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Dear Madam

**Construction of wind farm comprising of 9 wind turbines (maximum blade tip height 145m), formation of 5.6km new access track, erection of substation building, welfare building, temporary construction compound and 2 borrow pits, Creag Dhubh Windfarm, Creag Dubh, North East Of Strachur Village, Argyll And Bute.**

**Reference Number: 19/02544/PP**

1. Muirden Energy PLC has applied for consent to build Creag Dhubh wind farm, with 9 turbines of 115-144m (rounded) blade-tip height.
2. Mountaineering Scotland **objects** to the proposed development on grounds of visual impact and its consequential potential adverse effect on mountaineering recreation and tourism.

#### **Mountaineering Scotland**

3. Mountaineering Scotland is an independent association of mountaineering clubs and individuals, with over 14,000 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. 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 is adequately robust and resilient. 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) The most recent energy policy documents restate but do not increase the policy support for onshore wind.<sup>1</sup>
7. The most recent Scottish Government policy response to climate change might be regarded as providing increased support for any action that reduces carbon emissions.<sup>2</sup> However, 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, if the climate emergency was to be regarded as trumping all other considerations, then any wind farm in any location would have to be approved regardless of the level of adverse impacts, making the planning system redundant. There is no indication that it is the Scottish Government’s intention to introduce such a policy. In the context of 11.7 GW of operational renewable electricity generation capacity and 9.1GW consented capacity in Scotland<sup>3</sup>, a single onshore scheme of 0.036 GW capacity is not so vital to Scotland’s climate ambitions that its adverse effects can simply be dismissed.
8. Development of turbines of this size on this site is not supported by Argyll and Bute Council policy, being contrary to the assessment contained within the Argyll and Bute Landscape Wind Energy Capacity Study (2017). Similarly it is not supported by SNH policy
9. 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 harmful consequences. There are many possible locations for low-carbon electricity generation.<sup>4</sup> 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)**

10. 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 on the upland environment. 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 – nearly 50 years for one of us. We do not suggest

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<sup>1</sup> Scottish Energy Strategy, 2017; Onshore Wind Policy Statement, 2017

<sup>2</sup> Climate Change (Emissions Reduction Targets) (Scotland) Act 2019

<sup>3</sup> 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)).

<sup>4</sup> 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.

that either professional or consumer judgement trumps the other; simply that each has a distinct place in informed decision-making.

11. A common tactic in LVAs is to say that the principal focus of the view from a viewpoint is anywhere but in the direction of the proposed development. For example: “[from the Arrochar Alps] ... the site would be viewed in the opposite direction to the interior of the LLaTT [sic] National Park and away from other nationally sensitive landscapes, such as the Loch Lomond NSA.” (Table 7.7, p.18). Throughout the visual impact analysis we find that viewers’ attention will be directed to anywhere but in the direction of the wind farm. The point of reaching a panoramic viewpoint is to enjoy the panorama, not just the parts of it facing away from a proposed development.
12. 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 to weaken the overall perspective. In this case, the landscape assessment is split into 20 areas with four designations. How we experience landscape is not separated into component parts like this 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.
13. The development site and its management are typical of the area’s extensive commercial forestry plantations. The turbines’ proposed location is high on the western slopes of the Succoth glen<sup>5</sup>, near the upper edge of the forestry, with some screening to the west from the Creag Dhubh ridge, and partial screening to the north and east by the hills running south from Cruach nam Mult. The base altitudes of the turbines are around 400m and the blade-tip altitude ranges from c.510m OD for turbine 1 in the south to c.575m OD for turbine 9 in the north. Turbine 9 just overtops the adjacent Cruach nan Capull (565m OD) while all turbines overtop the Creag Dhubh ridge that runs south from this, Creag Dhubh itself being 484m in altitude. The hills to the east are generally higher than the turbine blade-tips but with lower altitude gaps between them.
14. If there was no context to this proposed development site, Mountaineering Scotland would most likely have no interest in the application. However, there is an important context. The site is just outside the Loch Lomond and Trossachs National Park (1km) and within 13km of the Arrochar Alps, an immensely important area for Scottish mountaineering and hill-walking. The proposed development is screened by topography from the valleys and lower slopes of the Arrochar Alps but the summit areas and upper western slopes of most of its Munros and Corbetts have full visibility of the proposed development at distances from c.5.5km (Beinn Bheula) to c.13km (Beinn Narnain). In most cases, the higher altitude view would result in the proposed turbines being backclothed by dark moor and forestry, increasing their conspicuity.
15. The LVIA states that there is no visibility of the proposed development prior to reaching the summit of Beinn Bheula. This is not so. The route over Beinn Bhreac, as shown in *walkhighlands*<sup>6</sup> or the SMC Corbett Guide<sup>7</sup>, gives earlier sight of most or all of the turbines depending on the exact line taken. From the summit, the turbines would appear at the treeline, just off the Creag Dhubh ridge, well above the mostly invisible glen. Their movement would be very visible, enhanced by backclothing, and distract from the view of Beinn Cruachan beyond. We concur with the LVIA assessment that the impact would be significant. We do not accept the LVIA caveats seeking to weaken this conclusion.

