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15 March 2023

Dear Mr Black

QUANTANS HILL WIND FARM PROPOSAL, CARSPHAIRN

ECU reference: ECU00003399

Background and Context

1. Vattenfall Wind Power Ltd has submitted an application for a wind farm of 14 turbines of 200m BTH across the southern slopes of Cairnsmore of Carsphairn above the village of Carsphairn in the Glenkens, Dumfries and Galloway.
2. Mountaineering Scotland **objects** to the proposed development on grounds of visual impact.
3. Mountaineering Scotland is a membership organisation with more than 15,000 members and is the only recognised representative organisation for hill walkers, climbers, mountaineers and ski-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.
4. Mountaineering Scotland supports the move to a low carbon economy but does not believe that this need be at the expense of Scotland's marvellous mountain landscapes. It objects only to the small proportion of proposals that are potentially highly damaging to Scotland's valuable mountain assets, consistent with its policy set out in Respecting Scotland's Mountains. This approach 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) Policy

6. Under NPF4 renewable energy developments attract considerable support in principle. This is,

however, subject to site-specific assessment and it is for the decision-maker to balance the various policies and other considerations in respect of a specific proposed development. One of those considerations, the one that usually most affects mountaineering interests, is visual impact.

7. The sections of NPF4 most directly relevant to this objection are (Policy 11, p.53):

- "e) ... project design and mitigation will demonstrate how the following impacts are addressed:
 - ii. significant landscape and visual impacts, recognising that such impacts are to be expected for some forms of renewable energy. Where impacts are localised and/ or appropriate design mitigation has been applied, they will generally be considered to be acceptable;
 - xiii. cumulative impacts."

8. Both NPF4 (p.7) and the Onshore Wind Policy Statement 2022 (OWPS) (para 3.6.1, p.19) contain the sentence "This means ensuring the right development happens in the right place." For reasons given below, Quantans Hill is not the right place for a development of the type and scale proposed. The visual harm outweighs the anticipated benefits.

9. Ninety per cent (28/31) of S.36 wind farm applications determined in the three years 2020-2022 were consented (compared with only 64% (18/28) 2017-2019). NPF3/SPP2014 applied in both periods and it is clear that Reporters and decision-makers were recalibrating their judgments over time as the direction of travel became clearer and stronger, even if not expressed in formal policy as it now is in NPF4 and the OWPS. As the applicant itself notes: "... especially over the last few years, the needs case and support for commercially viable renewable energy projects such as the Proposed Development has increased immeasurably." (Planning, Design and Access Statement. p.1). While the intention of NPF4 may be to make it easier to gain consent for S.36 applications, Mountaineering Scotland would suggest that this had already become the *de facto* position in recent years.

10. NPF4 does not require that all applications are consented. If there was not a continuing requirement for planning decisions to balance the potential benefits and site-specific harms, and sometimes to decide that the latter outweigh the former, there would be no need for proposed onshore wind farms to go through the planning system at all except to agree Conditions. Policy 11 e) ii would not use the word 'generally' if the intention was 'always'.

11. The generic benefits arising from onshore wind development as set out in the OWPS – primarily energy generation but also including contributions to peatland restoration, increased woodland, and biodiversity improvement – can be obtained from development in many locations across Scotland. Where a development would be particularly harmful to a landscape is specific to the individual location whose site or setting is particularly unique, of high quality, regionally significant, or publicly valued/popular (solus or in combination). Where 'impacts are localised' to an area of scenic value, the fact that they are localised is not mitigation. The adverse consequences of an individual scheme should gain weight in the planning balance because they attach to the specific location, which cannot be replicated elsewhere, unlike the benefits. It is Mountaineering Scotland's case that the harms from Quantans Hill would outweigh the benefits by a considerable margin.

b) Landscape and visual impact (including cumulative impact)

Introduction

12. Landscape and visual impact assessment (LVIA) compiles data and presents results within an objective structure but ultimately involves subjective judgement, whether professional or consumer.

