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7th November 2018

Dear Sir/Madam

**THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND)
REGULATIONS 2017
ELECTRICITY ACT 1989 : APPLICATION FOR SECTION 36 CONSENT FOR THE PROPOSED
GLENSHERO WIND FARM, LAGGAN, HIGHLAND**

ECU reference: ECU00000517

1. Introduction

1. SIMEC Wind One Ltd has applied for planning permission for 39 wind turbines of 135m blade-tip height at base elevations of around 600-750m AOD in a split formation to the east and west of the Corbett Meall na h-Aisre, on the north slopes of upper Glen Spey, west of Laggan.¹
2. Mountaineering Scotland has assessed the proposal, for its operational phase, in terms of its likely effect upon mountain assets and mountaineering activities. Based on this assessment, the proposed development is considered severely detrimental to both because of its visual impact and consequential impacts on recreation. These impacts cannot be mitigated. We therefore object to the application.

2. Mountaineering Scotland

3. Mountaineering Scotland is an independent association of mountaineering clubs and individuals, with over 13,000 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

¹ These heights are taken by eye from Figure 2.1a. The EIAR refers to 'the site' lying between 613-752m AOD Para 4.3.8). The link road to Stronelairg Wind Farm is mapped at c.800m in Figure 2.1a.

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 twenty² – 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.

3. Material considerations

a) Preamble

6. We noticed several typographic errors in the LVIA, including names, distances and directions. These did not affect our assessment but could be misleading to a decision-maker without knowledge of the area.³

b) Policy

7. The Planning Statement concludes that "... it is large onshore wind sites with excellent wind resource, readily available infrastructure such as a proximate grid connection and limited environmental impacts that are likely to be able to proceed to implementation in an increasingly competitive environment, and therefore contribute to the Scottish Government's and the UK Government's targets and policy objectives." (Para 10.6.1). Mountaineering Scotland agrees that this is the reality in the current rather muddled and unbalanced Scottish and UK policy and implementation environment. It does not agree that the proposed site has 'limited environmental impacts'.
8. The Scottish Government enthusiastically supports onshore wind deployment and an individual planning application is not the place to question whether this 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."⁴
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 negative consequences. There are multiple ways through which to derive the anticipated benefits of low-carbon electricity generation⁵: if one site with one particular technology is not consented, there are other sites available (though seemingly no technologies at scale to balance wind's variability).⁶ The adverse consequences of a scheme, however, are

² 41 objections from 857 planning applications for onshore wind turbines to September 2018.

³ For example, Figure 4.4 omits the Corbett Meall na h-Aisre which is within the development site, and the Munro Beinn a'Chaorainn (west of Creag Meagaidh). It correctly maps Gairbeinn as a Corbett but the text of Chapter 4 and Appendix 4.7 take Corrieyairack Hill as the Corbett. Quality control appears deficient.

⁴ Scottish Planning Policy 2014, Para 28

⁵ It is of note that in 2018 almost all Scotland's electricity generation now comes from the low carbon sources of renewables and nuclear.

⁶ It is expected by Scottish Government that installed renewable electricity generation capacity would need to be around 17GW by 2030 (as cited in Planning Statement para 8.2.6). Data for June 2018 shows that there is 10.3GW operational, 1.5GW under construction and 7.3GW consented but not yet built (Energy Statistics for Scotland Q2 Figures, September 2018, Scottish Government). This total of 19.1GW exceeds the 2030 expectation. Wind is 76% of operational capacity; 89% of under construction capacity; 93% of consented but not built capacity; and 93% of the further 3.4GW in planning (Renewable Electricity Planning Statistics for Scotland, data for June 2018, Scottish Government). We offer these statistics not to suggest that the 2030 expectations are any sort of cap – we are not aware of any limit to the Scottish Government's appetite for turbines despite its rhetoric on diversifying electricity supply – but simply to show that pursuing ambition for renewable electricity (and in particular wind generation) is not reliant upon the consenting of

often site-specific and should weigh more heavily in the balance because of this. The only thing 'unique' about this scheme is its location. As a development that will export electricity to the grid – it will not directly power any industrial site – its beneficial elements are replicated across many other consented, in-planning and scoping developments.

10. The Planning Statement goes into great detail on energy needs and targets. It does so, of course, in a way designed to enhance its client's case. It is wrong, however, when it states that "The proposed development would make a valuable contribution to what remains an unmet and uncapped target for 2020 ..." (Appx 5, Para 1.6.6). The EIAR states that construction of the proposed development would take 24 months (Para 2.4.1). Even if the development was consented immediately, work could not begin on-site until Spring 2019, meaning that it would not be generating until 2021. It cannot contribute to the 2020 target.

