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23 January 2024

Dear Sir/Madam

**CULACHY WIND FARM PROPOSAL,**  
**ECU reference: ECU00003423**

## 1 Introduction

1.1 Fred Olsen Renewables Ltd has submitted an application for a wind farm of 8 turbines of up to 200m blade-tip height (BTH) on Culachy Estate, south of Fort Augustus. The site is adjacent to the northern leg of the famous Wade road over the Corrieyairack Pass. Mountaineering Scotland believes the proposed development, set within a popular area for walking with historic resonance, would have substantial visual impacts, diminishing the regional mountaineering recreation and tourism resource. It **objects** to the application on those grounds.

## 2 Mountaineering Scotland

2.1 Mountaineering Scotland is a membership organisation with more than 16,000 members and is the only recognised representative organisation for hill walkers, climbers, mountaineers and snowsports 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.

### **3 Summary**

3.1 Mountaineering Scotland believes that the proposed site does not have the capacity to support a commercial wind energy development without significant and unacceptable harm to the landscape setting of Wade's Road and significant adverse visual impact upon local Munros and Corbetts.

Cumulative impact is of some importance since the proposed development would notably project wind farm development further south in the Monadhliath and into a different type of setting. The EIAR overstates the benefits and understates the adverse impacts of the proposed development at this inappropriate location.

### **4 Landscape and Visual Impact**

#### **a) Preamble**

4.1 For all the appearance of objectivity, professional landscape and visual impact assessments are ultimately subjective judgements. In our experience, assessments by professionals commissioned by developers repeatedly downplay the impact of proposed development upon the mountaineering experience. This application is no exception. Mountaineering Scotland, with an assessment team composed of, informed by and representing experienced 'consumers' of mountain landscapes, believes its own judgement of impact can offer a complementary but no less valid perspective.

4.2 Mountaineering Scotland's assessment is focussed on its members' interests: the enjoyment of hillwalking and mountaineering in a high quality upland environment. Hence its main concern is visual impact on the uplands, as here, and sometimes on views to the uplands.

#### **b) Assessment**

4.3 The proposed development site lies on a southeast-northwest axis on sloping moorland, with minor summits rising to a little over 500m to its west from which the ground slopes down to Glen Tarff to its east. The topography is more varied in the south of the site with the valley of the Allt Lagan a'Bhainne cutting across the site and an eastward spur of higher ground in Carn Bad na Circe (495m AOD). The lowest altitude turbine is the northernmost one at c.400m AOD while the highest is the southernmost at c.480m AOD. Blade tip altitudes would therefore be of the order of 600-680m AOD (hubs c.520-600 AOD).

4.4 The Beaully-Denny overhead power line (BDOHL) is intrusive in this landscape and has, as was predicted by objectors to it, created an undesirable level of damage to the landscape locally. That said, it is of a different scale to the proposed development and, no less importantly, is static. (The maximum height of pylon on the BDOHL is 65m. Mountaineering Scotland does not know the local

pylon height.) At 162m diameter, the moving rotors of the proposed turbines would be equivalent to birling 2.5 of the tallest pylons in the air. Viewpoint 21 appears to have been carefully positioned to give a totally misleading impression of the relative scale of a pylon and turbines.

4.5 The site is enclosed, with some gaps, by higher hills to the north (Carn a'Chuillin), east (Corrieyairack Hill and Carn Leac - Poll Gormack) and south (Carn Dearg - Beinn Bhan) while being open to the west (EIAR Fig 6.09). The primary visual impact is therefore upon the immediately surrounding hills and, more distantly, upon proximal hills to the west of the Great Glen.

4.6 By introducing very large vertical, kinetic structures into the landscape, the proposed development would obliterate the sense of grandeur and openness experienced when traversing the historic and well-used Wade Road between Speyside and Fort Augustus. Mountaineering Scotland acknowledges that this experience has been diminished by the BDOHL, but its impact is much lower than would be that of the proposed turbines since the BDOHL is visually permeable, of lower height and static.

4.7 The cumulative situation has evolved since the EIAR was completed. It is Mountaineering Scotland's understanding that the Millennium South consent has lapsed. Cloiche and Corriegarh 2 have very recently been consented. These changes do not alter the regional pattern of a landscape punctuated repeatedly by wind farms, typically with a large number of turbines in each cluster. Millennium South was a proposed extension; the recent consents are extensions to existing clusters. Culachy would be an isolated small scheme.

4.8 The EIAR claims that the proposed development would be consistent with the regional 'landscape with wind farms' experienced on either side of the Great Glen.

