

By email to
Econsents_Admin@gov.scot

Mr Mark Ashton
Energy Consents Unit
Scottish Government

3rd February 2020

Dear Sir

Clauchrie Windfarm, Generating station of 18 wind turbines up to 200m height; South Ayrshire Council, Dumfries and Galloway Council.

ECU Reference: ECU00002001

1. Scottish Power Renewables has applied for consent to build Clauchrie wind farm, with 18 turbines of 200m blade-tip height.
2. Mountaineering Scotland **objects** to the proposed development on grounds of visual impact and its consequential adverse effect on mountaineering recreation and tourism.

Mountaineering Scotland

3. Mountaineering Scotland is an independent association of mountaineering clubs and individuals, with 14,000 members who are hill walkers, climbers and snowsport 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.
4. 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 and contributes financially to its policy work.
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 Scottish Government enthusiastically supports continued onshore wind deployment and an individual planning application is not the place to question whether overwhelming reliance on a single generating modality makes for a robust energy policy. However, policy is clear that expected economic and emissions benefits are to be balanced against potential harms in the determination of an individual planning application. “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)
7. The most recent energy policy documents restate but do not increase the policy support for onshore wind.¹ We do not agree that “In essence there is a renewed and enhanced impetus being imparted, rather than just a continuation of previous support” (Planning Statement para 157). The documents themselves contain no such statement.
8. The most recent Scottish Government policy response to climate change might be regarded as providing increased support for any action that reduces carbon emissions.² However, despite the Planning Statement’s contention that: “The current climate change emergency must therefore significantly inform the weight to be attributed to the climate change benefits that would result from the operation of the proposed Development.” (para 136), there has been no change in any government policy document to the position set out in SPP2014 quoted above. Benefits to the global environment must be balanced against costs to the local environment. Taken to its logical conclusion, the applicant’s approach would require that any wind farm in any location be regarded as so important for combatting climate change that it must be approved regardless of the level of adverse impacts, making the planning system redundant. In the context of 11.7 GW of operational renewable electricity generation capacity and 9.1GW consented capacity in Scotland³, a single onshore scheme of 0.1GW capacity is not so vital to Scotland’s climate ambitions that its adverse effects can simply be dismissed.
9. The Planning Statement cites two recent decisions which, in the applicant’s view, show the increased support for onshore wind development, even though one actually only says that it is ‘undiminished’ (para 172). We could counter-cite decisions (both to consent and to refuse development) that have taken the view that recent policy documents do not diminish the protection for landscapes put in place by SPP2014.⁴
10. Although energy storage is not part of our case, we take issue with the idea that 25MW is ‘substantial’ (Planning Statement para 177). First, MW is a measure of energy output not of storage. The EIA does not state the amount of storage involved, which should be stated in MWh. Second, if we assume 25MWh is intended, this represents <0.04% of Scottish daily demand averaged over the year.⁵ Such a trivial amount is useful for smoothing minute-to-minute transmission from the wind farm to the grid but is essentially useless for maintaining output on entire days with low wind – the real challenge for storage.
11. Each development needs to be judged on its own merits and in its geographical context. This applies whether or not the decision-maker adopts a “tilted balance” as the applicant would wish. 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 anticipatable

¹ Scottish Energy Strategy, 2017; Onshore Wind Policy Statement, 2017

² Climate Change (Emissions Reduction Targets) (Scotland) Act 2019

³ Energy Statistics for Scotland Q3 2019 Figures. (Scottish Government; December 2019). 78% of operational capacity is wind, 89% of which is onshore; consented capacity is 90% wind, equally split between onshore and offshore (Renewable Energy Planning Statistics Sep 2019 (Scottish Government, December 2019)).

⁴ Culachy Wind Farm Appeal Decision Notice by Robert Seaton, 27 April 2018. Whitelaw Brae PLI Report by David Buylla and Claire Milne, 17 August 2017.

