

By email to
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Mr Tony Young
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Energy Consents Unit
Scottish Government

29th May 2020

Dear Sir

APPLICATION FOR THE PROPOSED CLOICHE WIND FARM 11 KM TO THE SOUTH EAST OF FORT AUGUSTUS IN THE HIGHLANDS.

ECU Reference: ECU00002054

Introduction

1. SSE Generation Ltd has applied for planning permission for 36 wind turbines of 149.9m blade-tip height (BTH). The turbines are in two groups east (8 turbines) and west (28 turbines) of the operational Stronelairg wind farm, also built and operated by the applicant, which both groups of application turbines abut. The application, despite being named 'Cloiche', is in effect for east and west extensions to Stronelairg wind farm. Consent is sought for 50 years.
2. Mountaineering Scotland has assessed the proposal, for its operational phase, for its likely effect upon mountain assets and mountaineering activities. Based on this assessment, the proposed development is considered significantly detrimental notwithstanding the existence of the operational Stronelairg wind farm, because of its visual impact and consequential impacts on mountaineering recreation and tourism. These impacts cannot be mitigated. We therefore **object to this application.**

Mountaineering Scotland

3. Mountaineering Scotland is an independent association of mountaineering clubs and individuals, with over 14,500 members who are hill walkers, climbers and ski tourers. It was established in 1970 as the national representative body for the sport of mountaineering in Scotland. It is recognised by the Scottish Government as representing the interests of mountaineers living in Scotland.

4. It also acts in Scotland for the 80,000 members of the British Mountaineering Council, which fully supports Mountaineering Scotland's policy relating to wind farms and contributes financially to its policy work.
5. It assesses wind farm proposals, and other mountain developments, according to its policy set out in *Respecting Scotland's Mountains*. This policy has been strongly endorsed by its members and by kindred organisations such as The Cairngorms Campaign, North East Mountain Trust and The Munro Society. It objects only to the minority of proposals that, in its judgement, are potentially most damaging to Scotland's marvellous mountain assets and the sport of mountaineering. Recognising the need for low-carbon electricity generation, it has not objected to 95% of the 965 onshore wind applications made in Scotland¹, despite many being in locations of value for mountaineering but not of *primary* value.

Material considerations

a) Policy

6. Strong Scottish government support for onshore wind, in response to genuine and justified public concern about climate change and heavy commercial lobbying, is not new and is well established in policy. More recently, political support for renewables has gained a higher profile following the First Minister's declaration of a 'climate emergency'.
7. Broad-brush political declarations are not policy. There have been no statements of intent or action by the Scottish Government that alter, or set out any future alteration to, the planning position established for some time now that the beneficial and adverse aspects of any proposed energy development must be weighed and balanced against each other. The applicant's planning statement appears to want existing formal policy to be set aside because of political statements and the applicant's hope that future policy may be more favourable to its interests. There is nothing in these early days of developing NPF4 to suggest that, as far as onshore wind farms is concerned, future policy will be materially different from the present. Broad political statements about NPF4 supporting Scotland's climate change goals are not specific to the siting of onshore wind farms but vaguely cover the whole gamut of activities needed to address climate change.
8. Decision-makers are not bound by energy and planning policies, still less by political declarations, to consent any individual proposal for electricity generation unless its anticipated benefits outweigh its anticipated adverse impacts. Each development needs to be judged on its own merits and in its geographical context. There are many options about where and how to reduce the climate impact of Scotland's energy demands and consumption habits. The adverse consequences of a particular proposal, however, are often site-specific and must weigh more heavily in the balance because of that.

¹ As listed in the Renewable Energy Planning Database March 2020 public download.

