



The Mountaineering Council of Scotland

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Dear Sir

Application 15/P/1/0189 Objection to Proposed Balunton Hill Wind Farm, Glen Trool

1. Introduction

Balunton Hill Wind Farm Ltd has applied for planning permission for 9 wind turbines of 125m blade-tip height at base elevations of around 200-250m OD on Balunton and Glencaird Hills, near Glen Trool adjacent to the Galloway Forest Park.

The MCofS objects to the proposed development on the grounds of visual impact.

2. The Mountaineering Council of Scotland (MCofS)

The MCofS is an independent organisation with more than 12,500 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. We are recognised by the Scottish Government as representing the interests of mountaineers living in Scotland.

We also act in Scotland for the 75,000 members of the British Mountaineering Council (BMC), the representative body for mountaineers in England and Wales, which fully supports our policy relating to wind farms and contributes direct financial support to our policy work.

The MCofS recognises the need to move to a low carbon economy but it does not believe that this transition need be at the expense of Scotland's marvellous mountain landscapes. It objects only to proposals that we regard as potentially most damaging to Scotland's widely-valued mountain assets, consistent with our policy as set out in our policy document Respecting Scotland's Mountains. This reflects the views of our members and those organisations which support our policy, which include The Cairngorms Campaign, North East Mountain Trust and The Munro Society. To date we have objected to fewer than one in twenty applications.

3. Summary

The MCofS believes the proposed site does not have the capacity to support a wind energy development without unacceptable harm to the enjoyment of the mountain landscapes to its east.

While the site itself is unexceptional, the proposed development is not consistent with the present pattern of development which sits at a more respectful distance from the core mountain area of Galloway.

4. Material considerations

a) Preamble

For all the appearance of objectivity, visual impact assessments are ultimately structured subjective judgements commissioned by the developer. The MCofS - composed of and representing experienced 'consumers' of mountain landscapes - believes its judgement of impact on the mountaineering experience to be no less valid.

b) Visual impact

The MCofS has objected to very few of the many applications for wind farms in southwest Scotland. We have begun to do so only recently as applications have pressed ever closer to the core mountain resource within an approximate triangle anchored by Cairnsmore of Fleet, Shalloch on Minnoch and Cairnsmore of Carsphairn. To the west of this core there is already a consented wind farm landscape and a similar landscape is likely to develop to the north.

However, this current proposal is very clearly not set within the emerging wind farm landscape of the Wigtownshire / Ayrshire borderlands. It stands starkly separate, with a strong visual impact on views from the western hills from Cairnsmore of Fleet to Shalloch on Minnoch giving a clear psychological effect of development pressing closer towards the hills than any existing development west of the Merrick range. This visual impact is experienced at distances of approximately 8-12 km, close enough for blade movement to be very visible. The development would also be visible from Cairnsmore of Fleet at a somewhat greater distance but at an angle from which it is very clearly an isolated development much further advanced towards the hills than any other consented or presently proposed development.

The development would also be visible through the east-west gap of upper Glen Trool from Meikle Millyea and some of the lower hills north of the upper glen, the latter being the southern edge of the very core of wild Galloway. The distances vary but views would be sufficiently close for blade movement to be visually attention-catching.

In the visual impact assessment and Wild Land Area assessment the Environmental Statement contains several references to views of the proposed development from the Merrick range being 'distant'. This is an example of the subjectivity of assessing impact. Distances involved are typically around 10km, which we do not regard as distant for large rotating structures that will often be seen by hill-walkers as pale against a contrasting dark background of forestry or moorland.

The impact on hill views is summarised by the applicant in paragraph 7.13.26 of the ES:

“From elevated locations the proposed development would be seen in the context of the other consented developments across the plateau with forestry landscapes, and would be seen as part of the characteristic pattern of forestry with windfarms landscape, with limited additional effects which would not give rise to significant effects on visual amenity.”

The MCofS disagrees strongly with this conclusion. The proposed development would appear as a substantial move (north) eastward from the established pattern of windfarm development. The visual impact on the Merrick range and other western hills would be, in our judgement as regular hillwalkers familiar with the area, significant and adverse.

