

By email to
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Ms Claire Farmer
Case Officer
Planning and Building Standards
The Highland Council

21st September 2020

Dear Ms Farmer

MEALL BUIDHE WIND FARM - Erection of and Operation of a Wind Farm for a period of 25 years, comprising of 9 Wind Turbines with a maximum blade tip height 149.5m, access tracks, substation, control building, and ancillary infrastructure with a maximum output of 45 Megawatts. Land 4420M NW Of Croick Estate Ardgay

THC Reference: 20/02659/FUL

Introduction

1. Muirden Energy PLC has applied for consent to build Meall Buidhe wind farm, with 9 turbines of 149.5m blade-tip height.
2. Mountaineering Scotland **objects** to the proposed development on grounds of visual impact and its consequential potential adverse effect on mountaineering recreation and tourism.

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. 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.

4. Mountaineering Scotland agrees with the need to move to a low carbon economy but does not believe that this transition need be at the expense of Scotland's marvellous mountain landscapes. It objects only to the small proportion of proposals – around one in twenty – that are potentially most damaging to Scotland's widely-valued mountain assets, consistent with its policy set out in *Respecting Scotland's Mountains*. This has been strongly endorsed by its members and by kindred organisations such as The Cairngorms Campaign, North East Mountain Trust and The Munro Society.

Material considerations

a) Policy

5. The Scottish Government enthusiastically supports continued onshore wind deployment and an individual planning application is not the place to question whether overwhelming reliance on a single generating modality is adequately robust and resilient. However, policy is clear that expected economic and emissions benefits are to be balanced against potential harms in the determination of an individual planning application. “The aim is to achieve the right development in the right place; it is not to allow development at any cost.” (Scottish Planning Policy 2014, Para 28). The most recent energy policy documents restate the policy support for onshore wind but do not change planning policy or the weight to be applied to different elements in the planning balance.¹

6. The most recent Scottish Government policy response to climate change might be regarded as providing increased support for any action that reduces carbon emissions.² However, there has been no change in any government policy document to the position set out in SPP 2014 quoted above. Benefits to the global environment must be balanced against costs to the local environment. Taken to its logical conclusion, if the climate emergency was to be regarded as trumping all other considerations, then any wind farm in any location would have to be approved regardless of the level of adverse impacts, making the planning system redundant. There is no indication that it is the Scottish Government’s intention to introduce such a policy. In the context of 11.9 GW of operational renewable electricity generation capacity and 9.0GW consented capacity in Scotland³, a single onshore scheme of 0.045 GW capacity is not so vital to Scotland’s climate ambitions that its adverse effects can simply be dismissed.

7. The entire turbine site and substantial parts of the access road appear to lie in an area designated ‘Group 2: Areas of Significant Protection’ in national planning policy. Fieldwork experience confirms that the site is very wet. The long carbon pay-back period of the proposed development is consistent with a site of high peatland value. While the layout seeks to avoid areas of deep peat as much as may be possible in this location, it does intrude into them. Many wind farm planning decisions require a balance to be struck between peat destruction and wind energy generation. It is questionable if this proposal achieves the right balance.

8. Each development needs to be judged on its own merits and in its geographical context. Decision-makers are not bound by national energy and planning policies to consent any particular scheme for electricity generation if its anticipated benefits are outweighed by its anticipated harmful consequences. There are many possible locations for low-carbon electricity generation.⁴ The adverse impacts of a scheme, however, are often site-specific and should weigh more heavily in the balance because of this.

¹ Scottish Energy Strategy, 2017; Onshore Wind Policy Statement, 2017

² Climate Change (Emissions Reduction Targets) (Scotland) Act 2019

³ Scottish Government Energy Statistics Hub. <https://www.gov.scot/publications/scottish-energy-statistics-hub-index/> Accessed 16 Sep 2020.

⁴ To illustrate this point, there was 3,598 MW of onshore wind in planning at September 2019. Mountaineering Scotland had raised no objection to >85% of this capacity.

b) Landscape and visual impact (including cumulative impact)

9. Landscape and visual impact assessment (LVIA) 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 on the upland environment and this LVIA is certainly no exception. 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 hills around the development site stretching over decades. It is important in reaching a balanced decision that neither professional nor consumer judgement trumps the other; each has a distinct place in informed decision-making.