"... it is the authors' professional opinion that in broad terms, the Proposed Development would not alter the current perception of a 'landscape with wind farms' characteristic currently experienced within the central highlands and in the context of the Great Glen. The addition of the Proposed Development would result in the redefining of a localised area of upland landscape (focussed around the site area), including the northern part of WLA 19 as a 'wind farm landscape character type' at a localised level but not in the wider landscape context where the 'landscape with wind farms' characteristic would be maintained at the regional level and as such would not give rise to a perception of a 'wind farm landscape' in the central highlands." (6.12.12)

4.9 But this argument ignores the implications of extending development into a new area and a different topography. Existing and applicant wind farms are on the upper slopes of hills. Culachy would be on a mid-height shelf below the hills. When seen at the same time as other wind farms (in

the same view or by turning one's head) it would appear to have a different character because of its different relationship to the regional topography. The nearest wind farm would be Cloiche (consented). When seen simultaneously the contrast would be very apparent, with the blade tips of Culachy only reaching the altitude of the bases of Cloiche (averaging of the order of 650m AOD for those nearest to Culachy).

4.10 In fairness, it is noted that the EIAR does sometimes acknowledge that Culachy would extend the spread of wind farms. For example, in respect of the Loch Lochy and Loch Oich SLA:

The Proposed Development would add further development to the existing spread of wind energy development currently visible, introducing potential cumulative effects. ... From the hills above Loch Lochy, the Proposed Development would appear in the upland backdrop to the views across the Great Glen and would bring development closer on the broad upland plateau to the north-east than currently experienced when viewing more distant existing schemes such as Stronelaig." (6.10.72)

4.11 However such acknowledgement is invariably then qualified by bringing in other wind farms or the BDOHL. This is to confuse the effects of physical location with those of wind farm context. The former has an impact which the latter, because of Culachy's different setting to existing wind farms, does not diminish.

4.12 The EIAR consistently uses the visibility of existing wind farms as diminishing the potential visual impact of Culachy, almost regardless of distance or setting. For example, in respect of the Loch Lochy and Loch Oich SLA:

"From the high hills west of Loch Lochy the Proposed Development would be experienced as a distant feature occupying a small part of a wide horizon of upland within the same part of the panorama as existing wind farm development. ... The presence of existing wind turbines in views from this SLA, both to the north and east means that the proposed turbines would not be introducing elements that are uncharacteristic in their influence." (6.10.72)

4.13 Much the same wording is repeated for many viewpoints. As has already been argued, Mountaineering Scotland believes that the setting of existing and application wind farms is very different from Culachy.

4.14 Sometimes the EIAR, in trying to support the applicant's case, simply tries to have it both ways: Culachy would be different but the same. For example at Burach (VP 13):

"The Proposed Development appears within a part of the panorama that does not currently have wind energy development within it and so would increase the spread of wind turbines

seen in the wider panorama increasing the cumulative effect when considering the baseline wind energy visible in the view." (6.11.99)

4.15 That is very true, but later in same paragraph:

"Whilst not in the same part of the panorama, the existing wind energy development in the view such as the Millinium (*sic*) Group, Stronelairg and Bhlaraidh provides an existing wind energy baseline, within which the Proposed Development would not be entirely uncharacteristic. " (6.11.99)

4.16 The EIAR claims that significant visual effects are only local.

"Significant visual effects are found to extend to around 5.5 km to the south and 4.5 km to the north. The significant visual effects are largely as a result of closer proximity views from higher sensitivity recreational receptors. This is particularly relevant for hill walkers and recreational walkers on the Corrieyairack Pass and GWMR [Wade Road]. For these receptors the Proposed Development would be in relatively close proximity." (6.12.8)

4.17 Mountaineering Scotland profoundly disagrees with this assessment and regards significant effects as definitely extending out to at least 14km (Viewpoints 13-15) and possibly to 22km at Meal Fuar-mhonaidh. It is not uncommon for EIARs to overstate the extent to which impact falls off with distance and that is certainly the case in this EIAR.

4.18 The EIAR consistently overplays the visibility of the BDOHL. While it can sometimes be seen at a distance, its permeability means it is generally not nearly so significant a feature as the EIAR claims and nowhere near as significant as 200m turbines. From field experience in a variety of conditions, it is often difficult to make out the BDOHL much beyond 5km (increasingly so as the metal dulls over time) and certainly uncommon to see it beyond 10km unless looking very, very hard or sunshine illuminates wet towers and conductors. The LVIA assessor must have been blessed with exceptional conditions and vision to consider it as having an impact at the distances claimed in the EIAR.

