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Dear Sir

**OBJECTION to proposed Cnoc an Eas Wind Farm, Balnain, Glen Urquhart**

**Planning application 15/02758/FUL**

## 1. Introduction

Force 9 Energy has applied for planning permission for 13 wind turbines of up to 136.5m blade-tip height at base elevations of around 310-400m OD on forest and moorland north of Glen Urqhuart.

The Mountaineering Council of Scotland believes the proposed development is not needed to meet climate change targets, is of an unsuitable size and scale for the site, raises issues of cumulative impact, and would be detrimental to the image of the area that is key to its successful marketing as a tourist destination. While none of these considerations alone is of sufficient significance to trigger an objection, taken together the adverse impacts are sufficient to justify an objection.

## 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.

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. 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. Material considerations**

**a) Need for the development**

The MCofS does not normally comment on energy policy considerations. However, in its justification of the need for the proposed development the *Planning Statement* is seriously misleading. It is able to quote a document apparently favourable to its case that was published as recently as June 2015. It is able to make an oblique reference to recent (mid-2015) changes in DECC policy though it misleadingly states that they only apply to England. (Changes in financial incentives apply across the UK.) Yet it calls upon Audit Scotland figures from 2013 to show that the Scottish renewable electricity target, which requires 14-16 GW of operational renewable electricity generation capacity by 2020, is not being met. Figures for 2015 demonstrate this is no longer true.

Scottish Government figures for March 2015 showed 16.3 GW of renewable electricity generation operational or consented. As at 25 July 2015, the UK Wind Energy Database shows 13.8 GW of wind capacity operational or consented in Scotland. Of that, 864 MW is under construction and 7,742 MW is consented but not yet under construction. At present rates of construction, it would take 9 years to construct the consented wind farms. So not only is there enough consented capacity to meet the Scottish Government target (and the UK target, which is why market incentives are being withdrawn from onshore wind) but any delay to achieving targets is not from too few consents but from backlogs in construction. It should also be noted that wind development applications continue to come forward for less damaging locations than the present proposal. On that basis, there is no need for the proposed development.

The proposed development would generate electricity equivalent to only 0.27% to 0.34% of Scotland's gross consumption (based on average annual consumption 2009-2013 of 38,366 GWh (Scottish Government *Energy Statistics* June 2015)). This minor contribution reinforces the weakness of the need for the development.

**b) Landscape and visual impact**

The setting of the proposed development is craggy rolling moorland with extensive areas of commercial forestry to north and south of a spine of the highest ground stretching from Carn nam Bad in the east to Meall Gorm in the west. The spine has its highest points at Carn nam Bad (457m), Carn Mor (456m) and Meall nan Caorach (428m). The proposed development lies just WSW of Carn Mor. The base heights of the 13 proposed turbines range from 310 to 400m OD. The seven turbines at higher altitudes are to be 126.5m blade-tip height and the remaining six 136.5m BTH. Four turbines will be at base heights of 380-400m OD. Assuming these are all 126.5m BTH, then the blade tips would reach to around 500-525m OD.

These four turbines would be, by around 50m, the highest objects between Strathglass and Glen Convinth. By a lesser amount they would be the highest objects between Strathglass and Loch Ness. Even their hubs (at c.450-470m OD) would reach a similar altitude to the highest summits in the local area, with only a single 501m peak near to Loch Ness being clearly higher. By their visual prominence, the turbines would become the defining features of this landscape. Viewpoints 11, 12 and 17 clearly show how the wind farm design creates a landscape subordinate to the turbines.

Viewpoint 12 is an odd choice of viewpoint since it is an uncommonly climbed hill. The suspicion must be that it was chosen in preference to the adjacent Corbett (Beinn a'Bhathaich Ard, 862m OD) because its lower altitude (737m OD) gave an angle of view that allowed more topographic screening of parts of some turbines in an attempt to produce an image that diminished the prominence of the wind farm.