9. The aim of planning is to locate development in the right place, not facilitate development at any cost.² The Cloiche eastern cluster and parts of the western cluster were not considered to be in the right place in 2014. They were removed from the original Stronelairg proposal to avoid an objection by Highland Council, thus enabling the development to gain planning consent without examination through a PLI.³ The removal of the Cloiche sites from Stronelairg in 2014 reduced the level of landscape and visual impact to an acceptable level, in Scottish Ministers' judgement. The implication is that their inclusion in 2014 would have resulted in an unacceptable level of impact. It follows that their reinstatement now via the Cloiche proposal would also produce an unacceptable level of impact. Despite this issue being raised in scoping responses, the EIAR (cf chapters 2, 6, TA 2.1) and Planning Statement do not address this site-specific issue at all. The previous planning history of the proposed Cloiche sites is simply ignored.⁴
10. The turbines removed in 2014 were, with one exception, in the areas now proposed for Cloiche east and that part of Cloiche west around the Lochan Iain gap. Turbines reduced in height (from 135 to 125m BTH) included those immediately west of Cloiche east. This mitigation was essential to Stronelairg securing consent. In both these areas, and more extensively in the west, the applicant now seeks to build 149.9m BTH turbines.
11. Highland Council's Onshore Wind Energy Supplementary Guidance (Nov. 2016) states, with reference to the Monadhliath: "*Limited scope for ... additional Large turbines within the existing pattern. Turbines should: ... Preserve mitigation established by current schemes*". (p.51, added emphasis). The Cloiche sites were the wrong place for development in 2014 and were removed as mitigation. They remain the wrong place for development today.
12. The benefits claimed for the proposed development are overstated. A review of progress on Scottish climate targets might conclude that Scotland has excelled at building wind farms but been poor in many other areas of required action. Almost all of Scotland's electricity generation is now low-carbon. As of December 2019, renewable generation capacity operational (11.8 GW), in construction (1.2 GW) and awaiting construction (7.6 GW) exceeded the nominal 17GW target for 2030 by over 20%. Wind is dominant in this.⁵ Cloiche would contribute further to this imbalance.
13. Set against the considerations listed in paragraph 169 of SPP 2014, it is our assessment (set out below) that the proposed development would have markedly adverse individual and cumulative landscape and visual impacts (including on wild land and the Cairngorms NP), which would

² Scottish Planning Policy 2014, Para 28.

³ Scottish Ministers' Stronelairg Wind Farm Decision Letter (6 June 2014) is unambiguous. The Highland Council proposed "the removal of 16 turbines, the repositioning of two anemometer masts, the reduction in height of 10 turbines and the repositioning and lowering of a further turbine." (p.2) and Scottish Ministers adopted this position in giving consent. This was explicitly to reduce landscape and visual impacts by constraining development within an area of topographic enclosure. ... "the changes requested by The Highland Council are designed to further ensure that the wind farm is well contained within the bowl-shaped landform surrounding the site and will therefore result in a reduction in the overall prominence and visibility of the turbines."(p.10) "Ministers consider that the reduction in scale of the proposal has helped to mitigate the visual and landscape impacts of the development, and has satisfactorily addressed these impacts to help bring them to an acceptable level." (pp.6-7)

⁴ There seems to be increasing enthusiasm amongst developers to revisit proposed sites or parts of sites that failed previously to make it through the planning system. This might be viewed as a cynical attempt to exploit the topicality of the 'climate emergency' for commercial ends.

⁵ At Q4 2019, wind was 79% of operational renewables capacity; 91% of under construction capacity; 93% of consented capacity awaiting construction; and onshore wind alone was 94% of the further 4 GW in planning (Scottish Renewables <https://www.scottishrenewables.com/our-industry/statistics> Accessed 19 May 2020)

particularly affect hill-walkers. There are consequential concerns regarding the impact on hill-walking tourism. These adverse impacts must be included in the negative balance by the decision-maker against the claimed merits of the proposal.

b) Landscape and visual impact (including cumulative impact)