In our experience, commissioned assessments consistently downplay the impact of proposed development. (Though in this case, while the conclusion of the LVIA does, the detail does not insofar as it relates to Mountaineering Scotland's interests.) Mountaineering Scotland's assessment has been informed by the compilers and reviewers of this objection having extensive experience on Scottish and other hills, and familiarity with the hills around the development site over many 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.

13. 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 to weaken the overall perspective. Hillwalkers experience landscape as a total visual and sensory experience, not separated into component parts. That is how we approach our assessments and we would hope that the decision-maker would take a similar holistic approach. Words such as 'landscape' are used by us in their ordinary, lay, meaning.

14. In summary, it is Mountaineering Scotland's case that the harms from Quantans Hill – breaching the integrity of the upper Glenkens basin and breaking the visual link between Cairnsmore of Carsphairn, the Glenkens and the Rhinns of Kells – are such as to make the location unacceptable: it is development in the wrong place.

Key characteristics as currently experienced by hillwalkers

15. It is assumed here that all consented developments will be constructed, and Mountaineering Scotland's assessment was conducted and is reported on that basis.

16. The key characteristics of the area in respect of hillwalking and the appreciation of the hills around Carsphairn are:

- a. The Corbett of Cairnsmore of Carsphairn. One of the highest hills in the southern Uplands, easily accessed from west-central Scotland and popular, though it has been reported to us as losing some appeal with the increasing density of turbines to its north and east. Only its southern slopes are without turbines in close proximity (operational or consented).
- b. The southern and southwestern views from Cairnsmore of Carsphairn down the Glenkens and to the Rhinns of Kells, with elements of the Awful Hand (Merrick) range glimpsed behind the latter. These views have (and will have more) turbines at some distance but none at close range (<10km) and none in line with the key inter-hill and down-glen views.
- c. The reciprocal view to Cairnsmore of Carsphairn from the Rhinns of Kells across the visually recessive upper basin of the Glenkens. This is framed by turbines on the upper eastern slopes of the Glenkens further south from, and outwith, the upper basin, and by turbines further north and further east, beyond the basin and Cairnsmore of Carsphairn.
- d. The view of the Rhinns of Kells across the upper Glenkens basin from hills to the southwest of Cairnsmore of Carsphairn. This is rather similar situation to Cairnsmore of Carsphairn but with the open views being to the west and turbines in an arc behind the westward viewer. It includes views from the Southern Upland Way.
- e. Cairnsmore of Carsphairn provides a striking northern termination to the basin when viewed from lower elevations in the basin and further south in the Glenkens.
- f. The overall current perception in views from the hills is of a landscape (Cairnsmore-basin-

Rhinns) pressed upon by turbines from north and east but not intruded into by them.

17. As the sole exception to the picture described above, there are two consented 100m blade-tip turbines at Torrs Hill on the west flank of the Glenkens. While potentially detrimental, these have been consented since 2004 and only remain 'live' because a small amount of track work was undertaken to formally commence the development prior to the consent expiring. It is unlikely that they will ever be built.

18. Mountaineering Scotland has repeatedly sought to protect these characteristics while accepting the very substantial amount of development to the east and north of the basin and Cairnsmore. It objected to Longburn (consent refused), Shepherds' Rig (PLI held) and now Quantans Hill. (It was unaware of the Torrs Hill local application.) Of these, Quantans Hill would be by far the most damaging.

Assessment

19. There are 25 viewpoints. We have considered 17, all of which identify walkers as a receptor. We concur with the EIAR's assessments of magnitude, level and significance of visual effects (Table 5.23) with the exception of viewpoint 5 where we regard the effect as significant because of the highly visible intrusion of even a small number of turbines into the basin. The EIAR's rating of 12 of the 17 walker viewpoints as significant is a high number and shows that the impact of Quantans Hill, especially the localised impact upon the basin and its surrounding hills would be very substantial. This is also borne out in the ZTVs (Figs 5.2a, 5.3).

20. We also concur with the EIAR (para 5.11.123 ff) that there would be a major significant effect upon the Galloway Hills Regional Scenic Area within 8km of the proposed development. The conclusion to the LVIA misleadingly restates this as 5-8km (para 5.13.8) when the main text refers to impact within 8km, with the only reference to 5km being in respect of the ZTV. Mountaineering Scotland would say the impact stretches *at least* to 8km.

