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19 February 2025

Dear Sir/Madam

**APPLICATION FOR SECTION 36 CONSENT FOR GLENTARKEN WIND FARM**

**ECU reference: ECU00004700**

**Introduction**

1. SSE Renewables has submitted an application for the Glentarken wind farm with 12 turbines of 180m blade-tip height (hub 99m) between Loch Earn and Loch Tay.
2. Mountaineering Scotland **objects** to the proposed wind farm development on grounds of visual impact on the nationally significant and highly popular Munros and other hills situated in all directions from the proposed site, with adverse impacts being experienced on hills at distances from 0 km up to around 25 km.

**Mountaineering Scotland**

3. Mountaineering Scotland is a membership organisation with 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.

## Policy

4. There is no dispute between the applicant and Mountaineering Scotland on the importance of climate change and the significance that both UK and Scottish governments attach to increasing renewable electricity generation. It is acknowledged that *NPF4* and other Scottish policies and strategies such as the *Onshore Wind Policy Statement* (2022) and the *Draft Energy Strategy & Just Transition Plan* (2023) are highly supportive of onshore wind development. *NPF4* gives renewable energy developments 'National Development' status which means the *principle* of development (i.e. the 'needs case') is taken as established.

5. Notwithstanding this strong policy support, both *NPF4* (page 7) and the OWPS (para 3.6.1) reiterate from previous planning policy that the goal is the right development in the right place. This accords with Mountaineering Scotland's approach to assessing development planning applications, which is to ask, "Is this the right location for this proposed development?" In very many cases it is, but not all.

6. It is Mountaineering Scotland's opinion that the location of the proposed Glentarken development is not the right place. It has reached this conclusion based on an assessment of visual impact and the knowledge that there are hills around the site that are extremely popular for outdoor recreation, at distances close enough to experience significant visual detriment, consequentially diminishing the quality of hillwalking experience. This is expanded upon in the following section.

7. Glentarken fails to meet *NPF4* Policy 11.e.ii. The impact is not 'localised' and no design mitigation can diminish the prominence of such a hill-top location. The visual impact and detriment is sufficiently substantial and significant as to outweigh the benefits claimed for the development.

8. There is nothing in current national policy that seeks to promote development in inappropriate locations, and other proposed wind turbine developments have been refused consent under *NPF4*. Every proposed individual onshore wind farm is not mission-critical for the achievement of national policy goals given the context of a large level of unbuilt, consented capacity, a steady and substantial stream of new proposals seeking consent, and an equally substantial stream of Scoping proposals coming forward. Many alternatives to the proposed Glentarken development are coming forward in less visually damaging locations.

9. The proposed development promises a range of benefits beyond simply generating electricity. These should be afforded little or no weight, not because they are unimportant but because they are an accompaniment to any onshore wind development in Scotland. Ecological enhancement is a mandatory requirement for all development under *NPF4* so all proposals now

promise such action. Battery storage is encouraged in NPF4 so almost all wind developments now propose the inclusion of a small level of battery storage, as here. All construction generates economic activity, and it is exceptionally rare for a wind farm proposal not to offer 'community benefit' payments. At a Scottish level all these positives are gained no matter where development takes place. Realising them depends on a continuing flow of projects across the country, which there demonstrably is, not on every single proposal being consented.

10. In government policy, strategic significance has been attached to onshore wind development, not least through designation as National Development. The applicant tries wrongly to attach such significance (in policy applied to a sector) to the individual project of Glentarken.

11. It is also misleading for the applicant to cite the Bunloinn Wind Farm consent as supportive of the present proposal (Planning Statement paras 6.2.44-45). The context of Bunloinn was of turbines reaching c.760m OD at blade-tip alongside a bulky hill reaching 789m OD which gave a substantial level of screening (though still inadequate in Mountaineering Scotland's opinion) and in close proximity to two operational wind farms with blade tips reaching similar and higher altitudes. In contrast, Glentarken would reach a blade-tip altitude of c.840m OD in a block of upland reaching a maximum height of 712m OD, and distant from other wind farms. The circumstances are quite different regardless of what nuance one attempts to apply to the term 'localised'.