- Ben Tee (13km): "a distant view of the BDOHL, which although distant provides a marker for identifying the site area in this large scale landscape" (6.11.105)
- Burach (13km): "Both the towers and overhead lines of the BDOHL are clearly visible from this location in contrast with the dark and muted colour of the moorland upland of the site and surrounding landscape." (6.11.98)
- Meall Dubh (14km): "The BDOHL towers can be seen to the south-east crossing the site area before becoming skylined on the elevated ridge of the Corrieyairack Pass." (6.11.115)

- Meall Fuar-Mhonadh (22km): "The BDOHL towers are just discernible in this distant view as they cross the site area." (6.11.133)
- Yet at Carn Dearg (5.4km) the line (and existing turbines) "are small elements in the view" (6.11.45)

Only the last observation quoted appears accurate and reasonable.

4.19 Mountaineering Scotland's assessment of those Viewpoints relevant to its interests is given in Table 1 below. This does not include Viewpoints 8, 10, 11, 12 and 16 since these are not of direct concern to Mountaineering Scotland, but it is notable that the proposed development also appears from wirelines and visualisations for these viewpoints as a new intrusion into a view without existing or consented turbines, further demonstrating how Culachy would markedly extend the pattern of development.

**Table 1**

Viewpoint		EIAR assessment*	Mountaineering Scotland assessment
<i>Near hills (clockwise from north)</i>			
4	Carn a' Chuilinn (4.5km)	Major / Significant	Turbines on the left foreground of the Nevis range and on the right foreground of the Loch Lochy Hills. While not breaking the skyline, birling rotors in the foreground would distract from the view of the hills beyond. Culachy occupies the only part of the 360° panorama without operational or consented wind farms (at distances of 5-17km). By occupying a new area, Culachy would increase the perception of regional wind farm development out of all proportion to the eight turbines proposed.
3	Corrieyairack Hill (3.8km)	Major / Significant	Hazy baseline photography. The Millennium-Beinneun cluster to the west is 15+km distant so 'not uncharacteristic' (6.11.27) but nor in close proximity. Turbines would foreground the Glen Garry hills. With Stronlaig-Cloiche to one side and Culachy to the other, the impression of being corralled by wind farms would be much increased. The EIAR understates both the effect and its significance.
D	Coire Odhar Beag (2.5km)		Gunsight view of several turbines gives a Major/Significant effect.
5	Carn Dearg (5.4 km)	Moderate / Significant	Concur. Turbines would foreground Meall Fuar-mhonaidh and the discernible void of the Great Glen. That the more scenic views are in other directions (Glen

			Roy, upper Spey) does not mean that walkers ignore this direction. A full panorama is typically the goal.
20	Meallan Odhar (1.7km)	Major / Significant	Concur.  Note that the viewpoint is not on Meallan Odhar but on the track c.170m OD below it, giving a much more restricted view of Culachy than the almost total view that would be obtained from Meallan Odhar itself.
21	Beaully-Denny track (0.9km)	Major / Significant	Concur.
<b>Wade Road (from east to west)</b>			
1	Corrieyairack Pass (1.3km)  The EIAR claims:  "The view to the north-west from this location is not particularly scenic, particularly when considered against the more scenic view to the north along Glen Tarff or south-east along the Corrieyairack Pass." (6.11.11)  As the baseline photograph shows, Glen Tarff cannot be seen from this viewpoint. To the SE the Corrieyairack pass is above the viewpoint with the BD line converging with the Wade Road – not particularly scenic. Whereas to the NW the distant view skylines hills from Glen Garry to Affric.	Major / Significant	Concur. Culachy would create a layering of pylons, 200m turbines, and distant (13+km) smaller Millennium-Beinneun turbines. The view of the hills on the horizon would be seen through the rotors of Culachy.  The summit of the Corrieyairack Pass (c.1.5km east of Viewppoint 1) is at c.770m AOD. It drops westward and within 1km is below 680m – i.e. below the highest blade-tips of Culachy. From there, continuing west, the walker is confronted and dominated by the proposed turbines for c.3km until the Wade Road drops into the Lagan a'Bhainne (cf Fig 10.11) and turns away north. The turbines thereafter are less dominating being to the side and partly screened (cf Fig 10.08).  Without Culachy, walkers descending the Wade Road have view forward to Millennium-Beinneun at 13km at Viewpoint 1 but no other wind farms would be in view from the Wade Road except possibly a brief glimpse of a fragment of Cloiche.
2	General Wade's Military Road (1.7km)  The EIAR again claims that "The view from this location is not particularly scenic, particularly when considered against the more scenic view to the north along Glen Tarff [actually better seen from	Major / Significant	Concur. The <i>relative</i> insignificance of the BDOHL is clearly shown in this visualisation.