21. Mountaineering Scotland's assessment is presented in relation to, and in the order of, the characteristics (a) to (f) identified above.

22. Point (a): The proposed development would place turbines across the southern slopes of Cairnsmore of Carsphairn, visually closing the only direction from/to the Cairnsmore massif that is without turbines in close view. Cairnsmore of Carsphairn would not have a continuous ring of turbines but the gap between turbines would extend to no more than 50 degrees on the west of Cairnsmore and less to the east compared with a normal human field of view of over 100 degrees. It would be impossible to look in any direction from the Cairnsmore massif and not have turbines close in the field of view (see also Fig 5.12b). This impact would be exacerbated if Shepherds' Rig was also consented, but the greater impact would be from Quantans Hill.

23. Point (b): The effect of Quantans Hill upon views from Cairnsmore of Carsphairn to the Glenkens and Rhinns of Kells is clearly seen at Viewpoints 3, 4 and 20. The turbines lie below the eye-line but their bright movement at close quarters would be highly distracting to any attempt to enjoy the view beyond. Note that the visualisation for VP3 excludes Turbines 1 and 4: the wireline must be used to see the impact on the view to the Rhinns of Kells. Again the impact would be exacerbated by Shepherds' Rig but the far greater impact comes from Quantans Hill.

24. Point (c): VPs 11 and 12 show the impact upon views to Cairnsmore of Carsphairn and on the perception of the basin. VP25, which lacks photography, shows the impact upon the basin. VP 12 particularly shows how a perception of encirclement of Cairnsmore will be created if Quantans Hill is

consented, especially if Shepherds Rig is also consented, with large numbers of turbines appearing behind it (north) on either side and Quantans Hill across the front (south).

25. Point (d): The impact upon views westward into and across the basin from hills east of Quantans Hill is seen at VPs 5, 6, 16 and, with especially good photography bringing out the impact, 21. These views would be severely impacted by Shepherds' Rig, with the effect exacerbated if Quantans Hill were added. But unlike from other directions the primary impact here would be from Shepherds' Rig not from Quantans Hill.

26. Point (e): VPs 10, 13 and 18 (a road viewpoint) show how the dramatic feature of Cairnsmore of Carsphairn acting as a visual terminus to the Glenkens would lose much of its drama if fronted by large turbines. They would, at best, compete with Cairnsmore as the defining feature but more likely displace it, with a distinctive, eye-catching regional landmark upstaged by commonplace turbines hardly worth a second glance.

27. Point (f): The foregoing sets out the substantial detrimental impact that the proposed development would have, whether alone or in conjunction with Shepherds Rig. While the latter would be detrimental, Quantans Hill would be very much more so. In combination they would devastate the upper Glenkens, moving turbines from the edge into the core of the basin, and from the fringes to the heart of views between hills, across the basin and down the Glenkens. Turbines are commonplace in southern Scotland; landscapes such as the upper Glenkens and its surrounding hills are not.

28. It is worth noting a statement by the Reporter who dismissed the appeal for Longburn Wind Farm. "The proposed development also has the potential to change the pattern of wind farm [sic] in the wider landscape whereby wind turbines would become a dominant and visible feature in the more accessible and settled valleys." (Longburn Wind Farm Decision Notice, Para 55) The same would apply to Quantans Hill.

29. The LVIA of the EIAR concludes by overstating its case, claiming that "significant effects to both landscape and visual receptors ... would occur in a localised area. These would affect a relatively small number of landscape and visual receptors situated within 8 km of the Proposed Development." (para 5.13.20) The main LVIA text is much more discerning and accurate regarding the likely effects (e.g. Table 5.23). Significant visual effects occur to 12.7km (VP12). While it may be arguable that the effects are localised, their impact upon a high quality local landscape and views across it is, for mountaineering interests, the vital element to be considered in determining this application.