⁵ Scottish Energy Statistics Database: Total Scotland Electricity Consumption. 2018 = 24,196 GWh.

harmful consequences. There are many possible locations for low-carbon electricity generation.⁶ The adverse impacts of a scheme, however, are often site-specific and should weigh more heavily in the balance because of this.

b) Landscape and visual impact (including cumulative impact)

12. 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 between them well over 100 years of experience on Scottish and other hills, and 'fieldwork' in the hills around the development site stretching over decades – 45 years for one of us. We do not suggest that either professional or consumer judgement trumps the other; simply that each has a distinct place in informed decision-making.
13. A common tactic in LVIAs is to say that the principal focus of the view from a viewpoint is anywhere but in the direction of the proposed development. It is used here several times. Most egregiously, it is used for The Merrick where "The Development will be viewed to the west of the Merrick, outwith the main visual focus of the view to the south and south-east over the core areas and rugged uplands of the Merrick WLA." This is nonsense. The point of reaching a panoramic viewpoint is to enjoy the panorama, not just the parts of it facing away from a proposed development. The focus of another viewpoint (7) is claimed to be Ailsa Craig even though it is half-hidden, yet Ailsa Craig is only briefly mentioned in the post-development view from The Merrick even though it is fully visible. Could that be because Clauchrie wind farm would sit in front of it?
14. 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 by Character Types/Units and Designations, arbitrarily changing at council boundaries, to weaken the overall perspective. How we experience landscape is not separated into component parts but merges as a total experience. That is how we have developed our assessment and we would hope that the decision-maker would take a similar holistic approach.
15. The relevant landscape capacity studies use rather unhelpful nomenclature. There is little moorland in the slopes rising from the Cree-Minnoch basin that is given Landscape Character names of "Plateau moorland" in the SNH characterisation, or "Plateau Moorlands with Forestry & Wind Farms" in the Ayrshire Landscape Capacity Study (LCS) and "Plateau moorland with forest" in Dumfries and Galloway LCS (cf Figures 6.5.a and b: compare with the layer-shaded topography of Figure 6.3 and the forestry of Figure 11.1). However, we agree with the detailed descriptions of these LCTs that they are of subdued topography masked by extensive conifer plantations.
16. The development site and its management are typical of the area's extensive commercial forestry plantations. The gently undulating, unobtrusive topography of the almost totally forested conjoined upper basins of the Rivers Cree and Minnoch (N of the A714) are bounded to the north by a ridge of hills (the western spur of the Carrick Hills) that emerge from the plantations at around 400m and reach summit altitudes of 465m in the west to 565m in the east. The proposed development would be located south and southwest of this ridge, with the most westerly turbines in hilltop locations where the ridge broadens and subsides into forestry. The broad basin is bounded more dramatically to the east by the Merrick range, the spine of which exceeds 600m for c.10km, with the highest point being The Merrick itself (843m) – the highest point in Southern Scotland and a popular place for hill-walking.

⁶ To illustrate this point, there was 3,598 MW of onshore wind in planning at September 2019. Mountaineering Scotland had raised no objection to >85% of this capacity.