10. The development site consists of undulating wet moorland above extensive forestry to north and south. The proposed location for the turbines is high on the northern slopes of a gentle ridge which forms a spine, running from Ben Ulbhaidh (496m) through Meall Buidhe (459m) to Meall Dheirgidh (506m). The base altitudes of the turbines are at c.370-420m OD, giving blade-tip altitudes of c.520-570m OD. All turbines thus overtop, usually substantially, the ridge when seen from notable hills to the WSW and south (*cf* Viewpoints 8 and 10, representing the nearest significant hills to the WSW and south, and Seana Bhraigh, Beinn a'Chaisteil and Ben Wyvis at greater distances in the same directions). With hub heights matching Ben Ulbhaidh's squat height and blade-tips exceeding Meall Dheirgidh's more shapely appearance, any perception that the proposed development is 'bookended' by their summits when viewed from other hills is fanciful, particularly in respect of Ben Ulbhaidh.

11. The site is nearly ringed by national and local landscape designations⁵ from south clockwise to NE. The areas of mountaineering interest lie within these designations and while we make no assessment in respect of the designations themselves, the fact that these areas have received formal recognition is evidence of their high landscape quality and vulnerability to inappropriate development.

12. To give Mountaineering Scotland's concerns in brief, the proposed development would:

- a) have a significant visual impact upon nearby hills, as represented at Carn a'Choin Deirg and Carn Chuinneag;
- b) bring wind farm development much closer – typically by c.10km – to the south and west than the existing and consented Lairg cluster⁶ and locate it NW-to-SE along a ridge line, giving a significant visual impact deeper into the hills (and designated landscapes), as represented at close quarters at Carn a'Choin Deirg and Carn Chuinneag and more distantly at Beinn a'Chaisteil, Seana Bhraigh and Ben Wyvis.

The following paragraphs provide more detail on our assessment of the visual impact of the proposed development

13. Viewed from hills to the north and northeast, such as Ben Klibreck or Ben Horn, the visual impact of the proposed development would be attenuated by distance and appear, where they are visible, beyond (and above) Rosehall, Achany and, especially, Braemore wind farms. To the extent that further wind farms are consented southeast of Lairg, this would also diminish the impact of the proposed development from this quarter.

14. From south clockwise through to west, views of the proposed development would be

⁵ We include Wild Land Areas in this for simplicity while acknowledging that they are not strictly a designation.

⁶ The LVIA tries to have its cake and eat it by claiming both that the proposed development can be seen as part of the Lairg cluster and that it has an effective separation from it.

unobstructed and bring turbines closer to the hills, the Meall Buidhe turbines appearing in front of and sometimes at a clearly different altitude to existing, consented and proposed developments around Lairg (excepting Braelangwell (scoping) which may raise the same concerns as Meall Buidhe if it proceeds to an application.). The Viewpoints at Carn a'Choin Deirg, Seana Bhraigh and Ben Wyvis all demonstrate this.

15. From the northwest, views of the proposed development (e.g. Ben Sgeireach, Ben More Assynt) are also unobstructed, appearing to the right (south) of existing wind farm clusters. Wind farms consented but not yet built and plans being worked up are within those clusters except for Braelangwell. In the absence of Braelangwell, Meall Buidhe would appear as an outlier, albeit attenuated by distance from the viewer.

16. The LVIA is not credible when it asserts that "The viewpoint analysis indicates that significant visual effects would extend out to approximately 6.5km from the nearest turbine locations [thus including only Carn a'Choin Deirg of the hill viewpoints] ... It may be noted that there are no instances of 'Substantial' level of effect." (7.5.3.1). Mountaineering Scotland profoundly disagrees with this limited distance, which elsewhere in the LVIA is stated even more narrowly as 5-6.5km (7.12.5).

17. The effect at Carn a'Choin Deirg is substantial and it is no less strong, despite the greater distance, at Carn Chuinneag. The increased lateral spread of development seen from Ben More Assynt (though notably attenuated by distance) and Ben Sgeireach to the NW and Ben Wyvis to the S is also an adverse visual impact. The effect of bringing turbines closer to wild hills is evident from Beinn a'Chaisteil, particularly, and Seana Bhraigh not only because they are indeed closer but also because they are bigger and sit across the line of view. There is also a higher likelihood of turbines seen from the south or SW being seen front-lit, making the turbines and their movement more eye-catching.

18. We do not agree with the LVIA that "In some instances (Viewpoint 8: Carn á Choin Deirg and Viewpoint WL1: Beinn á Chaisteil and to a lesser extent Viewpoint 10: Carn Chuinneag and Viewpoint WL2: Beinn Sgeireach) the overlapping of the Proposed Development with other existing and/or consented wind farm developments, or the visibility of wind farm development in the same sector of the view serves to slightly reduce the cumulative effect of the Proposed Development in comparison to the assessment on a solus basis." From Viewpoints 8, 10 and WL1 the proposed development is very clearly perceived as much closer to the viewer while from Viewpoint 10 (again) and WL2 the proposed development is clearly positioned as an outlier.