14. Landscape and visual impact assessment compiles data and presents results within an objective structure but ultimately applies subjective judgement, whether professional or consumer. In our experience, commissioned assessments consistently downplay the impact of proposed development upon mountain environments and the mountaineering experience. Mountaineering Scotland's assessment has been informed by the compilers and reviewers of this objection having between them well over 100 years of experience on Scottish and other hills, and 'fieldwork' in the Monadhliath stretching over decades (38 years in the case of our primary windfarm casework reviewer). We do not suggest that either professional or consumer judgement trumps the other; simply that each has a distinct place in informing decision-making.
15. As lay consumers of mountain landscapes, we find the professional distinction drawn between the various landscape and visual impacts often rather theoretical. The way in which landscape, and the effect of development upon it, is experienced can involve all of the senses, but is primarily appreciated visually. Separating landscape and visual effects is understandable but artificial. Likewise, the segmentation of landscapes for analysis by separate Character Types and Designations is understandable but serves to weaken the overall perspective. By including many landscape slivers in the analysis with no significant effects, the importance of those landscapes that do matter is diluted. How landscape is experienced by people is as a single entity, not split between multiple parts defined by lines on a map. That is how we have developed our assessment.
16. The context of the two development sites is typical of the Monadhliath – rolling moorland uplands with extensive views. The turbine base altitudes would be c.700-750m OD (east) and c.640-730m OD (west). Also typical of the Monadhliath is the existence of a wind farm – Stronelairst, the largest in the western Monadhliath wind farm landscape, with 66 turbines of 125-135m blade-tip height, with bases at c.610-720m OD.⁶ The highest blade-tips of Stronelairst reach c.845-855m OD⁷; Cloiche east blade-tips would reach c.900m OD and Cloiche west c.880m OD.
17. These differences in blade-tip altitudes are small but significant. In the east the 'enclosing' ridge north of (and excepting) Geal Charn drops to 830m OD before rising to 895m at Carn Odhar na Criche – higher than the existing Stronelairst blade tips for all but a short distance; lower than those proposed for Cloiche over the entire distance. The highest eastern Stronelairst turbine has a blade-tip altitude of c.835m. The highest proposed Cloiche east turbine would have a blade-tip altitude of c.890m. In the west the topography is more complex but three prominent hills can be used as illustration. Carn a 'Chuillin's summit is 816m; the nearest Stronelairst turbines are c.6.5km distant with maximum blade altitudes of c.775m; the nearest Cloiche turbines would be c.4.5km distance with blade altitudes at c.830m – higher than the summit. Corrieyairack Hill's summit is 892m and Gairbeinn's 896m. They lie, respectively, nearly 7km and 5 km from Stronelairst with blade-tip altitudes of c.825m and c.795m OD. For both, Cloiche west would bring turbines within 3-3.5km and blade-tip altitudes to c.880m.

⁶ Stronelairst as consented was 67 turbines: 56 x 135m, 11 x 125m, 1 x 110m. As built it consists of 66, omitting the 110m turbine (T51), and onsite roads also differ somewhat from the 2014 consented layout.

⁷ The Stronelairst Deer Management Plan Sept. 2016 (TA 8.7, p.6) wrongly gives the range as 640-800m.

18. The eastern edge of Cloiche east is 1.5km from the boundary of the Cairngorms National Park.⁸ Wild Land Area 20, Monadhliath, is 1km east of Cloiche east, curving around it. Compared with Stronelairg, Cloiche east extends about 1km further east. WLA 19, Braeroy-Glenshirra-Creag Meagaidh, is 5km south of Cloiche west. Compared with Stronelairg, Cloiche west extends about 3km further south.
19. Dell wind farm (14 turbines x 130.5m BTH) is consented abutting Stronelairg at its northwestern end. With a maximum base altitude of c.710m OD, the maximum blade-tip altitude of Dell would be c.840m – trivially lower than Stronelairg. Mountaineering Scotland did not oppose these turbines since they did not increase visibility of development beyond that of Stronelairg in areas of mountaineering interest.⁹ Since the effects of Dell are the same as those of Stronelairg we do not usually refer to it separately hereafter.
20. Of the 20 viewpoints in the EIAR, 14 are hilltops (or thereabouts) and 3 are glen routes used by hillwalkers. We have assessed these viewpoints for their operational phase impacts. (Viewpoints 2, 14 and 20 are not of hillwalking interest and were not assessed.) The EIAR text lists only two viewpoints where the visual impact is significant (7, 18). Technical Appendix 7.7 gives five (7, 8, 9, 15, 18). It is not clear why there is this discrepancy in the application documents. Our independent assessment is that ten viewpoints experience a significant impact:
Major: 18 (viewpoint number)
Moderate: 7, 8, 9, 11, 19
Minor-moderate: 3, 4, 13, 15
Minor: 16
We agree with the non-significant EIAR findings for viewpoints 1, 5, 6, 10, 12 & 17.
21. A key difference between the EIAR and Mountaineering Scotland appears to be the extent to which adverse effects of Cloiche are discounted because of the existing effect of Stronelairg or the general visibility of wind farms in the Monadhliath and across the Great Glen. The appalling impact of Stronelairg on the upland landscape cannot be ignored, and we do not, but nor does it give a carte blanche to further development on the basis that there is already a wind farm so anything goes.
22. In assessing the landscape impact on the Monadhliath northeast of the site, the EIAR notes that Cloiche would usually be seen in association with Stronelairg, but “... it could potentially increase presence of wind turbines within the context, either by occupying a greater part of the surrounding horizon, or due to the larger scale of turbines in relation to those of Stronelairg. In some cases, this may have potential to diminish the perceived scale and sense of distance.” (para 7.7.7) “...This would result in a localised Moderate and significant effect ...limited to small areas ...”. (para 7.7.9) “Whilst these [eastern cluster] blades would be seen with tips and blades of Stronelairg from some of the highest areas, from other areas they would be established as a new feature. The proximity and scale of these blades would be potentially distracting, and likely to affect the sense of remoteness which is obtained within these areas.” (para 7.7.20). It is suggested in TA 7.4 that places in WLA 20 with visibility of Cloiche when there is no Stronelairg visibility would be limited to a few dips and hollows (cf p1.19). This is misleading since most visibility to the northeast and east, where mountaineering interest is focussed, would actually be on high slopes. Cloiche-only visibility would be experienced on high ground at distances of 5-15 km, most notably on the ridge between the Munros of Carn Sgulain and Carn Dearg, summits east of Glen Markie, and Beinn Sgiath (beside Geal Charn, viewpoint 9)

