

**PE1564/G**

Petitioner Letter of 4 September 2015

Scottish Parliament Petitions Committee,  
Room T3.40, Scottish Parliament

Friends of the Great Glen,  
A Highland Conservation Group

4<sup>th</sup> September 2015

Dear Mr Sharratt,

**Response to the views of the consultees, Scottish Natural Heritage (SNH), Highland Council (HC), Scottish Government (SG), Scottish Renewables (SR) and the John Muir Trust (JMT) on Petition 1564 Save Loch Ness (LN) and the Great Glen (GG).**

Various submissions have been presented by the planning authorities SNH, HC, the SG, and also by SR and the JMT. We thank them for their candid views. We have presented **Evidence 1** that Loch Ness area and the Great Glen are areas of outstanding natural beauty, of international importance, and the premier visitor destination in the Highlands, attracting over 1 million visitors per annum (VisitScotland data). The SPICEe report quotes Visit Inverness and Loch Ness which describes the area as home to “some of the most dramatic scenery in Scotland”. Loch Ness is undisputedly the World’s most famous loch and in global terms the most famous “lake” and as such attracts universal attention. This Petition therefore addresses a matter of national importance which we feel neither SNH, HC, the SG or SR acknowledge.

**Evidence 2** in the Petition is quoted from official sources, namely that over 500 turbines are in the planning process for the LN and GG areas. The evidence is PROVIDED on the SNH website map of windfarm development and on the HC website and we are disappointed that both SNH and HC fail to mention this in their response to the SPPC. The HC, SG, SNH and SR give **NO opinion** as to whether over 500 turbines and hundreds of miles of access track and pylons will damage this internationally acclaimed landscape nor whether 30 miles of industrial developments on either side of LN and GG is proportionate. Our contention is that this will degrade and destroy the spectacular landscape and beauty of the area. None of these consultees apart from the JMT give an evaluation of the outstanding natural beauty of the area, nor whether it will be impacted.

In their responses the consultees SNH, HC and the SG and SR say that current planning regulation gives LN and the GG adequate protection. However, we present **evidence 3** shown below that the Loch Ness area and the Great Glen are not adequately protected:

1. The Petitioners conclude from SNH and HC websites that the planning process is failing to protect LN and the GG which are areas of outstanding natural beauty. The SG says that it is determined to protect landscapes of outstanding natural importance and beauty to the nation. We assert that LN and the GG is one such area.
2. Over 500 wind turbines are approved or in the planning process in this area of outstanding natural beauty: we ask, is this protection?
3. Windfarms have been constructed or are in construction at six locations in areas of outstanding natural beauty.
4. The Millennium South windfarm 4 miles south of Fort Augustus is obvious from the A82 the main tourist artery in the west Highlands, and 28 turbines are visible (photo presented to the committee).
5. Special Landscape Areas. This designation does not give sufficient planning protection and can be over-ruled. Only National Scenic Area or National Park status confer secure protection.
6. The HC consultative document *Spatial Planning for Onshore Wind Energy in Highland* to which HC and SNH input suggests areas of search for onshore windfarm development. This document does not adequately consider the impact on tourism and is also RECOMMENDING extensive tracts in the LN and GG area that WILL be suitable for onshore windfarm development. This is clear evidence that, not only is protection not being afforded to these sites of outstanding natural beauty, but the planning authorities are encouraging developers into these areas in the face of strong opposition from local communities.
7. SNH, HC and the SG in their responses all mention planning regulation which states "the right development in the right area". The Petitioner asks, if this is the PRIME consideration of planning authorities and the SG, then planning guidance is based on a vague notion. For example how do the planning authorities define "right" development and what is a "right" location. The Petitioners call to the SPPC is that LN and the GG is not the "right" location, so why is it not given planning protection.
8. In their submissions HC and SNH maintain that they have successfully protected the views from the A82, the premier visitor route in the Highlands and one of the most iconic road journeys in the World. However, the Petitioner in the submission gave a photo of a wind farm development showing 14 of an actual 28 turbines clearly seen from the A82 four miles south of Fort Augustus. The restitution of this site is recommended here. Further, the HC and SNH say that they have adequately protected the landscape from the A82, but many visitors to the LN and GG area view the areas by boat or canoe from the canal and lochs, bicycle or are hill walkers and

climbers. Therefore the hundreds of turbines, access roads and pylons will be seen from other locations, all surrounding hills and from the 200 metre contour above LN and the GG. The planning authority implies that the enjoyment of these landscapes is restricted to those that travel by car or by bus, but this is incorrect and of concern to other visitors to the area. The planning process has failed to consider the impact of developments on those visitors that are active and not “seat-welded” such as on a car or bus and we ask the SPPC to urge the SG to recommend to the Highland Council planning authority to urgently review planning guidelines as the public interest is not being served.

