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Mr Chris Park  
Energy Consents Unit  
Scottish Government

18<sup>th</sup> January 2019

Dear Sir/Madam

**THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017  
ELECTRICITY ACT 1989 : SHEPHERDS' RIG WINDFARM: WIND ENERGY DEVELOPMENT COMPRISING THE CONSTRUCTION, 25 YEAR OPERATION AND SUBSEQUENT DECOMMISSIONING OF UP TO 19 TURBINES; TOGETHER WITH ON-SITE ACCESS TRACKS, HARD-STANDING AREAS, TEMPORARY BORROW WORKINGS, A SUBSTATION, BATTERY ENERGY STORAGE AND CONTROL BUILDING COMPOUND, OPERATIONAL ANEMOMETRY MAST, ON-SITE UNDERGROUND CABLING AND A TEMPORARY CONSTRUCTION COMPOUND.**

**Reference Number: ECU00000735**

### **Objection to the Proposed Shepherds' Rig Wind Farm**

1. Mountaineering Scotland objects to the proposed development on the grounds of visual impact and recreational detriment. We do so particularly to protect the integrity of Cairnsmore of Carsphairn, a listed Corbett, as a significant hill-walking resource.
2. Mountaineering Scotland believes the proposed site does not have the capacity to support a wind energy development of commercial scale without unacceptable harm to the context of the mountain landscape of Cairnsmore of Carsphairn and the quality of experience of hillwalkers on that hill, on the Rhinns of Kells and on the Southern Upland Way.

### **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 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 twenty<sup>1</sup> – 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. Introduction

6. SETT Wind Development Limited (a partnership of Infinergy Ltd and Boralex LLP) has applied for planning permission to develop a wind farm comprising 19 turbines, generating a maximum of 78.6 MW<sup>2</sup>, at a location 5km east of Carsphairn and, of particular relevance to this objection, 3km/5km to the southeast/south-southeast of the Corbett of Cairnsmore of Carsphairn.
7. The site would host 17 turbines of 149.9m blade-tip height and 2 turbines of 125m BTH. The turbines would sit at base altitudes of c.230-350m OD, giving turbine tip heights of 380-500m OD.<sup>3</sup> The highest natural ground on the site is Craigengillan Hill (401m) at the north of the turbine layout and Marscalloch Hill (380m) at the south of the layout.
8. Mountaineering Scotland has not objected to any wind farm application north of Cairnsmore of Carsphairn or to its east, excepting Windy Rig which we argued was damagingly close (consented November 2018). We have accepted that north and east of Cairnsmore of Carsphairn is already and will be increasingly characterised by wind turbines. Nor have we objected to applications on the east of the Glenkens lying further south, more distant from Cairnsmore of Carsphairn and in a different context.
9. However, Mountaineering Scotland has consistently sought to protect one segment of the view, to preserve turbine-free intervisibility between Cairnsmore of Carsphairn and the Rhinns of Kells, looking west across and south along the Glenkens. The aim is to maintain mountaineering interest in the upper Glenkens and to maintain a reasonably-sized mountain resource in the western Southern Uplands, avoiding cumulative encirclement of Cairnsmore of Carsphairn by wind farms. (An impression of this can be gained from EIA-R Figure 8.3, though this does not show Quantans and thus understates the degree of encirclement threatened.)
10. In pursuit of this aim it objected to an application for Longburn Wind Farm<sup>4</sup>, lying immediately east of the current application, which was refused by Dumfries and Galloway Council in September 2017 and is currently on appeal to the DPEA. It objected to Quantans Wind Farm<sup>5</sup>, immediately west of the current application, which was submitted as a S.36 in 2014 then withdrawn for redesign and which has not reappeared. It has not objected to applications at Cornharrow (east of Longburn) or Glenshimmeroch (further south). Their impact on Cairnsmore of Carsphairn was judged as insufficient to trigger an objection because of one or more of: direction of view, distance to turbines, and visual association with existing or consented turbines.<sup>6</sup>

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<sup>1</sup> 41 objections from 857 planning applications for onshore wind turbines to September 2018.