11. Recent energy policy documents restate but do not increase the policy support for onshore wind. In refusing the Culachy Wind Farm appeal the Reporter stated⁷:

146. There is nothing express[ed] in either document⁸ to suggest that any increased weight is to be given to the contribution of onshore wind development to meeting renewable energy targets or that less weight is to be given to landscape protection or other environmental considerations. I am not persuaded the Scottish Government would make such a policy change without doing so expressly.

148. I therefore do not consider that the new renewable energy targets or anything else in the Scottish Energy Strategy or Onshore Wind Policy Statement alter the balance of a planning decision further in favour of onshore wind development than the support already accorded to such development when it is in the right place

12. In the earlier PLI Report on Whitelaw Brae Wind Farm (consented), before the policy was finalised, the Reporters stated⁹:

2.77 The draft Onshore Wind Policy Statement 2017 ... does not seek to change existing Scottish Government policy, which is to support deployment of onshore wind, whilst protecting the environment [etc.] ...

2.80 ... these draft documents ... do not represent a significant departure from existing Scottish Government policy...

13. Rather than giving an 'enhanced impetus'¹⁰ for new locations for onshore wind, the language of the Onshore Wind Policy Statement can be seen as anticipating a transition during the 2020s to few new onshore wind sites being developed with the main focus of increasing capacity changing to repowering of suitable existing sites coming to the end of their operational life.

Our energy and climate change goals mean that onshore wind will continue to play a vital role in Scotland's future ... This important role means we must support development in the right places, and – increasingly – the extension and replacement of existing sites, where acceptable, with new and larger turbines, based on an appropriate, case by case assessment ...¹¹

14. Compared with the past decade there seems also to be a diminished ambition for renewable electricity. In 2011 the ambition for 2020 was anticipated to need 14-16GW of installed renewable capacity; in 2017 the ambition for 2030 was anticipated to need only 17GW.¹²

one individual scheme of 0.17GW regardless of adverse impacts. The weight accorded to the estimated contribution to targets of an individual scheme should be accordingly modest.

⁷ Appeal Decision Notice by Robert Seaton, 27 April 2018

⁸ Scottish Energy Strategy, 2017. Onshore Wind Policy Statement, 2017.

⁹ Report by David Buylla and Claire Milne, 17 August 2017

¹⁰ Planning Statement, Appendix 5, para 1.5.23

¹¹ Scottish Government. Onshore Wind Policy Statement 2017. Ministerial Foreword, p.3. Added emphasis.

¹² Referenced in the applicant's Planning Statement, Appx 5, paras 1.4.16 & 1.5.11. In practice progress towards climate change targets during the 2020s will hinge on developing and deploying low-emission, affordable substitutes for gas heating, not on further (comparatively high cost) electricity generation.

15. Set against the considerations listed in paragraph 169 of SPP 2014, it is our assessment that the proposed development has substantial negative impacts in relation to landscape and visual impacts (including on wild land) and cumulative impacts, which would particularly affect hill and country walkers. There are consequential concerns regarding the impact on hill and country walker tourism and recreation. These demerits need to be balanced by the decision-maker against the claimed merits of the proposed scheme.

c) Landscape and visual impact (including cumulative impact)

16. 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 Laggan stretching over decades. We do not suggest that either professional or consumer judgement trumps the other; simply that each has a distinct place in informing decision-making.

17. 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 and Designations to weaken the overall perspective. We also, in this area in particular, find the landscape character types can lack consistency and boundaries appear arbitrary. 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.

18. The development site and its management are typical of the rounded hills, open elevated moors and incised valleys of the Monadhliath. It is not in an officially recognised landscape area but sits close to the Cairngorms National Park (CNP); Ben Alder, Laggan & Glen Banchoir SLA¹³; Monadhliath Wild Land Area (WLA) and Braeroy, Glenshirra & Creag Meagaidh WLA. The site is at a high altitude, with turbine bases at c.600-750m AOD, making the maximum hub/blade-tip altitudes c.830/885m AOD, compared with hill summits in the vicinity ranging from c.770-950m. It sits on the outer face of the hills, with a broadly southerly aspect, giving it a distinctly different topographical context to the more enclosed adjacent Stronelairg Wind Farm. Although visible across an extensive area up to 10km north of the site, this would affect an area already visually dominated by - and with views of Glenshero foregrounded by - Stronelairg Wind Farm and often with other wind farms also prominent (cf Viewpoint 1, though the photographs were taken on a dull day and do not reflect the visibility of operational wind farms that can be experienced). Our assessment therefore focusses on hills to the east, west and south of the site.

19. A key context for the proposed development is the Stronelairg Wind Farm.

"The proposed development has been designed to appear as an extension to the Stronelairg Wind Farm and as such abuts this existing scheme and utilises comparable turbine sizes. Its position on the southern side of the Stronelairg array avoids causing or contributing to coalescence of separate developments in the vicinity, the nearest existing/consented development to Stronelairg being Corriegarth ..." (Planning Statement, Table 4.1, p.27).