### **Responses to consultees: their comments on designations to protect the LN and GG areas**

The Petitioners are asking that some form of protection can be given to the LN and GG areas and suggest NSA or World Heritage Status. We reflect the rather lukewarm responses from HC, SG and SNH in assessing some form of protection for one of Scotland’s acclaimed and spectacular landscapes! The Public and visitors clearly think the reverse and revere the area. We contend that LN and the GG ARE areas of outstanding natural beauty and that this is recognised globally. As the SPICe review paper and SNH state there are 40 NSAs but these were designated in 1980 by the Countryside Commission. Our response to the submission from SNH is: do they consider LN and the GG as one of the World’s best loved landscapes and of international scenic interest? Have the planning authorities have responded defensively? Specifically we state in response to SNH, HC and SG:

1. While 40 NSAs were originally designated by the Countryside Commission in 1980, we ask why was the number not 39 or 41. We feel that the SNH report and policy on NSAs has not been adequately peer-reviewed. What criteria made it 40 NSAs when there are other areas in Scotland of outstanding natural beauty that also deserve this assignment and protection. We maintain from the international interest in the LN and GG areas, over 200,000 overseas visitors annually, that this is more than a NSA but an **International Scenic Area** and therefore qualifies for some special protective designation.
2. There are 40 designated NSAs but visitor numbers in the LN and GG (VisitScotland) EXCEED all of those listed existing NSAs with the exception of Loch Lomond and the Cairngorms which are both National Parks and by this very designation attract visitors from overseas. We take this as a poll of footfall numbers by visitors as a recognition that they primarily visit because of the scenic qualities of the area and they rate LN and GG as an area of outstanding natural beauty. Visitor numbers must reflect the public view of “natural beauty”.
3. As LN and the GG attract higher visitor numbers than 38 of the 40 NSAs this area is highly regarded for its landscape qualities and for importance to the tourist industry

and should receive some form of NSA protection. Also, this is one of the criteria that should be used by SNH and HC in their assessment of the quality of landscapes and the need to protect them. We protect these scenic areas because the public want to see them and come to Scotland for that very reason.

4. We reflect that planning authorities should consider afresh the inspirational outstanding natural beauty when devising planning guidance. We have not heard any useful way ahead by SNH, HC nor the SG in their submissions to protect the LN and GG areas. **This inertia is not useful in the planning process nor to Scotland and reinforces our view that the status quo should be challenged.**

5. SR argue that human activity such as agriculture is present in the LN and GG area, but such activities also occur in both the Cairngorm National Park and also the Loch Lomond National Park as long as they do not affect the natural character of the areas. We feel that over 500 turbines and hundreds of miles of new access roads and pylons criss-crossing the LN and GG area will materially affect and destroy the character and reputation and visitor attractiveness of this beloved area.

### **World Heritage Status**

All consultees voice a view on WHS and say the area is not on the UK wish list. However, if the SG was sufficiently disposed no UK Government would refuse consideration of LN and the GG as a WHS. This would also bring large economic benefits to the area. We feel that there is sufficient justification for an application.

### **Responses to consultees: the Importance of Tourism**

The survey of visitor attitudes to Windfarms by the SG is now 8 years old. The visitor economy is the prime economic driver of the Scottish Highlands. Mike Cantlay, Chair of VisitScotland, suggests a fresh poll on attitudes to wind turbines (Press&Journal 20<sup>th</sup> August 2015). We are heartened by the response of the JMT and for the references to several recent quantitative surveys revealing that a high proportion of respondents would be averse to visiting an area because of the proliferation of windfarms.

### **In conclusion**

None of the planning authorities has demonstrated adequate protection of the outstanding scenic qualities of the LN area and GG. Apart from the JMT none of the consultees has suggested viable alternatives to the proposals of either NSA or WHS status suggested in the Petition that will afford protection to the area. This is the last opportunity to save Loch Ness and the Great Glen and we urge the SPPC to consider that we have in the LN and GG a Scottish resource and undoubtedly an area of spectacular scenic quality and international acclaim, but a prime visitor

destination that is threatened by over 500 wind turbines and access tracks and pylons. We therefore ask for some urgent form of planning protection. Scotland's Visitor economy and national reputation depend on these internationally acclaimed landscapes.

### **Specific responses to consultees not mentioned above**

SNH: SNH in their submission did not mention the Stronelairg Development which was quoted in the SPICe review paper. SNH could have mentioned that the development of 76 turbines was approved against their expert advice and would cause "significant environmental damage" to an area the size of greater Inverness.

Highland Council: the HC submission states that the windfarm footprint shown by the Petitioner does not reflect the actual turbine location. However, HC do not indicate on their maps the extent of new access tracks, hundreds of miles of pylons to connect to the National Grid nor substation footprint. We suggest that HCs consideration of planning footprint is grossly understated and these other footprints should in future be shown on HC planning maps.

John Muir Trust: we note that public and visitor attitudes to windfarms has changed markedly over the last few years as the impact of windfarm developments on scenic landscapes and wild land become apparent. Further investigation of public attitudes to windfarms is welcomed.

Yours sincerely,

James Treasurer, for Friends of the Great Glen