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<sup>5</sup> Also known as Glen Cur.

<sup>6</sup> <https://www.walkhighlands.co.uk/argyll/beinn-bheula.shtml>

<sup>7</sup> Scottish Mountaineering Club. The Corbetts and Other Scottish Hills. 1990

16. For Ben Donich, also, there is some visibility of the proposed development from the most common route, from the Rest and be Thankful, depending on the line taken, even though the LVIA says there is not. From the summit, the turbines would appear at the treeline, just off the Creag Dhubh ridge, well above the mostly invisible glen. Their movement would be very visible, enhanced by backclothing. We concur with the LVIA assessment that the impact would be significant. We do not accept the LVIA caveats seeking to weaken this conclusion.
17. The viewpoint in the LVIA for the central Arrochar Alps is The Cobbler, but this viewpoint must also serve to assess the impact on Beinn Ime and Beinn Narnain (Munros), and on Beinn Luibhean, Beinn an Lochain and Binnean an Fhidleir (Corbetts). There would also be partial visibility of the proposed development from the Bealach a'Mhaim and ridges leading up from it. The level of haze in the baseline photography for The Cobbler is unfortunate. Sharp views of turbines of the size proposed are not uncommon at 11.4km distance. The conspicuous blade movement would attract the eye to an area otherwise inconspicuous. Taking into account the much wider area of which The Cobbler summit viewpoint is representative, the impact upon walkers in core area of the Arrochar Alps would be significant. (The LVIA concludes 'not significant' for the Cobbler summit alone.)
18. Both the LLTNP and the North Argyll Area of Panoramic Quality (APQ) follow fairly arbitrary boundaries in the vicinity of the proposed development. The relevant consideration is that these designations show a formal public recognition of the quality of landscape in the immediate vicinity of the proposed development. We do not believe that such recognition is consistent with consenting a wind farm of the size and altitude proposed in this location.
19. The cumulative pattern of development has thus far avoided close proximity to the National Park and the Arrochar Alps, with the unfortunate exception of Clachan Flats<sup>8</sup>. From most hills east of the proposed development it would have a background of the wind farms around Loch Awe. However, they would be more than, often much more than, 10km further away than the proposed development. The Clachan Flats is visible from some summits of the Arrochar Alps. The proposed development would be visible from almost all the summits that don't have visibility of Clachan Flats (Fig 7.14). Remarkably, the fit is almost perfect.
20. We concur with the LVIA assessment for (1) Ben Lui – it is distant and has a narrow view of the proposed development and (2) Ben Cruachan – it is distant. The assessment for Beinn Bhuidhe in relation to the Ben Lui WLA relies upon the nearer presence of Clachan Flats wind farm to diminish the impact of the more distant proposed development. If Clachan Flats was to be removed at the end of its life, the proposed development (if consented and built) might then be judged to have a significant solo impact.

### c) Socio-economics

21. 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.
22. 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.<sup>9</sup>

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<sup>8</sup> We concur with the LWECS and the view expressed by SNH that, with hindsight, Clachan Flats is an unsuitable location for a wind farm.

<sup>9</sup> Page 16-6, footnote 7

23. Mountaineering Scotland has reviewed the evidence for impact of wind farms on tourism.<sup>10</sup> 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.
24. The EIAR Chapter 16 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.
25. 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. Prominent amongst its flaws is the mixing of windfarms in all types of landscape into a single unstructured analysis.
26. The development lies partly within the North Argyll APQ, just outside the LLTNP and close to the Arrochar Alps, a major draw for mountaineering recreation and tourism. While the site itself may be unexceptional, it is set within a high quality and valued mountain landscape.
27. Using the 2017 version of the BE report and a list of windfarms operating in local landscape designations (LLDs) (including APQs), an analysis for Mountaineering Scotland found a negative impact on tourism from wind farms operational in LLDs.<sup>11</sup> 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.
28. As far as mountaineering tourism and recreation is considered, the benign conclusion of the EIAR is unwarranted and greater caution regarding potential adverse tourism and recreation impacts is merited when faced with applications set within high quality landscapes.

## Conclusion

29. The proposed development would materially change the perceived character of the presently largely recessive landscape as seen from the Arrochar Alps. This is an area of substantial mountaineering significance, highly accessible from the Central Belt yet a true Highland landscape. Wind farms are not absent in the wider view but, with the regrettable exception of Clachan Flats, their impact is muted by distance and good siting. The proposed development does not offer these mitigations and manages to be visible from all the summits from which

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<sup>10</sup> Wind farms and tourism in Scotland: A review with a focus on mountaineering and landscape (2017)

<sup>11</sup> <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.

Clachan Flats is not visible. It would have an impact wholly disproportionate to the climate benefits to be gained from such a small development in the wrong location.

30. Mountaineering Scotland **objects** to the proposed Creag Dhubh Wind Farm.

Yours sincerely



**Stuart Younie**  
**CEO, Mountaineering Scotland**