⁸ Distances in this paragraph quote the EIAR and refer to the site boundary. This is tightly drawn around the turbines so the distance to the nearest turbine is essentially the same.

⁹ It did object to the access road (now consented) across steep slopes when the existing Stronelairg roads run nearly to the Dell site. The failure of SSE and Dell to co-operate on access is even more puzzling when SSE has agreed access via Stronelairg with the promoters of Glenshero wind farm (in planning).

– all within WLA 20 and within or on the boundary of the Cairngorm National Park – as well as on high slopes either side of upper Strathdearn. It is accepted that on the highest Strathdearn slopes this is usually in combination with Stronelairg but Cloiche alone considerably extends the area affected, especially on the southern side. The impact particularly derives from the eastern cluster, demonstrating the importance of the mitigation required in the 2014 consent.

23. The Monadhliath northeast of the site is also WLA 20 Monadhliath, and partly in the CNP. The effects described above impact adversely on these designations locally.
24. It is a statement of fact that *“The LCA: Spey Headwaters: Upper Glen of the Spey forms the threshold of the CNP within Glen Spey. (para 7.7.22). But there is no dramatic change on the ground. On the contrary, the impression of heading west out of the Cairngorm National Park is of heading into scarred but wilder country. “... some western cluster turbines of the Proposed Development would form a new feature in the existing landscape and would appear fairly prominently on the northern horizon within an area which is often a focus of the view.” (para 7.7.22). We do not agree that because “this LCA acts as a threshold between east and western landscapes ... the Proposed Development would not necessarily appear out of place, as it would be associated with the larger scale hinterland away from the CNP. It would also be seen within a context of the existing Beaully-Denny transmission towers. An existing access track which winds up the hill in this area already suggests a presence of development or management activities beyond the visual envelope of the glen and, whilst the Proposed Development may appear to emphasise this, it would not appear out of place.” (ibid). We completely disagree. By breaching the Stronelairg ‘bowl’, the development would appear very out of place, even by comparison with other – static and much smaller – man-made features.¹⁰*
25. To the south/southwest, WLA 19 Braeroy–Glenshirra–Creag Meagaidh and the northern edge of the Ben Alder, Laggan and Glen Banchor SLA have extensive visibility of Cloiche, with the Creag Meagaidh-Carn Liath high-level route being impacted by both clusters (extending the width of development) as are most summits in WLA 19, while the western cluster impacts the northern hills of the WLA and casts a wide shadow across the lower ‘central valley’ of the WLA from Melgarve to Luib-chonnal – an area currently with no turbines in view.
26. The cumulative impact of Cloiche is repeatedly understated in the EIAR by including the Glenshero application site in the comparison.¹¹ The Glenshero application seeks to breach the Stronelairg ‘bowl’ even more extensively and flagrantly than Cloiche. An assessment of cumulative impact without Glenshero shows Cloiche to have a substantial additional impact, particularly but not exclusively in the southern arc, despite a cumulative baseline scenario of widespread visibility of wind turbines.
27. The EIAR uses language to create an impression that Cloiche would have only limited effects or localised effects, on a small number of elevated locations, and anyway wind farms are common hereabouts so it would not appear as a new feature. The foregoing analysis suggests otherwise. It would have a substantial effect over a wide area from the northeast clockwise round to west-southwest. It would introduce a new feature in some views while exacerbating, sometimes substantially, the effect of Stronelairg wind farm in other views. The EIAR understates the impact on some close and many midrange and more distant viewpoints. The development would, in our view, be a more prominent element of the view than the EIAR claims because of its disruptive

