

By email to: Econsents_admin@gov.scot

Energy Consents Unit
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29 April 2022

Dear Sir/Madam

Chleansaid Wind Farm - S36 application for 16 turbines on the Dalnессie Estate, north of Lairg.

ECU reference: ECU00002031

Background and Context

1. ESB Asset Development UK Ltd has applied for consent to build a wind farm of 16 turbines of 180-200m blade tip height (BTH) on the Dalnессie Estate, north of Lairg.
2. The proposed development is similar to a previous application (Dalnессie, withdrawn 2014 while a PLI was in preparation), with the turbine area moved approximately 6km southwest.
3. Mountaineering Scotland **objects** to the proposed development on grounds of visual impact.

Mountaineering Scotland

4. Mountaineering Scotland is a membership organisation with more than 15,000 members and is the only recognised representative organisation for hill walkers, climbers, mountaineers and ski-tourers who live in Scotland or who enjoy Scotland's mountains. We represent, support and promote Scottish mountaineering, and provide training and information to mountain users for safety, self-reliance and the enjoyment of our mountain environment.
5. Mountaineering Scotland supports the move to a low carbon economy but does not believe that this need be at the expense of Scotland's marvellous mountain landscapes. It objects only to the small proportion of proposals that are potentially highly damaging to Scotland's valuable mountain assets, consistent with its policy set out in Respecting Scotland's Mountains. This approach 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) Introduction

6. The EIAR states at para 2.7.20 and 6.2.5 that turbines 12-15 are of 180m BTH but Table 2.1 (para 2.8.2) lists turbines 13-16 as being of 180m BTH. The visualisations appear consistent with the former, with T16 appearing to be slightly taller than T15. Whichever is the true position, it does not affect our assessment.

b) Policy

17. Scottish planning and energy policies are in a state of change. The extant policies will have been superseded by NPF4 and a new Scottish Energy Strategy (SES) by the time a decision is made on this application. But NPF4 is currently only in consultation draft and the SES not even at that stage. Chleainsaid, therefore, cannot sensibly be assessed against either current or future policy other than at a very general level.

18. The Scottish Government enthusiastically supports continued onshore wind deployment. However, policy (extant and in draft) is clear that expected economic and emissions benefits are to be balanced against potential harms in the determination of an individual planning application.

19. Each development needs to be judged on its own merits and in its geographical context. Decision-makers are not bound by national energy and planning policies to consent any particular scheme for electricity generation if its anticipated benefits are outweighed by its anticipated negative consequences. There are many possible locations suitable for low-carbon electricity generation. The adverse consequences of an individual scheme, however, are site-specific and should weigh more heavily in the balance because of this.

c) Landscape and visual impact (including cumulative impact)

20. Landscape and visual impact assessment (LVIA) compiles data and presents results within an objective structure but ultimately applies subjective judgement, whether professional or consumer. In our experience, commissioned assessments consistently downplay the impact of proposed development. Mountaineering Scotland's assessment has been informed by the compilers and reviewers of this objection having extensive experience on Scottish and other hills, and 'fieldwork' in the hills around the development site over many years. We do not suggest that either professional or consumer judgement trumps the other; simply that each has a distinct place in informed decision-making.

21. As lay consumers of mountain landscapes, we find the professional distinction drawn between the various landscape and visual impacts often rather theoretical and the segmentation of landscapes for analysis to weaken the overall perspective. Hillwalkers experience landscape as a total experience, not separated into component parts. That is how we approach our assessment and we would hope that the decision-maker would take a similar holistic approach.

22. The development site and its management are typical of the rounded mid-level hills of the area, with open, elevated moors above plantation forestry and rough grazing. Were this site in a different context there would be no objection to it. The local context, however, raises two concerns for Mountaineering Scotland.

23. First, the site abuts the Klibreck-Armine Wild Land Area (WLA), stretching north and east, an area of wild and remote character, including several hills of mountaineering interest lying north of Chleainsaid which would be visually impacted. Most of these hills also lie within the Ben Klibreck and Loch Choire Special Landscape Area.

24. Second, the proposed development would exacerbate the disruption to the previously acceptable (from a mountaineering perspective) pattern of wind farm development in the Shin basin, created by the unfortunate consenting of Creag Riabhach wind farm. Such disruption has a

widespread impact upon hills overlooking the basin from the west and south, which also lie within WLAs. (It is appreciated that the site actually lies in the upper Brora catchment, but visually it appears as part of the wider Shin basin in most views.)

25. Operational and consented wind farms around the Shin basin are concentrated around Lairg in the southeast, with the exception of Creag Riabhach. Creag Riabhach was a totally aberrant scheme consented despite having no relation to the emerging wind farm pattern around the Shin basin. Indeed, it broke the pattern, sitting prominently on the north of the basin, and its existence will no doubt serve to encourage continued applications for development around the north of the basin, such as this one.

26. Current applications around Lairg, fringing the basin on the south and east, are of no concern for mountaineering interests. Strath Tirry would sit inside the northeastern part of the basin but low down in forestry and alongside the A836, reducing the impact of the small scheme (4 turbines of 135m BTH) to an acceptable level. However, applications extending northwest along the ridge and flanks SW of Loch Shin – Achany Extension and Salachy – would, combined, effectively create a straggling, elongated turbine edge to the basin to its southwest. This is the context into which the Chleansaid application has been introduced.