30. The insertion of Quantans Hill into the upper Glenkens basin would change the perception of Cairnsmore of Carsphairn, the Rhinns of Kells and the Upper Glenkens. At present they are seen as a whole, without interruptions or any strong markers of scale. Quantans Hill would disrupt and diminish this pleasing relationship between the basin and the hills flanking it to north and west. It would introduce a scale marker that would be misperceived as smaller than its actual height and so would notably diminish the perceived scale of the landscape. Most landscapes in Scotland, even supposedly expansive ones, are actually very small features but feel larger in the absence of scale markers and are thus susceptible to a radical shift in perception if such markers are introduced.

c) Socio-economics

31. Mountaineering Scotland does not disagree with the general proposition that well-sited wind farms have no effect on tourism. But this is a broad generality. There are two major flaws to such a generalisation. First, there has been no study of the impact of wind farms in relation to the quality of their settings other than Mountaineering Scotland's reanalysis of Biggar Economics' data which

showed a possible negative effect in locally designated scenic landscapes.¹ Second, there has been no study of the impact of wind farms upon different segments of the tourism and recreation market other than Mountaineering Scotland's own survey of its members which suggested a significant minority of hillwalkers were choosing to reduce visitation to areas with wind farms.²

32. The tourism assessment in the EIAR addresses neither of these points, both of which are relevant to this proposal since it would impact upon a scenic area that attracts those who might be more likely to be deterred from visiting by such built development. Instead it falls back on unevidenced assumptions:

"The improved access will allow more people to access outdoor recreation and encourage new types of walkers to the area. The scale of this increased amenity is not known; however it is assumed that this will be equivalent to any potentially decreased amenity from current walkers due to the addition of the windfarm to the character of the paths." (Para 14.7.75)

33. Outwith the distinct circumstances of Whitelee Wind Farm, we are not aware of other evidence that would support the assumptions made in the EIAR. Opportunities to walk on tracks through wind farms are widespread across Scotland, not least in the wider area around this proposed development. Why some more at Quantans Hill should be expected attract walkers to this particular location is unexplained in the EIAR.

34. The economic and employment benefits of wind farm development, regionally and nationally, do not rely upon Quantans Hill proceeding. The attractiveness of the area around Carsphairn to hillwalkers, however, does depend on it not proceeding. In the absence of development, the relative attractiveness of the Carsphairn area would be enhanced in years to come since - bearing in mind the density of consented developments and applications - it will be rare to experience high quality hills in the Southern Uplands without wind turbines in close proximity.

Conclusion

35. Mountaineering Scotland has carefully assessed the proposed development. It would have a substantial adverse visual impact upon hillwalkers in the surrounding hills. This is a direct effect of the location of the proposed development and cannot be mitigated.

36. The geographical context of the application site is central to Mountaineering Scotland's objection. To the north rises the distinctive bulk of Cairnsmore of Carsphairn and its outliers. From Cairnsmore there is a magnificent open view down and across the Glenkens to the Rhinns of Kells. This view is reciprocated, especially north of Corserine where the hill-to-hill distance shrinks to 10km. Quantans Hill would be located in this setting, which Mountaineering Scotland has sought consistently to keep free of turbines while accepting, without objection, substantial development on the extensive uplands north and east of Cairnsmore and further south on the eastern side of the Glenkens.

37. Mountaineering Scotland argues that Quantans Hill, if constructed, would perceptually detach Cairnsmore of Carsphairn from the Rhinns of Kells by placing development clearly within the broad basin of the upper Glenkens. A mountain landscape of high value and of national significance would thus have an important limb visually severed. The prime remaining mountaineering resource in the Southern Uplands would, by this single development, be markedly shrunk in size to only the area between the Rhinns of Kells and the Merrick range. The Southern Uplands abounds in places where

¹ Gordon, D. Wind Farms in Scenic Areas Damage Tourism. (Sep. 2020)

² Gordon, D. Wind Farms and Tourism in Scotland: A review with particular reference to mountaineering. Mountaineering Scotland. (Nov. 2017)

the minority of hill-walkers who choose to walk in proximity to turbines can do so. In contrast, there is a rapidly diminishing choice of hills in southern Scotland from which turbines are only distantly experienced. The Galloway Uplands are the pre-eminent such place.

38. Mountaineering Scotland **objects** to the proposed Quantans Hill 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