And Glenshero has been "designed ... to avoid anomalous elevated slopes or summits that would be incongruous in view from elevated summits." (Planning Statement, para 4.2.19)

20. Large windfarms, often with large extensions or large adjoining wind farms are agreed to be the pattern straddling the Great Glen (cf EIAR para 4.3.25). However, existing wind farms on the Monadhliath and Great Glen are on open slopes or hill tops, not "in the interior" as the Planning Statement claims (Table 4.1, p.27). Stronelairg is the only Monadhliath wind farm in which the enclosure of the site played a key part in obtaining planning consent, and it was reduced in size

¹³ Which at its closest is c. 4km to the south, not to the northwest as the EIAR states at para 4.3.28, nor 5km as the EIAR states in Technical Appx 4.5, Table 4.5.1.

by the Scottish Ministers explicitly to lessen landscape and visual impact (See Box).

Stronelairst Wind Farm Decision (Scottish Ministers Decision Letter, 6 June 2014)

When considering the Stronelairst Wind Farm application, The Highland Council proposed “the removal of 16 turbines, the repositioning of two anemometer masts, the reduction in height of 10 turbines and the repositioning and lowering of a further turbine.” (p.2) and Scottish Ministers adopted this position in giving consent. This was explicitly to reduce landscape and visual impacts by constraining development to within an area of topographic enclosure.

“... the development will be significantly shielded from surrounding land by topography, sitting as it does in a natural hollow surrounded by high ground. Ministers therefore consider that the development is well-designed to minimise the impact on surrounding areas of wild land, and the changes requested by The Highland Council are designed to further ensure that the wind farm is well contained within the bowl-shaped landform surrounding the site and will therefore result in a reduction in the overall prominence and visibility of the turbines.”(p.10)

“Ministers consider that visual impact of the development from beyond the area immediately around the development site has been effectively minimised by its siting in an upland basin, so that views towards the development are largely shielded from most directions by surrounding high ridges and peaks. ... visibility of the development is effectively contained by this topography. ... away from its near vicinity [it] will mostly only be visible on certain limited areas of high level ground.

Ministers consider that the reduction in scale of the proposal has helped to mitigate the visual and landscape impacts of the development, and has satisfactorily addressed these impacts to help bring them to an acceptable level.” (pp.6-7)

Mountaineering Scotland objected to the Stronelairst application and, now that it can be experienced partly constructed, remains of the view that it is the wrong place for such development. Nonetheless, we respect the rationale offered as illustrated in the quotations above, even if we regard it as downplaying the mountaineering and wild land impacts. We assume that the Scottish Government would expect proposals for further development to also respect that rationale and future planning decisions to be consistent with it.

21. This context makes any proposed extension or adjoining development to Stronelairst either very simple or very challenging for the decision-maker. If a proposal clearly fits well with the original Stronelairst rationale and raises no new issues it can be consented without difficulty.¹⁴ If it does not fit well, as we shall show is the case with Glenshero, the decision-maker must refuse the application or, if minded to consent, must explain why the rationale used to justify consenting and limiting Stronelairst was wrong.
22. We note in passing, though it has played no part in our assessment of Glenshero, that extensions to Stronelairst are currently being scoped to both the west and east of the consented turbines, the effect of which would be to establish turbines in the areas from which they were excluded by the 2014 consent and expand development further, using larger turbines.¹⁵
23. Consideration of combined effects with Stronelairst would have been easier if Figure 4.6a had made only a comparison with Stronelairst, and Beinneun wind farm had been combined with Millennium wind farm, to which it is adjacent, in Figure 4.6b. There is no logic in the maps as presented other than to make interpretation of the Glenshero-Stronelairst visual interactions more difficult.
24. The LVIA uses 21 viewpoints excluding Viewpoint 1. Of these, 17 are on hill ground (not necessarily summits) and four in glens, only one of which is a roadside viewpoint. That accurately reflects the main receptors – hill and country walkers (for convenience simply called hillwalkers hereafter). The Planning Statement claims that the LVIA found significant effects at only two summits. In fact, it found significant effects at five hill viewpoints as well as three glen viewpoints. These effects were acknowledged even though the language of the LVIA

¹⁴ An example is Dell wind farm (at appeal). The turbines, immediately adjacent to Stronelairst, were considered broadly acceptable by statutory consultees and Mountaineering Scotland and the access road route was the reason for refusal.

¹⁵ This is being scoped under a misleading new name of Cloiche Wind Farm.

consistently downplays effects on the glens and hills.

25. We can group the visual impacts of concern to Mountaineering Scotland into five geographical areas. The assessment presented here is from a mountaineering perspective. Mention of Wild Land Areas (WLA), the Cairngorm National Park (CNP) and Special Landscape Areas (SLA) should be read in the context of this being a mountaineering analysis. We have not performed an assessment from a WLA, CNP or SLA perspective *per se*.

