an effect on the NSA as the proposal lies beyond its boundary. SNH disagrees with this conclusion. We consider it to be self-contradictory given the significance of the visual effects stated. ES incorrectly underplays the contribution of wider views beyond its boundary to the experience of the NSA. .

Turbines would be seen clearly above the first summit ridge immediately north of Loch Rannoch. In this elevated location the turbines would:-

- act as scale indicators in a landscape with few human objects and would, in views from the NSA, make the surrounding and more distant mountains seem less grand, extensive and remote.
- introduce modern, large-scale, distracting elements in the view from the NSA which would draw the eye, create new focal points, and consequently, detract from current views and vistas across open water towards iconic peaks and mountain ranges;
- cause the views of distant mountains from within the NSA to appear developed and less remote, contrary to the existing and valued perceptions of land-use and development in this area;
- detract from the overall perception of peacefulness and tranquillity in the Loch Rannoch area;
- detract from expansive mountain panoramas and classic vistas currently enjoyed from the NSA, including views to and from iconic mountains such as Schiehallion and Ben Alder; and
- erode the sense of remoteness and wildness of the mountainous uplands associated with the NSA and its surroundings..

In the light of the above effects we advise that the Talladh-a-Bheith wind farm proposal would significantly affect the following Special Qualities of the Loch Rannoch and Glen Lyon NSA:

- *Epitomises the mountain grandeur of Highland Perthshire*
- *A clear linkage of land use and landform*

- *Combination of natural and cultural beauty*
- *Wild summits*
- *Peacefulness and tranquillity*
- *Great expanse of Loch Rannoch*
- *Long symmetric mass of Schiehallion*
- *Dominance of Ben Lawers*

We consider the significant effects on the NSA's special qualities are such that the objectives of the designation and the overall integrity of Loch Rannoch and Glen Lyon National Scenic Area would be compromised. This development is therefore in conflict with the first test in Scottish Planning Policy paragraph 212. As these effects cannot be overcome by siting, design or other mitigation we object to this proposal in principle.

Ben Nevis and Glen Coe National Scenic Area

This National Scenic Area presents a landscape of massive proportions, breathtaking grandeur and great variety. Of particular importance to this application it contains Rannoch Moor and Glen Coe. Rannoch Moor is a wide open expanse of barren, wet peat moorland which seems primeval in its character described as

'probably the best known moor in Scotland. Its endless-seeming wastes have a beauty derived from the inter-relationship of water and islands with the moor and the relationship of the moor to the surrounding mountains'³

The journey by road northwards across the open Rannoch Moor, past the iconic sentinel of Buachaille Etive Mor, and down through spectacular Glen Coe to the sea is a journey of great contrasts – one of the classic Highland journeys and is recognised specifically within the NSA special qualities. Those travelling along the West Highland Way long distance route and the West Highland Railway line will have a similar experience of Rannoch Moor.

The application site is approximately 10km to the north east of the eastern boundary of the Ben Nevis and Glen Coe NSA. The wind farm would be seen from within and across Rannoch Moor and, in particular, by travellers on the classic highland routes described above. The scenic experience is related to long views across tracts of remote and seemingly extensive boggy moorland punctuated by lochans and boulders, and backclothed by the enclosing mountains. These views across a wild and remote landscape devoid of contemporary human activity and artefacts are distinct and unique. Rannoch Moor is renowned in the national context.

The ES has provided five representative viewpoints (VPs 12, 13, 18, 19 and 20) from within the NSA including two from the Moor itself and three from elevated summits, and states that there would be significant adverse effects on walkers at one of these (viewpoint 19 from within the Moor) and also on the landscape character of that eastern part of the Moor / NSA. We consider the ES underplays the effects on viewers at the other viewpoints (deemed to be 'very low' to 'low' and 'not significant') and disagree with their conclusion that there would be no effects on the special qualities of the NSA.

³ Scotlands scenic heritage

Visualisations for Viewpoint 12 from the A82 on Rannoch Moor and Viewpoint 19 from within the Moor demonstrate that turbines would be seen in views to the north east. In addition the turbines would be seen in good visibility from summits and ridges of mountains in the NSA that enclose Rannoch Moor – as illustrated in Viewpoint 13 (West Highland Way), Viewpoint 18 (Buachallie Etive Mor) and Viewpoint 20 (Glencoe ski centre). The views are currently devoid of large man-made structures, and the introduction of turbines would draw the eye and be seen at the focal point of existing views across Rannoch Moor.