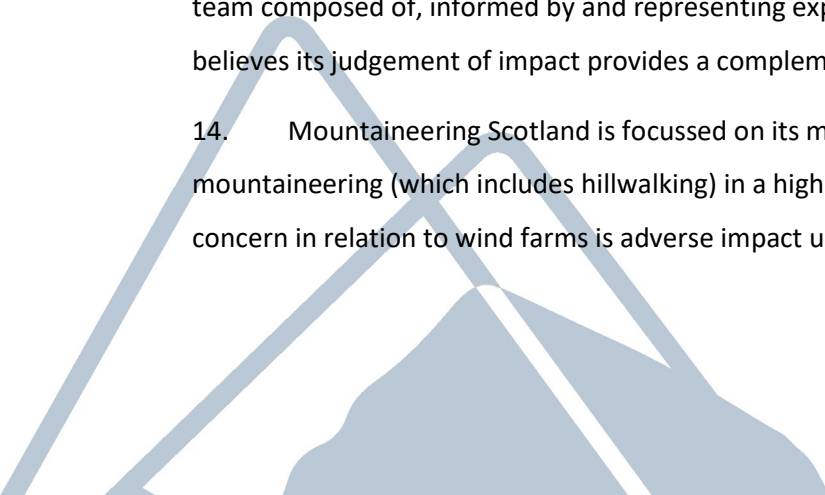
12. There is no requirement in policy, nor is it necessary for addressing the climate emergency, to consent development proposals that are not acceptable in planning terms. Mountaineering Scotland submits that the proposed Glentarken development is not acceptable in planning terms - the visual detriment outweighs the benefits - and therefore consent should be refused.

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

##### **a) Preamble**

13. For all the appearance of objectivity, professional landscape and visual impact assessments are ultimately subjective judgements. In Mountaineering Scotland's experience, assessments commissioned by developers repeatedly downplay the significance of the impact of proposed development upon the mountaineering experience. Mountaineering Scotland, with an assessment team composed of, informed by and representing experienced 'consumers' of mountain landscapes, believes its judgement of impact provides a complementary and equally valid perspective.

14. Mountaineering Scotland is focussed on its members' interests: the enjoyment of mountaineering (which includes hillwalking) in a high quality upland environment. Hence its main concern in relation to wind farms is adverse impact upon visual amenity, in this case upon



hillwalkers on the many popular hills around the proposed development. Mountaineering Scotland is grateful to the applicant for adopting its suggestion, made at Scoping, of a viewpoint at Meall an t-Seallaidh and of visualisations for Ben More, Ben Sheashgarnaich and Schiehallion, though the last is so hazy as to be uninformative.

15. It is regrettable that the baseline photography for most of the photomontages was taken in poor atmospheric conditions. These images should be sharp to represent the 'worst-case' scenario and they most certainly do not. Their haziness and/or dullness (overcast conditions) gives a misleading impression of the visibility of the site and of just how visible and prominent hilltop turbines of the size proposed actually are in clear conditions. For example, the hazy conditions of the photography for Schiehallion (VP17) make the site almost invisible while the photography for Beinn Sheashgarnaich (VP16), exactly the same distance away, taken in clearer though overcast conditions, the site is much more obvious.

16. The EIAR states "Loch Lomond and the Trossachs National Park lies approximately 1 km to the west and south of the Proposed Development, from the nearest WTGs" and references Figure 2.2 (para 2.2.5). Figure 2.2 shows the actual distance from the nearest turbine (T08E) to the LLTNP boundary as being c.2.7km due south, and from the westernmost turbine to the LLTNP boundary as being c.7km (cf Figure 5.4). The error is repeated in the Planning Statement (para 3.2.3). This suggests a lack of familiarity with the site – on paper and on the ground – by some of those responsible for compiling the planning application. The error is not repeated in the LVIA since nowhere in that chapter is distance to the LLTNP boundary stated.

## **b) Assessment**

17. The proposed development site itself is of limited mountaineering interest, though it does include the Graham (hills of 600-762m OD) of Creag Ruadh (712m), the summit of which is only 600m distant from and about 130m lower in altitude than the blade-tip of Turbine 03E. A borrow pit search area occupies most of the area between T03E and the summit, which would further degrade the hill's quality (Figure 2.1).