<sup>2</sup> In places the application claims a maximum power output of 84.6 MW by adding the proposed on-site battery output to the maximum potential wind power output. This is inappropriate since battery storage is deferred consumption of generation, not additional generation. A battery of the proposed capacity (6MWh capacity, 6MW output (Para 4.3.57)), equivalent to 5 minutes of wind farm output at full power, is capable only of short-term smoothing, not sustained load-matching output (cf Para 4.3.58). The Planning Statement, for example, is misleading in claiming that the development "could generate up to 84.6 MW" (e.g. para 4.2.23; 5.2.156; 7.1.9).

<sup>3</sup> Measured by eye from EIA-R Figure 4.1.

<sup>4</sup> For 10 turbines for 134m BTH

<sup>5</sup> For 19 turbines of 130m BTH

<sup>6</sup> For completeness we note that there was no objection to Torrs (2 x 100m BTH turbines) application in 2003; consented but as yet unbuilt. We were unaware of it. Were a similar application made now, Mountaineering Scotland would object.

11. Note that we use the term 'Southern Uplands' in its long-standing meaning of the upland area stretching across southern Scotland. There is also a much more restricted Landscape Character Type labelled 'Southern Uplands' (as well as Southern Uplands with Forest). It is not always clear in which sense it is being used in the EIA-R LVIA.

#### 4. Material considerations

##### 4.1 Policy

###### a) National and Local

12. The Scottish Government enthusiastically supports onshore wind deployment and an individual planning application is not the place to question whether continuing this *ad infinitum* makes for a robust energy policy. However, policy is equally clear that anticipated 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."<sup>7</sup>
13. The most recent Scottish Government energy policy documents<sup>8</sup> restate but do not increase the policy support for onshore wind, as Reporters have noted.<sup>9</sup>
14. 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 generation.<sup>10</sup> 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<sup>11</sup>). The adverse consequences of a scheme, however, are often site-specific and should weigh more heavily in the balance because of this. The only thing 'unique' about this scheme is its location. Its beneficial elements are replicated across many other consented, in-planning and scoping developments.
15. Indeed, 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 built, with the focus of increasing capacity changing to repowering of suitable existing sites.

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 ...<sup>12</sup>

Mountaineering Scotland is not seeking to suggest that development of new sites should be excluded. We simply submit that nothing in national policy, echoed by local policy, constrains

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<sup>7</sup> Scottish Planning Policy 2014, Para 28

<sup>8</sup> Scottish Energy Strategy, 2017. Onshore Wind Policy Statement, 2017.

<sup>9</sup> Culachy Wind Farm Appeal Decision Notice by Robert Seaton, 27 April 2018, cf paras 146, 148. Whitelaw Brae Wind Farm PLI Report, David Buylla and Claire Milne, 17 August 2017; cf paras 2.77, 2.80

<sup>10</sup> It is of note that almost all Scotland's non-island electricity generation now comes from low carbon renewables and nuclear.

<sup>11</sup> Wind is 76% of operational capacity and >90% of under-construction, awaiting construction and in-planning capacity (Renewable Electricity Planning Statistics for Scotland, data for September 2018, Scottish Government). We are not aware of any limit to the Scottish Government's appetite for wind turbines despite, or perhaps because of, its failed rhetoric on diversifying electricity generation sources. Nonetheless, growing renewable generation capacity is clearly not reliant upon the consenting of one wind scheme of 0.08 GW irrespective of its adverse impacts. The weight accorded to the estimated contribution to targets of an individual scheme should be accordingly modest.