The viewpoints illustrate that the proposal would introduce modern, uncharacteristic, large-scale, man-made features into panoramic views across Rannoch Moor and seemingly into the Moor itself. The turbines would act as scale indicators and make the Moor and the enclosing mountains seem less vast than they are. They would also provide a new edge to the seemingly endless Moor and reduce its perceived extent,

In the light of these effects, we advise that consent of the Talladh-a-Bheith wind farm would significantly affect the following Special Qualities:

- *Land of mountain grandeur*
- *Land of classic highland vistas*
- *Expansive moor of Rannoch*

There would be significant adverse effects on the Ben Nevis and Glen Coe National Scenic Area, particularly on those parts comprising Rannoch Moor and, the Glen Coe and Etive mountains and on important routes through the NSA.

We consider the significant effects on the NSA's special qualities are such that the objectives of the designation and the overall integrity of Ben Nevis and Glen Coe National Scenic Area would be compromised. This development is therefore in conflict with the first test in Scottish Planning Policy paragraph 212. As these effects cannot be overcome by siting, design or other mitigation we object to this proposal in principle.

Wild Land Areas

Scottish Planning Policy (SPP) recognises Wild Land Areas identified on SNH's 2014 map as nationally important. Planning authorities are required to identify and safeguard the character of these areas, noting that they "*are very sensitive to any form of intrusive human activity and have little or no capacity to accept new development.*" Paragraph 215 of the SPP sets out the approach to considering proposals within a Wild Land Area, which should demonstrate that any significant effects can be substantially overcome by siting, design or other mitigation.

We advise that the Talladh a' Bheithe wind farm turbines are located within Wild Land Area 14 Rannoch - Nevis - Mamores - Alder. This is one of Scotland's most extensive areas of high wildness, the experience of which is enhanced by wider views into the surrounding Wild Land Areas. The proposal would introduce tall moving man-made objects onto an elevated rolling plateau, which would be highly visible from an extensive part of the WLA and its neighbouring WLAs. It would result in significant adverse effects on the WLA, in particular on the wildness experience as

currently enjoyed from Rannoch Moor, the Ben Alder massif, the Drumochter hills in the Cairngorms National Park and from other popular mountain tops in the central, eastern and Rannoch Moor areas. Its prominence in these views would weaken the physical attributes of the WLA relating to '*lack of construction or other artefacts*' and '*perceived naturalness*'. Consequently, two of the perceptual responses evoked by the WLA would also be diminished – the '*sense of remoteness and sanctuary*', and the '*arresting/inspiring qualities, a sense of awe and prospect*'. The degree of weakening of these perceptual responses would adversely affect a large section of the WLA that is not currently impaired by other prominent detractors.

There would be a significant adverse effect on the qualities of a Wild Land Area and the diminishment of wildness found across the wider area. We advise that these effects cannot be substantially overcome by siting, design or other mitigation and we object to this proposal in principle.

Impacts on views and visual amenity

SNH considers there would be significant adverse effects on views and visual amenity of:

- **Visitors and residents in the Loch Rannoch area** including settlements and roads along its loch shore: Where visible, turbines would be seen behind a simple skyline or partially screened by intervening trees. SNH considers that skylines are of critical importance as a viewer's eye is naturally drawn to them. Views of blades, part blades and tips would detract from views and vistas across and along open water towards iconic peaks and mountain ranges.
- **Travellers on the road from Rannoch Station.** The ZTVs indicate that no hubs would be visible but that there would be theoretical visibility of up to 6 part-blades from a 1km stretch of the road. Of particular importance are the highly sensitive views eastwards towards the distinctive conical peak of Schiehallion (see Figure 7.27). Should turbines be noticeable on the simple skyline they would be likely to draw the eye away from this iconic focal point resulting in at least a medium magnitude of change resulting in a high adverse significant effect upon views and visual amenity of travellers on this road.
- **Hill-walkers on Munros and other summits** in Carn Mairg / Schiehallion range, Ben Lawers range, Ben Alder range, the Glen Coe and Etive mountains and the Drumochter hills in the Cairngorms National Park. This part of Perthshire also includes many important hill-walking routes and destinations including Munros and Corbetts, and SNH regards the specific areas south of Loch Rannoch – including Schiehallion – and west of Loch Erich – including Ben Alder - as being of high quality in terms of the recreational resource. The Talladh a' Bheithe wind farm would draw the eye and become a new focal point in the panoramic and currently wind farm free views across layers of receding ridgelines to distant skylines. This would result in a high adverse significant effect upon views and visual amenity of hill-walkers on these and other summits in these ranges.