There is no viewpoint representing the other nearby Corbett of Sgurr na Diollaid (818m OD) which lies at a slightly greater distance than Carn Ban (14.5km vs 11.5km) but is at a higher altitude so a similar adverse visual impact can be assumed.

It is odd that neither of these closest Corbetts is included in the list at para 6.97 of "The highest mountains in the study area include the following Munros and Corbetts ..." yet Corbetts in the Monadhliath twice as far away are included. (The list is in error in including Carn na Laraiche Maoile which was deleted as a Corbett in 1981. The relevant Corbett is Carn na Saobhaidhe, about 3km to the northwest.[1]) Listing 'the highest' avoids addressing the issue of the nearest. There are 6 Munros and 3 Corbetts within 25km of the development, all except one Corbett lying in the western quadrant from the proposed development. The number increases substantially beyond 25km and these hills would be affected in the clearest conditions, which are most attractive to hill-walkers. However it is difficult to accurately capture such conditions in photomontages. Viewpoint 19, for example, exaggerates the visibility of the proposed development in the atmospheric conditions when the base photograph was taken and in which the Corrimony turbines, at a distance of 18km, are barely visible through the haze.

The modelling of the ZTV taking into account tree cover (Fig. 6.35) is an interesting exercise, but as the ES acknowledges, and as can be seen in the photomontage for Viewpoint 9, the continuance of tree cover cannot be relied upon. In any case, mountaineering interest lies primarily above the tree-line. The MCofS also disagrees with the assessment of impact for Viewpoint 9 (as representative of areas where open views can be obtained on this section of the Kintail-Affric Way). Open views are a welcome relief to the monotony of walking through commercial conifer plantations and thus have a particularly high value to walkers. As the photomontage for Viewpoint 9 shows, and contrary to the assertion of the LVIA, the proposed development will become a 'defining feature' of any open views from this area.

The LVIA assessment understates the magnitude of effect on Meall Fuar-mhonaidh (Viewpoint 11). The MCofS regards this as *high* because, once consented wind farms are constructed, the only direction of view from Meall Fuar-mhonaidh without wind farms in sight would be the northern quadrant, within which the proposed development lies. We therefore rate the overall level of level and significance of effect at this location as high and significant.

The LVIA assessment for Carn Ban (Viewpoint 12) understates the magnitude of effect on the higher Corbett and Munro summits for which it stands as a proxy. Other man-made influences on the view here are subdued compared with the prominence of the proposed development topping Eskdale Moor. The MCofS regards the magnitude of effect as *high* and accordingly rates the overall level and significance of effect on Corbetts and Munros within 10-20km westwards from the proposed development as high and significant.

The LVIA repeatedly refers to the turbines being seen backclothed against moorland and forestry, with the seeming, but not stated, implication that this diminished their visual impact. The compilers appear unaware that research has shown that such backclothing generally leads to the visibility of contrasting pale-coloured turbines being accentuated.[2]

The proposed development would intrude into a landscape currently encroached upon at a distance but relatively lightly impacted by wind turbines.

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[1] It is not clear which list of supposed 'Corbetts' was drawn upon to compile the ES. The penultimate bullet point of Para 6.156 refers to "... the Corbetts of Beinn Bhreac Mhor (807m AOD) ..." This hill has never been listed as a Corbett.

[2] Caroline Stanton. The backclothing of wind turbines in the Scottish landscape: A report to the Cairngorms National Park Authority. Final report. September 2012

**c) Cumulative visual impact**

Taking into account turbines consented but not yet constructed, the area has generally distant visual exposure to turbines but itself provides the only gap of more than 12km in the lines of wind farms on the high ground to west and east of the northern two-thirds of the Great Glen (see Figure 6.6).