<sup>12</sup> Scottish Government. Onshore Wind Policy Statement 2017. Ministerial Foreword, p.3. Added emphasis.

decision-makers to be any more inclined to grant consent for development than has been the case to date, with half of all wind farm applications in Scotland to date refused or withdrawn.<sup>13</sup>

## **b) Presumption and tilting**

16. The applicant's Planning Statement argues that the SPP's presumption in favour of 'sustainable development' (which SPP unhelpfully leaves undefined) should not merely be engaged but that a tilted balance in favour (and beneficial to their development) should apply since the Dumfries and Galloway LDP is inconsistent with the SPP published after the LDP was adopted (Para 4.2.6). The inconsistency refers only to one specific element of the LDP – the Strategic Framework map. The Strategic Framework criteria are set nationally by the Scottish Government with no local discretion<sup>14</sup>, so even if the Council had not now published such a map as part of their consultation on the next LDP<sup>15</sup>, it takes little time to establish that the Shepherds' Rig site lies mainly in Group 3 (Areas with potential for wind farm development) with perhaps small parts that should be in Group 2 (Areas of significant protection, in this case because of deep peat (cf Figure 12.5)).<sup>16</sup> That Dumfries and Galloway Council has not got such a map in its current LDP is hardly sufficient justification to further tilt the planning balance in the applicant's favour. We also note that the applicant is inconsistent, being content elsewhere to cite the non-compliant map to support its case.<sup>17</sup> The decision-maker should ignore this special pleading.

## **c) Landscape capacity<sup>18</sup>**

17. The proposed development is located at the end of a peninsula in the Ken unit of LCT 19a (Southern Uplands with Forest). The peninsula is only as wide as the forest within which the development is sited. It is thus inevitable that a major part of the impact of the development would be experienced by adjoining LCTs, of which LCT 19 (Southern Uplands) is of primary relevance to Mountaineering Scotland. The Dumfries and Galloway Council Landscape Capacity Study states of LCT 19: "Any additional wind farm development in this and the adjacent Southern Uplands with Forest (19a) could have significant cumulative effects on this landmark hill [Cairnmore of Carsphairn]" (p.337)

18. The Capacity Study identifies that "There is scope to locate wind farm development [in LCT 19a] to avoid significant intrusion on the Glenkens and impacts on the setting of the main Rhinns of Kells ridge and therefore minimise effects on the special qualities of the Galloway Hills RSA. Operational and consented wind energy development already influences these areas." (p.353)

19. It considers for large typology (turbines 80-150m) "Capacity for additional development is likely to be very limited within the Ken unit, although some scope for repowering and/or small extensions to operational wind farms may be possible provided that effects on promoted recreational routes and on more sensitive glens are minimised." (p.347)

20. However, it is explicit that such scope as there is, is located within the core of LTC 19a, not on the outer edges where Shepherd's Rig is located. "While development sited in the more

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<sup>13</sup> REPD September 2018 extract: 874 determined applications, 441 refused, withdrawn or abandoned.

<sup>14</sup> Scottish Planning Policy 2014, Table 1 (p.39)

<sup>15</sup> Dumfries and Galloway Council. Local Development Plan 2: Proposed Plan. January 2018. Map 8, p.71

<sup>16</sup> The applicant considers that the turbine and infrastructure locations are entirely within Group 3 (Planning Statement para 4.2.21 and Map on p.20). This is a very small, pixellated, map at odds with the large scale, high resolution map of peat depths in the EIA-R showing turbines located in areas of >0.5m peat (Figure 12.5, and text at para 12.1.47 which identifies six turbines as sited in deep peat.). It is consistent with the SNH Carbon and Peatland map (EIA-R Map 12.4) but, as the EIA-R notes (para 12.1.48), that map reflects the absence of peatland vegetation because the site was under forestry.

<sup>17</sup> Planning Statement paras 5.2.101; 5.2.152; 7.1.7

<sup>18</sup> All citations in this section are to: Dumfries and Galloway Council. Local Development Plan Supplementary Guidance, Adopted 22nd June 2017. Part 1 Wind Energy Development: Development Management Considerations. Appendix 'C' Dumfries & Galloway Wind Farm Landscape Capacity Study.

sensitive outer hills would dominate the scale of adjacent settled valleys and glens, there is scope for this [large] typology to be sited within the interior of the hills in the more extensive landscape units of *Ken*, *Carsphairn* and *Eskdalemuir* to avoid impacting on the wider landscape context. This typology could however impact on the setting and key views to and from Cairnmore of Carsphairn ... if sited in western parts of the *Ken* and *Carsphairn* units.” (p.351)

