

# PLANNING APPLICATION FOR PROPOSED NAVIDALE WIND FARM, HELMSDALE

Highland Council reference 17/02436/FUL

## Objection by Mountaineering Scotland

### 1. Introduction

Mountaineering Scotland is an independent organisation of 14,000 members that represents the interests of mountaineers and hill walkers in Scotland. It also represents the interests of over 80,000 members of the British Mountaineering Council (BMC) which provides financial and policy support for its work on issues affecting Scotland's landscape.

Green Cat Renewables, on behalf of the owner of Navidale Farm, has applied for planning permission for 5 wind turbines of up to 125m blade-tip height at base elevations of around 330-380m OD on the high, wet moorland of Creag Thoraraidh (summit altitude 405m).

The proposed wind farm has been reviewed carefully against our membership-endorsed criteria for an objection. Our assessment of it has benefitted from recent extensive fieldwork undertaken to assess the West Garty wind farm application and the preparation of evidence for the PLI on that application. The Navidale proposal with fewer but slightly higher turbines raises many of the same issues as West Garty from a mountaineering perspective.

### 2. Summary

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.

### 3. Material considerations

#### a) Visual impact

The proposed development is not so much designed as shoe-horned into a site within the applicant's ownership that is severely constrained by communications infrastructure and signal paths, and has difficult access for the size of turbine components proposed.

The site itself is impaired by the presence of telecomms infrastructure and in a less sensitive landscape a wind farm development might be acceptable. However, it sits on the edge of a highly sensitive landscape. The proposed 125m kinetic pale turbines would be a prominent feature and an unwelcome focal point viewed from the hills around. With blade-tips reaching up to 450-500m AOD, they would stand around 50-100m taller than the summit of Creag Thoraraidh. The existing, very much smaller, static, visually permeable telecomms towers can be close to invisible at distance and certainly do not attract attention to themselves from hill viewpoints. This is clearly represented in Figure 2.7f, from Morven (10 km distance, within the same WLA as the site). A similar effect would be experienced from Scaraben (8 km distance and also within the WLA) and a possibly lesser but still significantly adverse effect from Beinn Dhorain/Ben Uarie (12 km distance). (Note that we link these hills since it is obvious on the ground that Ben Uarie offers the better views and is where people spend time rather than on the summit of Beinn Dhorain itself. The hills are linked by a high col with <50m of reascent between them.) Morven, Scaraben and Beinn Dhorain are Grahams and thus attract attention by virtue of that, while Morven has long been regarded as an iconic hill by virtue of its topography and setting.

There is no simple relationship between the size of a wind development and its impact. Context is extremely important and a small number of large turbines in a prominent location, visually disconnected from a settled landscape which can often more readily accept individual and small clusters of turbines, can have an adverse impact out of all proportion to the number of turbines involved. We think that is the case here.

Mountaineering Scotland does not make a case on wild land grounds *per se*. Our remit is for Scotland's hills and mountains and the quality of people's experience on them. Nonetheless, most of Scotland's uplands not already subject to wind farm impacts lies in or adjacent to WLAs. This adds weight to the importance of protecting Morven and Scaraben from the adverse close-range visual impact that would result from this proposal. The applicant's Wild Land Assessment substantially understates the impact of the proposed development upon the large valley bowl of the Langwell (deer) Forest as well as the distinctive hills. It downplays the impact on views to the North Sea (from Morven, for example) by not mentioning that beyond the North Sea lie the Moray Coast and Cairngorms – a view Navidale's turbines would interrupt. It also makes much of the development being perceived as on the margins of wild land but the edge of the wild land is not currently perceived at all. It is a 'soft' edge, defined by the rolling topography ceasing and the North Sea continuing beyond and below. Large turbines would provide a 'hard' edge defined by man, totally altering perceptions. Visibility of turbines at distances of at least up to 20km, where blade rotation is clearly visible, is sufficient in itself to alter perceptions of sanctuary and remoteness (vulnerable qualities since they are largely founded on an illusion in our small country).

## **b) Cumulative impact**

The viewpoints referred to in the previous section also all have sight of the operational Gordonbush wind farm. From Morven, Gordonbush is almost twice as far away as the proposed Navidale development. Yet it is a clear presence, made acceptable by its 'low' setting clearly subordinate to the adjacent higher ground to its east. Navidale has no such saving grace.