Southeast Monadhliath

26. There is very substantial mountaineering interest in the popular Munros of this area, linked by high moorland and incised by deep glens. Views are extensive. It includes parts of the CNP, Monadhliath WLA, and Ben Alder, Laggan & Glen Banchor SLA. The CNP and WLA are coterminous at the proposed wind farm's nearest approach, just over 1km from the closest turbine. Viewpoints 6 (Carn Dearg, Balloch) and 12 (Geal Charn, Markie), both Munros, are in this area. Carn Dearg and Geal Charn are in the CNP and WLA, and Carn Dearg also in the SLA. We also consider here Meall na h-Aisre, a Corbett, which sits within the development site with 16 turbines to its west and 23 to its east. Proximity and popularity make these three hills and linking high ground the most heavily affected by the proposed wind farm.
27. The development would bring turbines very close to Geal Charn (1.6km), backclothed to maximise their conspicuity and movement and close enough for noise pollution to be an issue. They would be perceived as spilling out from the Stronelairg 'bowl' onto the southern hill slopes. The LVIA assesses the impact as Major and the cumulative effect as Major/Moderate. We disagree with the latter assessment since Glenshero alongside Stronelairg would extend the close-view horizontal wind farm extent by over 50% - a Major cumulative effect. (Other wind farms are in view behind the development site but over 25km away.)
28. Although the turbines would be more distant from Carn Dearg (7.7km), the LVIA's Moderate and non-significant assessments for visual and cumulative visual effects are kind to the development. Blade movement at this distance is very apparent and draws the viewer's attention to even partial blades rotating in and out of sight. The development would give the impression of a straggling extension to Stronelairg, with a notable increase in the horizontal spread of close-view wind farms of 60-65%, the latter figure assuming that the gap between Stronelairg and Glenshero shown in Figure 4.13a would not actually be perceived as such in reality. While we accept that the individual visual magnitude of change might be slight given the baseline of Stronelairg and the shielding of the towers, we do not accept that the cumulative effect magnitude of change could be considered as less than Moderate, giving a significant Major/Moderate cumulative effect on Carn Dearg.
29. There is no assessment of Meall na h-Aisre in the LVIA even though it is situated between the two wings of the development, 1km from the nearest turbine to the west and <2km from the nearest turbine to the east. To the north of Meall na h-Aisre is Stronelairg wind farm, which occupies the NE and NW quadrants of view. The SE and SW quadrants are uncluttered (or will be once the Stronelairg grid connection work is completed). Glenshero would occupy these quadrants. Looking south, the gap without turbines would be significantly less than the field of human vision so that no view could be obtained without the distraction of moving turbine blades. At the distances involved, noise pollution would also be an issue.
30. The effect of the proposed development upon the southeast Monadhliath would be very substantially adverse, notwithstanding the already significant impact of Stronelairg wind farm. As well as affecting the Munros and Corbett referenced, it would be visible from the high open ridges linking Carn Sgulain (Munro) and Carn Dearg, and Carn Dearg and Geal Charn. Stronelairg would often also be in view from both ridges but Glenshero would add massively to the extent of the view occupied by turbines. The overall effect would be devastating.

Southwest Monadhliath

31. This area includes the hills from north of the Roy-Spey through-valley to north of the

Corrieyairack Pass. It is broadly similar to the southeast Monadhliath but considerably less precipitous and a little lower, with the highest summits being four Corbetts rather than Munros. The views are no less extensive. South of the Corrieyairack Pass it is within the Braeroy, Glenshirra & Creag Meagaidh WLA (4km to the nearest turbine). It finds favour with hill-walkers seeking a wild overnight experience, with bothies in the glens for extended journeys.