¹⁰ Beaully-Denny line lattice towers are 42-65m high.

¹¹ For example in para 7.8.19: From the south “...the Proposed Development would usually be seen to the rear of Glenshero which would appear much more prominent, minimising the magnitude of change of the Proposed Development.” But without Glenshero, with Stronelairg in the background it is Cloiche that appears ‘much more prominent’.

visual impact due to its size (vertical and areal extent, including its dual-site design), intensity of development and breaching of the Stronelairg 'bowl'.

28. The cumulative effect above the adverse impact of Stronelairg is not simply a function of nearer distance or greater prominence. It is the different relationship that the Cloiche has with the topography of the area. Instead of being contained within a relatively simple upland bowl, as is Stronelairg, it spills out visually. In this, it conflicts fundamentally with the rationale given by Scottish Ministers in 2014 for consenting Stronelairg in a more limited form than SSE wanted.

c) Socio-economics

29. We do not dispute that constructing a wind farm produces some financial benefits. That is no justification for constructing one in the wrong place. There are many 'right' places where the same benefits can be gained at lower cost to the environment.
30. The EIAR (Chapter 15) offers a benign conclusion that wind farms have no effect on tourism. Mountaineering Scotland would not disagree with the general proposition that well-sited wind farms have no effect. But the problem is that this is a generality. The planning system is not concerned with generalities but with the specific impacts of specific proposed developments in specific locations. That requires a properly focused approach to tourism and recreation impacts both in research and in practical application. This is lacking in the broad-brush consideration given to tourism in the EIAR.
31. From a review of the evidence undertaken for Mountaineering Scotland¹², the hypothesis that best fits the available, limited and far from perfect, evidence is that wind farms do have an effect on some tourism and recreation. The effect is experienced predominantly in areas where large built structures are dissonant with expectations of desired attributes such as wildness or panoramic natural vistas, and where a high proportion of visitors come from the 25% of tourists who are particularly drawn by the quality of upland and natural landscapes, with hillwalking visitors prominent amongst these. The outcome is displacement within Scotland from areas perceived as being sullied to areas seen as still retaining the desired sense of naturalness and space.¹³ In short, tourism impact from wind farms is a consequence of visual impact from wind farms in the wrong place. In much of Scotland, and for most tourists, wind farms are no serious threat to tourism: the nature of the local tourism offer and good siting of wind farms mean they can and do co-exist. The question is whether Cloiche is well-sited.
32. The research by BiGGAR Economics does not recognise that different landscapes are likely to produce different responses to wind farms.¹⁴ Wind farms in all types of landscape were combined into a single unstructured analysis. BiGGAR Economics' own data shows a negative impact on tourism-related employment from wind farms operational in SLAs in Scotland.¹⁵ All three wind farms in such areas in their study lost employment between 2009 and 2015 (averaging -7%), compared with a Scottish increase of 15%. Remarkably, there has been no comprehensive study of the impact on tourism and recreation of wind farms stratified by landscape quality. It is unknown what the effect is of development outwith designated areas but

¹² Wind farms and tourism in Scotland: A review with a focus on mountaineering and landscape (2017)

¹³ Wind Farms and Mountaineering in Scotland (2016) <https://www.mountaineering.scot/mountainwind-farm-research>

¹⁴ BiGGAR Economics (2017) Wind Farms and Tourism Trends in Scotland

¹⁵ <https://www.mountaineering.scot/assets/contentfiles/pdf/Wind-farms-and-tourism-in-Scotland-Supplement-December-2017-20171121.pdf>

in close proximity to, and with adverse visual impact upon, a National Park, two WLAs and an SLA, as would be the case for Cloiche. To suggest there is none is to go beyond the evidence.