In general, although we found it difficult to distinguish between the blue and green colours, our reading of the cumulative ZTV Figures suggests strongly that Navidale's visual impact reaches the parts that other wind farms do not. This would substantially extend the overall visibility of wind farms in east Sutherland/south Caithness – to an extent wholly disproportionate to the size (power output) of the proposed development. This can be illustrated with reference to Figure 1.10a showing the cumulative impact with West Garty (in planning). Despite substantial overlap of the ZTVs, Navidale would be visible extensively from hill slopes and moorland from which West Garty would not be visible. The visual impact of either West Garty or Navidale would be significantly adverse: the impact of both together would be disastrous, occupying a major section of the view in a direction where turbines are not currently present.

The two consented Navidale Estate turbines are very much smaller and sited at a lower altitude, appearing (like Gordonbush) substantially inferior to the adjacent high ground. Their much smaller rotors would have a different rotation speed that those proposed for Navidale Farm and where they appear simultaneously this could be visually confusing.

Were West Garty not to be consented, a substantial part of Langwell Forest would have no or minor visibility of Gordonbush (Fig 1.8a) and Buolfrulich (Fig 1.8b), the nearest windfarms to south and north. But it would have substantial visibility of the proposed Navidale development.

We note the previous refusal of development at Dunbeath and West Garty (in the 1990s when turbines were much smaller) on visual impact and, in the case of Dunbeath, recreational grounds.

## **c) Socio-economics**

Proponents of wind farms would have us believe that tourism impacts are negligible. The real position is much more nuanced and complex. The assessment of tourism impact in the ES is typical in its uncritical use of a limited range of studies, some of poor quality and several well out of

date. A full consideration of the evidence suggests that, while most wind farms have a negligible impact on tourism, some do have a potential adverse effect.

Most research has looked at tourists as a whole, and even then often quite superficially or with weak methodology. This literature has little to offer an assessment of the specific circumstances of an area with a particular niche tourism profile. East Sutherland/south Caithness has a tourism profile weighted, compared with the Scottish average, towards more active, landscape-oriented tourists. Views of large built structures are dissonant with the expectations of at least some of these tourists for desired attributes such as wildness and panoramic natural vistas. The effect of expectations not being fulfilled would be the displacement of an unpredictable but possibly significant proportion of landscape-driven tourism from the local area to parts of Scotland perceived as retaining these desired attributes, to the long-term detriment of the local economy.

It is of particular note that the available evidence on wind farms and tourism in Scotland (and elsewhere in the UK) relates to the present pattern of development consented under a rigorous planning system. This makes it difficult to assess impact on mountaineering and similar landscape-driven related tourism empirically because very few wind farms have been consented that might be expected to have an adverse effect. When wind farms are refused in mountain areas the reasons given are usually landscape and visual, but an unacknowledged side-effect has been to limit any potential for tourism impacts.

Insofar as MScot objections can be used to identify planning applications in areas important for mountaineering and related tourism, there have been only eight wind farm consents in such areas. Only two of these were operational by 2016. There has been only one wind farm consent in a WLA, which has not begun construction. It is illogical to assume that the absence of impact claimed for wind farms in less sensitive areas applies universally without research specifically on wind farms in sensitive areas.

That there are some economic benefits to wind farms is not contended. Most of the benefits accrue at national and regional levels, so their realisation is not dependent upon the construction of a specific wind farm in a specific location. Taken nationally, the same economic development benefits can be realised from many locations. There are many development proposals offering much greater economic and energy benefits currently within the planning system; there are many developments at earlier stages; and a very substantial pipeline of consented developments awaits construction, almost 90% wind energy. There is therefore no pressing national need for *this* development in *this* location.

#### **4. Other matters**

Mountaineering Scotland does not comment on matters beyond its expertise but it would anticipate that others with appropriate expertise will raise concerns about the peat impacts of construction on this very wet site with few probes finding <1m peat depth, and the physical effect and visual impact on road users of construction of a wide gravel road across the steep southern slope of Creag Thoraraidh. We have some doubt that the proposed wind farm can be constructed commercially given the challenging site access and conditions, and the low level of 'community benefit' proposed might be an acknowledgement of that, but commercial viability, community benefit and the applicant's remarkable vision in Section 5.4, are not planning matters.

#### **5. Conclusion**

The proposed development offers a very small energy contribution and presumed CO2 reduction compared with other applications currently coming forward and its contribution would be far outweighed by its damage to a distinctive and, thus far, barely impaired landscape, with consequences for the tourism economy. It would have direct adverse impact upon national mountaineering interests, and for that reason Mountaineering Scotland objects to the proposal.

*Submitted on behalf of Mountaineering Scotland by Dr Dave Gordon, Planning Volunteer, 27 June 2017*