- **People on routes crossing Rannoch Moor:** GLVIA states specifically (paragraph 6.33) that '*where travel involves recognised scenic routes awareness of views is likely to be particularly high*'. This group of receptors has not been taken into account in the visual sensitivity methodology (A7.1.11) in the ES. SNH considers there would be a significant adverse effects on travellers on the A82 and the West Highland Railway; and walkers on the Rannoch Moor Track and the West Highland Way. Turbines would draw the eye and be a new incongruous focal point in long views across tracts of remote and seemingly extensive moorland.

Cumulative impacts

Given the high intrinsic sensitivity of walkers and climbers in Scotland's remote mountains to wind farm development ⁴ we advise that there would be likely to be significant adverse cumulative impacts on the views available to climbers on a number of popular Munros. We emphasise very high sensitivity of those who reach the summits of Schiehallion, Ben Lawers and, in particular, Ben Alder. These tops are distinctive because of their technical grade, accessibility and the relative scarcity of similar resources and because they attract significant numbers of visitors from national, UK-wide and international 'catchments'⁵

The consent of Talladh a' Bheithe in addition to Griffin, Calliachar and Stronelaireg would result in a significant adverse cumulative impact (successive and sequential) upon the views, visual and recreational amenity of climbers in these mountains. Talladh-a-Bheithe would be dominant in the view and be prominent in a landscape that is seen as wind farm free.

⁴

⁵ Draft note from Mark Wrightam – reference?

Annex 2 - Ecology including Ornithology

Ornithology

The Talladh-a-Bheithe estate site is located within an area with known and significant ornithological sensitivities which include breeding raptors, upland waders and plovers and lapwing.

Corrie Bhachdaigh Site of Special Scientific Interest

The Corrie Bhachdaigh SSSI is located immediately next to the development site and overlaps with the wind farm proposal ornithological study area. This SSSI is notified for its breeding bird assemblage which includes golden eagle and golden plover.

When considering the impacts of the proposed wind farm on golden eagle interests we have relied on the 2013 vantage point data. This is because the 2012 and older vantage point work utilises vantage points from within the wind farm footprint, which is not in accordance with our guidance. While we appreciate this is due to a change in the development footprint, observations from these vantage points are unlikely to represent typical flight activity over the site (owing to observer disturbance), and therefore the collision rates derived from them cannot be relied upon.

Using the 2013 data in the standard collision risk model, and applying our recommended avoidance rate this predicts a collision mortality of about 0.62 birds per year. As the 2013 observations only cover the period from May to September, this collision rate is less reliable than it might otherwise be, and should be regarded as a minimum. A collision rate of 0.62 eagles per year (including adults and sub-adults) is likely to result in adverse effects on the notified golden eagle interest of Coire Bhachdaigh SSSI and we therefore object to this proposal.

Furthermore, we do not agree with the statement in the ES that a Natural Heritage Zone (NHZ) level assessment of impacts on eagles is impractical at this site. Most of the turbines would fall within NHZ 11, 'Cairngorms Massif', so a wider countryside assessment may be carried out for this geographic unit.

As discussed in SNH's Conservation Framework for Golden Eagle, the eagle population within NHZ 11 is not in favourable conservation status, probably because of poor survival of birds post-fledging. While the Framework suggests that persecution is likely to be the most important factor in this, SNH considers that the additional mortality at Talladh a' Bheithe would add significantly to the challenges for any recovery in this part of Scotland, particularly as the proposal affects the territory of a pair of very productive eagles.

In undertaking our calculations of golden eagle collision risk, we do not support the removal of specific VP observations from the collision risk model on days when

gralloch was present. The response of eagles to the abundance and type of prey available to them is complex and is still being researched. We cannot conclude with confidence that the removal of deer shooting from the wind farm site would significantly reduce eagle flight activity over the area.