	positions further north or south on the Wade Road] or south-east along the Corrieyairack Pass. " (6.11.19).  The Pass cannot be seen from this viewpoint.		
<b>Middle-distance hills (clockwise from south to north)</b>			
B	Craig Meagaidh (13km)		Two blades would be seen in an area separate from the three obvious large existing/consented turbine clusters. While blade movement and glint in sunlight might catch the eye, this would not have a significant effect.
14	Ben Tee (13km)	Moderate / Not Significant	Culachy would appear as an isolated development in a setting very different from all other, higher altitude, Monadhliath/Great Glen wind farms, in particular contrasting with Stronelaig and Cloiche seen behind <i>and above</i> it. The visualisation gives a realistic impression of backclothed turbines in clear sunlight at this middling distance. The EIAR substantially understates both the effect and its significance.
15	Meall Dubh (14km) #	Minor / Not Significant	Despite the nearer turbines of Millennium and, if one moves south a bit from the summit viewpoint, Beinneun, Culachy would appear as an isolated development in a lower backclothed setting very different from the other Monadhliath and Great Glen wind farms. Although somewhat hazy, the visualisation gives a fair impression of backclothed turbines in clear sunlight at this middling distance. The EIAR understates both the effect and the significance of Culachy's spreading of development into a new and contrasting landscape setting, notwithstanding that the closer turbines of Millenium-Beinneun clearly moderate the effect.
13	Burach (13km) #  The EIAR inconsistently claims that "Both the towers and overhead lines of the BDOHL are clearly visible from this location <u>in contrast with the dark and muted colour of the moorland</u>	Moderate / Significant	Culachy would appear as an isolated development in a setting very different from the other Monadhliath wind farms set on upper slopes Hazy baseline photography gives an unrealistic impression of visibility in good conditions (compare VP15 at a similar distance in a clearer atmosphere). The EIAR understates both the effect and its significance due to the insertion of



	upland of the site and surrounding landscape." (6.11.98) Yet " <u>The muted upland moorland</u> and overall large upland scale of the distant landscape of the site area provides a landscape context considered <u>suitable for wind energy development</u> of the type proposed." (6.11.99) (added emphasis)		development into a new and contrasting part of the landscape.
<b>More distant hills (clockwise from south)</b>			
C	Ben Nevis (36km)		Culachy would be seen as a couple of turbines in a wide gap between eastern and western foci of development either side of the Great Glen at similar/greater distances. Given the distance involved this would only be a minor effect.
17	Meall Fuar-mhonaidh (22km)	Moderate-Minor / Not Significant	Culachy would occupy a clear area of separation between wind farm clusters, breaking the pattern. It would appear below but in front of the distinctive Nevis-Grey Corries-Easains skyline. Backclothing would increase its visibility in afternoon sunshine. Despite the distance it would appear intrusive. The EIA understates the effect and its significance at this popular summit.
18	Toll Creagach (32km)	Minor / Not Significant	Culachy would be in an area of separation between wind farm clusters but in a direction of view characterised by an extensive spread of recurrent windfarms, several of which are nearer to the viewpoint. Backclothing would increase its visibility in afternoon sunshine. The EIA understates the effect but given the distance and the multiple windfarms characterising the view the effect would be no more than moderate and not significant.

\* EAIR Assessment - Consented Scenario except for VPTs 3, 4 and 13 where Cloiche, the nearest application site in the EIA, is now consented and therefore the Application Scenario has been used.

# The EIA assessor suggests for Burach (6.11.96) and Meall Dubh (6.11.112) that the presence of a substantial cairn indicates interest in and frequenting of the summit by hillwalkers. While these summits do attract interest, particularly the latter since it is a Corbett, the cairns are historic features, possibly associated with 19<sup>th</sup> century sporting estates. Attributing them to modern hillwalkers suggests the assessor is unfamiliar with the history of Scottish hills.

### c) Wild land

4.20 The mountain experience in Scotland is closely connected with the wild land character of the landscapes in which most mountains are located. For example, almost all Munros and Corbetts are

within Wild Land Areas (WLA). Mountaineering Scotland uses WLAs as indicators of the quality of mountaineering experience in an area. It does not assess impact on WLAs in their own right.

4.21 The boundary of any WLA is somewhat arbitrary and that is particularly the case here. The Braeroy-Glenshirra-Creag Meagaidh WLA is the southern part of what was originally mapped as a much larger WLA that, before the definitive map was published, was split to enable Stronelaig wind farm to be consented. The Braeroy-Glenshirra-Creag Meagaidh WLA boundary superficially appears drawn to exclude the BDOHL but the line actually runs inside the very northern tip of the WLA, suggesting that the BDOHL was not considered entirely incompatible with wildness when the boundary was drawn. More importantly, on the ground the perception of wildness extends eastwards across Glen Tarff and up the slopes of Carn a'Chuillin and Corrieyairack Hill, interrupted rather than bounded by the BDOHL and the retained construction road.