Cumulative ZTV mapping (Figure 6.7) shows that the area already has substantial visibility of wind farms. However, ZTV mapping does not weight visibility by distance. This is ignored in the LVIA (para 6.158) which blithely asserts that "the introduction of Cnoc an Eas Wind Farm will introduce additional theoretical visibility of wind farms to relatively limited areas within the study area". In fact, the proposed development would be much closer to the Mullardoch and Monar hills than approved developments. It would extend further north the line of wind farms visible from the Affric hills at distances of around 10-20km. Its dominance of the wider landscape in which it would sit, would make it more intrusive than the fewer and smaller turbines of Corrimony Wind Farm (5x100m BTH), even though the latter is closer to the Affric hills. The spread of the proposed development across the landscape and its overtopping of the proximal high ground contrasts with Corrimony's tight footprint.

We would note that the MCofS did not object to the now-operational wind farm at Corrimony. After careful consideration we decided that it was, just, at the limit of acceptability in terms of distance from mountainous country and size of turbine, though we thought the turbines were taller than desirable for the location. Our view on their height has been confirmed now that they are erected.

As we have already stated, one of the main cumulative impacts is that the proposed development occupies a sector of the landscape that is currently free from wind farms. By closing this gap, consent for the proposed development would mean that from many of the hills to the west, no views eastwards would be possible that did not include a wind farm west of the Great Glen and in the background the linear sequence of western Monadhliath wind farms. This impact is systematically understated in the LVIA.

For example, the assessment for Toll Creagach (Viewpoint 17) states that: "The turbines will occupy a small proportion of the panoramic views available from this location, and at a distance of over 22km, will appear at a greater distance from the viewpoint than the operational turbines of Corrimony, Millennium and Millennium Extension." (Appendix Table 6.4.17) This statement does not recognise the impossibility of sitting on a hillside looking at the view wearing blinkers. The field of view of a seated walker is well over 90 degrees. From Toll Creagach, the southeast quadrant is occupied by Millennium, the northeast quadrant is currently impinged upon by Corrimony but would be visually overwhelmed by the proposed development. A single additional wind farm in the wrong place would adversely impact one quarter of the available view.

Similarly, the cumulative assessment of visual impact grossly understates the impact on Meall Fuar-mhonaidh by treating the operational and under construction turbines in the Monadhliath as part of the baseline and not mentioning them in the cumulative impact assessment. As Figure 6.7 shows, the proposed development would be in the only quadrant of view from Meall Fuar-mhonaidh currently not containing a consented wind farm. A similar complacent understatement of effect on this hill is given in para 6.315.

The LVIA repeatedly refers to the proposed development as fitting the established spatial pattern of wind farm development. The MCofS agrees: it fits into the worst pattern that could have been developed for maximising the spread of visual impact per megawatt-hour of electrical output. Given that the UK energy policy need for continued expansion of onshore wind capacity has subsided, there is now the opportunity not to continue the mistake of scattering wind farms at approximately 10km intervals across vast swathes of the Highland landscape.

**e) Public access during construction**

The proposed restrictions on public access during construction are excessive. We mostly concur with the comments made by the Inverness and Nairn Access Officer (23 July 2015) but do not share his view that it is acceptable to exclude access on new tracks for the whole construction period.

The MCofS appreciates the need for construction activity to have due regard to both operator and public safety. Restrictions on access should apply only to areas of active construction and be for the minimum time necessary. 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, including shared use of access tracks, especially since many people would in any case choose not to go to an area that is a construction site.

**f) Socio-economics**

The ES cites the usual research cited by developers to assert that wind farms have no effect on tourism, in particular relying upon the now well out of date research by Glasgow Caledonian University published in 2008, with fieldwork undertaken in 2007 when onshore wind capacity in Scotland was one quarter of the present level.

The ES cites VisitScotland research published in 2012 which showed that around 17-20% of tourists could be deterred by a wind farm (Para 15.2.16). This needs to be set in context: In studies across the UK undertaken prior to 2008 the figure was under 10%. In the GCU study already referred to it was 2%. In 2013 a Scottish Renewables survey found 26% discouraged. Although there are few recent data points it is possible, to put it no more strongly, that increased visibility of turbines is now impacting upon intentions. (Data taken from secondary analysis of population surveys in *Wind Farms and Changing Mountaineering Behaviour in Scotland* (MCofS, March 2014).) It is of note that Scottish Renewables dropped the tourism question when it repeated its survey in 2015, perhaps because of concern that the answer might confirm a trend.