18. Mountaineering Scotland's substantive interest in relation to Glentarken is the views to the site from elevated locations in all directions at distances from zero (Creag Ruadh) to about 25km. Many of these elevated locations lie within locally or nationally defined landscapes recognised for their quality. (For the avoidance of doubt, Mountaineering Scotland's assessment is restricted to the visual amenity experienced from the mountain landscapes and consequential impacts upon the quality of mountaineering experience and does not extend to assessing impacts on the qualities of designated or otherwise defined areas in themselves.)

19. The table below assesses those Viewpoints relevant to Mountaineering Scotland's interests. It should be noted that as well as the EIAR viewpoints there are other hills of significance near to the proposed site. These include Creag Each (672m, Graham, within 3km SW), Creag Uchdag (879m, Corbett (hills of 762-914m), c.4.5km NE) as well as numerous hills proxied by viewpoints (e.g. the Tarmachan ridge and multiple hills in the Lawers range proxied by Ben Lawers (VP8) or Creag Mac Ranaich proxied by Meall an t-Seallaidh (VP22). Note that Para 5.4.31 states that nine of the Viewpoints are Munros and then lists, correctly, the seven viewpoints that actually are Munros.

Viewpoint (nearest turbine)		EIAR assessment (daylight)	Mountaineering Scotland assessment
In close proximity			
1	Rob Roy Way (2.3 km)	Major, Significant	Agree with EIAR. These viewpoints, particularly the more elevated VP1, also give some indication of the impact on Creag Ruadh and Creag Each, Graham summits in close proximity to the proposed development.
C	Core Path STF-101 (0.9 km)	Major, Significant	
To the North			
8	Ben Lawers (11 km)  Note that Table 5-3 (page 5-20) gives the distance as 16.3km but Figure 5.24 gives it correctly as 11.4km.	Major-Moderate, Significant	EIAR <b>understates</b> the effect. The heat haze on the baseline photography should not be used to diminish the prominence of the proposed site in good visibility, which is when most people want to climb Ben Lawers. The visual impact on most of the Lawers-Tarmachan range is substantial and not limited to a summit view. The turbines would appear in the same angle of view as Ben Vorlich, competing for visual attention. It is a stretch for the LVIA to claim that smaller operational turbines appearing in a different direction at nearly twice the distance of Glentarken would "provide an existing wind energy baseline, within the wider context of which the Proposed Development would not be entirely uncharacteristic." (Page 5-94).
19	Lochan na Lairige (8.8 km)	Moderate, Not Significant	EIAR <b>understates</b> the effect and significance. The location of the VP close to the southern limit of visibility encourages this whereas further up the pass more of Glentarken would be in view, as it would be when beginning the climb to the hills. That is, from the very start and frequently, if not constantly, throughout the day a walker on these hills would have Glentarken in plain view.
17	Schiehallion (25 km)	Minor, Not Significant	Although understated, it is <b>agreed</b> that the effect would not be significant even when more evident in clearer conditions without a heat haze.
To the East			
2	Ben Chonzie (10 km)	Major-Moderate, Significant	EIAR <b>understates</b> the effect, in part by assuming the 'key views' are north and east when west, to distinctive high hills, is also a key view. (Note that one cannot see 'along' Glen Almond from Carn Chois (EIAR page 5-91).) The effect of introducing moving, contrastingly pale structures into the recessive moorland foreground is also understated.
6	Carn Chois (11 km)	Major-Moderate, Significant	