4.22 The applicant seeks to downplay the quality of that part of the WLA that it wishes to build on. Mountaineering Scotland regards the entirety of the Tarff glen, moorland slopes and surrounding hill slopes as having a wild character. The interruptions of the BDOHL and retained road diminish but do not remove that perception.

## 5 Socio-economics

5.1 The standard analysis of potential recreational (and consequent tourism) impacts by Biggar Economics ignores, as always, the potential for differential impact on different sectors of the market. While tourism as a whole may be unaffected, the evidence from surveys of hillwalkers suggests that some activity is displaced from areas with wind farms to areas without.

5.2 The EIAR is truly remarkable for its attribution of motivations to those on hills and trails with no evidence whatsoever to support its suppositions. There is nothing in the text or the references on the motivations of hill-users. Biggar Economics' claims on motivations appear to have been plucked out of the air simply to give an air of credence to a pre-formed conclusion. For example, it is claimed for the Wade Road:

"The walkers who use this route will either traverse the route in its entirety, include it as part of a circular route or to climb some of the peaks on the way. The entire route is expected to take between 10 and 12 hours (Walkhighlands, 2022) and therefore the route is likely to attract experienced and motivated walkers. **The presence or visibility of the Proposed Development will not impact the motivation to walk this route.** [added emphasis] However, the assessment in Chapter 6: Landscape and Visual Impact Assessment

has identified that there will be Major Significant Effects on some parts of this route and the landscape may also be a motivation for walkers." (13.7.99)

**"The motivations for both cyclists and walkers to use the path suggest that while visual impacts may be important, the use of the route is not dependent on them.** [added emphasis] Therefore, the significant visual effects will not have permanent or long-term effects on the resources on which enjoyment of the natural heritage depends." (13.7.101)

"Consequently, the effect of the Proposed Development on the recreational trail of the Corrieyairack Pass has been assessed as minor adverse (not significant)." (13.7.102)

5.3 The EIAR contains not one jot of empirical evidence on the motivations of walkers (or cyclists) either in general or with regard to this specific route or area. It is simply the assessor's subjective opinion, which conveniently coincides with the client's interests.

5.4 Nor is there any evidence that Biggar Economics is well-informed about either hillwalking or the local area. For example:

- Blackburn of Corrieyairack bothy is assessed simply as accommodation, with no understanding of bothying as an activity in its own right (para 13.7.71).
- Gairbeinn and Corrieyairack Hill are referred to as twin Corbetts (para 10.7.103) but only the former has been listed as a Corbett since the early 1990s.
- Carn Dearg (VP5, 815m) is confused with Carn Deag (Brunachain) (834m) (para 13.7.107). There are three Carn Dearg Corbetts (and at least one other hill with the name) in the vicinity of Culachy. Experienced hillwalkers know to be careful not to confuse them.

5.5 People come to the Highlands of Scotland for many reasons but its magnificent scenery is the backcloth to the majority of visits. This is particularly the case for hillwalkers and others attracted (motivated) to places because of the quality of landscape on offer. Of course there are many motivations for climbing hills but even a cursory glance at a hillwalking magazine shows that the quality of visual experience (the view, the scenery) is an important one.

5.6 Mountaineering Scotland undertook a survey in 2016 and repeated the same question in 2023 asking if hill-walkers had changed their behaviour in response to the spread of wind farms. The results were statistically the same for the two years, analysed using 95% confidence intervals. Averaged, they suggest that 20% of hillwalkers would go to another area to avoid wind farms and 42% would still go to an area with a wind farm but their enjoyment would be diminished. In contrast, only 2% would go to such an area more often. (For completeness: it would have no impact on 35%.)

5.7 These surveys did not ask about motivations directly, but the behavioural responses recorded suggest that they include a strong visual element. If the EIAR seeks to claim "that the visual impacts will not be the primary motivation for completing these routes for the majority of users" (13.7.104 re Corrieyairack Hill and Pass) and "the enjoyment of the recreational assets is not dependent on the visual impacts at specific points along each route" (13.10.6) then it is reasonable to expect such a claim to be supported by evidence, whether by way of references cited or fieldwork evidence. It is not so supported, and cannot be, because the empirical evidence is to the contrary.