32. Viewpoints 2 Carn a'Chuillin, 3 Corrieyairack Hill, and 13 Carn Dearg (Roy) are in this area. Viewpoints 2 and 13 are Corbetts; Viewpoint 3 is a popular ascent from the crest of the Corrieyairack Pass and used to be a joint Corbett with Gairbeinn. The latter has been recognised as the Corbett since 1997, with Corrieyairack several metres lower.¹⁶ Gairbeinn is not a viewpoint in the LVIA but is only just over 2km from the nearest turbine. Glenshero would have a very substantial adverse visual effect on it, akin to the effect on Geal Charn (Markie).
33. Glenshero would have a very similar impact on Corrieyairack Hill (5.2km to the nearest turbine) and Carn a'Chuillin (7.1km). From both, the long ridge of Gairbeinn provides partial screening (emphasising the devastating effect likely on Gairbeinn). From both, Glenshero would appear as a scatter of blades and hubs alongside, but slightly separated from, Stronelairg. In each case, Glenshero would substantially increase the horizontal extent of wind turbines: by around 60% from Carn a'Chuillin and by around 40% from Corrieyairack Hill. In both cases we agree with the LVIA that the impact of Glenshero against a baseline with Stronelairg is limited. However, we do not agree that the cumulative impact is slight given the increase in the horizontal extent of turbines and we regard the cumulative effect on both these viewpoints as markedly adverse.
34. Carn Dearg (Roy) is further away (13km) and has a more obstructed view but will have sight of a number of blades and some hubs. It is lower than much of the line of hills north of Glen Spey (described as the southern edge of the Monadhliath in the LVIA Technical Appendix 4.7, Table 4.7.2¹⁷) and this obstructs any sight of Stronelairg. Glenshero would thus give views of a wind farm in motion in a direction currently unaffected and on the left of the view through Glen Roy to Glen Spey towards which the topography tends to draw the eye. The two Corbetts north of Turret Bridge, both called Carn Dearg, are usually climbed together and the hill-top Beinneun and Millenium are visible from both, though more so from the higher Ben Dearg which partially obscures them from the lower (Viewpoint 13) Ben Dearg. There is already visibility of windfarms to the northwest. Glenshero would add visibility of a windfarm to the northeast, something that was avoided in the siting of Stronelairg. While the view is slight, the adverse effect is more substantial.

Upper Glens Spey and Roy

35. These glens provide through routes from Laggan to (1) Glen Roy via Loch Spey and (2) Fort Augustus via the Corrieyairack Pass. They include parts of the Braeroy, Glenshirra & Creag Meagaidh WLA, Cairngorm National Park and Ben Alder, Laggan & Glen Banchor SLA. They are used both in their own right as through routes but also as approaches to the hills on either side of them both as day walks and with overnight stays. There are two MBA open bothies at Luib-chonnal (upper Glen Roy) and Blackburn (west of the Corrieyairack Pass) and a non-MBA open bothy at Melgarve where the Corrieyairack and Glen Roy routes come together.
36. Viewpoints 4 Glen Roy, 5 East of L Spey and 10 Garva Bridge (inappropriately named Corrieyairack Pass in the LVIA) are in this area. Viewpoint 14, Aberarder Forest, lying just south of Glen Shirra, a short side-glen of Glen Spey, is conveniently considered here too. In numerical order, the viewpoints are 12, 6, 4 and 8 km from the nearest turbine. The visual impact at all the viewpoints except Glen Roy (Vpt4) is assessed as Major or Major/Moderate in the LVIA. We concur, though we think Major/Moderate is kind to the proposed development.

¹⁶ The LVIA appears unaware of this and refers to Corrieyairack Hill as a Corbett (Para 4.6.32).

¹⁷ The proposed development sits on this southern edge, though the LVIA appears rather unsure since elsewhere it says the proposed turbines "would remain separated from the edge of the Monadhliaths" (EIAR Para 4.6.17) – a difficult feat when they sit on the edge.

37. The LVIA assesses the visual impact at Glen Roy as Moderate and not significant. We regard it as more substantial and significant because it would be the only wind farm in view, directly ahead when going east through the pass, and at only 12km distance blade movement is immediately visible and tends towards the distracting if in direct line of sight, as would be here for nearly 3km around the viewpoint and then, after a 4km gap, for a further 4 km to Melgarve. The LVIA is incorrect to state: "Views of the proposed development ... would be ... limited to sections at the eastern end of Glen Roy, beyond the location of the loch terraces." (Tech Appx 4.6, Table 4.4) The terraces, albeit subdued, continue up the glen east of Viewpoint 4 past Luib-chonnal bothy to the col, with the turbines in sight well before the terraces end.
38. From all these glen viewpoints, the turbines would appear as large moving structures well above the viewer and well above the plantation forestry and power line of Glen Spey. The walker heads further into the quiet glens, such as upper Glen Roy, to be free of such intrusions. The turbines' impact would be particularly significant because they would be the only ones in sight from the glens. The restriction of Stronelaig to the 'upland bowl' means that it has no impact on these lower elevations. Glenshero turbines would appear prominent and be perceived as sitting on the edge of the hills or, from some places, spilling out from them. It would reach the parts that Stronelaig does not (cf Fig 4.6a).