21. Scottish Natural Heritage, in its assessment of the current planning application for Cornharrow Wind Farm is unequivocal that no more than one of the three current applications (prior to Shepherds’ Rig) in the southern lobe of LCT19a Ken unit can be accommodated without exceeding landscape capacity.<sup>19</sup> Otherwise the risk would be that “this entire arc of the southern section of Southern Uplands with Forest, Ken Unit would consist of wind farm development.” Shepherds’ Rig would extend this arc even further west, raising the same issue of exceeding landscape capacity, despite a short separation from the lobe by the narrow Water of Ken Valley. Note that the EIA-R LVIA assessment considers that in longer distance views Shepherds’ Rig would be seen as an extension to Longburn, the next in-planning wind farm east in the arc.<sup>20</sup>
22. Dumfries and Galloway’s draft Supplementary Guidance on wind farm development management labels the whole of LCT 19a as Medium sensitivity for wind farms with 80-150m turbines.<sup>21</sup> This is potentially misleading and we consider that greater weight should be given to the detailed text of the Landscape Capacity Study, which paints a more qualified picture.

#### **d) Policy: Conclusion**

23. The applicant seeks to interpret planning documents in such a way as to raise the bar for refusal so high as to be unattainable. Mountaineering Scotland believes this to be inappropriate. There is a planning balance to be assessed and the decision-maker should make this assessment on a level playing field, not a tilted one. The planning system is already required to provide a ‘supportive environment’ for onshore wind development and a fair assessment requires that substantial weight is also given to the negative impacts in relation to landscape and visual effects, including cumulative impacts and spatial patterning, the last of which would particularly affect hillwalkers who obtain a birds-eye view of the landscape.. There are consequential concerns regarding the impact on hillwalking tourism and recreation. These demerits need to be balanced in an even-handed way against the claimed merits of the proposed scheme.

#### **4.2 Visual impact**

24. 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 Carsphairn stretching back more than four decades. Professional and consumer assessments are built on different values and understandings of landscape. We do not suggest that either professional or consumer judgement trumps the other; simply that each has a distinct place in informing decision-making.
25. 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. How landscape is experienced is not as its component parts but as a total experience, with the parts melded. That is how we have developed our assessment and we

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<sup>19</sup> SNH Letter of 9 November 2018 in Dumfries and Galloway Council on-line planning system documents for Cornharrow application (18/1127/FUL)

<sup>20</sup> For example, EIA-R Paras 8.7.41, 8.7.64

<sup>21</sup> cf Planning Statement Figure 3, p.61

would hope that the decision-maker would take a similar holistic approach.

