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FAO Mr Peter Wheelan
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Dear Mr Wheelan

LOCHLUICHART WIND FARM EXTENSION II - erection of 9 turbines (maximum tip height 133m), temporary construction compound, borrow pits, crane pads, access tracks, underground cables between turbines, sub-station, battery storage, maintenance and control buildings with welfare facilities. Land Between Lochluichart and Loch Glascarnoch, Garve.

Reference No. 19/01284/FUL

Context

1. Bluebell Wind Farm Ltd has applied for consent to build a second extension to Lochluichart Wind Farm, adding 9 turbines of 133m blade-tip height (BTH) to the original 17 and 6 extension turbines of 125m BTH.
2. Mountaineering Scotland **objects** to the proposed development on grounds of visual impact.
3. The application is seriously deficient in containing no reference to the proposed Kirkan Wind Farm, which is located immediately east of Corriemoillie wind farm. Paragraph 9.4.56 states the cut-off date for cumulative assessment as October 2018 (cf also Table 9.3 and Figure 9.11). Kirkan scoping report was submitted to the ECU on 8/3/18 and a response issued on 10/7/18. Despite this it is not included and no reference is made to it in the text. An application for Kirkan wind farm, with 17 turbines of 175m BTH, was submitted to the ECU on 29/3/2019. Clearly there is significant potential for cumulative effects, with less than 2km separating the Kirkan and Lochluichart Extension 2 turbines. Without a consideration of cumulative effects with Kirkan the EIA is fatally flawed. **The application should be withdrawn and resubmitted with a revised cumulative analysis.**
4. Notwithstanding the omission of Kirkan, the basis for Mountaineering Scotland's objection is given below.

Mountaineering Scotland

5. 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.

6. 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.
7. 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) Planning history

8. This area has a considerable planning history with regard to wind farms. We are aware of six applications to date and one relevant screening application: Lochluichart; Lochluichart Extension 1; Corriemoillie (<50MW); Corriemoillie (>50 MW in same footprint); Lochluichart Extension 2; Kirkan; and screening for a single 133m turbine south of Corriemoille.
9. A consistent pattern in the Lochluichart extension applications is the desire to place turbines to the north of the originally consented wind farm, across Meallan Caoruinn, in an area removed from the original application because of concern by statutory consultees about the northern section's potential adverse visual impact. Extension 1 attempted to re-enter this northern area but was consented only for the turbines south of Meallan Caoruinn with an explicit visual impact rationale for a limited extension.

“Scottish Ministers recognise that this Application proposes to place turbines in an area where they were removed from in the original Lochluichart wind farm scheme. Scottish Ministers are satisfied, with the approval of the adjacent Corriemoillie Wind farm scheme, that this proposal, whilst introducing an increased number of turbines into views, will provide an opportunity to improve the visual relationship of the developments. They are of the view that this proposed extension scheme will help to “round off” the consented developments, giving the appearance of one larger scheme.” (Decision Letter)
10. The Extension 2 EIA, Planning Statement and Design and Access Statement are silent on this history. The LVIA gives a brief resume but does not provide any substantive justification as to why a previously ‘rounded off’ scheme should be extended along the slopes north of Meallan Caoruinn and, in a weakly integrated limb, along the Sochach Allt Giubhais ridge. It simply claims that

“... a rigorous and lengthy iterative design process has been undertaken to ensure that the Proposed Development will minimise the potential effects through successful integration with landscape character and the layout and appearance of the Operational Wind Farms.” (para 9.5.5)

All proposed wind farm extensions claim something similar. This general statement does not address the specifics of this extension in relation to previous planning decisions.
11. We conclude from our assessment of the visual impact of Extension 2 (Section c below) that the adverse impact of adding two northern offshoots to the concentrated design achieved by the extant wind farms, including Lochluichart Extension 1, shows clearly that an extension here cannot be mitigated by design.
12. It is difficult not to conclude that the applicant believes that if repeated applications are

persisted with for areas from which turbines were removed so as to gain consent for previous applications, the planning system will eventually prove malleable to its wishes.

b) Policy

13. 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)
14. 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).
15. 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)

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 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.
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/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 the nine Extension 2 turbines against the background of the existing 42 operational turbines. We have not considered any interaction with the Kirkan application scheme.
18. 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 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. The proposed development would spill more obviously over the watershed.
19. It is not 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 distances ranging from 1-13 km. Mountaineering interest is mainly within these areas.
20. The design lacks visual coherence. The proposed development does not appear well integrated into the existing body of turbines but appears as two offshoots from it. It overtly

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

crosses the watershed towards Loch Glascarnoch into a topographically different milieu even though it is the same landscape character type. If the present developments are contained within a 'bowl', as the LVIA has it, then the proposed development would spill northwards out of the bowl. Seen from east or west it extends the horizontal spread of the combined operational wind farms to a degree disproportionate to the number of turbines involved. This gives rise to adverse visual effects at distances up to 14km that, contrary to the LVIA, we regard as significant. All the mountain viewpoints are assessed in the table below.