North of Loch Laggan and Strathmashie

39. There is very substantial mountaineering interest in the Munros lying north of Loch Laggan, from which the land drops to smaller hills around Strathmashie, giving shorter walks, including Dun da Lamh. The hills sit largely within the Ben Alder, Laggan & Glen Banchor SLA (excepting Beinn Teallach and Beinn a'Chaorainn); those west of Carn Dubh (NN514925) sit within the Braeroy, Glenshirra & Creag Meagaidh WLA and those east of it within the Cairngorm National Park.
40. Viewpoints 15 Carn Liath and 21 Beinn Teallach represent the Munros of the area. Viewpoints 11 Dun-da-Lamh, 16 Loch na Lairige¹⁸ and 17 Doire Dubh represent the lower hills around Strathmashie. The LVIA assesses the visual effect at all viewpoints as either Major (Vpt 15) or Major/Moderate (Vpts 11, 16, 17) except for Beinn Teallach (Vpt 21) where it is Moderate and not significant. It assesses the cumulative effect as Major/Moderate for Carn Liath but only moderate for Loch na Lairige and Beinn Teallach. No other wind farm would be in sight from Dun-da-Lamh and Doire Dubh.
41. Carn Liath (9km to the nearest turbine) and Beinn Teallach (18km) represent the outer ends of the chain of Munros north of Loch Laggan. Both show how the proposed development would seem to spill out of the hills, over-running the topographic containment regarded as an important consideration when consenting Stronelaig. The Glenshero turbines are very prominent at the eastern end, fronting the Stronelaig turbines, and even the emollient words of the LVIA cannot conceal this. However the effect remains substantial as one moves west, where the changing angle of view diminishes the visibility of Stronelaig but makes the southward thrust of the Glenshero turbines, increasing the horizontal spread, more notable. From all the high ground north of Loch Laggan, the turbines will appear front-lit, generally backclothed by dark moorland, and at distances where rotor motion is obvious.
42. Dun-da-Lamh (7km), Loch na Lairige (7km) and Doire Dubh (11km) are clustered around Strathmashie. Glenshero would be the only wind farm in clear sight from these locations, though there would be some blade-tip visibility of Stronelaig from Loch na Lairige (Fig. 4.23a) and presumably rather more when viewed from the adjacent higher ground.¹⁹ From all these locations, Glenshero turbines would be seen backclothed and skylined, spilling from the hills incontinently, appearing as two separate developments or one fragmented development depending on the angle of view and topographic concealment of the east or west part of the development.

¹⁸ Misspelt as Loch na Lairige in the Viewpoint assessment in Technical Appendix 4.7.

¹⁹ The viewpoint is c. 30m lower than the summit Trig Point. The hill itself is Creag Ruadh, a Graham.

43. We do not agree with the LVIA's conclusion that significant effects on hillwalkers would be confined to the summit of Carn Liath. There would be substantial widespread effects across the hills north of Loch Laggan and around Strathmashie.

Ardverikie-Ericht-Drumochter hills

44. These popular Munros and high Corbetts are well-used, attracting day walkers, overnights and longer stays. They would not normally be considered together but they have in common their southeast quadrant positioning relative to Glenshero, similar summit elevations (c.900-1050m, with Ben Alder an outlier at 1148m), and mostly similar distances to Glenshero (18-23km, with Ben Alder (27km) and Leathad an Taobhain (29km) as outliers). The viewpoints east of Loch Ericht lie within the Cairngorm National Park and most in the Cairngorms WLA. West of Loch Ericht they lie within the Rannoch-Nevis-Mamores-Alder WLA and mostly within the Ben Alder, Laggan and Glen Banchor SLA. Multiple overlapping designations/mapped environmental interests seem a fair acknowledgement of their importance as well-used, accessible, extensive areas of unsullied mountaineering country.
45. Viewpoints 7, 8, 9, 18, 19, 20 and 22 are within this area.²⁰ In most cases they have theoretical visibility of Stronelairg but, with exceptions, the practical visibility of Stronelairg is very limited because of its location, topographic shielding and, to some extent, distance. (The exceptions are viewpoints 7 and 8 which will be considered below.) Glenshero's location achieves the opposite. The turbines would be seen front-lit, with a mix of backclothing and skylining. From nearly all locations, some element of Glenshero would be seen spilling down the upper front of the hills that contain Stronelairg. At distances of 20km, with rotors of this size, movement is readily apparent and therefore eye-catching when looking in their direction.
46. For some locations the impact is exacerbated by the 2.5km separation between the closest turbines of the two parts of the proposed development. This makes it appear as two separate wind farms, and this is especially so from viewpoints where the western part is skylined and the eastern part backclothed (Vpts 7, 18, 19, 20).
47. We found it difficult to work with some of the viewpoint Figures. Figure 4.14e (Vpt 7 Geal Charn, Ardverikie) does not appear to match the Stronelairg turbines seen on the wireline of Figure 4.14a. Figure 4.15a (Vpt 8 Ben Alder) either omits the Glenshero turbines or colours them the same as Stronelairg. Unfortunately these viewpoints cover the same angle of view (within which there are a number of other Munros) and it is the one where there may be a cumulative effect with Stronelairg. Notwithstanding this, the increase in prominence of turbines because of the proposed development seems sufficiently adverse to us to be regarded as more than a Moderate effect.
48. We note in passing that the imagery for Viewpoint 9 (Carn na Caim) shows what we have noted ourselves in the field: the best camouflage for backclothed turbines is snow, perhaps especially scattered large patches with linear streaks up/down-slope. These snow conditions are becoming less common with climate change.
49. The LVIA adopts the standard position of applicant's landscape architects (and of decision-makers) in discounting impacts rapidly with increasing distance. Of course visual impacts do diminish with distance, but our observations in the field suggest that this is not as rapid as is claimed. Developments gain prominence when they *appear* alone (even if they are actually not), or front-lit, or backclothed, or on a viewer-facing slope, or in a context where 'wildness' is expected. Each of these factors increases the distance over which a substantive adverse effect is experienced. In combination they can increase the distance substantially. And they frequently appear in combination in the proposed Glenshero development as viewed from this south-to-east arc of well-trafficked hills