26. The LVIA repeatedly asserts that wind farms are characteristic of the Southern Uplands and stresses that Shepherds' Rig would not introduce turbines into an area from which they are absent. We agree that turbines now characterise much of the Southern Uplands, and it is for that reason that maintaining some areas without turbines is so important. These areas should be sufficiently large to give a proper sense of space without turbines in close proximity. Mountaineering Scotland believes that the upper Glenkens, leading up to Cairnsmore of Carsphairn, lying alongside but outwith the Merrick-Rhinns of Kells mountain core, is scenically valuable as open space without turbines, avoiding Cairnsmore becoming separated visually and psychologically from the mountain core. This value base informs our assessment of the LVIA and of the impact of the proposed development, and hence of its acceptability.
27. Cairnsmore of Carsphairn is a Corbett (a Scottish hill between 2500 and 2999 feet high) and a deservedly popular hill of significance to Scottish mountaineering. Despite substantial plantation forestry and extensive wind farm development (operational and consented) to its north, east and (at a distance) south, it retains a wild feel with extensive open views southward and westward. Note that Figure 8.62 c gives a misleading impression since it omits the consented schemes of South Kyle and Benbrack to the north, which will be visible from a little further north of the viewpoint. This is an inevitable problem of using fixed points to represent views when the people passing that point are engaged in a dynamic activity.
28. The proposed development site itself is unexceptional. It is a commercial forestry plantation of little scenic value. It is the location of the site that causes Mountaineering Scotland concern and triggers this objection. The site interrupts the view from Cairnsmore of Carsphairn and its satellites across the upper Glenkens to the Rhinns of Kells and down the Glenkens. It is not in direct line between Cairnsmore and the Rhinns but is well within the field of view and thus appreciation of the scene is distracted by the movement of the turbine blades, especially in the direction from Cairnsmore to the Rhinns of Kells, where the turbine movement is close.
29. Mountaineering Scotland accept that wind farms offer an element of "visual permeability" and that turbines are "relatively slender structures" (at a distance). We do not agree that the introduction of turbines to a view leaves the sense of openness or visibility between areas "not ... greatly altered" and does not "obstruct the longer distance views". (Para 8.6.70) It is our practical experience that a wind farm at relatively close quarters (certainly within 10km, a distance where movement is very obvious) has the effect of catching and holding the eye and that a mental effort is then required to look through or over the movement to the longer distance views. There is a sense in which the presence of an array of turbines creates an eye-catching 'stop point' in the view. The sense of openness across landscapes and appreciation of landscape scale and form is inevitably impacted. We think that would be the case with Shepherds' Rig in many views.
30. There are six viewpoints of direct relevance to mountaineering interests, including Benbrack on the Southern Upland Way (SUW), and another two on the SUW. The LVIA assessment and our assessment for these viewpoints are summarised in the following table.

Viewpoint	LVIA assessment of impact	MS Assessment of impact	MS comment
10 Benbrack (also SUW)	Significant	Significant	
13 Beninner	Not significant	Significant	The LVIA rating is for the summit but the LVIA acknowledges that from the slopes the effect is significant. People spend time above the cliffs where the effect is significant, not at the summit.
14 Cairnsmore of Carsphairn	Significant	Significant	
15 Knockgray	Significant	Significant	
16 Althang	Significant	Significant	
21 Corserine	Not significant	Significant	Shepherds' Rig turbines would be terrain-

			backclothed, front-lit, spaced-out kinetic structures in an area with no other turbines, appearing very separate from and contrasting topographically with the more distant skylined Wether Hill and the massed turbines north of Cairnsmore of Carsphairn. This is a significant impact.
7 SUW Culmark Hill	Significant	Significant	
17 SUW Waterside Hill	Not significant	Significant	Shepherds' Rig presents an eye-catchingly messy appearance with overlapping turbines with hubs at varying heights, varying topographical screening and moving blades highlighted by mixed backclothing of dark terrain and light sky. This design car-crash creates a significant impact.

31. In summary: from a mountaineering perspective, the impact of this development alone would be substantial, adverse and significant at all the relevant viewpoints. This would be compounded by the adverse impact of locating turbines into an area currently without them, but set in a wider context of multiple wind farms.
32. We do not agree that “Wind farms are ... already a characteristic of the landscape and thus the Proposed Development would not be introducing new elements into the local landscape, and they would not appear in part of the landscape that does not currently feature turbines.” (Para 8.6.71, added emphasis). It is undeniable that wind farms are characteristic of large sections of the wider local landscape. But they are not present in this part of the landscape and to introduce them here would be introduce them to a new area. Although the quotation above refers to the Ken unit of LCT 19a, the LVIA repeatedly makes this same point in relation to many of the locations considered. However, it is only true if one is prepared to accept that turbines have the same impact regardless of distance and thus that turbines distant in one angle of the view should be given the same weight when assessing impact as turbines close by in a different angle of the view and possibly at a different altitude or topographical context.<sup>22</sup>
33. The tabular analysis in the LVIA shows (Table 8-14, p. 8-82) that operational and consented schemes exert a substantial influence on the summits in the area. All 12 of the wind farms included in the analysis are visible from Corserine, 10 from Cairnsmore of Carsphairn and Beninner, and 9 from Benbrack.
34. However, none of the cumulative wind farms is located where Shepherds' Rig would be, though Longburn<sup>23</sup> comes close. The individual impact of Shepherds' Rig alone would be bad enough (and reason enough to refuse consent). The additional impact of adding a large wind farm in an area of the landscape currently without such a presence, taken in the context of the multiplicity of wind farms in view in other sections of the landscape would be very markedly adverse. The impact would be amplified by the wider context. In a wide region characterised by an extensive spread of wind farms, the upper Glenkens basin offers relief – hill summits from which near views of wind farms can be avoided; moorland that can be traversed without a sense of being always watched over by structures. That would be lost.
35. We agree with the LVIA that, as a general principle, “in any given view where turbines are already present the additional effect on visual amenity of introducing further turbines may not be as significant as the initial introduction of turbines. Furthermore, in general, the greater the number of turbines in the baseline view the less significant the addition of further turbines may be in visual amenity terms as the landscape will be more heavily characterised by turbines in

