

John Muir Trust
Response to PE1564
Save Loch Ness and the Great Glen

July 2015



PE1564/D

The John Muir Trust is a conservation charity dedicated to protecting and enhancing wild places and helping people to connect with them. The Trust thanks the Committee for seeking our views on [PE1564](#) (Save Loch Ness and the Great Glen) which is calling

“...on the Scottish 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.”

Trust support for Petition

The Trust shares the concerns of the Petitioners about the need for action to be taken to protect the special natural heritage and landscape of the Loch Ness setting, and about the increasing cumulative impact in the area of inappropriately sited, industrial wind developments - both visually and with regard to the wonderful landscape. The Petitioner commented *“We are looking for some form of protection, given our view that the current planning system, in local government and national terms, does not protect areas that are indisputably of international scenic importance.”* The Trust also shares this desire to gain protection for the area, since the quality of the landscape is of international importance and a positive asset, worth protecting from significant adverse impacts whatever causes those impacts. So the Trust supports this Petition which is giving forward-looking suggestions as to how such pro-active protection and enhancement might be achieved.

Response to Committee discussion

In the Petition discussion, the Convenor said, *“I note that the comments on your petition were almost exclusively about wind farms rather than the designation of a national scenic area and an application for world heritage status. Does that reflect people’s motivation for supporting your petition?”* The Trust would point out that the evidence shows that wind developments and infrastructure are the current major impacts on natural landscapes around Loch Ness and the Highlands and so it is unsurprising that the comments reflect that.

Evidence for rapidly increasing impacts

Evidence for this is contained in Scottish Natural Heritage’s Natural Heritage Indicator showing the Visual Influence of Built development¹. This annual analysis clearly shows that the massive change in Scotland’s landscapes in recent years has been due to wind turbines. 20% of Scotland was theoretically visually impacted by turbines in 2008 whereas it was nearly 46% of Scotland in 2013. No other impact that is measured changed by more than 0.8% in the same period (this was “minor roads”).

Another question asked at the Committee session was *“Do you believe that turbine developments harm tourism in the area? If so, what evidence do you have to support that?”*

¹ <http://www.snh.gov.uk/publications-data-and-research/our-changing-environment/scotlands-indicators/natural-heritage-indicators/>

Evidence on this question, quoting four surveys regarding public opinion on wind farms and wild land.

1) “The Economic Impacts of Wind farms on Scottish Tourism”² is the main survey quoted by both the onshore wind industry and the Scottish Government and it was carried out before 2008 by the Moffat Centre of Caledonian University. Researchers surveyed slightly over 1000 people face-to-face or on the internet. It is often claimed that this study concluded that wind farms would not negatively affect tourism. In fact, even as early as 2007 when the research was undertaken, the study concluded

- *“The GIS work has shown that even large sites such as Dalswinton can have minimal impact on Tourism.The situation with the new developments along the M74 needs further investigation.”* This shows how the situation has moved on since then. Dalswinton, classified in those days as a “*large site*”, appears to be a fifteen turbine site. Developments of from thirty to seventy turbines are amongst those being considered in the area covered by this Petition with the cumulative impact possibly adding up to 500 turbines.

Other comments from the Moffat Report include:

- *“In general this research has found that the negative impact of wind farms on tourism at national level is small and any reduction in employment in tourism will be less than the numbers currently directly employed in the wind power industry. **However the impacts in some local areas are important enough to warrant specific consideration by planning authorities.**”*
- *“Most individuals appear to prefer a landscape from the hotel bedroom without a wind farm (63%)”*

And this is particularly relevant to this Petition,

- *“Finally this research found that, in general, the public did not recognise that some areas had been protected from development. **Currently those tourists who do find wind turbines an objectionable presence are most likely simply to move to another area in Scotland. To ensure substitution opportunities it is important that areas are retained where turbine development is limited to supplying local needs in small remote communities, and indeed the wilderness nature of these areas publicised.**”*

So, in 2007, the researchers and public regarded fifteen turbines as a large wind farm and even then the researchers recognised the need for areas to be protected for “wilderness” qualities. Crucially, there has been no government-led further investigation, as was recommended even then. Although the Scottish Government has given partial protection from wind farms to identified “Wild Land Areas”, the Petition’s approach of pro-actively recognising and protecting this special area around Loch Ness very much fits with the Trust’s view that the value of natural landscapes needs recognised and strategically cared for.

More up-to-date data

Moving forward from 2007 to later years, the landscape is literally entirely changed. It is frequently said that there is little evidence about what tourists and Scots value and whether they would be deterred from visiting an area which was previously known for natural heritage but is now dominated by wind turbines. There are several relevant surveys.