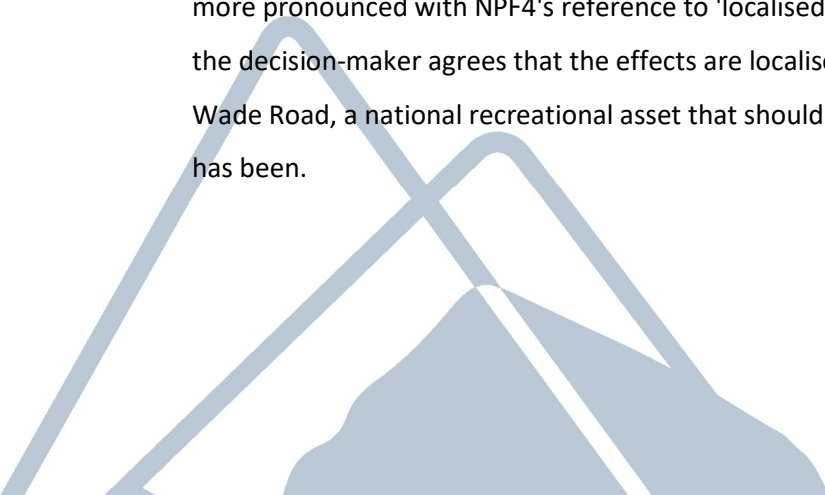
5.8 While Mountaineering Scotland does not agree wholly with the LVIA in the EIAR, it is a considerably more sound basis for assessing visual impact upon hill and trail walkers than is the utterly inadequate and uninformed subjective commentary offered in Chapter 13 of the EIAR.

## 6 Policy

6.1 Mountaineering Scotland agrees with the applicant that NPF4 should be accorded significant weight by the decision-maker. And also agrees that energy policy is highly supportive of onshore wind development, for example the *Onshore Wind Policy Statement (2022)* and the *Draft Energy Strategy & Just Transition Plan (2023)*.

6.2 Even with such highly supportive policies, the EIAR and Planning Statement find it necessary to cherry-pick to boost the applicant's case. For example, EIAR para 5.5.19 cites the Climate Change Committee's 2020 Report as highlighting wind power "as the backbone of renewable energy production". But the report actually said "Wind, particularly offshore, is the backbone of the system" in their vision for 2050. (added emphasis) (page 135, *The Sixth Carbon Budget: The UK's path to Net Zero*. Dec 2020)

6.3 The LVIA in the EIAR claims that significant visual effects are only local. Mountaineering Scotland acknowledges that the development would be screened at close quarters from some directions, but not from all. It profoundly disagrees that significant visual effects would be limited to 5.5km (6.12.8). To the west they would reach at least 14km and possibly to 22km at VP17. EIARs often overstate the extent to which impact falls off with distance and that tendency has become more pronounced with NPF4's reference to 'localised' impacts being acceptable (page 53). Even if the decision-maker agrees that the effects are localised, they are localised to the vicinity of the Wade Road, a national recreational asset that should not be compromised further than it already has been.



6.4 The applicant proposes to undertake some ecological enhancements on Culachy Estate, though this will merely undo a small part of the damage accumulated through the estate's damaging land management practices (e.g. to undo some of the peat drainage). Since, under NPF4, such enhancement is a mandatory requirement for all development it should not be given much weight by the decision-maker.

6.5 Similarly, the proposed 10MW battery should carry little weight since most applications now include batteries, often larger, and applications are now coming forward for storage at grid scale (e.g. Coalburn, 500MW, consented June 2023).

6.6 Notwithstanding the strong policy support for onshore wind, both NPF4 (page 7) and the OWPS (para 3.6.1) reiterate from previous policy that the goal is the right development in the right place. It is Mountaineering Scotland's view that the location for the proposed development is not the right place. The previous refusal supported this view. Notwithstanding that since then policy has become more favourable towards onshore wind development, there is nothing in current policy that seeks to promote development in inappropriate locations. Proposed wind developments have been refused consent under NPF4. It is Mountaineering Scotland's contention that Culachy is the wrong place for a wind farm, as set out in the assessment above, and that judgement is reinforced when the modest amount of generation capacity proposed is factored in.

6.7 The proposed development would have a generation capacity of 57.6MW. This modest contribution to electricity generation must be balanced against its significant adverse visual impact. It must also be set in the context of established progress towards the Scottish Government's goal of at least 20GW of onshore wind capacity by 2030.

6.8 At the end of Q2 2023, Scotland had 9.4GW of onshore wind operational, 1.6GW under construction and 4.1GW awaiting construction: a total of 15.1GW. (Scottish Government online Energy Statistics Hub) In the second half of 2023, a further 1.1GW was consented (ECU website) bringing the total operational and consented to over 16GW. It is accepted that some consented schemes will not be constructed, but in practice consent has lapsed for only a handful of schemes.

6.9 There was 7GW of onshore wind in planning at the end of Q2 2023 (Energy Statistics Hub). There are many further schemes at scoping stage prior to making an application. (ECU website) There is thus, to say the least, no sign that the appetite of developers is diminishing. A continued large volume of applications can be anticipated.

