

By email to
eplanning@highland.gov.uk

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

26 April 2021

Dear Ms Farmer

Sallachy Wind Farm - Erection and Operation of a Wind Farm for a period of 30 years, comprising of 9 Wind Turbines with a maximum blade tip height of 149.9m, access tracks, temporary borrow pits and construction compound, substation, control building, and ancillary infrastructure. Land at Sallachy Estate, Lairg

THC Reference: 21/01615/FUL

Introduction

1. WKM GmbH has applied to The Highland Council for consent to build a wind farm of 9 turbines of 149.9m blade-tip height towards the western end of the south shore of Loch Shin, west of Lairg.
2. The same applicant previously submitted an application in 2011 for 22 turbines of 125m BTH on a wider site straddling the ridge south of Moavally. This was refused by the Scottish Government in 2015 primarily because of impacts on wild land and the Ben More Assynt-Coigach National Scenic Area. The present application is for the easternmost section of the previously refused scheme, with a broadly similar layout but taller turbines. The applicant considers that this reduces the landscape and visual impacts to an acceptable level.
3. Mountaineering Scotland does not agree with this assessment and **objects** to the revised proposed development on grounds of visual impact, most notably upon mountains and wild land within the Ben More Assynt-Coigach NSA, the Reay-Cassley Wild Land Area and the Foinaven-Ben Hee WLA, with consequential potential adverse effect on mountaineering recreation and tourism.

Mountaineering Scotland

4. Mountaineering Scotland is an independent association of mountaineering clubs and individuals, with over 14,000 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 75,000 members of the British Mountaineering Council, which fully supports Mountaineering Scotland's policy relating to wind farms.

5. 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

6. The enthusiastic support of the Scottish Government for onshore wind deployment is well understood. However, policy is equally clear that: "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, paragraph 28) More recent policy documents restate support for onshore wind in the context of political declarations of a climate crisis, while placing a much increased emphasis on offshore wind, but no policy or advisory documents to date suggest that the principle of 'right development in right place' has been abandoned or that the weight to be attached in the planning balance to energy policy relative to landscape protection has changed to such a degree as to make a site such as Sallachy acceptable in policy terms.
7. It is notable that the Scottish Government's 2020 target to generate the equivalent of Scotland's electricity consumption from renewable sources was very narrowly missed (on provisional data) not because of insufficient consented schemes but because of the failure of developers to progress consented schemes timeously. To take a very local example, Creag Riabhach was consented in October 2016. It only began construction in 2019 and the grid connection was consented as recently as March 2021. Clearly the "considerable shortfall against the 2020 target" to which Creag Riabhach would make "a valuable contribution", which was used in the S.36 application (applicant's Planning Note January 2016) as a reason why it should be consented, was no longer a consideration for the developer once consent had been gained.

b) Landscape and visual impact (including cumulative impact)

8. The proposed development would have adverse visual impacts upon mountaineering assets, the NSA and WLAs, wholly disproportionate to the climate benefits to be gained from a development of limited capacity in the wrong location.
9. Considering how long the applicant has been pursuing permission for this site, it has had sufficient time to provide better baseline photography than that accompanying the application. The poor baseline photography is explained by the applicant at para 6.7.374. However, comparison of the 2020 baseline photography with earlier photographs would have allowed the latter to be used in many instances since there has been little change. The greyness and murkiness of most of the photomontages relevant to our mountaineering assessment (which considered Viewpoints 1, 2, 3, 7, 12, 13, 17, 18, 19, 22, 23) substantially diminishes the photomontaged visibility of the proposed development and gives a thoroughly false impression of the visual impact to be expected in good conditions.
10. Our objection is rooted in visual impact and perception of landscape. The appreciation of 'wild land' both as scenery and for its perceptual qualities is part of this but we do not consider

impacts on wild land as such. It is notable that the LVIA assessor displays a lack of empathy with wild land and more generally with hillwalkers' appreciation of their surroundings.

11. The LVIA acknowledges some 'localised' effects. This fails to appreciate the essential character of the central Sutherland landscape, typified by extensive long distance views between mountainous areas across recessive moorland, flows and forestry. This has already been diminished by the incomprehensible consenting of Creag Riabhach. Sallachy would significantly further diminish this distinctive regional character.
12. Viewed at the same time as Creag Riabhach and the Lairg cluster, as well as more distant wind farms on good days, Sallachy would give the impression of wind farms untidily spattered across the landscape in a way almost designed to maximise visual impact rather than focussing capacity and impact within discrete, coherent clusters.
13. The Creag Riabhach decision also set a poor example in consenting 5 of the 22 turbines within a Wild Land Area (by a maximum of 348m), the only such instance to date we believe. In contrast to this marginal incursion, the Sallachy turbines are 1-2km inside the WLA boundary, which is the loch shore. The Sallachy site itself and almost all the wild land impacted by it sits in the top 40% of wild land in Scotland (Jenks category 5 and above). To consent Sallachy would be to compound the mistake of Creag Riabhach, opening the door to innumerable speculative applications.
14. If constructed, Sallachy would represent a major thrust westward from the Lairg cluster. Sallachy would be 5.2km from the NSA, 8.5km from Ben More Assynt and 13km from Ben Hee. The nearest part of the Lairg cluster is 15, 22 and 28km, respectively. While we agree with the LVIA that Sallachy would be broadly in the same direction as existing development (*i.e.* east), distance matters as well as direction in determining impact. Furthermore, Sallachy is 8km due E from Ben More Assynt, in the same angle as the much more distant (48km) Kilbraur, while the Lairg cluster is 22 km SE from Ben More Assynt and Creag Riabhach 21km NE. Rather than fitting in, Sallachy would fill a visual 'gap' between existing development at a much closer distance (*cf* Viewpoint 2, cumulative wireline).
15. The LVIA regards 9 out of 23 Viewpoints as experiencing a significant adverse impact. (The summary table moves one of these -Vpt 10 - to non-significant for 'residual effect'. The text does not explain this change, which we discount here.) We disagree with the rating for Ben Klibreck which we consider would experience a significant effect when the wider context of Sallachy fitting between Creag Riabhach and the Lairg cluster is considered. Of viewpoints from the mountains/wild land, five out of eight are significantly adverse in the LVIA. We would increase this to six with the inclusion of Ben Klibreck. This is a high proportion. Of viewpoints looking towards Ben More Assynt, only one (Vpt 7) of three is rated in the LVIA as significant. This is kind to the development. We think Viewpoints 17 and 18 are also significantly adverse, at around 10km distance, with the turbines at Sallachy introducing a kinetic distraction from Ben More Assynt in an angle of view currently without wind farms.
16. The applicant's Wild Land assessment repeatedly contrasts the eastern leg of the Reay-Cassley WLA, where the applicant wants to site the development, and the mountain core of the WLA. It is silent on the impact on the peatlands of the western leg, where the perceptual wild feel to the landscape would be much diminished in a sizeable area of high wildness (Jenks 7) where Sallachy would be the only wind farm visible (Figs. 6.11.c & d).
17. The LVIA also repeatedly refers to the Creag Riabhach wind farm to downplay the wildness of the southern part of the Foinaven-Ben Hee WLA without acknowledging that the Sallachy scheme would have a similar impact on that area in a different angle of view and on the southern limbs of the Reay-Cassley WLA, both western and eastern legs. Indeed, it would

