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15 February 2021

Dear Sir/Madam

Corriegarth 2 Wind Farm - Installation of a wind farm comprising up to 16 wind turbines of up to 149.9 m to tip height and associated infrastructure, Corriegarth Estate, Highlands

ECU reference: ECU00002175

Introduction

1. Corriegarth 2 Windfarm Limited, a wholly owned subsidiary of BayWa r.e. UK Limited, has applied for S.36 consent to construct a wind farm with 16 turbines of 149.9m blade-tip height encircling the operational Corriegarth wind farm's 23 turbines of 120m BTH.
2. Mountaineering Scotland **objects** to turbines 8, 9 and 10 and to the height of turbines 7 and 11 on grounds of unacceptable adverse visual impact, with consequential adverse impact on mountaineering recreation.
3. We have no objection to the remainder of the proposed development.

Mountaineering Scotland

4. Mountaineering Scotland is an independent association of mountaineering clubs and individuals, with over 14,000 members who are hill walkers, climbers and snowports 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 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) Policy

7. Scottish Government policy strongly supports the development of renewable energy sources, including onshore wind. We do not question policy, though we interpret recent documents differently from the applicant (*cf* applicant's planning statement). We regard them as maintaining support for onshore wind while pivoting the future focus towards offshore wind, where deployment on the scale required can be achieved, and towards reorienting the economy, society and land use towards 'net zero', a much greater challenge than simply generating electricity. We do not think that onshore wind development gains greater weight from these documents than it already has in the planning balance, but even if the decision-maker disagrees, that does not mean that consent necessarily follows (as shown by the refusal of the Millenderdale appeal cited in the Planning Statement para 2.6.20 *et seq*; and more recently by the consenting of Paul's Hill 2 only with the deletion of one of the seven application turbines).
8. 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). This has been maintained in the recent Position Statement on Scotland's Fourth National Planning Framework (Nov.2020). This states that the intention for NPF4 is that renewable energy developments should be *"appropriately located"* (p.9) and shown *"to be acceptable on the basis of site specific assessments"* (p.10). Each development needs to be judged objectively on its own merits and in its geographical context.

b) Landscape and visual impact

9. Our assessment of Corriegarth 2 is that most of the proposed turbines would have no adverse impact on mountaineering interests given the existing operational scheme but that a small number would. The proposed Corriegarth 2 turbines encircle the existing Corriegarth wind farm. Most are at base altitudes and, allowing for the higher turbines proposed, have blade-tip altitudes within the range of those of the operational turbines. Some turbines exceed this envelope and some of these would have an unacceptable visual impact on mountaineering interests.
10. The operational Corriegarth wind farm sits on a west-facing hillside with a degree of partial visual containment from the surrounding topography.¹ We do not accept the description of the site as a 'bowl' but if it is regarded as such then it is a very leaky bowl since turbines from the existing scheme are visible at hub height and lower across much of the elevated ground of the Monadhliath in the eastern half of the compass (where the main mountaineering interest affected is) with even more extensive visibility in the western half (where there are few significant Monadhliath summits and western hills are mostly distant). The proposed development would intensify this impact. In general, we do not find this unacceptable.

¹ We note an error in the EIAR Table 6.10. The second paragraph under 'Magnitude' refers to east when it means west and vice versa and to north-east when it means northwest. The error is repeated in the Planning Statement para 4.3.29.

