



The Granary
West Mill Street
Perth PH1 5QP
Tel: 01738 493 942

By email to
Econsents_Admin@gov.scot

Energy Consents Unit
Scottish Government

7th May 2019

Dear Sir/Madam

**THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND)
REGULATIONS 2017
ELECTRICITY ACT 1989 : KIRKAN WIND FARM: WIND ENERGY DEVELOPMENT
COMPRISING THE CONSTRUCTION OF UP TO 17 TURBINES OF UP TO 175 M IN HEIGHT,
LOCATED APPROXIMATELY 5.8 KM NORTH WEST OF GARVE, HIGHLANDS
Reference Number: ECU00001800**

1. Kirkan Wind Farm Ltd has applied for consent to build a wind farm of 17 turbines of 175m blade tip height (BTH).
2. Mountaineering Scotland **objects** to the proposed development on grounds of visual impact.
3. The application is deficient in containing no visual analysis of the proposed development in relation to the proposed Lochluichart Extension 2. The latter is referred to at Para 5.7.39 which references Figure 4.6. But only operational and in planning turbines are shown on the Figure. By submitting planning applications almost simultaneously, both Kirkan and Luichluichart Extension 2 have each submitted applications ignoring the potential interaction between them. Without a consideration of this the EIA is seriously flawed. **The application should be withdrawn and resubmitted with a revised cumulative analysis.**

Mountaineering Scotland

4. 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.
5. It also acts in Scotland for the 80,000 members of the British Mountaineering Council, which fully supports Mountaineering Scotland's policy relating to wind farms and contributes financially to its policy work.

6. Mountaineering Scotland agrees with the need to move to a low carbon economy but does not believe that this transition need be at the expense of Scotland's marvellous mountain landscapes. It objects only to the small proportion of proposals – around one in twenty – that are potentially most damaging to Scotland's widely-valued mountain assets, consistent with its policy set out in *Respecting Scotland's Mountains*. This has been strongly endorsed by its members and by kindred organisations such as The Cairngorms Campaign, North East Mountain Trust and The Munro Society.

Material considerations

a) Context

7. This area has two operational wind farms – Lochluichart (with extension) and Corriemoillie - which form a single entity visually. There is also a current planning application for Lochluichart Extension 2 (LE2). There are 42 operational turbines, 2 with consent but not erected (in Corriemoillie) and 9 in planning for LE2. All are of 125m BTH except for LE2 which are proposed to be 133m.

b) Policy

8. The Scottish Government enthusiastically supports continued onshore wind deployment and an individual planning application is not the place to question whether overwhelming reliance on wind makes for a robust energy policy. However, policy is clear that expected economic and emissions benefits are to be balanced against potential harms in the determination of an individual planning application. "The aim is to achieve the right development in the right place; it is not to allow development at any cost." (Scottish Planning Policy 2014, Para 28)
9. More recent energy policy documents restate but do not increase the policy support for onshore wind nor diminish the protection for landscapes (cf Reporters' Reports on Culachy and Whitelaw Brae wind farms¹).
10. 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 many possible locations suitable for low-carbon electricity generation. The adverse consequences of a scheme, however, are often site-specific and should weigh more heavily in the balance because of this.

c) Landscape and visual impact (including cumulative impact)

11. Landscape and visual impact assessment (LVIA) compiles data and presents results within an objective structure but ultimately applies subjective judgement, whether professional or consumer. In our experience, commissioned assessments consistently downplay the impact of proposed development. Mountaineering Scotland's assessment has been informed by the compilers and reviewers of this objection having between them well over 100 years of experience on Scottish and other hills, and 'fieldwork' in the hills around the development site stretching over decades. We do not suggest that either professional or consumer judgement trumps the other; simply that each has a distinct place in informed decision-making.

¹Culachy Wind Farm Appeal Decision Notice by Robert Seaton, 27 April 2018.
Whitelaw Brae PLI Report by David Buylla and Claire Milne, 17 August 2017.