The western edge of the mountain core of Galloway currently looks out on an extensive fringe of plantation forestry beyond which, typically at distances of 20km and upwards, a wind farm landscape is being built.

The proposed development would break that pattern by placing a wind farm within the forestry fringe. The simple sequence of landscape transitions from open hill to forestry to wind farms would be disrupted.

c) Cumulative impact

Scottish Government energy and planning policies have already set the scene for there to be substantial impact from wind farms in this part of Scotland. The question, therefore, is where the line should be drawn between the exploitation of one asset (wind, providing low carbon though inconsistent electricity) and the protection of another asset (mountain landscapes, providing a healthful experience).

The extent of consented development and potential further development in southwest Scotland is clearly shown in Figure 7.4.2 (and the map does not cover scoping work which we know is being undertaken in the area). The nearest consented developments are both large developments no closer than 9km.

Our concern with the proposed development is therefore not cumulative impact *per se* but its break with the pattern of development already established. In every western view from the uplands from Cairnsmore of Fleet to Shalloch on Minnoch it would be seen in the context of an extensive wind farm landscape. But it would also be seen as quite detached from the landscape, positioned much closer to the hills in the forest zone, and inadequately screened by the landform of Balunton and Glencaird Hills. For the sake of nine turbines, which could easily be accommodated within the emerging wind farm landscape to the west, the cumulative impact from the contrasting visual effect is too high a price to pay.

d) Socio-economics

Mountaineering is a substantial contributor to tourism and recreation spend in specific parts of Scotland. It is a niche but locally important market. The applicant's tourism assessment repeats dated evidence from the Moffat Centre (2008) with fieldwork undertaken in 2007 when onshore wind capacity in Scotland was one quarter of the present operational level. Most subsequent 'research' simply consists of secondary reviews, such as Aitchison 2012 cited in the ES, and thus relies heavily upon the Moffat Centre report.

What little new primary research has been undertaken has mostly been in general population surveys, not focused on particular receptors or areas. Even so, they suggest a change is taking place over time that developers do not want to acknowledge. In studies across the UK undertaken prior to 2008 fewer than 10% of respondents expressed the view that they would be deterred from visiting an area by the presence of a wind farm. In the Moffat Report itself it was a mere 2%. VisitScotland research published in 2012 showed that around 17-20% of tourists would be deterred. A Scottish Renewables survey in 2013 found that 26% were discouraged. Although there are few recent data points it is possible, to put it no more strongly, that the steadily increasing visibility of turbines in the Scottish landscape is being reflected in a rising trend of potential visitor discouragement. (Data taken from secondary analysis of population surveys in [Wind Farms and Changing Mountaineering Behaviour in Scotland](#) (MCofS, March 2014).)

MCofS has undertaken its own primary research amongst mountaineers and hillwalkers. Our report cited above presents the results. In brief, it found that 56% would adapt their future walking and climbing plans in response to the increasing number of wind farms in Scotland. The most common reaction was to avoid areas with wind farms (40%) and to take more trips away from Scotland (9%).

Those respondents living outside Scotland were twice as likely as Scots to reduce the frequency of their visits to Scottish mountains: 27% would do so. There was very little positive preference for wind farms, showing a net substantial negative impact. At best these stated intentions may lead over time to a redistribution of tourism and recreation spend within Scotland to areas without wind farms. At worst it would divert spend from Scotland.

On this evidence, small mountain areas that could be significantly encroached upon by wind farms, such as is the case in Galloway where full encirclement is conceivable, may be particularly vulnerable to the translation of survey-revealed intentions into actual actions.

5. Conclusion

The proposed development sits immediately adjacent to the core mountain area of southwest Scotland. It will, both individually and cumulatively, impact visually on that resource, which is rare south of the Highlands and increasingly beleaguered. If consented, it would diminish the mountain-going experience. It would be likely to reduce mountain-based recreational spend in the area.

We object to the proposed development.

Yours sincerely

David Gibson
Chief Executive Officer