Viewpoint	Distance & direction	Assessment
5 Ben Wyvis	13km E	Walkers typically are facing the wind farms on descent. Moorland backclothing increases the visibility of the turbines and draws attention to the more straggling layout of Extension 2. Blade movement is readily seen. Extension 2 would increase the width of the combined wind farms by more than one third. The view to Sgurr Mor would be almost over turbines from the summit (the viewpoint) and fully over (moving) turbines from the ascent/descent route and An Cabar, a common place to pause. Significant and highly adverse visual impact.
6 An Coileachan	8 km W	This is the reverse image of that from Ben Wyvis with the important qualifier that Extension 2 would be partially visible as moving blades rather than full height. Contrasting backclothing would increase the effect. Were this to be the only location experiencing an adverse effect, it would not be of consequence because of the amount of screening.
7 Sgurr Mor	12 km W	The view from Sgurr Mor is similar to An Coileachan but with its higher elevation more blades are seen against a contrasting backcloth and the increased width of the combined wind farms is very obvious. Extension 2 turbines would appear in front of Ben Wyvis, the main focus of the eastward view, unlike the existing turbines which sit to one side. Walkers on the ridge from Sgurr Mor to An Coileachan would have a largely continuous forward view of Extension 2. Significant and highly adverse.
8 Beinn a' Chaisteil	8 km N	Walkers typically are facing the wind farms on descent. Seen from here, the operational Extension 1 creates outliers to the right of the view. Extension 2 would partly merge with these outliers, making them appear more part of the body of the wind farms, but create new outliers with turbines 8-10. These would break the skyline as the walker descends. Turbines 2 and 3, although they would sit in front of the operational Corriemoillie turbines, would bring development perceptibly closer. Significant and highly adverse for turbines 8-10.
10 Sgurr a' Mhuillin	14 km S	Extension 2 would extend the visible width of the wind farm with a straggle of turbines to the left, three visible to hub height (6, 8, 9), one blade (7) and one indiscernible tip, while others would sit behind the existing wind farms. It gives the impression of turbines 'escaping' their existing 'containment'. Significant and highly adverse for the 'straggle' (turbines 6-9).
11 Sgurr a' Choire Ghlais	26 km S	Extension 2 would introduce some leftward straggle (akin to Viewpoint 10 but with more Extension 2 turbines to the rear of existing development because of the slight difference in angle of view). However, at the distance the straggle would

		only be visible in conditions of high contrast and even in such conditions it is likely that the impact of the existing developments would overwhelm any additional effect from the straggle.
12 Beinn Dearg	14 km NW	The Extension 2 turbines would sit in front of the existing wind farms and thus tend to blend in. The rightmost turbines (6-9) are more prominent because they appear at or almost at full height while the background turbines' towers are partly shielded by topography. This could give the impression of Extension 2 turbines breaching the current 'containing' topographical boundary of Meallan Caoruinn. It is difficult to judge the strength of this effect given the extent of turbines in view but because the most prominent turbines would also be among the closest to Beinn Dearg the effect could be material. Significant and moderately adverse for turbines 6-9.

21. Although the number of turbines proposed might appear small, it is a 20% increase on the operational turbines of the combined wind farms. Although the increase in horizontal spread might appear modest, it is again not insignificant compared with the horizontal spread of the operational wind farms. If this were a well-designed and integrated extension, we would have no objection to it given the existing baseline. However, it is not, and if this is the best design that can be achieved, it must be concluded that the topography north of the existing wind farms is not favourable to any extension, as was advised by SNH over a decade ago when the original Lochluichart wind farm was proposed.

d) Socio-economics

22. We do not dispute that constructing a wind farm produces some financial benefits. However, in a dynamic energy economy, achieving construction and operation benefits for the region and nation is not reliant upon the consenting of any one proposal. Nor do economic benefits for a private company trump environmental considerations.
23. The EIAR (Chapter 6) 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 this is a broad generality. The planning system is not concerned with generalities but with the specific impacts of specific proposed developments in specific locations. That requires a properly focused approach to tourism and recreation impacts both in research and in practical application. This is lacking.
24. However, by different reasoning to the EIAR, Mountaineering Scotland concludes that any impact of Extension 2 on mountaineering (including hill-walking) recreation and tourism would be minor. 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. No study has looked at the effect of wind farms in proximity to designated landscapes nor 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 tourism and recreation in an area will 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.
25. 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

26. Mountaineering Scotland has carefully assessed the proposed development. Even when it opposed an original scheme, it does not in most instances object to an extension provided it is well located and designed. This proposed scheme is neither. The scheme would have major adverse visual impacts that significantly and demonstrably outweigh its predicted benefits.
27. Lochluichart Extension 1, as consented and built, provided a consolidation of the combined Lochluichart/Corriemoillie wind farms. The present proposal would undo this for modest public benefit and some public harm. The adverse impacts are a direct effect of the location and design and cannot be mitigated.
28. Mountaineering Scotland objects to the proposed Lochluichart Extension 2.

Yours sincerely

A handwritten signature in black ink, appearing to read "Stuart Younie".

Stuart Younie
CEO, Mountaineering Scotland