12. As lay consumers of mountain landscapes, we find the professional distinction drawn between the various landscape and visual impacts often rather theoretical and the segmentation of landscapes for analysis by Character Types/Units (which in this area appear rather idiosyncratic) and Designations to weaken the overall perspective. How we experience landscape is not separated into component parts but merges as a total experience. That is how we have developed our assessment and we would hope that the decision-maker would take a similar holistic approach. We have assessed the impact of Kirkan against the baseline of the existing 42 operational turbines. We have not considered any interaction with the Lochluichart Extension 2 application.
13. The development site and its management are typical of the rounded mid-level moorland hills of the area, with their mix of open elevated moors and plantation and native woodland forestry. The operational wind farms sit on broadly southward and eastward facing slopes rising from the south to the Glascarnoch-Luichart watershed. Corriemoillie extends over the watershed but in an area of subdued topography largely sitting back from the northward-facing slopes.
14. The proposed Kirkan development would sit at the upper end of a northeast-facing valley, contained to some degree by higher land but turbines of the size proposed would generally overtop the 'containing' topography. (Blade tips would reach approximately 460-560m OD; the highest 'enclosing' landform summit is 479m OD.) It would sit east of the operational wind farms. In many views, especially those from elevated locations, it would appear as part of a single extensive group of turbines. From some angles it would expand but maintain the relatively compact shape of the existing combined Lochluichart, Corriemoillie and Lochluichart Extension 1. (Lochluichart Extension 2, in planning, would disrupt the northwest corner of this compact design.) From other angles, Kirkan would substantially increase the horizontal extent of development.
15. The proposed turbines are 175m high with a rotor diameter of 142m (para 2.6.31). This contrasts with the existing developments in which all turbines are 125m high with 90m rotor diameter (Lochluichart Extension 2 EIA Report para 9.2.6). Depending on angle and distance of view, the difference in turbine height and speed of blade rotation may have a significant impact upon how the proposed development is perceived: as melding with or clashing with the existing operational baseline.
16. The proposed development is not located in an officially recognised landscape area but, with some gaps, is surrounded by three Wild Land Areas and, often overlapping, three Special Landscape Areas at closest distances ranging from 3-12 km. Mountaineering interest is mainly within these areas. From most locations of mountaineering interest where Kirkan would be visible, so too would be the existing Lochluichart/Corriemoillie turbines (cf Figure 4.6a). The notable exceptions in terms of impact would be from the main routes to Little Wyvis and Ben Wyvis and from Strath Vaich.
17. Our assessment of all the hill viewpoints in the LVIA is given in the table below. They are treated approximately clockwise from Ben Wyvis, with some variation to take nearer viewpoints first in any direction of view. The number and name of those we judge to be significantly adversely impacted by the proposed development are emboldened.

Viewpoint		Distance & direction to Kirkan	Significant impact in EIA report	Mountaineering Scotland assessment
6	Ben Wyvis	9 km W		Kirkan would fit with the shape of the existing developments, diminishing its impact. However it would be closer and this would amplify the size difference of the turbines. Different rotation speeds would be very evident. On descent, existing developments would become screened while Kirkan would remain visible for several hundred metres more. We judge this hill and its ascent route to experience a significant adverse impact .
19	Little Wyvis	7 km WNW	Yes	Kirkan would appear as a large horizontal extension of the developed area, appearing largely as a separate development rather than part of a single cluster. It would be closer and this would amplify the size difference of the turbines. Different rotation speeds would be very evident. On descent, existing developments would become screened while Kirkan would remain visible for several hundred metres more. We agree with the significant finding of the EIA for the summit and the ascent route..
5	Sgurr Marcasaidh	8 km N	Yes	Kirkan would appear as a large horizontal extension of the developed area. It would increase the view of turbines from c.28 to c. 40 degrees. Different rotation speeds would be very evident, with visibility increased by front-lighting and dark backclothing. (The visualisations use a snowy picture which our fieldwork has found to be the ground conditions most likely to make backclothed turbines visually indistinct.) We agree with the significant finding of the EIA.
9	Beinn a'Bha'ach Ard	23 km N		The impact is similar to Viewpoint 5 but attenuated by distance and a moderate degree of topographic screening (of proposed and extant developments). Horizontal spreading is notable but not of itself sufficient to be significant at this distance alongside an existing cluster.
8	Sgurr a'Mhuillin	15 km NE		Kirkan would appear as a large horizontal extension of the developed area. Different rotation speeds would be very evident, with visibility increased by front-lighting and dark backclothing. The Kirkan

				<p>turbines would be seen as larger than existing development even though slightly further away, creating a sense of visual dissonance. We judge this hill to experience a significant adverse impact.</p> <p>The route to Sgurr a'Mhuilinn by Meallan nan Uan was judged by the LVIA not to be significantly impacted. We disagree: the 'developed context' does not eliminate the impact of Kirkan appearing as a large extension with differently sized turbines.</p>
10	Sgurr a' Choire Ghlais	26 km NNE		<p>The impact is similar to Viewpoint 8 but attenuated by distance and a minor degree of topographic screening (of proposed and extant developments). The horizontal spread is notable but not of itself sufficient to be significant at this distance alongside an existing cluster.</p>
11	Moruisg	31 km NE		<p>From this angle of view and distance Kirkan would become mixed with existing developments and simply intensify the existing effect of development without notably adding a new element.</p>
12	Beinn Eighe (Leathad Buidhe)	36 km E		<p>From this angle of view and distance Kirkan would be mixed with existing developments' blade-tips without adding a new element.</p>
13	An Coileachan	11 km E		<p>Although mingled with existing turbines, the greater size of Kirkan's turbines would produce a substantial impact over the baseline. The primary eastward view to Ben Wyvis would be visually distracted by the kinetic Kirkan turbines being in direct line. Different rotation speeds would be very evident, with visibility increased by dark backclothing. The Kirkan turbines would be seen as larger than existing development even though slightly further away, creating a sense of visual dissonance. We judge this hill to experience a significant adverse impact.</p> <p>The route to Beinn Liath Mhor a' Ghuibhais Li was found by the LVIA to be significantly impacted. The route over Beinn Liath Mhor Fannaich to Sgurr Mor was found not to be but we disagree. We also note that the LVIA says there would be no visibility of Kirkan from the summit of Sgurr Mor but the ZTV (Fig 4.5a) shows visibility on the</p>