² <http://www.gov.scot/Publications/2008/03/07113554/0>

Although the whole of the Loch Ness area is not wild land, there is a very relevant study which can perhaps be looked on as a proxy for assessing the public's views regarding this scenic area.

2) “Public Perception Survey of Wildness” by Scottish Natural Heritage, Cairngorm National Park Authority and Loch Lomond and Trossachs National Park Authority³ was a major study released in July 2012. The study looked at three groups whose results are reported separately – a nationally representative group from across Scotland (main sample); a residents group and a group from interested organisations (self-selected) - totalling over 1800 responses.

The study found that

“Respondents generally considered that it was very important that Scotland had wild areas. 72% of the main sample stated this, with only 3% stating that it was not at all important.”

An even greater proportion of the residents' sample and the organisation members stated that they considered that it was very important that Scotland has wild areas - 83% and 93%, respectively.

Between 55% and 92% of participants felt that wild land was under threat and *“Across all samples, although most respondents indicated that protecting wild areas and promoting economic activity were (both) important, respondents appear to place greater importance on the protection of wild areas than they placed on promoting economic development in rural areas.”*

Between 80% and 92% of respondents thought action to preserve wild land was needed in Scotland. Participants were asked to select up to three possible actions from a list of ten. Other options were “don't know” (chosen by between 0% and 6%) and “none” (selected by less than 2%).

Effective planning control for wind turbines was picked as one of the most effective possible actions by 37% of the main sample; 57% of the residents' sample and 63% of the organisation members.

The introduction of a specific 'wild land' designation (which might be considered as a proxy for the suggested National Scenic Areas suggestion regarding Loch Ness, since no other designation option was included) was selected by 48% of the main sample; 31% of residents and 54% of organisation members. Residents rated effective planning control for buildings and effective planning for telephone masts and pylons as higher priorities.

This very detailed piece of academic work details a considerable amount of concern and a very significant, and possibly surprising, consensus across residents and other groups that action is needed to protect Scotland's unique natural landscapes.

The Trust has had two polls conducted which may be helpful background.

3) A Yougov poll⁴ across Scotland for the John Muir Trust in 2013 has found that 51 per cent of people asked would be 'less likely to visit a scenic area which contains large-scale developments (e.g. commercial wind farms, quarries, pylons)'. This compares to just 2 per cent who say they would be 'more likely' to visit a rural area with such visible structures.

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<http:// Cairngorms.co.uk/resource/docs/publications/25092012/CNPA.Paper.1843.Public%20Perception%20Survey%20of%20Wildness%20in%20Scotland.pdf>

⁴ <https://www.jmt.org/news.asp?s=2&cat=Campaigning&nid=JMT-N10829>

4) In May 2014, a Survation poll⁵ of over 500 people across the Highland and Islands found that, excluding “don’t knows”, 53% supported the (then current) proposal to protect wild land whilst only 24% opposed the proposal wild land protection.

Trust comment on SNH response to PE1564

Regarding new designations

The Trust notes Scottish Natural Heritage’s response to PE1564 and wishes to respond to some aspects.

It states *“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.”*

However, SNH said, in response to PE1383 on wild land protection in February 2011, “We would note, however, that given the intensity of current pressures, the time available for existing approaches to prove their efficacy must be regarded as limited. If they are unable to do so, alternatives such as that advocated by the John Muir Trust would become essential. There is a history, in the field of environmental protection, of acting decisively only when the resources in question are under extreme threat. Given the distinctiveness and rarity of Scotland’s wild land resource – in a western European, not purely a UK, context – we must surely avoid this trap and act before it is too late.”

The Trust notes SNH’s own figures with regard to the speed of loss of natural landscapes from wind farm impact, quoted above, and we would suggest a longer term option won’t work.

SNH’s response to PE1564 states *“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 landscape.... 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.”*

The description on SNH website is *“The 40 National Scenic Areas (NSAs) in Scotland, with their outstanding scenery, **represent** Scotland’s finest landscapes.”* “Represent” does not necessarily equate to *“includes all of”*. The suite of NSAs has never been revised so there does not appear to be evidence for the assumption that the SNH submission makes – that a revision now would not include all or part of the Loch Ness area. It is not clear from SNH’s submission what their thinking on NSAs going forward is and, specifically, whether they are considering any areas for new NSAs.

SNH refer to local landscape designations. In the Trust’s experience, these are not given much weight when planning decisions on industrial-scale wind farms are taken.

World Heritage Site

The suggestion for advancing the area as a proposed World Heritage site is worthwhile but would be a longer-term prospect than a National Scenic Area.

The Trust hopes that this additional evidence will assist the Public Petitions Committee to assess the necessity of action to protect the Loch Ness area.

⁵ <http://www.jmt.org/news.asp?s=2&cat=Campaigning&nid=JMT-N10918>