17. The Merrick range forms the western edge of the mountain core of Galloway. This edge currently looks out westwards over an extensive fringe of plantation forestry beyond which, typically at distances of 15km and upwards (Dersalloch to the N is somewhat closer), a wind farm landscape is being created (cf Figure 6.4). Mountaineering Scotland has implicitly accepted that pattern by not objecting to any of the operational, consented or application wind farms lying west of The Merrick range shown on Figure 6.4 and in Table 6.11.10, totalling c.340 turbines of >100m BTH within 25km. However, placing a wind farm into the forestry fringe would disrupt the simple, coherent sequence of landscape transitions outwards from The Merrick range - from open hill to forestry to wind farms. Cumulative ZTVs simply showing whether or not there is visibility of developments without weighting for distance and turbine size do not allow for this pattern and as a consequence fail to bring out the substantial impact that Clauchrie would have on the Merrick Range and its western slopes.
18. Furthermore, the extensive LCT 18c has a quite different character north and south of the Duisk valley when seen from elevated locations. To the south it does have something of a 'plateau' character, increasingly characterised by turbines. To the north it has more of a basin character with only Mark Hill wind farm sitting low on a peripheral western lobe. The proposed development site would not consolidate development within an existing wind farm landscape, as the LVIA claims, but would extend the influence of turbines substantially into a landscape with a very different feel to it, redefining its perceived character (cf LVIA para 349-50).
19. Mark Hill (28 turbines of 110m BTH) is the closest of the western operational developments, at 17km from The Merrick (Viewpoint 8). Clauchrie, at 10.5km, with turbines nearly twice the height, would fill the visual gap between Mark Hill and Hadyard Hill wind farms, obstructing the view to Ailsa Craig and south Kintyre. It would do more than that. Because of its proximity, higher altitude, turbine size, and the forest/moor backclothing of many turbines, Clauchrie would appear as a much more visually intrusive development than those currently operational. The same applies at Benyellary (Viewpoint 24).
20. Similar comments, but with the eye-catching isolated hill being Knockdolian instead of Ailsa Craig, can be made for Shalloch-on-Minnoch (Viewpoint 13). And in reverse, the view from Knockdolian to the north end of the Merrick range would be obstructed while the south would be seen sitting well above the lower-lying Mark Hill turbines (Viewpoint 5). We do not understand the LVIA's conclusion that the effect on Knockdolian is 'not significant' when the reasoning appears to clearly state that it is significant (Table 6.10.10). We agree with the reasoning, not the conclusion.
21. Our assessment of the impact on the Merrick range could be repeated for the Lamachan hill group south of Glen Trool. Our response to the Scoping Report suggested a viewpoint on these hills but this was not acted on. The impact may be attenuated by distance (16km) but from this angle the horizontal extent of the development would be seen at its greatest (cf Viewpoint 6 at a similar distance but lower elevation). Benyellary (Viewpoint 24) provides a similar 'full-width' view from an elevated location nearer to the proposed development.
22. Distant views from lower ground show that turbines of this scale dominate the landscape upon which they are placed. The highest altitude bases are c.400-410m OD while the hills reach 565m, but that means that the highest blades overtop the highest summit by c.40m and even the lowest altitude turbine blades reach nearly 500m OD. Seen from lower altitudes, the dominant feature is the turbines, visually overwhelming the landscape upon which they are set (Viewpoints 4, 6; to some extent viewpoint 17 though the host landscape is largely invisible from this point). Contrary to Figure 6.14.b, Viewpoint 4 is not screened by 5m trees and from personal observation will not be for many years.
23. The effect of distance and size are also seen from Corserine, where existing wind farms are background features not disturbing the prime view across the wild land core to The Merrick range.

Clauchrie will intrude, with turbines both back-clothed and skylined to maximise impact in different conditions (Viewpoint 14).

24. The impact on the Merrick Range is given added significance by the inclusion of the western slopes of the range within the Wild Land Area (WLA), within 6km of the nearest turbine. These slopes are not simply a low-value fringe – in fact they have quite high wildness values in their own right – and are integral to the overall experience of this small area of wild land. Clauchrie would be visible from 87% of the Merrick range ridge and western slopes, amounting to almost one quarter of the whole of this small WLA (Table TA6.3-2).
25. The Rugged Granite Upland (LCT 21) of the Galloway Hills is rightly described as ‘Highland’ in appearance (EIAR 6.9.3.5). It is the only part of southern Scotland of which this can be said. It is also the only major upland in southern Scotland from which turbines remain at a distance. There is a sense of remoteness on the Merrick range explicitly because of the distancing effect of the Cree-Minnoch basin with its lack of built development. The main visual character of the basin is formed by the pattern of clearfell coupes and plantings at different stages of maturity – shades of natural colours rather than built structures. In general, the plantations are visually recessive. The proposed development would nearly halve the distance between The Merrick and turbines, with eye-catching turbines nearly twice the height of Mark Hill, prominently spaced across a substantial footprint. The easternmost turbines of Clauchrie would be 7.5km east of operational Mark Hill. This does not seem to be “clustering of development near to the existing windfarm influenced landscape, within parts of the landscape that are already affected by windfarm development” (TA 6.3 p.13). Clauchrie would be a major intrusion into the sense of remoteness and sanctuary from proximal turbines currently experienced on the Merrick range.