<sup>22</sup> Compare Wether Hill and Windy Standard with Shepherds' Rig seen from Corserine in Figure 8.57. The LVIA considers that “The Proposed Development would also be located within part of the landscape that already features wind energy development, and thus, it would not introduce turbines into part of the landscape where they are currently absent.” (Para 8.6.139) Our assessment is the complete opposite: that the proposed development would introduce turbines prominently into a broad section of landscape from which they are currently absent.”

<sup>23</sup> Application site to which Mountaineering Scotland objected for similar reasons to its present objection.

the baseline situation.” (8.7.53) But the principle has to be applied in a specific setting. And in the settings of Shepherds’ Rig the baseline landscape cannot be regarded as a single entity. There is a wider and a proximal landscape, and a topographical context.

36. There are no operational or consented wind farms within 5 km of the proposed development, with the exception of Windy Rig in a different context to the north. There are none at all within the proximate upper Glenkens basin. In Mountaineering Scotland’s view, the existence of many turbines in the wider baseline landscape strengthens the argument for not consenting turbines at the proposed location. If Shepherds’ Rig was consented, it would indeed become the case that the whole regional landscape - wider and proximate – northeast and east of the Galloway Forest Park / Wild Land Area would be characterised by turbines, including the upper Glenkens. At present the wider but not the proximate landscape is so characterised. Adding Shepherds’ Rig would not merely reinforce an existing perception<sup>24</sup> or characteristic. Instead it would transform the perception of the Upper Glenkens basin from being different – neither blanket forested or intensively turbinated – to one of simply being homogenous with the wider wind farm landscape across the hills of the Southern Uplands, and of the particularly intensive concentration in the borderlands of Dumfries and Galloway and East Ayrshire. The wireline and visualisation from Viewpoint 21 stands in evidence of this (Fig. 8.57).
37. The effect on the Southern Upland Way would be to further reinforce the feeling that this is the Southern Wind Farm Way, in a section where otherwise wind farms sit at some distance from the route. We cannot agree with the LVIA that because the SUW exists in a context of numerous wind farms in the Southern Uplands, the addition of Shepherds’ Rig at close quarters would not have a significant adverse effect. In the event that either Longburn or Shepherds’ Rig was built, the perceived effect from Culmark Hill to Benbrack would be of walking in close company with proximal wind farms dominating the route for a distance of some 10km (bearing in mind walkers look all around, not just straight ahead). It may seem a short distance, but it is 2-3 hours of travel on foot with a pack.
38. Mountaineering Scotland’s assessment of the proposed development can be summed up by considering its impact on the Regional Scenic Area. The lobe of the RSA northeast from the Water of Deugh/Carsphairn Lane encompasses Cairnsmore of Carsphairn and a sizeable area of unforested ground from which wind turbines are absent and from which they appear, or will do once consented schemes are built, at some distance and/or in different topographical relationship to the lobe than Shepherds’ Rig. (We discount the extension of the lobe beyond Cairnsmore of Carsphairn since the introduction of Windy Rig prominently fronting multiple other wind farms will effectively remove its residual scenic appeal.)
39. Shepherds’ Rig would introduce turbine views at short distances ( $\leq 4$ km) across a large part of the lobe. It would change the experience of traversing the lobe. With blade tips at 500m OD, the turbines would have a looming presence over walkers traversing the lower moorland and as height was gained would, as already described, alter perceptions of the ‘sweeping and dramatic views of hills’ in views out of the RSA lobe. Views into the lobe would also be radically altered since one does not appreciate the boundary of the lobe when viewing it (e.g. from the Rhinns of Kells) but sees the whole upper Glenkens basin as a single topographic element, rising leftwards to the mass of Cairnsmore of Carsphairn.<sup>25</sup> If Shepherds’ Rig is consented, the lobe would no longer meet the criteria for inclusion within the RSA. The change would be that substantial.