11. The applicant appears rather desperate to promote the idea that not only is this site in a bowl but that the pattern of development in the western Monadhliath is "*of wind farm clusters generally situated within natural bowl landforms*" (EIAR p.3-10) How anyone can mischaracterise the sites of Farr (and Kyllachy) or Dunmaglass (and Aberarder) wind farms as bowls is beyond our comprehension.
12. Further evidence that the site is a very leaky bowl is evident in the ZTV. Contrary to the EIAR (para 6.6.2) visibility within 5km of the site extends across a large area to the northeast through southeast, at hub as well as blade-tip height. This is confirmed elsewhere in the EIAR at Table 6.11 para 2 under 'Magnitude'.
13. Corriegarth and the proposed Corriegarth 2 form part of a ribbon of high altitude wind farms spaced along the western Monadhliath. Its visual impact must be judged in the context of that baseline but also in the context of the gentle topography of the highest summits.
14. Seen from hills to the west and northwest (Viewpoints 11, 15, 18), the main effect of Corriegarth 2 would be an intensification of turbines in the development area. These hills are mostly fairly distant with the closest of note being Meall Fuar-mhonaidh (13 km; viewpoint 11). In clear non-hazy conditions, which the baseline photography does not reflect, there is a panoramic view of the western Monadhliath. In the north, Farr and (more strikingly) Dunmaglass turbines are the most prominent features in their vicinity, overshadowing – literally in Dunmaglass's case - the highest natural features. (This would be exacerbated if the proposed increase in turbine height is allowed at the consented but unconstructed Aberarder site, adjacent to Dunmaglass, potentially giving blade tip altitudes of 945m OD against the nearby hilltops of 802-807m.) To the south, the relative containment of Stronelairg and Corriegarth has thus far avoided such an effect. From viewpoint 11, however, individual Corriegarth 2 turbines are seen as having a particular prominence: turbines 8 to 11.
15. Seen from the southwest and south (Viewpoints 13, 14, 17) the proposed development intensifies the visual impact of Corriegarth within a landscape punctuated by multiple wind farms. From the south (Vp13), however, turbines 8-10 appear individually prominent because of their partial tower visibility (compared with other turbines showing only hubs or blades) but this is in the context of a wider landscape characterised by wind farms rather than topography.
16. Seen from the east, where there is visibility from the Munros and Corbetts of the eastern Monadhliath, the impression of Farr (and Kyllachy) and Dunmaglass (and Aberarder) is of turbines on the seemingly level hill tops, perceived collectively as a plateau since the dissecting glens are typically imagined by the viewer rather than observed. Corriegarth has thus far avoided this effect. Corriegarth 2 would undo some of this topographic mitigation, particularly where towers are visible: turbines 8 to 10 and sometimes 7. This can be observed at viewpoint 9 (a Munro) - where turbines 8-10 compete with Carn na Saobhaidhe (811m) for attention and, being kinetic, would win. It is also evident at Wild Land viewpoints 3, 5 and 7 (respectively a Munro Top (subsidiary summit), a Corbett and a Munro).
17. Wild Land viewpoint 3 is particularly useful since it offers a more southerly eastern viewpoint without operational turbines in the foreground (cf Vp 13 foregrounded by Stronelairg wind farm). This enables a clearer appreciation of the impact of Corriegarth 2 added to Corriegarth. It shows the general intensification of visual effect and the substantial contribution to this from the small number of turbines with visible towers and located at a high altitude (turbines 7 to 11). Corriegarth and Corriegarth 2, both alone and combined with Dunmaglass/Aberarder, change the viewer's perception of scale and distance. The turbines are not interpreted as the size they actually are and as a consequence the perceived extent of 'wild' land is diminished. The interruption in the view to the distant hills of Affric – thickets of turbine towers sometimes

appearing almost as fencing – also contributes to this diminution of perceived scale. The perceived expansive landscape has been shrunk. Some of the proposed Corriegarth 2 turbines would shrink it further.

18. From the north, the viewpoint of Beinn Bhreac Mhor again suggests that specific turbines are unduly prominent: turbines 8 to 10. Although turbine 9 is obscured to hub height by Carn na Saobhaidhe (811m), it is striking that a full blade-length is visible on the wireline rising above Carn na Saobhaidhe in this almost level view between summits, while the summit is framed by the partly-visible towers of Turbines 8 and 10. Compare this with the almost complete lack of visibility of Corriegarth currently. Bringing turbines too far up the hill leads to the hills becoming subservient to the turbines, as is already evident with the Dunmaglass turbines visible in the baseline photography.
19. We find it remarkable that the LVIA has almost no regard to the impact on the Corbett Carn na Saobhaidhe (at 811m OD, not the 602m (603m on some maps) knoll of the same name within the development site). In the substantive assessment part of the LVIA chapter, there are three mentions of Carn na Saobhaidhe 602m and only one of Carn na Saobhaidhe 811m. The latter is the highest hill in the western Monadhliath and the closest 'listed' hill to the proposed development (<1 km from the nearest turbine), yet the applicant deliberately chose not to select it as a viewpoint and the LVIA clearly regards it as of no consequence.

20. One of the site-specific design objectives was

"Minimise additional effects by avoiding the highest ground and sensitive skylines formed by the surrounding hills and ridges which contain the interior of the Site, including Carn Ruighe na Gaoithe and Beinn Bhùraich (780 m AOD) to the north, and Carn a' Choire Sheilich (791 m AOD) and neighbouring summits to the south, south-east". (EIAR p.3-9)

It is odd that there is no mention here of Carn na Saobhaidhe (811m), the surrounding hill on the east side of the site, which the proposed design insensitively compromises.

21. The applicant claims for the final design, presumably based on the use of Carn Sgulain as one of the design viewpoints:

*"Additional effects on WLA20 and CNP minimised by **avoiding the highest ground** formed by the surrounding hills and ridges which contain the interior of the Site" (Figure 3.8, emphasis in original)*

We do not agree that this has been achieved from the perspective of mountaineering interests. It is accepted that the effects are less than they would have been had turbines been placed on the very highest ground, but that does not mean they have been minimised. An improved design would reduce them further. (We have no position in relation to WLA20 or the CNP.)