effectively detach the eastern leg from the body of the WLA. (The assessor does, however, acknowledge Creag Riabhach's significant visual impact on Viewpoint 13, Cnoc Alaskie, in paras 6.7.565, 6.7.567 and 6.7.575 – the only Viewpoint at which the LVIA recognises a significant cumulative impact.)

18. The proposed development not only affects views from the mountains but also views to the mountains (*cf* Viewpoint 7, 17, 18 - at the last two the static imagery does not convey how distracting moving blades can be even at some distance). From the east of the Foinaven-Ben Hee WLA, views towards the striking Ben Mor Assynt would embrace the Sallachy turbines. The turbines would appear in line abreast to the SW (*cf* Viewpoint 13) with Creag Riabhach to the NE. This visual interruption gives a sense of being enclosed or bounded by turbines. Even though the number of Sallachy turbines is small, they are simply in the wrong place and the linear layout – not unacceptable in many locations – here increases the impact by resembling a fence-line. This latter impact, again combined with Creag Riabhach to the east, is also evident at Ben Hee (Viewpoint 12). Many of the features that the LVIA considers as diminishing wildness, such as the aerial, are in fact hardly visible in the field since they are small and/or recessive.
19. This development is proposed for the wrong location. This area cannot accommodate a commercial wind farm without disproportionate and unacceptable damage to the landscape quality that provides its distinctive regional character.

c) Socio-economics

20. Mountaineering Scotland does not disagree with the general proposition that well-located wind farms have no effect on tourism or recreation. That generality does not apply here. This is a poor location and there is evidence (albeit limited) that poorly-located wind farms do have an impact upon tourism.
21. The applicant's tourism and recreation assessment is both formulaic and ill-informed. For example, there are far more than three Corbetts within the area defined by the five Munros listed in the paragraph 13.5.51. But counting Corbetts within a radius from a development is as irrelevant to a proper assessment as including visitor attractions nowhere near the location (*cf* 13.6.61 ff). The assessment is also lacking in local knowledge. For example, Benmore Lodge, a private residence with no view of the proposed scheme, is confused with a hotel of the same name in Crianlarich (13.6.87). Mention of the West Highland Way in its description obviously failed to give the chapter's authors pause for thought.
22. More serious is the circular logic employed by Biggar Economics. Its own poor quality research and a partial reading of the very limited literature on tourism and wind farms has led it to conclude that wind farms never have any impact on tourism. Therefore, when it assesses the impact on tourism of a specific proposed development, it finds none because its starting point is that wind farms don't have any effect on tourism.
23. Mountaineering Scotland takes a much more nuanced approach, specific to the landscape around a proposed development and informed by knowledge of the local context and of the specific segment of the tourism market most at risk from inappropriate developments: hill-walkers and other landscape-oriented visitors. In areas of high landscape quality visited by tourists attracted specifically by such quality, there is the potential for harm to tourism and recreation. The area around Sallachy is such a landscape and attracts such visitors.
24. Given that there appears to be a potential for harm to tourism and recreation from wind farm development in certain circumstances, and that those circumstances are met in relation to Sallachy, caution is merited. A deterioration in the perceived quality of the local landscape 'offer' may have long-term consequences for tourism footfall and spend. Why put at risk the

largest employment sector in the local area (Table 13.5)?

Conclusion

25. The Scottish Ministers 2015 Decision Letter for the previous application concluded: "the impacts ... most particularly in respect of the impacts of the Development on the NSA and on wild land, are not acceptable and are not outweighed by any wider policy benefit. Scottish Ministers consider that the balance is not in favour of the Development, and consent ... is therefore refused." Mountaineering Scotland believes that the same conclusion applies to the present application.
26. The proposed development would materially change the perceived character of the landscape. It would extend well beyond the Lairg wind farm cluster and bring wind farm development unacceptably close to one of Scotland's iconic mountain landscapes. This is simply not the right location for a wind farm.
27. **Mountaineering Scotland objects to the proposed Sallachy Wind Farm.**

Yours sincerely



Stuart Younie

CEO, Mountaineering Scotland

