



## The Mountaineering Council of Scotland

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Letter sent by email to:

Case Officer: Simon Hindson  
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10 April 2015

Dear Sir

### **Mountaineering Council of Scotland response to**

**15/00737/FUL**

**Erection of 12 wind turbines (130m in height) at Carn Ghriogair, Aberarder Estate, Inverness**

#### **1. Introduction and Summary**

RES has applied for planning permission for 12 wind turbines of 130m blade-tip height at base elevations of c.650-770m on undulating moorland on the western edge of the Monadhliath Mountains.

It is the view of the MCofS that the string of consented wind farms on the western side of the Monadhliath has effectively destroyed the mountaineering value of the area. Although most are yet to be built, in forming our view of this proposal we have assumed that all will be built. In particular, the proposed development is immediately adjacent to Dunmaglass wind farm with 33 turbines of 120m BTH consented and under construction.

Along the western side of the Monadhliath, stretching over 50km from north of the A9 to the Corrieyairack Pass, the hill-walker will rarely be more than 5km from a wind farm. The Munros north of Laggan, forming the Cairngorm National Park boundary, are all within 15km of already consented turbines – <5km at the closest. The area south of the Corrieyairack and the eastern plateau above Aviemore will be less comprehensively impaired by current consents and thus still retain value as mountaineering assets: the MCofS will continue to object to proposals in these areas.

The question to be considered for this application is whether the addition of the proposed Aberarder wind farm would add materially to the level of destruction already consented.

The MCofS concludes that the proposed development, given the context, would add to the industrialisation of the western Monadhliath but without any significant additional impact on the mountain resource.

The value of that resource has already been diminished to such a level by existing wind farm consents that any further diminution by the construction of a wind farm at Aberarder would have little practical effect.

**Accordingly the MCofS offers no objection to the development of a wind farm in the location proposed.**

## **2. The Mountaineering Council of Scotland (MCofS)**

The MCofS is an independent organisation with more than 12,000 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. We are recognised by the Scottish Government as representing the interests of mountaineers living in Scotland.

Our work 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.

We also act in Scotland for the 75,000 members of the British Mountaineering Council (BMC), 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](#). To date we have objected only to around one in twenty wind farm applications.

## **3. Material considerations**

### **a) Location and landscape setting**

The Monadhliath was renowned for offering a strong sense of remoteness amid challenging terrain, with an often rough and damp moorland plateau dissected by deeply incised glens reaching far into the uplands. The contrast between the open plateau and the intimacy of the upper glens was a delight. There were few man-made objects to give a sense of scale, allowing an illusion of greater grandeur than the hills merited objectively.

Over the years these qualities were eroded to a degree by gravel vehicle roads but in the past decade they have experienced a sustained assault from roads, Glendoe hydro infrastructure and wind farms. Once the presently consented developments are built, it will still be possible to experience some of the area's former qualities in places – the intimacy of some of the enclosed upper glens, for example – but the overall experience and the sense of uninterrupted space on the plateau will be utterly changed.

This, however, is a consequence of existing consents and the proposed development would add little to the destruction already consented.

### **b) Visual impact**

While the MCofS does not necessarily agree with the many value judgements made in the LVIA, it does agree that the proposed development would have limited additional visual impact, particularly given the consented extensive Dunmaglass Wind Farm. The upper elevation range of the turbine bases is similar to that of the adjacent Dunmaglass Wind Farm. The proposed sharing of access tracks with Dunmaglass and possibly also the grid connection route is welcomed.

It is proposed that the turbines be 130m BTH. Those at Dunmaglass are 120m BTH. The height difference is acceptable for most of the turbines but T1 is at a marginally higher base elevation than any of the Dunmaglass turbines, making it the most elevated structure in the western Monadhliath with a blade-tip altitude of c.900m OD. (Further south the highest Stronelairg blade tip will also approach 900m OD.) For comparison, the highest hill in the vicinity of the proposed development is the Corbett Carn Na Saoibhaidhe at 811m OD (7km distant), while the spine of the Monadhliath, on the western slopes of which the proposed development lies, reaches maximum elevations of 802-807m. The MCofS would propose that the height of T1 should not exceed 120m so that it appears more in keeping with its neighbours.

### **c) Cumulative visual impact**

There appears to be almost nowhere where the proposed development would be seen where other turbines were not already in view, particularly those of Dunmaglass. As has already been noted, the lack of additional cumulative impact from the proposed development, given the high level of adverse visual impact of the multiple wind farms already consented in the area, is the reason for the MCofS not objecting to the proposed development.

### **d) Wild land**

The mountain experience in Scotland is closely connected with the wild land character of the landscapes in which most mountains are located. Almost all Munros and Corbetts are within Wild Land as mapped by SNH.

The proposed development would have a theoretical adverse visual impact on the two Monadhliath Wild Land areas but it would have no practical additional effect given the cumulative adverse effect of existing wind farm consents.

### **e) Decommissioning**

If consent for the development is granted, there should be a condition requiring the removal of all access roads on decommissioning. The general premise on which wind farms apply for temporary planning permission is that their impacts are reversible.

While we are sceptical about the real degree and speed of restoration that can be achieved on such sites, retaining roads specifically constructed for the development would be incompatible with its supposed transience.

### **f) Access**

The MCofS appreciates the need for construction activity to have due regard to both operator and public safety. Simply removing access rights across the whole development area for the duration of construction, as has been attempted with some other wind farm developments, is unacceptable and unnecessary.

Our experience has been that, with good information and signage accompanied by goodwill and common-sense on the ground, construction activities are not incompatible with public access, especially since many people would in any case choose not to go to an area where a development is under construction.

## **4. Conclusion**

The MCofS does not support of the proposed development. But neither does it welcome the damage to the Monadhliath that will be caused by wind farm consents already granted. These consents have destroyed the western Monadhliath as a mountain resource. On that basis, the MCofS raises no objection to the proposed development of a wind farm at Aberarder.

However, we think that the altitude of Turbine 1 combined with the 130m blade-tip height will create a discordant effect which could be mitigated by reducing the BTH to 120m.

Yours sincerely

David Gibson  
Chief Officer