²⁰ In order, the location names are: Geal Charn (Ardverikie), Ben Alder, Meall Chuaich (Gaick [not Gaik as the LVIA misspells it]), Meall Cruaidh, A'Mharconaich, Carn na Caim [not Gaim as the LVIA misspells it] and Leathad an Taobhain.

Landscape and visual impact conclusion

50. The LVIA uses language to create an impression that the proposed development would have only limited effects or localised effects, on a small number of elevated locations, and anyway wind farms are common hereabouts so it would not appear as a new feature. The foregoing analysis suggests otherwise. The development would have a substantial effect over a wide area. It would introduce a new feature in some views, notably the glens and lower hills to the south and east, while exacerbating, often substantially, the effect of Stronelaig wind farm in other views. The EIAR understates the impact of some close and, more especially, most mid-range and more distant views. The development would, in our view, be a more prominent element of the view than the LVIA judges it would be, because of its disruptive visual impact due to its size, split-layout design, simultaneous backclothing and skylining, and southern aspect.
51. The cumulative effect with Stronelaig is not simply a function of nearer distance or greater prominence. It is the fundamentally different relationship that the proposed development has with the topography of the area. Instead of being contained within a relatively simple upland bowl, as is Stronelaig, it spills out over the edge. In this, it conflicts totally with the rationale given by Scottish Ministers for consenting Stronelaig in a limited form.
52. This is not the right place for a wind farm. It would extend the reach of wind turbines visually and perceptually far into the hills and glens in the quadrants south of the proposed development, adding more than 50% to the visibility predicted for Stronelaig.²¹ Even at a distance, this is a major impact and adds to the devastating effects at close quarters which are themselves sufficient grounds for refusal.

d) Socio-economics

53. We do not dispute that constructing a wind farm produces some financial benefits. SIMEC's wider strategy also appears admirable. 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. The GFG Alliance can obtain renewable electricity from the grid without building a wind farm in this location.²²
54. It is surprising that the 'local area' for socio-economic analysis (Fig. 10.1) is defined such that it excludes Fort William, by far the largest town in the likely catchment area for commuting labour. It is only 32 miles from Fort Augustus (used here as a proxy for the site entrance) – half the distance of Kingussie to Fort Augustus, which is included in the analysis.
55. The EIAR (Chapter 10) comes to a benign conclusion that wind farms have no effect on tourism. Mountaineering Scotland would not disagree with the general proposition that well-sited wind farms have no effect. But the problem is that this is a 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 both in research and in practical application. This is lacking in the broad-brush consideration given to tourism in the EIAR.
56. From a review of the evidence undertaken for Mountaineering Scotland²³, the hypothesis that best fits the available, limited and far from perfect, evidence is that wind farms do have an effect on some tourism and recreation. 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

²¹ Estimated by eye from Figure 4.6a

²² We assume that SIMEC will put the electricity generated into the grid and draw its manufacturing plant requirements from the grid, not make its operations directly reliant upon the non-despatchable (i.e. non-reliable) generation of a single wind farm.

²³ [Wind farms and tourism in Scotland: A review with a focus on mountaineering and landscape](#) (2017)

25% of tourists who are particularly drawn by the quality of upland and natural landscapes, with hillwalking visitors prominent amongst these. In short, tourism impact from wind farms is a consequence of visual impact from wind farms in the wrong place. 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.