c) Socio-economics

26. We do not dispute that constructing a wind farm produces some financial benefits. However, in a dynamic energy economy, achieving construction and operation benefits for the region and nation is not reliant upon the consenting of any one proposal. Nor do economic benefits for a private company trump environmental considerations.
27. The potential effect of windfarm developments on the tourism and recreation sector has been very poorly researched, with no Scottish Government interest in funding high quality primary research since the very dated 2008 study cited by the applicant.
28. Mountaineering Scotland has reviewed the evidence for impact of wind farms on tourism.⁷ The hypothesis that best fits the available, far from perfect, evidence is that wind farms do have an effect on tourism and recreation but the effect is experienced predominantly in areas where large built structures are dissonant with expectations of desired attributes such as wildness or panoramic natural vistas, and where a high proportion of visitors come from the 25% of tourists in Scotland who are particularly drawn by the quality of upland and natural landscapes, with mountaineering visitors prominent amongst these. In much of Scotland, and for most tourists, wind farms are no serious threat to tourism: the nature of the local tourism offer and good siting of wind farms mean they can co-exist.
29. The EIAR (Chapter 13) comes to a benign conclusion that wind farms have no effect on tourism. Mountaineering Scotland would not disagree with the general proposition that well-located wind farms have no effect. But this is a broad generality. The planning system is not concerned with generalities but with the specific impacts of specific proposed developments in specific locations. That requires a properly focused approach to tourism and recreation impacts, which is absent both in research and in practical application.

⁷ Wind farms and tourism in Scotland: A review with a focus on mountaineering and landscape (2017)

30. Analysis of the tourism and recreation implications of a particular proposal needs to consider the nature of visitors to the area and the quality of landscape they are visiting. In areas of higher quality landscape, both the landscape and those visiting it might have higher sensitivity to wind farms than would be expected in areas of more modest landscape quality. The only empirical research on impacts in areas local to wind farms is the poorly conceived and executed Biggar Economics (BE) study, the 2017 version of which is cited by the applicant. Amongst its flaws is the mixing of windfarms in all types of landscape into one unstructured analysis.
31. The development lies partly within the South Ayrshire Scenic Area/candidate Local Landscape Area and just west of the Galloway Hills Regional Scenic Area. It is 6m west of the Merrick Wild Land Area. It is wholly within the Galloway Forest Park. It is within the buffer zone of the Biosphere and the buffer zone of the Dark Skies Park. These designations are indicators of a valued landscape, particularly east of the proposed site, with qualities appealing to mountaineers but also to other interests.
32. The main adverse effect of wind farms on hill-walking recreation, thus far, is self-reported displacement within Scotland from areas perceived as being sullied to areas seen as still retaining the desired sense of naturalness and space. We think, on anecdotal evidence, that there is particularly displacement from southern Scotland, which adds weight to the importance of its main, small, remaining area of prime mountaineering interest around the Merrick and Rhinns of Kells.
33. Using the 2017 version of the BE report and a list of windfarms operating in local landscape designations (LLDs) (Special Landscape Areas or their equivalent), an analysis for Mountaineering Scotland demonstrated a negative impact on tourism from wind farms operational in LLDs.⁸ This limited study is the only attempt to date to analyse wind farm impact on tourism/recreation in Scotland in relation to the quality of the receiving landscape. No study has looked at the effect of wind farm development in proximity to (as opposed to within) designated landscapes or in proximity to WLAs.
34. As far as mountaineering tourism and recreation is considered, the benign conclusion of the EIAR is unwarranted.

Conclusion

35. The proposed development would materially change the perceived character of the landscape as seen from The Merrick range. This is an area of substantial mountaineering significance, containing the highest hill in southern Scotland in a landscape more Highland than elsewhere in southern Scotland. It is also the only major area of upland in southern Scotland that retains a reasonable degree of separation from the wind farm landscapes that, when current consents are built, will occupy most views. The scheme would inflict major harm upon this distinctive range, outweighing its putative benefits.
36. Mountaineering Scotland objects to the proposed Clauchrie Wind Farm. If the Scottish Government is minded to consent the proposed development without the benefit of a PLI, we would ask that such consent should be conditional upon a reduction in height of those turbines whose blade tips (at 200m) are visible from within the core of the WLA (at Mullwharchar (Fig 6.37b) and Craiglee (Fig TA 6.3-5)). Such modification would not, however, alter our view that the proposed development is undesirable.

⁸ <https://www.mountaineering.scot/assets/contentfiles/pdf/Wind-farms-and-tourism-in-Scotland-Supplement-December-2017-20171121.pdf> The three wind farms in such areas in this study lost tourism employment (averaging -7%), compared with a Scottish increase of 15% between 2009 and 2015, and an increase of 35% in the vicinity of wind farms in non-designated areas.

Yours sincerely

Stuart Younie

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CEO, Mountaineering Scotland