27. The Klibreck-Armine hills have views of existing or consented wind farms¹ to the south (Lairg Cluster) at distances of over 20km, to the east (Kilbraur-Gordonbush cluster) at distances around 20km, to the north-northeast (Strathy cluster) at distances of over 20km, and to the west (Creag Riabhach) visible only from Ben Klibreck within 5km. Chleansaid would introduce a large new development into the view at distances from 5-12km (cf Viewpoints 8, 9; WLA Dusk Viewpoint 1), with visibility from all the notable summits and from extensive areas of the upper slopes facing south or southwest. Rather than the ridge of Sron Leathad Chleansaid providing a sense of separation (from the WLA within which the hills are located) as the LVIA claims (TA3 para 3.8.4), the turbines would appear to be encroaching towards the hills, especially where they emerge full-height to the left (southeast) of the ridge. Seen from the Klibreck-Armine hills looking south, Chleansaid would sit in front of the Lairg cluster but much closer – an effect increased by the larger turbines proposed. (The extent to which Chleansaid would intrude into an area without current wind development is well seen at Viewpoint 5.) The visual impact upon the Klibreck-Armine hills is substantially adverse.

28. We cannot agree with the LVIA assessment that the impact on Ben Klibreck (v-8) is barely significant (Moderate). That Creag Riabhach is visible does not mitigate the impact of Chleansaid in a different angle of view. In particular, Creag Riabhach and Chleansaid would offer distressingly complementary visibility, with Chleansaid visible from extensive areas that do not have a view of Creag Riabhach (cf Fig 6.1.11). Backclothing against dark terrain will increase the impact. Other, more distant, wind farms have a much more limited visual impact.

29. We do not accept that the impact on Ben Armine (V-9) is not significant. Our assessment for this viewpoint is similar to that for Ben Klibreck. That Chleansaid would be seen in front of existing and proposed turbines that are upwards of 20km away does little to diminish the effect of Chleansaid itself. The wireline for WLA Dusk Viewpoint 1 shows how a widespread impact persists on slopes away from the summits.

30. Turning to the wider visual impact of the pattern of wind farms in and around the Shin Basin as seen from the west (Viewpoints 10, 11, 12 and WLA Dusk Viewpoints 2 and 3), it is our view that the judgements in the LVIA underplay the impact of Chleansaid upon these hills and the wild land within which they are set. Taken collectively, these viewpoints show the substantial visual harm

¹ Like the applicant (para 6.5.41) we have ignored Dalchork, in close proximity to and potentially adjoining Chleansaid, but it would introduce another potential impact upon the north of the basin, and complication for decision-making, were it to proceed to an application prior to Chleansaid being determined.

potentially arising from the various wind farm proposals scattered across the basin away from the Lairg cluster, of which Chleainsaid is one.

31. If all current applications were to be consented (and that is not an implausible scenario), views across the Shin basin would become characterised by turbines in all directions at varying distances with dense clusters in some areas (Achany/Rosehall and the multiple developments around Lairg, Kilbraur and Gordonbush) and scattered groups in others (specifically Creag Riabhach, Sallachy, Achany Extension and Chleainsaid). Since the clusters already exist and further development of them would (from a mountaineering perspective) simply intensify the impact without substantially spreading it, it is the scattered developments such as Chleainsaid that would pose the greatest threat to the visual quality of the basin in distant views. This can already be seen in the impact from the deeply misguided Creag Riabhach development.

32. To sum up, the LVIA firstly underplays the significance of the adverse visual and perceptual impacts upon the hills of the Klibreck-Armine area and secondly, fails to acknowledge the potential impact of scattered developments such as Chleainsaid upon the look and feel of the Shin basin. Mountaineering Scotland believes that if these impacts are given proper consideration then the only sensible decision is to refuse consent for Chleainsaid.

d) Socio-economics

33. Mountaineering Scotland does not disagree with the general proposition that well-sited wind farms have no effect on tourism. But this is a broad generality. There are two major flaws to such a generalisation. First, there has been no study of the impact of wind farms in different types of landscape other than Mountaineering Scotland's reanalysis of Biggar Economics' data, which showed a possible negative effect in locally designated landscapes². Second, there has been no study of the impact of wind farms upon different segments of the tourism and recreation market other than Mountaineering Scotland's own survey of its members which suggested a significant minority of hillwalkers were choosing to avoid areas with wind farms³.

34. The tourism assessment in the EIAR for Chleainsaid simply follows the well-trodden path of using general statistics to deny any possibility of an impact upon tourism. It addresses neither of the above points, which are highly relevant to a proposal for a large wind farm impacting upon a wild and scenic upland area that attracts those who might be particularly sensitive to such built development

Conclusion

35. Mountaineering Scotland has carefully assessed the proposed development. It would have a substantial adverse visual impact upon hillwalkers in the Klibreck-Armine hills and, by adding to the scatter of wind farms across the Shin Basin, upon hillwalkers on the more distant hills west of the basin.

36. These adverse impacts are a direct effect of the location of the proposed development and cannot be mitigated.

37. Mountaineering Scotland **objects** to the proposed Chleainsaid Wind Farm.

² Gordon, D. Wind Farms in Scenic Areas Damage Tourism. (Sep. 2020)

³ Gordon, D. Wind Farms and Tourism in Scotland: A review with particular reference to mountaineering. Mountaineering Scotland. (Nov. 2017). See Table 1

Yours sincerely

Stuart Younie.

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