6.10 These statistics are presented simply to show that a single relatively small scheme is not important for the achievement of the government's policy goal given a substantial and continuing pipeline, most of which are in less damaging (more acceptable) locations. It is already clear that the

Scottish Government's target for 2030 will not fail to be met because of a shortage of *consented* capacity, even though construction and grid connection may well fall short of the sustained pace required.

6.11 It is Mountaineering Scotland's contention that 57.6MW of capacity, in the context of a very substantial flow of alternative proposals, is far from sufficient – even under the very permissive planning policy of NPF4 - to outweigh in the planning balance the significant adverse impacts identified in its objection and clearly set out in the previous refusal decision. While the environmental effects of the proposed development may not be unusual for a commercial scale wind farm application, that does not mean that they are acceptable in this specific location.

## 7 Previous refusal

7.1 This is a reapplication, by a different applicant, for a site previously refused by Highland Council (14/04782/FUL, 22 December 2014, decision notice 18 December 2015), appealed and refused by the DPEA Reporter (Robert Seaton) after a PLI (PPA-270-2151, decision notice 27 April 2018). Mountaineering Scotland was represented by a volunteer at the PLI.

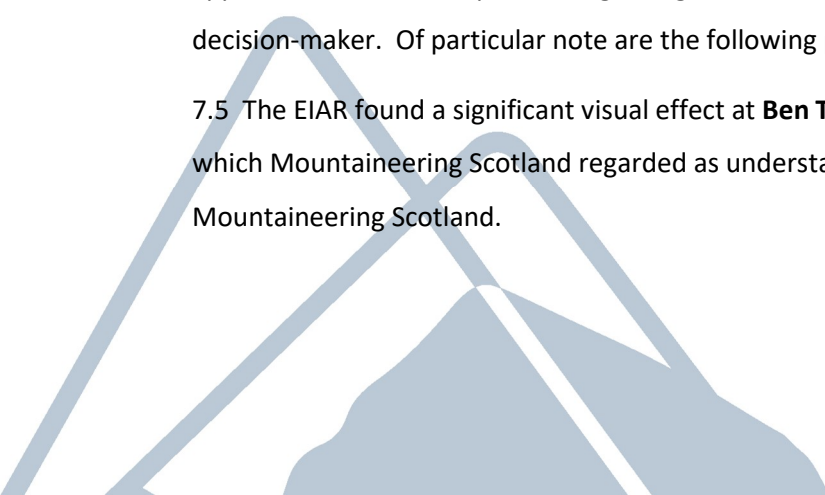
7.2 Compared with the previous application:

- Turbines have been drawn back somewhat from the Great Glen.
- The number of turbines has been reduced from 13 to 8.
- Blade-tip height has been increased from 149.5m to 200m (hubs from c.90 to 119m)
- Maximum generating capacity has increased from c.44MW to 57.6MW

7.3 None of these changes diminish the potential visual impact experienced by hillwalkers compared with the refused scheme. Visual comparison of the ZTVs of the two proposals suggests that they are very similar as far as visibility from upland areas is concerned. Mountaineering Scotland's viewpoint assessment also suggests very little difference from the refused scheme.

7.4 Accordingly, the Reporter's assessment of visual impact remains highly relevant to the present application. It was unequivocal regarding the adverse visual impacts. It is commended to the decision-maker. Of particular note are the following parts of the Decision Notice.

7.5 The EIAR found a significant visual effect at **Ben Tee** but not a significant cumulative effect, which Mountaineering Scotland regarded as understated. The Reporter concurred with Mountaineering Scotland.



"... the proposed development would introduce a presence of prominent windfarms on either side of the Great Glen, a key feature in the view, would bring wind energy development in the Monadhliath substantially closer to the viewpoint, and so would represent a notable increase in the influence of wind energy in the composition of the view." (Decision Notice para 82)

#### 7.6 The Reporter found a significant effect at **Meall Fuar-Mhonaidh**.

"Notwithstanding the distance, it [the proposed development] would appear relatively prominent, both on account of the proposed turbines' size and its location, back-clothed against higher ground, relatively close to the head of Loch Ness and to the view to the Nevis range. As a consequence, its visual effect would be greater than the distance from the viewpoint would suggest. ... the effect would be significant." (para 84)

"the proposed development would give some sense that, from east through south to the west, the viewpoint and the southern end of the loch was being encircled by windfarms. I consider this to be a significant cumulative effect, notwithstanding the distance from the viewpoint to the proposed windfarm." (para 85)

#### 7.7 The "perceived uniqueness and antiquity of the **Corrieyairack Pass** as a route, give it a remarkable sense of place." (para 66).