33. Not only does the EIAR Chapter 14 ignore the landscape quality of the impacted area, it also ignores the people most likely to be impacted. It would appear that there is no such thing as hillwalking tourism in this area as far as the EIAR tourism assessment is concerned. Three hills are listed in the tourism baseline: two Corbetts and a prominent non-Corbett, inaccurately referred to as three Corbetts (para 14.6.36). There is no mention of them or any other hills or of hill walking or mountaineering in the assessment of potential effects (para 14.7.37-58). In fact, there are seven Munros and six Corbetts within 15km of Cloiche (*cf* Figure 15.1). As already described, these all experience some degree of adverse impact, which may result in changed behaviour by some visitors with consequential effects on accommodation providers and other services. Mountaineers are tourists too.
34. Chapter 14 of the EIAR does not provide a proper assessment of the potential for specific impact from this proposed development. It gives a general desk-top assessment that could be rolled out for any onshore wind proposal in the Highlands.¹⁶
35. The assessment of recreation Chapter 15 purports to give an assessment of hillwalking impact but it appears ill-informed with, for example, Corbetts consistently misspelled as *Corbett's* and the suggestion that hills might be climbed together that almost never are.¹⁷ It is very misguided in its assumption that the sensitivity of Munros and Corbetts to change is Low because they will be climbed anyway as listed hills. A first ascent might indeed be made because of the listed status of a hill, but repeat visits are based on quality (and accessibility) not list status. Given that the assessors are clearly uncomprehending of what motivates hillwalkers, it is not surprising that this chapter does not recognise “any significant indirect amenity effects on the recreational users of Munros or Corbett’s [*sic*]within the study area” (para 15.7.22). Such an assessment, as with the LVIA that informs it, understates substantially the true potential impact of the proposed development on hillwalkers.
36. A proper understanding of the evidence on tourism, recreation and wind farms, when applied to the specific nature of the local landscape and the tourists attracted to it, leads to the conclusion that a wind farm at Cloiche would have an adverse effect on hillwalking recreation and tourism.

Decommissioning

37. It is impossible to anticipate what circumstances will apply when decommissioning is due after 50 years of operation. It might be hoped that society would have developed a more respectful approach to upland areas such as the Monadhliath. This would require the removal of the 26 km of gravel road that the applicant proposes to simply abandon when the site is decommissioned (para 3.6.28). If consent is granted, full road removal on decommissioning should be a condition.

¹⁶ This impression is reinforced by the inclusion in the references to Chapter 14 of reports by Mountaineering Scotland that are not cited in the chapter.

¹⁷ Chapter 15, paras 15.6.23-24. Beinn Teallach is often combined with Beinn a Chaorainn but almost never with Carn Liath or Stob Poite Coire Ardaar, which can, however, be combined with Creag Meagaidh.

Conclusion

38. The planning history of Stronelaairg makes any proposed extension or adjoining development either very simple or very challenging for the decision-maker. If a proposal clearly fits well with the original rationale for only consenting Stronelaairg in mitigated form in 2014 and raises no new issues it can be consented without difficulty. If it does not fit well, as we have shown is the case with Cloiche, the decision-maker must refuse the application or, if minded to consent, must explain why the rationale of 2014, based on landscape and visual impacts which Cloiche would reinstate and amplify, longer applies.
39. That this landscape is already badly scenically compromised by high altitude wind farms is not in question; whether it should be further compromised is the issue. The mountain landscapes affected by this proposal still have value, even if that has been diminished, particularly by Stronelaairg. There are places in Scotland where development has made a corpse of an area – it has the topographic attributes of a mountain landscape but without the scenic value: a body without a heartbeat. That is close to being the case here, but we do not believe that point has quite been reached.
40. Mountaineering Scotland objects to the proposed wind farm on grounds of its adverse landscape and visual impacts, with consequential impacts on mountaineering recreation and tourism.

Yours sincerely



Stuart Younie

CEO, Mountaineering Scotland