22. Carn na Saobhaidhe (811m) barely maintains primacy over the existing turbines, with the highest having a blade-tip altitude of c.820m. However the proposed development would have several turbines exceeding this. Turbines 5 to 11 would have blade-tip altitudes of 840m or greater. However, turbines 5 and 6 (c.850m OD BT altitude) are substantially shielded by topography and do not have a significant impact. Turbines 7 (c.850m) and 11 (c.840m) gain prominence by their size compared with the existing turbines (exacerbated in the case of turbine 7 by its position in a col) but would be acceptable if the same dimensions as the existing turbines (120m BTH). The undue prominence of turbines 8 to 10, however, cannot be similarly mitigated. They would dominate the highest landform in the western Monadhliath with blade-tip altitudes around 880-890m OD and hub altitudes (c.810-820m) equalling or exceeding the Corbett summit (811m).
23. The transition from a landscape with wind farms to a wind farm landscape is not simply a question of the number of turbines in view and how they are clustered. It also depends on how

turbines relate to the topography and how that relationship is perceived by the viewer. The north of the western Monadhliath is becoming a landscape where turbines are the primary visual feature, driven by their overtopping of what is naturally a recessive landform with few natural landmarks or scale indicators. To the south this is not (yet) the case. Applications around Stronelaig and the Corriegarth 2 application could make it so. At Corriegarth, consenting the application scheme without modification would remove any semblance of containment within a 'bowl', even a leaky one. The relationship between landscape and turbines in the southwest Monadhliath is at a tipping point as to which will be dominant.

24. In the case of Corriegarth 2, the relationship would remain one of turbines being subservient to the landscape if the proposed scheme was amended to remove turbines 8 to 10 and to reduce the height of turbines 7 and 11. It may be possible to compensate for the generating capacity thus lost by installing more turbines further down the hill, though this would depend on other technical and environmental constraints.
25. In summary, the LVIA is rather more benign than is our assessment. Our assessment has repeatedly identified that most of the proposed turbines have no adverse impact but a small number do, usually attributable to the visibility of partial towers (when most turbines would be visible only as hubs or blades). This, their base altitude and their blade-tip height and altitude makes them prominent; and where they encroach upon the unassuming dome of Carn na Saobhaidh (811m) they become dominant over their setting. Turbines 8 to 10 are consistently identifiable from upland viewpoints as the turbines responsible for this adverse visual impact. From some angles of view turbines 7 and 11 have an adverse impact but in neither case to the same extent as turbines 8-10 and in both cases attributable to scale discordance – 149.9m rather than 120m turbines.

c) Tourism and recreation impact

26. The potential effect of windfarm developments on the tourism and recreation sector has been very poorly researched, and in the absence of robust research and with strong vested interests disinterested in undertaking such research, applicants and their consultants, politicians, planners and Reporters are misled into assuming that an absence of good evidence means there is no impact. We disagree and our analysis of all the relevant literature suggests that wind farms do have an effect but only in certain circumstances. In much of Scotland, and for most tourists, wind farms are no serious threat to tourism: good siting of wind farms mean they can co-exist. However, an impact is likely in areas where large built structures are dissonant with expectations of landscape quality and where a high proportion of visitors come from the 25% of tourists who are particularly drawn by the quality of Scotland's upland and natural landscapes. This includes mountaineering visitors.
27. Notwithstanding that general proposition, which is consistent with all the available evidence, assessment of the potential specific impact of Corriegarth 2 suggests that it would be limited. There is a substantial baseline of wind farms. The existing Corriegarth is not the most prominent or visually intrusive element of the baseline. Dunmaglass is, because it is perceived – especially from the east – as rising above the plateau landscape rather than being subservient to it – with towers clearly visible. We have suggested above how Corriegarth 2 could be modified to avoid repeating that mistake. Since any impact of wind farms on tourism and recreation activity and quality is a consequence of visual impact, if the proposed scheme is modified to ensure that its visual impact is not unacceptable, then any tourism and recreation impact would also be minimised.
28. The applicant's tourism and recreation assessment appears ill-informed. We cannot understand how the authors think that *"The Monadhliath Mountain Range lies approximately 260 m south-*

west of the nearest turbine location." (EIAR p.14-15). Was it where the name was placed on a map they were using? This lack of understanding leads to such inanities as *"The Site itself is not within the Monadhliath mountain range ..."* (p.14-26). Really? While the following statement in the assessment of tourism effects simply leaves us baffled at what 'the entire mountain range' is if it is not the Monadhliaths.

"The Monadhliath Mountain Range will not experience significant visual effects. Visibility of the Development will be limited to nearby locations within the Monadhliath Mountain Range which is only a small section of the entire mountain range." (EIAR p.14-31)

29. Our suspicion is that only a desk-top exercise was undertaken, uninformed by any direct knowledge, experience or understanding of the site and its context. Furthermore, the assessment only references accommodation on the west side of the Monadhliath but anyone with local knowledge would know that most of the hillwalking access is taken from the east, from Strathspey, with some via Strathdearn (cf TA 6.4, Section 4.1.5.3 for a more informed statement).

Conclusion

30. Mountaineering Scotland does not object to the principle of an extension to Corriegarth wind farm. However, it regards specific turbines in Corriegarth 2 – some of those at the highest altitudes – as creating unacceptable visual impacts, especially seen from the Munros and Corbetts to the south, east and north. It **objects** to turbines 8, 9 and 10 of the proposed development and to the height of turbines 7 and 11 on grounds of unacceptable visual impact, with consequential impact on mountaineering recreation. Mountaineering Scotland would have no objection to the proposed development if turbines 8-10 were deleted (nor any objection to replacement capacity at lower altitude if other constraints would allow this) and turbines 7 and 11 reduced to 120m BTH.

Yours sincerely



Stuart Younie

CEO, Mountaineering Scotland