"... the view of the proposed turbines and their infrastructure would greatly affect the experience of travelling in both directions along the section of the path to the north of the pass." [The Reporter noted visual and aural impacts.] (para 67)

"For a walker or cyclist passing northwards ... Although the turbines would appear well spaced, they would fill the middle ground ahead, reduce the perceived scale of the moor around which the road can be seen to pass, and detract from the view across the Great Glen to the higher mountains beyond. There would also be a significant cumulative effect with [Millennium-Beinneun]. Turbines would fill the middle-ground and background of the view north, a unifying feature that would diminish the contrast between the landscapes on either side of the glen." (para 68)

"As a consequence, I consider the proposed development would be a dominant element of the experience of walking or cycling the Wade Road between Liath Dhoire and the pass, and have an adverse effect upon the existing sense of place." (para 69)

"The proposed development would also have a cumulative effect with the BDOHL infrastructure in two respects. First, it would make perceived proximity to energy infrastructure a feature of the route to the north as well as the south of the pass. Second, in the section north of the pass,



the view from the road of the BDOHL infrastructure together with the proposed turbines would be likely to give a cluttered impression." (para 70)

"The character of the wider landscape does contribute to the road's sense of place. ... I acknowledge that the landscape within which the road is set is not unchanged from the time the road was built. There are several post-1745 elements, of which the most prominent are the BDOHL and the retained section of its construction track. Together with its infrastructure, the BDOHL has an existing effect, reducing the sense of the road's remoteness and the perception of the scale of the surrounding mountains. However, the proposed development and the associated new tracks and broader retained track would considerably intensify this effect." (para 112)

7.8 The **BDOHL** is a blemish but the proposed development would be a greater one.

"Although plainly the proposed development would have no impact upon the hills' physical topography, I consider that it would have an adverse effect upon on the perception of their scale, and also upon their perceived emptiness and naturalness. This is the case even though the BDOHL is already present in many existing views to the proposed windfarm site from the Moorland Hills. Indeed, I find it likely that there would be a cumulative adverse effect upon the perception of landscape scale given the comparison that would be drawn between the turbines and BDOHL when the two are seen together." (para 55)

"Although the infrastructure of the BDOHL has an existing adverse effect on the amenity of the [Wade] road, the adverse effect of the proposed development would be of a greater order." (para 64)

7.9 **Wild Land** would also be adversely impacted.

"The proposed development would not just be visible at the margin of the WLA, but would have considerable influence in parts of the Moorland Hills that I would regard as its interior, such as the upper course of the Allt Lagan a' Bhainne and the summits of Carn Dearg south of Gleann Eachach and Carn Dearg north of Gleann Eachach. The Moorland Hills display the quality that they inspire awe in their scale and simplicity." (para 55)

7.10 The present application refers to the previous application and its refusal entirely in the context of the changed planning and energy policy context, with one minor exception. It does not address the other side of the balance – the unchanged landscape and visual impacts. NPF4, supported by energy policy, is unquestionably much more favourable towards wind farm applications than the preceding SPP and NPF3 under which the previous refusal was made. It is Mountaineering

Scotland's contention that 57.6MW of capacity – a mere 14MW more than the refused scheme – is not sufficient at this location to outweigh in the planning balance the adverse impacts identified clearly in the previous decision.

"Although I acknowledge the benefits of the proposed development in respect of climate change mitigation and net economic effect, I do not consider it adequately protects landscape or, in respect of visual amenity, the wider environment. Furthermore, in view of these effects, I do not consider it would be the right development in the right place." (para 179)

## 8 Conclusion

8.1 The proposed site does not have the capacity to support a commercial wind energy development without significant and unacceptable harm to the landscape setting of Wade's Road and significant adverse visual impact upon local Munros and Corbetts, including those set in Wild Land or Special Landscape Areas. Cumulative impact is an important issue since the proposed development would notably extend the landscape of recurring windfarms flanking the Great Glen while creating a dissonance by being set in a contrasting mid-height moorland rather than on upper slopes.

8.2 The proposed development offers only a modest energy contribution and presumed CO2 reduction that would be far outweighed by its immediate damage and by the effect of a further southward thrust of the wind farm landscape already operational and consented around Fort Augustus and the western Monadhliath.

8.3 The Reporter who refused the previous application for this site got it right. Notwithstanding the much greater favour shown to wind farms in NPF4, it is still the case that this would not be the right development in the right place. Scottish Ministers can attach such weight to such considerations as they wish when reaching a decision. Mountaineering Scotland hopes that in this instance they will attach substantial weight to the adverse visual impact upon the national treasure of Wade's Road and upon the surrounding hills, and **refuse the application.**

Yours sincerely



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

