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Energy Consents Unit  
Cloiche Wind Farm  
ECU Reference: ECU00002054  
Sent by email: [Tony.Young@gov.scot](mailto:Tony.Young@gov.scot)

22 April 2021

Dear Tony,

**Objection: Cloiche S36 Wind Farm**

In June 2020, the John Muir Trust submitted a holding objection to the Cloiche Wind Farm application (Energy Consents Unit reference ECU00002054). Having reviewed the responses from NatureScot and the Cairngorms National Park Authority we would like to maintain our objection. In addition to points made in that objection, we respectfully ask that the points below are also considered as a record of our submission.

In their appraisal, NatureScot conclude that the development will have significant adverse impacts on two of the five wild land qualities of Wild Land Area 19. Both of these qualities are associated with the interior of the Wild Land Area. To date, they remain strongly expressed, with few signs of human influence evident from what is described in the Wild Land Area description as its 'hidden interior'. If the proposed development was to proceed, the qualities associated with this 'hidden interior' would fade. The development's visibility would diminish the remoteness and sanctuary of the hidden interior and the apparent extent and openness of the Wild Land Area looking east would be restricted. These are points that align with those we made in our holding objection and we wish to note our agreement.

The foreseen impacts on the qualities associated with the interior of Wild Land Area 19 are landscape and visual considerations that led to the removal of turbines from the Stronelaig development. By seeking to reintroduce turbines that Ministers previously condemned, the proposed development would un-do an earlier decision that safeguarded the wild land qualities of the interior of Wild Land Area 19. This point, articulated more fully in our holding objection, concurs with NatureScot's assessment in their response: 'We advise that the Cloiche proposal would undermine the mitigation secured for the Stronelaig Wind Farm, by extending onto higher ground around the shallow bowl that contains much of the Stronelaig development. As a consequence there are significant areas from where the proposal will be visible and Stronelaig is not, many of which are located in the sensitive landscapes of WLA 19. This can clearly be seen in the cumulative ZTV for Cloiche and Stronelaig (figure. 7.8.4).'

NatureScot also observe that the development is sited on nationally important carbon rich soils and priority peatland habitat. Chapter 10 of the EIAR confirms the environmental sensitivity and national importance of the proposed site, 'The Proposed Development study area largely comprises Class 1

peatland which has been mapped in the northern and southern sections of the central study area and within the eastern study area.' Peatland habitats, such as the wet modified bog that the proposed site 'is dominated by' (Chapter 10, EIAR), are our most important terrestrial carbon store. In addressing climate change, they are an important national resource and rightly identified in Scottish Planning Policy 2 as 'areas of significant protection'. Restoring and protecting these habitats will help us to achieve net zero in 2045. The siting of new development can take us further towards this target, or further away, depending on whether priority peatland habitats are protected and restored, or not. NatureScot's response raises important questions about the accuracy of the EIAR with respect to peatland surveys and impact assessment. In their view the restoration programme is inadequate for addressing the expected habitat loss. Given the scale and footprint of the proposed development (36 turbines with associated permanent infrastructure including hard standings, 26km of access tracks, a new substation and underground cables), and where it is sited, we urge close consideration of whether the loss of a nationally important habitat at such a scale is one that can be overcome by siting, design or mitigation.

Yours sincerely,  
Rosie Simpson

The John Muir Trust