57. The main adverse effect of wind farms on hillwalking recreation, thus far, is self-reported net displacement within Scotland from areas perceived as being sullied to areas seen as still retaining the desired sense of naturalness and space.²⁴ The canard that hillwalkers are less negative than other tourists about wind farms (EIAR para 10.4.54) is an error in the summary in the Glasgow Caledonian University report, a fact of which Mr Blackett of BiGGAR Economics has previously been made aware.
58. An 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 choosing to visit might have higher sensitivity to wind farms than would be expected in areas of more modest landscape quality.
59. The EIAR suggests that it is going to undertake a properly focussed analysis.
- “The significance of the tourism and recreation assets was assessed with reference to evidence from previous research on the effect of wind farms on tourism and experience from similar existing and proposed developments elsewhere.” (para 10.2.25, added emphasis)
- Argument by analogy is an accepted scientific method but needs the proponent to provide at least one actual analogy. There is no attempt to do so in the EIAR. No similar development in close proximity to a National Park, two WLAs and an SLA is identified for comparison. In fact, no direct comparison is offered at all.
60. BiGGAR Economics does not recognise that different landscapes are likely to produce different responses to wind farms. This failing is evident in its empirical research on impacts in areas local to wind farms in which wind farms in all types of landscape were entered into a single unstructured analysis.²⁵
61. Analysis using BiGGAR Economics’ own data and a list of windfarms consented in local landscape designations (SLAs or their equivalent) showed a negative impact on tourism from wind farms operational in SLAs in Scotland. This is the only attempt to date to analyse wind farm impact on tourism in Scotland in relation to the quality of host landscape.
- “It can be cautiously concluded, from the limited evidence available, that wind farms in locally designated landscapes have an adverse impact upon tourism-related employment in their local area. All three wind farms in such areas in this study lost 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.”²⁶
62. Although the present application does not lie in a designated/mapped interest area, this result is nonetheless relevant because the great majority of the mountaineering tourism interest and activity that would be impacted by the proposed development does lie in such areas around the proposed location.
63. Not only does the EIAR ignore the landscape quality of the impacted area, it also ignores the people most likely to be impacted. It would appear that there is no such thing as hillwalking tourism in this area as far as the EIAR is concerned. Nowhere in the description of the current

²⁴ A net 22% of hillwalkers said in 2016 that their actual behaviour had changed to avoid areas with wind farms. Wind Farms and Mountaineering in Scotland (2016) <https://www.mountaineering.scot/mountain-wind-farm-research>

²⁵ BiGGAR Economics (2017) Wind Farms and Tourism Trends in Scotland

²⁶ <https://www.mountaineering.scot/assets/contentfiles/pdf/Wind-farms-and-tourism-in-Scotland-Supplement-December-2017-20171121.pdf> (para 20)

tourism baseline (Paras 10.3.19 - 10.3.35) or the analysis of impact (Paras 10.4.64 - 10.4.81) is there any reference to hills, mountains, hillwalkers or mountaineers. Figure 4.4 showing Munro and Corbett summits is not referenced, though general tourist attractions far away and with no visibility of the proposed development are introduced (cf Para 10.1.3). The Wade road and Corrieairack Pass are ignored.

64. The EIAR does not provide a proper assessment of the potential for specific impact from this proposed development. It gives a general desk-top assessment that could be rolled out for any onshore wind proposal in the Highlands. A proper understanding of the evidence on tourism and wind farms applied to the specific nature of the local landscape and the tourists attracted to it, leads to the conclusion that a wind farm at Glenshero would have an adverse effect on hillwalking recreation and tourism.

65. The EIAR references the Glasgow Caledonian University study of 2008 to support its contention that:

“The literature review found that most of the studies concluded no significant negative outcomes of wind farms on tourism in sensitive areas, as they generally don't have wind farms approved.” (Para 10.4.53, added emphasis)

Things have changed in 10 years and wind farms have been approved in Scotland that Mountaineering Scotland would consider to be in sensitive areas. That they are modest in number is to the credit of the planning system. Of all wind turbine applications in Scotland, fewer than half are consented.²⁷ Glenshero is not in an officially recognised sensitive area but it is in the midst of, and very close to, multiple such areas and the decision-maker should pay due regard to the potential for this to lead to adverse tourism and recreation consequences.

4. Conclusion

66. Mountaineering Scotland has carefully assessed the proposed development. Even when it opposed an original scheme, it does not automatically object to extensions or adjacent schemes (e.g. non-opposition to Aberarder and Dell wind farms, also in the Monadhliath). However, after detailed consideration, we conclude that the proposed Glenshero wind farm is not ‘the right development in the right place’. The scheme would have major adverse visual impacts and a consequential negative impact on recreational and tourist visitation. It would contravene the basis set out by Scottish Ministers for consenting and limiting the Stronelairg wind farm.

67. The needs case does not outweigh these adverse impacts since the need for low carbon electricity can be met in many places (and Scotland already produces a surplus, exported to England when the wind blows strongly²⁸) whereas the adverse impacts are site-specific.

68. Mountaineering Scotland objects to the proposed wind farm.

Yours sincerely



Stuart Younie
CEO, Mountaineering Scotland

²⁷ Analysis of 857 determined applications in the Renewable Energy Planning Database at September 2018. 416 (49%) were consented. The figure for schemes of 50+MW is almost identical: 62 out of 133 (47%).

²⁸ Low carbon consists of renewables plus nuclear. High winds and exports to England are strongly correlated: <http://euanmearns.com/> Post 31 October 2018: Scotland's wind exports to England and the myth of a 100% renewable Scotland