In addition to the impacts on golden eagle, the development is likely to result in the permanent loss due to displacement of up to two pairs golden plover which were recorded during the breeding season within the SSSI. Golden plover form part of the breeding bird assemblage notified feature of the Coire Bhachdaidh SSSI. We do not consider that this impact will significantly detrimentally affect the SSSI breeding bird assemblage.

Greenshank has been recorded within the proposed development footprint. We consider that a development in this location would result in the permanent loss of one breeding pair.

The ES states that turbine components would be shipped down Loch Ericht via barge. Due to the known breeding Schedule 1 species on the edge of Loch Ericht and within the development footprint, we advise that transport and construction activities would be likely to disturb these birds and would therefore be committing an offence. Activity of this scale on Loch Ericht and the proposed development site should avoid at the most sensitive times of the breeding season. Details of the breeding season for various species are available on our website and we would be happy to advise further should the proposal be consented.

European Protected Species and Legally protected mammals

Otter - Otter is a European Protected Species (EPS) and protected through Schedules 2 & 4 of the Habitats Regulations 1994 (as amended). Information is presented in the ES of otter activity on watercourses within the proposed development site although no evidence of active resting places or holts were found during survey work. There is still some risk of disturbance and destruction of resting places or holts during construction in relation to other locations associated with the wind farm.

Our general advice for development is that surveys for protected species should be completed no more than 18 months prior to submission of an application. This is to ensure that they are a contemporary reflection of species activity at and around a development site. More information on the law for protected species can be found on our website via <http://www.snh.gov.uk/protecting-scotlands-nature/protected-species/legal-framework/>

If this application is approved without a pre-construction survey and necessary mitigation measures for these species, then an offence under Regulation 43 of the Habitats Regulations 1994 and/or the Wildlife and Countryside Act (1981) as amended may occur. We therefore recommend that the mitigation measures of

preconstruction surveys for otter identified within 8.5 of the Ecology chapter of the ES are implemented as conditions of any planning consent. Surveys should, as described, be carried out in the year prior to construction and follow recognised methodologies.

Should any protected species or evidence of protected species be found, we would provide further advice. This would include whether further mitigation or licences are required to ensure offence(s) under the Regulation 43 of the Habitats Regulations 1994 and/or the Wildlife & Countryside Act 1981 (as amended in Scotland) are not committed.

Bats – Bats, like otters are European Protected Species (EPS) and enjoy the same protection in law. However pre-application advice was that risk to bats from the proposal is exceptionally low: the habitats present are of very limited value to bats and no roosts are affected. For clarity, our advice is therefore that the proposed development will not be detrimental to the maintenance of the bat populations at a favourable conservation status in their natural range.

Water voles - were also recorded within the development site. Water voles are included on Schedule 5 of the Wildlife and Countryside Act 1981 (as amended in Scotland). Whilst the animals themselves are not protected, it is an offence to intentionally or recklessly damage, destroy or obstruct access to any structure or place that a water vole uses for shelter or protection or to disturb a water vole whilst it is in such a structure or place. A water vole burrow would constitute a structure or place that they use for protection. The Wildlife and Countryside Act does not include a provision to allow licences to be issued to permit any such actions to take place for the purpose of development. We recommend that the mitigation measures for water vole identified within section 8.5 of the Ecology chapter of the ES are implemented as conditions of any planning consent. Surveys should, as described, be carried out in the year prior to construction and follow recognised methodologies.

Pine marten - evidence is presented of pine marten within the proposed development site, again protected under the Wildlife & Countryside Act 1981 (as amended in Scotland). We agree that there is little risk of an offence against this species as a result of the construction and operation of this wind farm.

Key observations – species surveys have been carried out and reported on land confined to the wind farm site itself. This has resulted in significant omissions in the environmental assessment as the mammal species surveyed are widespread in their distribution and may occur at any or all other locations associated with this development. This would include possible handling facilities at Dalwhinnie and Rannoch station, any handling areas for barges on Loch Ericht and all road realignments. The provision to undertake contemporaneous surveys as a condition of any planning consent must include all works.

Habitats

Rannoch Moor Special Area of Conservation - no assessment has been made of the impacts of developing a handling area at Rannoch Station on this SAC which is immediately adjacent. Qualifying interests are present in and next to the area proposed for tower and nacelle handling. In the absence of information we cannot advise on likely significant effect and therefore Object until additional information on this aspect of the proposal and its impact is presented.