12	Sron Bealaidh (17 km)	Minor, Not Significant	<b>Agree</b> with EIAR.
<b>To the South</b>			
7	Ben Vorlich (10 km)	Major-Moderate, Significant	EIAR <b>understates</b> the effect of introducing a spread of moving turbines, potentially front-lit and contrasting with the moorland much more than the muted/hazy visualisations would suggest. Glentarken would intrude distractingly into the vision of those seeking to enjoy the excellent views of the Tarmachan-Lawers range.
20	Mor Bheinn (7.5 km)	Major-Moderate, Significant	As above but with more certainty in assessing the effect to be <b>understated</b> in the EIAR because of Glentarken's alignment across the dip between the Lawers and Tarmachan groups.
<b>To the West</b>			
22	Meall an t-Seallaidh (13 km)	Moderate, Not Significant	EIAR <b>understates</b> the effect and significance. The LVIA refers to "the focussed view along ... Loch Earn" (page 5-117) Viewers do not wear blinkers and would experience an insistent vision of Glentarken's moving turbines, contrasting with the moorland, in the same field of view as their focus when looking along Loch Earn or (at a different angle) to Ben Lawers. The LVIA also refers, rightly, to "the successive layers of upland ridge that occupy the intervening landscape, with the layout occupying a ridge beyond Creag Each" ( <i>ibid</i> ) but it ignores that the layers continue to the east beyond the proposed development which would sit in front of the highest layer of Creag Uchdag-Ben Chonzie, only dimly visible in the very poor baseline photography. The statement that " Meall nam Fiadh [is] a central high point when seen from this location" ( <i>ibid</i> ) is puzzling since the only Meall nam Fiadh named on the OS 1:25,000 scale map is essentially obscured from Meall an t-Seallaidh by Creag Each. Even if the name is an error, it is impossible to identify the 'central high point' which is meant.
9	Meall na Samhna (16 km)	Moderate, Not Significant	EIAR <b>understates</b> the significance that should be attached to introducing a wholly new eye-catching feature into a relatively undistinguished direction of view (by comparison with the surrounding hills) and which will, however reluctant the viewer, compete for attention.
11	Meall Ghaordaidh (17 km)	Moderate, Not Significant	
15	Ben More (23 km)	Moderate-Minor, Not Significant	<b>Agree</b> , though the impact is downplayed and Mountaineering Scotland's assessment comes very close regarding the effect and significance as understated. The mitigation from distance is overstated and misleadingly presented to the decision-maker in the visualisation due to the extremely hazy baseline photography. (Afternoon sun in a clear atmosphere would give a totally different impression. Compare VP16, more distant yet with clearer visibility in different atmospheric conditions. Consider the definition of the Ben Chonzie skyline in the two baseline photographs.) Glentarken would bring wind farm visibility much

			closer than is presently the case. It is, however, accepted that it would be seen within a relatively broad area of subdued landscape.
16	Beinn Sheasgarnaich (25 km)	Minor, Not Significant	EIAR <b>understates</b> the effect though it would not reach significance. The LVIA neglects to mention in its description of the view down Glen Lochay that it leads the eye to the eastern end of Loch Tay and that Glentarken would appear above this and only a few degrees to one side.
A	Ben Lui (39 km)	Not assessed	These wirelines illustrate that Glentarken would be a very substantial leap forward far beyond current existing/consented wind farms into a different setting in a wholly new area.
B	Ben Lomond (39 km)	Not assessed	

20. The proposed development would form a new focal point in the landscape, clearly visible and prominent because of its high altitude. The significant effects on landscape character and visual amenity would not be "relatively localised in nature" (LVIA para 5.11.16) as repeatedly claimed in the EIAR. LVIAs, as here, usually overstate the extent to which impact diminishes with distance and that has become more pronounced following NPF4's stating that 'localised' impacts were acceptable (Policy 11.e.ii). In Mountaineering Scotland's experience, 'localised' appears to be a highly flexible word in the hands of landscape architects. It should also be noted that turbines are much larger than those previously constructed and, in the experience of Mountaineering Scotland, more overtly visible at greater distances than previously.

21. The size of the turbines also contributes to their visually overwhelming of the topography of the modest hill-top ridge around which they are sited. The ridge runs from Creag Ruadh (712m) northwest, dropping to c.630m then rising to Meall Daimh (696m). Although only two turbines are located on the ridge itself, even the lowest turbines (at c.500m OD) have blade-tips, and all but the two lowest have hubs, exceeding the lowest part of the ridge. All bar the two lowest have blade-tips exceeding the altitude of the two hills and although only four turbines have hubs higher than the hills, most are approaching their height such that the perception would be of the ridge and its hills being subservient to the turbines. This is evident from a range of directions and distances (e.g. VPs 2, 7, 8, 11).