In common with other developer assessments of tourism impact, emphasis is laid on the fact that the majority of visitors would not be deterred by the presence of a wind farm. The consequences of an apparently growing minority who would be discouraged from visiting (or more likely from re-visiting) are not considered. The potential impact was well summed up by a newspaper letter by a cafe proprietor in Glen Moriston.

> "Joss Blamire of Scottish Renewables claims that 69 per cent of respondents to a recent poll said their decision to visit Scotland would not be affected by the presence of a wind farm. So we are entitled to conclude that 31 per cent of tourists would be deterred. As the proprietor of a rural café on the main route from Loch Ness to Skye and the north-west Highlands, my profit margins would be wiped out by a reduction of that scale. Many other small, tourist-related businesses would be in the same predicament."
>
> http://www.scotsman.com/news/opinion/letters/blow-for-tourism-1-3294204
> Published 5 February, accessed 6 February 2014

As an aside, prompted by the ES's referencing of Whitelee Wind Farm, if wind farm visitor centres would be a popular attraction, why does the much-cited Whitelee remain the only one in Scotland? Why are there none in Highland? Could it be that Whitelee attracts day trippers from the mass population of the Central Belt, not tourists, and produces minimal local spend and few bed-nights?

Mountaineering is a substantial long-term contributor to tourism and recreation spend in highland Scotland, worth at least £600 million a year. It is a niche but important market. The MCofS report cited above mainly presented the results of a new survey of mountaineers and their behavioural response to wind farms. 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.

Only a very small number of respondents expressed a positive preference for wind farms, resulting in an overall substantial negative impact. At best a trend over time can be anticipated towards a redistribution of tourism and recreation spend from areas with wind farms to areas without. Bearing in mind that most consented wind farms in mountainous areas are not yet built, this process has barely begun. It will not show up in Highland-wide statistics but will appear in local businesses profit and loss accounts.

The impact of the proposed development by itself may be of minor significance for tourism and recreation. But by contributing to the continued development of wind farms around the Great Glen, it would contribute to a local image, from a mountaineering perspective, of a landscape where wind farms are unavoidable, in contrast to alternative destinations for mountaineering tourism at home and abroad perceived as unspoilt.

**4. Other matters**

The proposed development is not far from the refused Druim Ba Wind Farm site for 23 turbines of 149.5m BTH. Amongst its objections to Druim Ba, Highland Council, drew attention to "unacceptable cumulative impacts. The council does not consider that there is capacity for a large scale wind farm and the area should be free from wind farms in order to create a visual respite." (Para 7, PLI Report to Scottish Ministers, 21 Nov 2012). Although the Reporter did not agree with all aspects of Highland Council's objection, he did conclude "I consider that the number and height of the turbines would appear out of scale with the surrounding landscape and it would have significant adverse landscape and visual impacts." (para 8.167). We note that a smaller Druim Ba scheme (10 turbines of 126.5m BTH) is now being scoped. Such repeated applications themselves encourage a negative image of the Highlands. While not an exact parallel, the MCofS believes that this prior in-depth consideration of a proposed development in the same general area is relevant to the present proposed development.

**5. Conclusion**

The Mountaineering Council of Scotland believes that the needs case for the proposed development is weak. Although the adverse impacts are individually more minor than would normally stimulate an objection, it is our view that, when taken together, they are sufficient to merit an objection, particularly in the context of a weak needs case. The proposed development would have significant individual and cumulative visual impacts, overshadowing the local landscape and bringing wind farm development closer to the Monar and Mullardoch hills than any existing consent. In particular, taking into account existing consents, the proposed development would extend significantly northwards the western arm of the sequential wind farm landscape flanking the eastern and middle-western Great Glen.

Yours sincerely

David Gibson
Chief Officer