



The Mountaineering Council of Scotland

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17 September 2015

Dear Ms Robertson

WIN-270-4

PLI into Section 36 application for the proposed Millennium South wind farm

Further to our conversation yesterday, the purpose of this letter is to restate The Mountaineering Council of Scotland's objection to the Millennium South Wind Farm to ensure clarity as to our reasons for objecting and to correct an error in the original letter of objection of 30 June 2014.

We would be grateful if this current letter, which does not introduce new arguments or evidence, could be regarded as replacing our initial letter. This is our only contribution to the PLI process, in which we intend to play no further part.

1. Introduction

The Mountaineering Council of Scotland objects to the proposed Millennium South wind farm – the third extension to the original Millennium wind farm development - on the grounds of significant cumulative visual impact in an area of outstanding landscape importance.

The proposed Millennium South wind farm extension together with the existing twice-extended Millennium Wind Farm, consented adjacent Beinneun and its extension, the consented Bhlaraidh, Dunmaglass, Corriegarh and Stronelaig Wind Farm, and application sites at Aberarder, Dell and Culachy will have an adverse cumulative impact on the scenic experience for both the visitor and residents in this area of the Highlands.

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 on behalf of the 75,000 members of the British Mountaineering Council (BMC) which contributes both financial and policy support to our work on landscape matters in Scotland.

The MCofS has been supportive of the Government's commitment to increase the production of energy from renewable resources, including onshore wind. However, we have become increasingly concerned regarding the demands that proposals for large scale wind farms are making on Scotland's highland landscapes.

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 marvelous 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 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. The Millennium South Application

The application for 10 further turbines at the Millennium site represents the third extension of the original wind farm. It is not clear why it was felt necessary to vary the name for this extension. If consented, the total number of turbines will have increased from an original 16 to 36. We believe that it is important to the determination of the application to note that each extension has seen an increment in the size of the proposed turbines – 115, 125 and 132 metres to blade tip:

	Number	BTH (m)
Millennium	16	115
Millennium 1	4	125
Millennium 2	6	125
Millennium South	10	132
TOTAL	36	

The argument is advanced by the developer that because consent was given for the original development, the extension will have minimal impact. We consider that this argument is erroneous.

Whilst there are relatively small changes in sight lines and negligible effect on ZTV, the overall density of turbines is substantially increased. Taking Millennium as a whole and the adjacent Beinneun, from which it cannot be logically separated given a gap of <2km currently reducing to 1km if Millennium South is consented, the impression that the observer will obtain both from the main A87 road heading east from Cluanie and from the many affected mountain summits in the surrounding area, will be of a large scale industrial development in what was once an open scenic area.

4. The wider context

The intimate proximity of Beinneun to Millennium has been noted above. In addition, we listed in the Introduction a large number of consented wind farms and some current applications in the wider area which collectively ensure that wind farms will be the dominant visual characteristic of uplands east of the Great Glen from south of Fort Augustus to the Moray Firth and west of it from Fort Augustus to Glen Urquhart. Because of their high altitude, turbines will be highly visible across a wide area. Millennium South adds to the density of development.

5. Conclusion

The MCofS would not normally object to extensions to existing wind farms, even in locations where we objected to the initial development proposal. We did not object to the recently consented Beinneun extension even though we think the original consent was a grievous expansion westward of the Fort Augustus wind farm landscape. However, with Millennium we do not know when the developer will ever stop adding piecemeal extensions. In its response to the previous (consented) extension application, SNH commented that, consistent with the views of the Mountaineering Council for Scotland, they felt that the capacity of the locality has been reached through that development and any further applications should be discouraged. To now have an application for an even larger extension suggests to us that the developer has a complete disregard for any interests other than its own.

The Millennium South extension will result in a significant cumulative visual impact. Taken in conjunction with adjacent approved developments, the Mountaineering Council of Scotland believes that the capacity of this area to absorb the environmental impact of wind farms has been exceeded, and approval for the extension should not be granted.

It is for the reporter to determine the appropriate balance of interests in this case and to make a recommendation to Ministers. We hope that whatever the decision, the opportunity will be taken to send a firm message to all developers that multiple applications for piecemeal extensions are an unacceptable tactic in Scotland's planning system. It is the use of this tactic by the developer in this instance, probably more than the undesirable impact of the extension itself, that triggered the MCofS objection.

Yours sincerely

David Gibson
Chief Officer