#### **d) Socio-economics**

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<sup>24</sup> “From elevated parts of the local landscape, there is already a perceived presence of turbines, and the introduction of the Proposed Development reinforces this perception.” (Para 8.7.51)

<sup>25</sup> At a distance, it is arguable that lay impressions of landscape character are formed at least as much, if not more, by topography (land form) rather than land cover.

40. 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<sup>26</sup> and nation is not reliant upon the consenting of any one proposal.
41. The EIA-R (Chapter 17) comes to a benign conclusion that Shepherds' Rig will have no effect on tourism and recreation because wind farms have no effect on tourism and recreation. 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 almost entirely lacking in the available research and totally lacking in the broad-brush application of the EIA-R.
42. From a review of the evidence undertaken for Mountaineering Scotland<sup>27</sup>, 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 (supposedly) natural vistas, and where a high proportion of visitors come from the 25% of tourists who are particularly drawn by the quality of upland and (seemingly) 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 places. 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.
43. The main adverse effect of wind farms on hillwalking recreation and tourism, thus far, is self-reported net displacement from areas perceived as being sullied to areas seen as still retaining the desired sense of naturalness and space.<sup>28</sup> Displacement from a border area such as Dumfries and Galloway might be to England, where the Lake District, Northumberland Yorkshire Dales National Parks all provide accessible alternatives to Galloway.
44. 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. There is no analysis of either in the EIA-R.
45. BiGGAR Economics does not apply a differentiated approach to landscapes or visitors in the EIA-R. This failing is also 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.<sup>29</sup>
46. Analysis using BiGGAR Economics' own data and a list of windfarms consented in local landscape designations (such as RSAs) shows a negative impact on tourism from wind farms operational in such areas. 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

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<sup>26</sup> The impact on employment is assessed in the EIA-R Chapter 17 for the Dumfries and Galloway region but the development is nearly as close to Ayr as to Dumfries so it is quite possible that much of the local economic benefit would go to companies and workers from Ayrshire.

<sup>27</sup> [Wind farms and tourism in Scotland: A review with a focus on mountaineering and landscape](#) (2017)

<sup>28</sup> 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>

<sup>29</sup> BiGGAR Economics (2017) Wind Farms and Tourism Trends in Scotland. This study was carried out without independent oversight and has been the subject of substantive criticism.