19. The rationale for receptors (hillwalkers) on Carn Chuinneag (and Ben More Assynt) being High but those on Carn a'Choin Deirg only Medium is indefensible and appears to derive from a mistake in the assessment which states that the hill is not a Graham and would not attract hillwalkers (Appendix 7B)⁷, when it is and does, albeit not in the same number as Munros. Likewise, the magnitude of change being scored as medium on Carn a'Choin Deirg but low on Carn Chuinneag simply does not match the visual evidence presented in the LVIA or unbiased assessment in the field.

20. The LVIA claims: "There are no well walked hill summits, such as Munros, Corbetts or other popular hills within 10km." (7.7.4.1) Carn a'Choin Deirg is a Graham – an increasingly popular category of hill – 6km from of the proposed development and Carn Chuinneag, a Corbett, is only 11km from the development, just outside the arbitrary 10km limit chosen for the LVIA.

21. We contend that the visual impact on upland locations and hillwalkers are markedly understated

⁷ The LVIA's explicit statement that it is not a Graham is one of a sizeable number of errors in the LVIA that we assume are mostly typographical errors but this statement is particularly misleading.

in the LVIA.

c) Socio-economics

22. We do not dispute that constructing a wind farm produces some financial benefits. However, in a dynamic energy economy, achieving construction and operation benefits for the region and nation is not reliant upon the consenting of any one proposal.

23. The EIAR Chapter 16 states: “There are a number of prominent studies on the impact of wind farms on Scottish tourism which indicate that tourists are generally not deterred from visiting areas due to the presence of wind farms.” (16.5.4). In fact, the potential effect of windfarm developments on the tourism and recreation sector has been very poorly researched, with no Scottish Government interest in funding high quality primary research since the very dated 2008 study and the 2012 review of evidence that merely showed there had been no substantive new evidence since 2008, both cited by the applicant.

24. Mountaineering Scotland has reviewed the evidence for impact of wind farms on tourism.⁸ The hypothesis that best fits the available limited and imperfect evidence is that wind farms do have an effect on tourism and recreation in specific circumstances. These are when 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 mountaineering visitors prominent amongst these. In much of Scotland, and for most tourists, the nature of the local tourism offer and good siting of wind farms mean they can co-exist. That is not the case here.

25. Analysis of the tourism and recreation implications of a particular proposal needs to consider the nature of visitors to the area and the quality of landscape they are visiting. In areas of higher quality landscape, both the landscape and those visiting it might have higher sensitivity to wind farms than would be expected in areas of more modest landscape quality. For example, 23% of hillwalkers would go elsewhere rather than visit an area with windfarms while 44% would still visit but find the visit less rewarding.⁹ The EIAR puts forward an erroneous assumption (citing no evidence) that walkers “will not be significantly deterred from their recreational pursuits due to the visual presence of the proposed development, irrespective of their opinion of it.” (16.6.3.2). The empirical evidence suggests otherwise.

26. The applicant cites the 2016 version of the poorly conceived and executed Biggar Economics (BE) study into the impact of wind farms on tourism-related employment in their locality. Prominent amongst the flaws in this study is the mixing of windfarms in all types of landscape into a single unstructured analysis. Using the 2017 version of the BE report, an analysis for Mountaineering Scotland has shown a negative impact on tourism from wind farms operational in locally designated scenic areas.¹⁰ This limited study is the only attempt to date to analyse wind farm impact on tourism/recreation in Scotland in relation to the quality of the receiving landscape. No study has looked at the effect of wind farm development in proximity to (as opposed to within) designated landscapes.

⁸ Wind farms and tourism in Scotland: A review with a focus on mountaineering and landscape (2017)

⁹ Wind farms and mountaineering in Scotland (July 2016)

¹⁰ <https://www.mountaineering.scot/assets/contentfiles/pdf/Wind-farms-and-tourism-in-Scotland-Supplement-December-2017-20171121.pdf> The three wind farms in designated scenic landscapes lost tourism employment between 2009 and 2015 (averaging -7%), compared with a Scottish increase of 15% and an increase of 35% in the vicinity of wind farms in non-designated areas.

27. As far as mountaineering tourism and recreation is considered, the benign conclusion of the EIAR is unwarranted and greater caution regarding potential adverse tourism and recreation impacts is merited when faced with applications set within or near to high quality landscapes.

Conclusion

28. The proposed development would have a significantly adverse visual impact upon the mountain areas to the south and west, where the proposed development would place large wind turbines much closer to core mountain areas than existing wind farms, with consequential potential adverse impact on mountaineering recreation and tourism.

Mountaineering Scotland objects to the proposed Meall Buidhe Wind Farm.

Yours sincerely



Stuart Younie

CEO, Mountaineering Scotland