22. While the moorland may provide "a landscape context considered suitable for wind energy development of the type proposed" as the LVIA repeatedly states, that ignores the setting (wider context) of the proposed development within the Southern Highlands, not adjacent or peripheral to the mountains but sitting within them. Existing wind farms are clearly perceptible as set outside or on the margins of the Southern Highlands. (Although Calliachar and Griffin wind farms lie north of the Highland Edge, their context and siting are such that they are perceived as being on the margins when viewed from hills in the Southern Highlands (contrast Figures 5.24e and 5.24b).) Glentarken



would not have this mitigation but would intrude a wind farm well towards the heart of the eastern Southern Highlands. It would be jarring, even at a distance, in views into the Southern Highlands from the fringe where there is an expectation of a settled/developed landscape when looking (roughly) south to the lowlands but of a 'natural' landscape when looking deeper into the Highlands; for example, from Ben Ledi or Ben Chonzie (VP2).

23. Glentarken's turbines would not be sited in a nationally or locally designated or Wild Land Area landscape but it is surrounded by Munros and other mountains which do sit within such landscapes, indicative of the high value placed upon these surrounding landscapes. Its construction would visually diminish all of them. In terms of the value to be attached to seemingly unspoilt landscapes, a hint of the popularity of the area is seen in it having nearly three times the national average employment in accommodation and food service activities (Table 12-4). Ben Lawers has the distinction of being the 9th highest Munro in Scotland and the only hill above 1200m not in the Cairngorms or Nevis ranges, yet being relatively easily ascended and thus highly attractive to novice hillwalkers as well as seasoned mountaineers.

24. It is not clear whose judgement is being applied in repeated comments such as "The muted upland moorland and overall large upland scale of the Site area provides a landscape context considered suitable for wind energy development of the type proposed." (Ben Vorlich VP7, page 5-93, added emphasis) or "The large-scale of the upland ridgeline horizon to the west [of Glen Lednock] is considered an appropriate underlying landscape type and scale for the type of development proposed." (Para 5.8.55). Is it the landscape assessor's opinion? The client's (applicant's)? It is not a judgement shared by Mountaineering Scotland whose assessors for this application have long and extensive experience on the hills in the area.

25. Another regularly repeated phrase in the LVIA is that the proposed development "would not be entirely uncharacteristic" because wind turbines are already in view, however distantly (and smaller and at lower altitude) and regardless of the direction of view to them. On this basis, almost all of upland Scotland would be regarded as appropriate for wind farms since distant views of wind farms can currently be obtained from many hills and over time if development leap-frogs forward to open up new areas to exploitation (as Glentarken is attempting to do), the argument would be able to be applied to the whole of Scotland except for the interior of National Parks and NSAs. The LVIA does not address the contradiction between this argument, which is applied regardless of distance, and its discounting of any substantive effect from distant wind farms in the Viewpoint analysis.

26. The cumulative assessment with the Scoping Glen Lednock involves the unrealistic assumption that that scheme exists, even though not yet in planning, so that the cumulative impact



of Glentarken with it can be assessed. It is Mountaineering Scotland's view that either of these schemes would be unacceptable. The cumulative impact assessment for Glentarken is agreed with insofar as it shows that if either scheme is accepted the solus damage is so severe that consenting the other scheme would have only a modest additional impact.

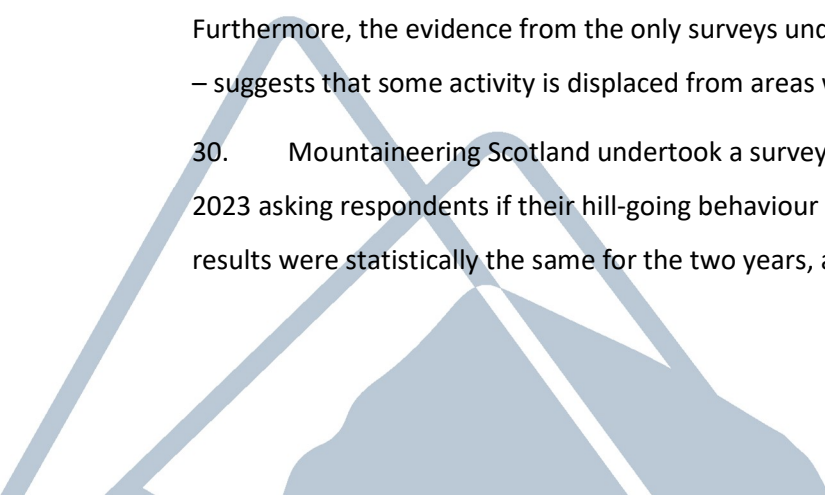
### **c) Impact on Mountaineering Experience**

27. The 'mountaineering experience' is a complex phenomenon. Mountaineers have multiple motivations, both individually and collectively. Very few go into the hills only to tick a list or achieve some challenge. Even a cursory glance at hillwalking magazines or chat on the hill shows that quality of visual experience (the view, the scenery) is important. So too are feelings invoked by the physical experience of remoteness, perceived wildness, and engaging with hard terrain. Harsh weather or snow and ice introduce another dimension. The experience is enhanced by engagement with nature both visually and aurally. The resultant benefits to physical and mental health are increasingly recognised and promoted.