-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.”<sup>30</sup>

47. This result is relevant because the great majority of the mountaineering tourism interest and activity that would be impacted by the proposed development – Cairnsmore of Carsphairn and the Rhinns of Kells – lies in the Galloway Hills RSA. The application site sits alongside and slightly within the RSA, though no infrastructure is located within it.
48. Not only does the EIA-R 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 and recreation in this area as far as the EIA-R is concerned. The EIA-R’s description of the current tourism baseline includes three upland ‘locations’ (Galloway Forest Park, the Striding Arches and the Southern Upland Way) but without linking them to hillwalking and contains no mention of Cairnsmore of Carsphairn. Yet it finds room in its assessment for a road-side tourist attraction in Gretna Green more than 60km away from the proposed development.
49. 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 Scotland. In its assessment of impact on the upland attractions, it offers no substantive evidence but only opinion. For example, in relation to the Southern Upland Way it asserts “There is no reason to think that the visibility of this particular wind farm, in this section of the SUW, will have any additional positive or negative impact on the existing number of individuals choosing to walk this route.” (Para 17.9.10) It offers no evidence for this supposition and ignores the evidence of surveys of recreational walkers in Scotland that would suggest otherwise. It also contains misleading statements that are known as such to BiGGAR Economics and Mr Blackett, yet continue to be used by them.
50. The EIA-R states that the Glasgow Caledonian study of 2008<sup>31</sup> found that “negative views [of wind farms] were less widely held among hill walkers [than other tourists].” (Para 17.8.23). This was a drafting error in the summary of the report and the body of the report is unambiguous that the study’s small sample showed no statistically significant difference between hill walkers and other tourists.
51. The EIA-R claims that the Mountaineering Scotland survey showing that 1% of respondents had stopped going to the hills in reaction to wind farms while 2% had increased their visits “would suggest that the development of wind farms in Scotland would have an overall positive impact on the number of people who participate in hill walking... “ (17.8.35). Mr Blackett accepted at a PLI in August 2016 that the difference between these two figures was not statistically significant. Indeed, anyone experienced in survey methodology and interpretation would know better than to interpret such small percentage figures as meaningful.
52. Selective use of literature of varying quality and relevance<sup>32</sup>, repeating past errors, and a formulaic approach without any consideration of the specific nature of the landscapes and visitors being impacted, as presented in the EIA-R here, is a poor basis for decision-making.
53. A proper understanding of the evidence on tourism and wind farms applied to the specific nature of the local landscape and the visitors attracted to it, leads to the conclusion that an adverse effect on hillwalking recreation and tourism from a wind farm at Shepherds’ Rig cannot be excluded. It cannot be stated as a certainty because of the paucity of robust relevant

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<sup>30</sup> <https://www.mountaineering.scot/assets/contentfiles/pdf/Wind-farms-and-tourism-in-Scotland-Supplement-December-2017-20171121.pdf> (para 20)

<sup>31</sup> Glasgow Caledonian University. The Economic Impacts of Wind Farms on Scottish Tourism. 2008. <http://www.gov.scot/resource/doc/214910/0057316.pdf>.

<sup>32</sup> There are flaws with almost all the ‘evidence’, or with the interpretation placed upon, used to support the ‘no impact’ hypothesis promoted by BiGGAR Economics in Chapter 17. This is not the place to list them in detail but the absence of a full critique in this objection letter should not be taken as indicating acceptance of the evidence and the use made of it.

research. We know the nature of the local landscape and the generic attitudes of hillwalkers, but have very little information on the visitors attracted specifically to this landscape or how important they are to the overall local tourism/recreation market locally or regionally. And we look in vain to the EIA-R to enlighten us.

#### 4. Conclusion

54. Mountaineering Scotland agrees with the applicant that the proposed development has adverse effects (in the abstract) typical of wind energy proposals across Scotland.<sup>33</sup> It also has benefits typical of wind energy proposals across Scotland. The key question is one of geography: whether this is the right location upon which to impose the adverse effects so as to gain the benefits. Mountaineering Scotland believes that it is not.
55. The proposed scheme would have major adverse visual impacts and a likely consequential potential negative impact on recreational and tourist visitation. Cairnsmore of Carsphairn has been subjected in recent years to applications by wind farm developers that, were all to come to fruition, would result in its cumulative encirclement. Mountaineering Scotland has consistently sought to protect only one segment of the view, to preserve turbine-free intervisibility across and along the Glenkens between Cairnsmore of Carsphairn and the Rhinns of Kells, and to preserve the integrity of the upper Glenkens basin as a distinct area with turbines only on the periphery. We look to the planning decision-maker to recognise the importance of mountaineering interest in the hills and basin of the upper Glenkens and to protect the shrinking mountain resource unaffected by proximal wind farm development.
56. Mountaineering Scotland objects to the proposed wind farm.

Yours sincerely



**Stuart Younie**  
**CEO, Mountaineering Scotland**

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<sup>33</sup> cf Planning Statement 7.1.5