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Planning and Environmental Appeals Division
4 The Courtyard
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2nd July 2019

Dear Ms Kerr

Erection Of 5 Wind Turbines (3Mw Each) With A Tip Height Up To 125M And Associated Infrastructure, Including Upgraded And New Access Tracks, Crane Hardstandings And A Sub-Station Building (Navidale Wind Farm), Land 3290M North East Of Church Of Scotland, West Helmsdale, Helmsdale, KW8 6JS

DPEA reference: PPA-270-2212 (Planning Permission Appeal)
THC reference: 17/02436/FUL

This short submission is made to confirm and update our **objection to this proposed development**.

As stated in our objection (27 June 2017):

Mountaineering Scotland believes that the proposed site is unsuitable for wind farm development.

- It would be detrimental to a nationally significant mountaineering resource, in particular being within 10km of Morven, the highest hill on the east coast between the Dornoch and Pentland Firths, in an area currently characterised by the lack of turbines between the Gordonbush-Kilbraur and Caithness wind farms.
- The adverse visual impact gains weight from the turbines being located within a Wild Land Area (WLA). Static communications infrastructure already degrades the wildness of the site itself but the proposed development has an extensive impact into the WLA, of which it forms the elevated south-eastern lip.

SNH also objected and that part of its objection relating to the impact on the Causeymire-Knockfin Flows WLA is consistent with Mountaineering Scotland's objection. The application was considered and refused by THC, again in part for its impact on the WLA and consistent with Mountaineering Scotland's objection. All those looking objectively at the location of the proposed development – on an extremely constrained site within the arbitrary landownership boundary of Navidale Farm – find it to be inappropriate with adverse effects that outweigh its acknowledged but putative, and sometimes frankly speculative, benefits.

The appeal by the applicant contains nothing that was not already before THC when it made the decision to refuse development consent. Nor are the arguments made in the appeal (or the application) much different from those made for the nearby West Garty wind farm S.36 application which was refused by Scottish Ministers in October 2018 after a full PLI process.

The appeal makes much of the exact location of the WLA boundary relative to the proposed development site. This is a diversion. The impact upon the southern part of the WLA, and the mountaineering interest therein, is what matters to us. Not whether the turbines are slightly inside or outside the boundary.

As we said in our original objection:

Were West Garty not to be consented [as has now happened], a substantial part of Langwell Forest would have no or minor visibility of Gordonbush ... and Buolfrulich ..., the nearest windfarms to south and north. But it would have substantial visibility of the proposed Navidale development.

It is also of note that Gordonbush (with Kilbruar) and Buolfrulich sit in very different geographical contexts to Navidale; significantly, none sit skylined on a level hilltop.

The appeal states that “Visibility alone should not cause significant effects.” (Para 7.80). We disagree. When a development is proposed in the wrong location, it is visibility of the development that causes significant adverse effects from a mountaineering standpoint. If it was not prominently visible – if it was placed in a better location – there would be no significant effects, or at least the trade-off in the planning balance would be substantially different. This development is proposed for the wrong location, and that key fact will not alter no matter how much the applicant tries to understate its impacts and overplay its benefits.

We deplore the implied threat (para 7.115 and elsewhere) that the landowner will continue to allow the peatland in his ownership to degrade if consent is not forthcoming for the wind farm. Good land management should not be conditional.

Mountaineering Scotland agrees with the applicant that the appeal can be dealt with via written submissions and unaccompanied site visits.

Yours sincerely



Stuart Younie
CEO, Mountaineering Scotland