

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

25 January 2021

Dear Ms Farmer

Bad Fearn Wind Farm - Erection of 6 wind turbines with a maximum height to tip of 149.9m, and associated infrastructure. Land At Braemore Road, Dunbeath

THC Reference: 20/00180/FUL

Introduction

1. EnergieKontor applied in January 2020 for consent to build Bad Fearn wind farm, with 8 turbines of 180m blade-tip height. Mountaineering Scotland was not aware of this application.
2. It submitted Further Environmental Information in December 2020, reducing the number of turbines to 6, reducing the height to 149.9m, and making minor changes in turbine locations.
3. Mountaineering Scotland **objects** to the revised proposed development on grounds of visual impact and its 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 14,500 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. It is recognised by the Scottish Government as representing the interests of mountaineers living in Scotland. It also acts in Scotland for the 80,000 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 support of the Scottish Government for onshore wind deployment is not contested. 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, Para 28). More recent policy documents restate support for onshore wind but none 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.

b) Landscape and visual impact (including cumulative impact)

7. Morven is the iconic hill of the northeast corner of Scotland. It is part of a cluster of distinctive steep-sided hills which include Scaraben and Maiden Pap. The quality of the local landscape is recognised by its designation as a Special Landscape Area and definition as a Wild Land Area. The proposed development sits in very close proximity to both. Views to and from this outstanding group of rugged hills are important.

8. The proposed development will have a visual impact upon the Morven group of hills that existing wind farms do not. The only turbines operational or consented within 10km are half the height of those proposed for Bad Fearn. Wind farms are certainly not absent in the wider view but their impact on the Morven area is muted by distance (cf Vp13 view to Causeymire cluster at >15km with the view to the proposed development at 9.4 km). The proposed development does not offer the mitigation of distance and instead is highly visible from upland viewpoints. It is also unacceptably prominent and distracting in views towards the Lone Mountains from the north, most especially when it interrupts the view to them (e.g. Vp 8, Vp 12) – the adverse effect of such interruption in operation can be seen in relation to Buolfruach at Vp 7) – or acts as a competing eye-catcher immediately to one side in the view (e.g. Vp 5 where it is most certainly not the case that "the proposed development would appear reasonably well accommodated in this view" (FEI Chapter 6 p 32)).

9. We could dissect the judgements and assumptions in the LVIA at length but can summarise our position by simply stating that the LVIA systematically understates the visual effect and its significance. The assessor judges that there would be a significantly adverse visual impact arising from the proposed development at only 5 of the 14 viewpoints – only those within c.5.2km. This is a remarkably short cut-off distance for significant effects from turbines of the size proposed and we do not regard it as credible. It suggests that distance rather than context has been given too much weight in the assessment. In many respects the LVIA assessment of the 8x180m turbine scheme seems more applicable to the current 6x149.9 iteration than does the LVIA for the latter. That is a measure of the consistent understatement of effect that is in play. (Though even in the original we cannot agree that the effect at VP10 and 12 is not significant.)

10. We regard the effect at all three mountain viewpoints (9, 10, 13) as understated and in all cases as significant. We also regard views to the Lone Mountains, where not already compromised by Buolfruich turbines, as understated and significant (Vps 5, 8, 12) even at a distance where this might well not be the case were the backdrop to the proposed turbines less spectacular.

11. The proposed development would have adverse visual impacts wholly disproportionate to the climate benefits to be gained from such a small development in the wrong location.

c) Socio-economics

12. 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. The tourism assessment in the EIAR is bland in the extreme and one has to question if the assessors are actually familiar with the local tourism market.

13. Analysis for Mountaineering Scotland of data compiled by Biggar Economics found a negative impact on tourism-related employment from wind farms operational in areas designated for landscape quality. No other study has attempted to look at tourism impact in relation to the quality of the receiving landscape, which is surely a relevant variable. No study has looked at the effect of wind farm development in proximity to (as opposed to within) designated landscapes.

14. Given that there appears to be a potential for harm to tourism and recreation from wind farm development in certain circumstances, caution is merited when faced with an application set within or adjacent to recognised high quality landscape.

Conclusion

15. The Reporter's conclusion recommending refusal of a previous application for a larger site encompassing the present application site remains relevant to the present application. *"The strong energy and planning policy support for renewable energy development is qualified to the extent that such development ought to take place in an environmentally acceptable manner. Based on my conclusions as to the landscape and visual impacts of the proposal I consider that that would not be the case here. I conclude overall that the clear renewable energy and other benefits of the proposal are outweighed by its unacceptably adverse landscape and visual impacts."* (Report to Scottish Ministers on Dunbeath Wind Farm, Oct. 2012 para. 11.123)

16. The proposed development would materially change the perceived character of the landscape in the vicinity of the most iconic uplands in this part of Scotland. This is simply not the right location for a wind farm of any commercially viable scale.

17. Mountaineering Scotland objects to the proposed Bad Fearn Wind Farm.

Yours sincerely



Stuart Younie
CEO, Mountaineering Scotland