				high ground around the summit.
18	An Teallach	34 km ESE		The visualisation is flattering to the development by backclothing the pale turbines with a snowy hillside. Nonetheless, at this distance Kirkan's turbines would rarely be distinct, though on those rare occasions it might come as a disappointment that a coast-to-coast view of Scotland has turbines intruding.
14	Beinn Dearg	16 km SE		Kirkan would appear as a large horizontal extension of the developed area, appearing as a different development because of its larger turbines and visual separation from existing development. It would increase the width of wind farm development by c.40% over existing developments. Different rotation speeds would be evident, with visibility increased by dark backclothing. We judge this hill to experience a significant adverse impact . The ascent route to Am Faochagach, nearer to Kirkan in the same angle of view, was significant in the LVIA.
15	Meall à Ghrianain	9 km S	Yes	Kirkan would appear as a large horizontal extension of the developed area but a distinct development with larger turbines. It would increase the width of wind farm development by c.40% over existing developments. Different rotation speeds would be evident, with visibility increased by dark backclothing. (A mid-day shot into the sun, as used in the LVIA, does not provide the best contrast.) We agree with the significant finding of the EIA for the summit and the ascent route to Beinn a' Chaisteal.
16	Meall Mor	16 km WSW		Kirkan would markedly increase the scale of development. However, it would broadly fit with the shape of the existing developments, somewhat diminishing its impact.

18. The LVIA found 3 of 13 hill viewpoints and 4 of 7 hill routes to be significantly adversely impacted by the proposed development. This understates the position. We judge 7 hill viewpoints and all 7 routes to be adversely impacted. This is more than would be expected from a development of 17 turbines being added to an existing baseline of 42 turbines. In part this reflects the highly visible location, surrounded by hills with contrastingly backclothed views of any development. In part it reflects the increase in horizontal extent of turbines from some angles that would result from the proposed development. In part it reflects the greater size of the proposed turbines compared with the operational turbines in the cluster.

19. The need for turbine lighting might be thought only to affect “a small number of wild campers” (para 4.7.108) but with increasing interest in ‘dark skies’, and the view west from the Ben Wyvis track being a great and safe place to experience this, as well as spectacular sunsets, it may potentially diminish a future tourism revenue stream.

d) Socio-economics

20. Socio-economics was scoped out of the EIA, though the Planning Statement touches on some of the possible positive impacts. Tourism and recreation impacts were scoped out on the basis that there is no evidence of any significant impact. Mountaineering Scotland does not disagree with the general proposition that well-sited wind farms have no effect. But this is a broad generality.

21. There is evidence that mountaineering tourism and recreation is adversely affected by wind farm development and that wind farms within designated landscapes have a direct adverse effect on tourism employment in their vicinity. However, no study has looked at the effect of wind farms in proximity to (rather than within) designated landscapes nor at the effect of adding turbines to an existing wind farm cluster. There is therefore no tourism and recreation evidence directly relevant to this application, which is ringed by designated landscapes within which the main mountaineering interest is found. Notwithstanding that, it seems plausible that the greatest impact on mountaineering tourism and recreation in an area might follow the initial wind farm and that thereafter increasing the number of turbines in the immediate area might have some incremental, but most likely minor, effect, the magnitude possibly depending on the visual ‘fit’ of the additional turbines with the existing turbines. There may also, however, be a point beyond which an area is considered excessively populated by turbines and becomes actively avoided by a large number of walkers. There has been no research on this.

22. For the avoidance of doubt, these comments relate only to mountaineering tourism and recreation. The proposed extension would significantly increase the visibility of turbines to motorists on the A835. That is not our area of expertise and we make no comment on the likelihood or magnitude of any possible impact on ‘roadside’ tourism.

Conclusion

23. Mountaineering Scotland has carefully assessed the proposed development. Even though it would be associated with existing developments, which ordinarily would mitigate its impact and does so here to some extent, it would have major adverse visual impacts.

24. The adverse impacts are a direct effect of the location and scale of the proposed development and cannot be mitigated without reconsideration of, at least, the size of turbines proposed so as to better fit with the existing developments.

25. Mountaineering Scotland objects to the proposed Kirkan Wind Farm.

Yours sincerely



Stuart Younie
CEO, Mountaineering Scotland