



**Scottish Natural Heritage**  
**Dualchas Nàdair na h-Alba**

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

**PE1564/B**

Ned Sharratt  
Assistant Clerk  
Public Petitions Committee  
Room T3.40  
The Scottish Parliament  
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**28 July 2015**

Dear Mr Ned Sharratt

**CONSIDERATION OF PETITION [PE1564](#)**

**Calls on the Parliament to urge the Scottish Government to take steps to designate the Loch Ness and Great Glen as a National Scenic Area; to recommend a priority application is made to UNESCO for the area to be afforded World Heritage protection; and to take appropriate steps to discourage further wind turbine developments and support the restoration of sites damaged by wind turbines**

Thank you for seeking the advice of Scottish Natural Heritage on this petition.

Scottish Natural Heritage is the government's advisor on the care, enjoyment and sustainable use of the natural heritage. Our landscape role includes the provision of advice to Scottish Government and local authorities on the designation and management of National Scenic Areas and other landscape designations as well as advising on the implication of policy and development and land-use decisions on landscape change.

In keeping with Scotland's commitments to the European Landscape Convention, we also work at the strategic level to help support communities and the public to get more involved in the planning and management of landscape change. We therefore welcome the interest being shown locally in looking after the landscape of the Great Glen and the contribution this resource makes to economic development, sense of place and identity, both locally and nationally.

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While the focus of the petition is on new designations as a means to protect the area from wind farm development, we consider that other options should be examined as means of addressing the concerns expressed. Perhaps of most relevance in this case would be the development of a more detailed planning framework for the area which is informed by community views on landscape change and sets out a vision for it in the longer term. In this regard, the Highland Council is currently preparing Draft Onshore Wind Energy Supplementary Guidance, and we are working with them on cumulative issues and matters of landscape capacity.

### **Designation as National Scenic Area or World Heritage Site**

Scotland's National Scenic Areas (NSAs) were designated in 1980 in recognition of the outstanding scenery of these areas. Considerable work on identifying these areas, considered to be the very best landscapes, was undertaken in the 1970s by the then Countryside Commission for Scotland. At the time, the Loch Ness and the Great Glen area does not appear to have been considered for designation as part of the suite. We consider that this would likely still be the conclusion if this work was repeated now.

The consideration of the World Heritage Area designation of this area would require a detailed technical assessment which has not been done. However, we know from our experience of promoting the Flow Country and the Cairngorms as potential World Heritage Areas, how challenging the successful nomination of new natural sites is for European nations. Our experience suggests that the case for this area as a natural site by itself is unlikely to be of the strongest calibre. We would note that the protection and management of most WHAs in the UK are also normally underpinned by national natural and cultural heritage designations.

While not providing the same degree of protection, local landscape designations (identified by The Highland Council) do cover substantial parts of the Great Glen area, from Lochend to Fort Augustus, and Bridge of Oich to Gairloch. The boundaries of these designations were reviewed in 2010 and have been confirmed in the new local development plan. This review also provided a range of information which could inform the development of a landscape framework for the area

### **Planning for wind farm development**

In line with our approach to renewable energy in general set out in our position statement on Energy and the Natural Heritage (<http://www.snh.gov.uk/planning-and-development/renewable-energy/our-approach-to-renewables/our-approach/>), we are supportive of wind farm developments which are well located and designed in relation to natural heritage interests including landscape. A key focus for us is the development of a strategic approach by local authorities to guide the right development to the right place.

To support this work, we have recently published new guidance on spatial planning for onshore wind farms (see "Spatial Planning for Onshore Wind Turbines – natural heritage considerations." <http://www.snh.gov.uk/docs/A1565897.pdf>). This will help planning authorities to produce a spatial framework for onshore wind farms as required by Scottish Planning Policy. It will also encourage planning authorities to provide additional information on landscape capacity and other considerations,

building on the principles contained in SNH guidance on the cumulative impact of wind farms (see <http://www.snh.gov.uk/docs/A675503.pdf>).

As noted above, we are currently working with Highland Council to identify where there is strategic capacity for wind farms. It is hoped that the outcome will identify both sensitivities and capacity and will be built into the Development Plan (or supplementary guidance). As far as Loch Ness is concerned, consideration of wind farm proposals has aimed to avoid or minimise visual impacts on the main tourist corridor of the A82/Great Glen and key tourist attractions such as Urquhart Castle. That aim has largely been achieved. However, cumulative impacts in the Great Glen area are becoming more evident, or could be given current proposals being considered or developed.

In relation to the restoration of wind farm sites we have prepared guidance on good practice in the construction of wind farms (<http://www.snh.gov.uk/docs/A1168678.pdf>) and have also undertaken research on the restoration and decommissioning of onshore wind farms (<http://www.snh.gov.uk/publications-data-and-research/publications/search-the-catalogue/publication-detail/?id=2007>). The latter concluded that improvements could be made in terms of current practice and made a number of recommendations to support this. A particular important mechanism to ensure landscape scale restoration are habitat management plans and we have also published "What to consider and include in Habitat Management Plans" to help developers and planning authorities improve practice in this area (<http://www.snh.gov.uk/docs/A1187633.pdf>)

We hope the Committee will find these comments helpful

**Scottish Natural Heritage**  
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