Coire Bhachdaidh SSSI – no assessment has been made of the likely impacts of locating the proposed lay-down area and handling facilities at the South of Loch Ericht. We Object until further information about the constituent habitats in this location and extent of impacts, with or without mitigation, are detailed.

Peatlands - The overwhelming majority of the proposed development site (86.28%) is recognised in the ES as deep peat with blanket bog. Blanket bog is listed as a priority habitat on Annex 1 of the Habitats Directive. It is therefore not likely to be feasible to avoid blanket bog through siting, design or other mitigation. Of the 24 Talladh a' Bheithe turbines, 22 are located on priority habitats along with extensive sections of associated track and other infrastructure. This would result in the permanent loss and long term effects on this important habitat within the site boundary as a result of both direct and indirect impacts. In our view, there would significant adverse impacts on Annex 1 priority habitats of international importance and its associated carbon rich soils and deep peats.

The Environmental Statement understates the impacts on blanket bog as there is not an adequate assessment of indirect effects, such as changes in drainage patterns and increased run-off, which would likely result in drying out of an areas of blanket bog even with the proposed mitigation measures in place. A more detailed assessment, in the context of SPP, in relation to indicative routes/locations and construction of tracks, borrow pits and hard stands should be undertaken.

Freshwater - The Loch Rannoch, Loch Ericht, Loch Laden and Loch Laiden catchment system is internationally known for its polymorphic Arctic Char interests. Arctic Char is sensitive to pollutants in the water, particularly heavy sediments and run off which may occur during wind farm construction. With regards to the Rannoch, Laiden and Tummel area, an appropriate Construction Method Statement, as required to avoid significant impacts on the River Tay Special Area of Conservation, would mitigate against the possible impacts on fresh water interests.

The proposed access route down Loch Ericht via barge for large turbine components has not appropriately assessed the impacts on freshwater interests including Arctic Char which could be affected by water pollution resulting from transportation or construction activities.

Deer - The information on deer and deer management contained within the ES for the proposed works is welcome but requires some additional information to satisfy deer management planning requirements.

The proposed wind farm will require a deer management plan that complies with current Wild Deer Best Practice standards. Guidance on the creation of deer management plans can be reached at:

http://www.bestpracticeguides.org.uk/planning_dmeps.aspx, and chapter 4 of the Code of Practice on Deer Management (<http://www.snh.gov.uk/docs/B949709.pdf>).

Consideration needs to be given to construction displacement, the potential for the wind farm to create new sources of food and/or shelter, the impacts this may have (both within and outwith the development boundary) and how this would be monitored and managed over time.

We recommend that Estate staff responsible for deer management provide the applicant with local knowledge and advice, to help the applicant draft a wind farm specific deer monitoring and management plan. In particular, the deer management plan for the proposed Talladh a Bheithe wind farm should take into consideration the potential impacts from wild deer utilising the Coire Bhachdaidh SSSI due to disturbance during the construction phase and beyond.

The plan should also take into account the requirement for a collaborative approach to deer management planning and the requirement for landowners to deliver not only their own objectives but also public objectives through their activities. (Further guidance on these issues is available by accessing the Code of Practice on Deer Management; <http://www.snh.gov.uk/land-and-sea/managing-wildlife/managing-deer/code-of-deer-management/>.) As the scheme boundary falls close to the Craiganour Estate boundary, we would expect the Talladh a Bheithe deer management plan to take into account the objectives of neighbours and how any changes to deer movements may affect their properties.

We would be happy to provide comment and advice to the applicant on the deer impact assessment and management plan in due course if required.

Contents of the Construction Method Statement

The following issues require to be addressed to fully inform a detailed Construction Method Statement (CMS).

- Mitigation measures must fully address all pollution risks to the River Tay Special Area of Conservation (SAC) whether from sediments mobilised as a result of construction work or chemicals, oils and fuels from plant and other operations within the catchment of the SAC. A comprehensive CMS would allow a conclusion of no Likely Significant Effect.

- Mitigation measures must fully address all pollution risks to the River Spey Special Area of Conservation whether from sediments mobilised as a result of construction work or chemicals, oils and fuels from plant and other operations within the catchment of the SAC. (Relevant only to work at Dalwhinnie.) A comprehensive CMS would allow a conclusion of no Likely Significant Effect.
- If consent was to be granted, there would be the requirement for up to date pre-construction species surveys to inform the specific species mitigation actions to be included within the detailed Construction Method Statement.