28. None of this is understood by those who feel able to pronounce on the potential impact of a proposed development on mountaineering without presenting or citing any meaningful empirical evidence on the motivations of mountaineers (or any other countryside users) either in general or with regard to a specific route or area. The cursory dismissal of impact upon hill routes in the EIAR (paras 12.5.55-57) consists of desk-based supposition from looking at websites, which has all the appearance of having been designed to give an air of credence to a pre-formed conclusion. The descriptions of the 'recreational trails' are verbatim from the WalkHighlands website with nothing to suggest that any have actually been visited by the author(s) of Chapter 12. If they had been, the erroneous statement that "While there are significant visual impacts, these effects are localised and concentrated to short sections of the routes, leaving views largely unaffected" (Para 12.5.55) could not have been made directly referencing inter alia Ben Lawers and the Tarmachan ridgeline, which would have almost continuous visibility of the proposed development by most routes from start to finish.

29. Mountaineering Scotland might be considered to have a better sense of what motivates and disincentivises mountaineers through its daily contact with a wide range of mountain-goers. Furthermore, the evidence from the only surveys undertaken of mountaineers – not general tourism – suggests that some activity is displaced from areas with wind farms to areas without.

30. Mountaineering Scotland undertook a survey in 2016 and repeated the same question in 2023 asking respondents if their hill-going behaviour had changed in response to 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 avoid an area with wind farms and go elsewhere while 42% would still go to an area with a wind farm but experience diminished enjoyment. (It could be hypothesised that this latter group might as a consequence make less frequent or fewer repeat visits). In contrast, only 2% would go to such an area more often. It would have no impact on 35%. These surveys did not ask about motivations directly, but the behavioural responses recorded suggest that they include a strong visual element. Such empirical data directly contradicts the unevidenced supposition in the EIAR that "Motivations for walking on these trails range from appreciation of their surrounding scenery to spending time outdoors and exercising and these motivations will not be altered in the presence of the Proposed Development." (12.5.56). The underlying motivations might not change but, for some, behaviour does change.

31. The EIAR assessment includes the idea that many 'recreational trails' are available locally and so individual 'trails' do not have a scarcity value, and those who prefer not to view manmade structures would have the opportunity to use other routes (12.5.57). But there is only one Ben Lawers, Tarmachan ridge, Ben Vorlich (Earn), Ben Chonzie or Ben More (Crianlarich). Every hill and every route has its distinct character, with endless variations on features, characteristics, settings and views. Substituting one hill for another thus requires the loss of a distinct experience. It diminishes the overall asset base for mountaineering in Scotland. The EIAR's sentiment should be turned around: there is no shortage of suitable sites for onshore wind so individual sites do not have a scarcity value and those wishing to develop wind farms have available to them the opportunity to develop other (lower-impact) sites.

#### **d) Conclusion**

32. The above assessment shows that the proposed Glentarken wind farm would have a significant adverse visual impact upon the surrounding hills that are extremely popular for outdoor recreation. It would also represent a significant movement forward for development from the edges to the interior of the Southern Highlands.

#### **Overall Conclusion**

33. The proposed development is contrary to national policy (NPF4). Its siting would not 'preserve natural beauty'. It would have a significantly adverse impact upon the visual amenity and overall experience of those visiting the many Munros, Corbetts and other notable hills that ring the proposed hill-top site in this highly popular area. It would extend very considerably the presence of wind farms from the edges to the interior of the Southern Highlands, an extremely significant movement.

34. Mountaineering Scotland **objects** to the proposed Glentarken wind farm.

Yours sincerely

A handwritten signature in black ink that reads "Stuart Younie". The signature is written in a cursive, flowing style.

**Stuart Younie**

**CEO, Mountaineering Scotland**

