



## The Mountaineering Council of Scotland

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24 March 2015

Dear Sir

### **Objection to planning application 14/04782/FUL**

**Erection of 13 wind turbines with 12 up to 149.5 m tip-height and one up to 132 m tip height including ancillary development (Culachy Wind Farm)  
Culachy Estate Land 6KM SE of Newtown Invergarry**

#### **1. Introduction**

RES Ltd has applied for planning permission for 13 wind turbines at base elevations of around 390-450m OD on elevated rolling moorland above the historic Wade road between the Great Glen and upper Strathspey over the Corrieyairick Pass.

The Mountaineering Council of Scotland believes the proposed development, sitting within an already-reduced Wild Land Area and in a popular area for walking with historic resonance, would have severe landscape and visual impacts and would diminish the local tourism and recreation resource. We object to the application on those grounds.

#### **2. The Mountaineering Council of Scotland (MCoFS)**

The MCoFS is an independent organisation with more than 12,000 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. We are recognised by the Scottish Government as representing the interests of mountaineers living in Scotland.

Our work reflects the views of our members and those organisations which support our policy, which include The Cairngorms Campaign, North East Mountain Trust and The Munro Society.

We also act in Scotland for the 75,000 members of the British Mountaineering Council (BMC), which fully supports our policy relating to wind farms and contributes direct financial support to our policy work.

The MCofS recognises the need to move to a low carbon economy but it does not believe that this transition need be at the expense of Scotland's marvellous mountain landscapes. It objects only to proposals that we regard as potentially most damaging to Scotland's widely-valued mountain assets, consistent with our policy as set out in our policy document [Respecting Scotland's Mountains](#).

To date we have objected only to around one in twenty wind farm applications.

### **3. Summary**

The MCofS believes that the proposed site does not have the capacity to support a commercial wind energy development without significant and unacceptable harm to the landscape setting of Wade's road and significant adverse visual impact upon local Munros and Corbetts. Cumulative impact is also a significant factor since this proposed development would notably increase the sense of encirclement of Fort Augustus by wind farms.

It intrudes into a Wild Land Area, identified in Scottish Planning Policy 2014 as requiring a high level of protection. Defined Wild Land in the Monadhliath has already been significantly reduced to accommodate Scottish Government consent for Stronelaig Wind Farm. There is no justification for further setting aside Wild Land protection to permit this development.

### **4. Material considerations**

#### **a) Preamble**

For all the appearance of objectivity, landscape and visual impact assessments are ultimately subjective judgements paid for by the developer. In our experience, such assessments repeatedly downplay the impact of proposed development. This application is no exception. The MCofS - composed of and representing experienced 'consumers' of mountain landscapes - believes its own judgement of impact to be at least as valid.

As SNH guidance recognises, no matter how proficiently photomontages are prepared, they never properly represent the visual impact of turbines since they do not show movement. Turbines do not sit quietly in a landscape - they rotate, catching the onlooker's attention. In addition, many photomontages are of insufficient clarity to give a realistic representation of the potential visibility of the turbines. The images in this proposal are of very variable quality.

#### **b) Landscape and visual impact**

The proposed development site lies on sloping moorland, with minor summits of 495m, 529m and 552m in the immediate proximity of the turbines: substantially lower than the blade-tip height of the turbines which will reach a maximum of nearly 600m OD. It is partially enclosed by higher hills but open to the west (roughly from southwest through to north, cf Fig 4.5). It is notable that on the hills to the northeast a very large wind farm (Stronelaig) has been consented, currently subject to a legal challenge.

The Beaully-Denny overhead power line (BDOHP) is intrusive in the landscape and has, as was predicted by objectors, created an unacceptable level of damage to the landscape locally. The MCofS agree that the BDOHP is a detractor from the enjoyment of the mountain environment around Corrieyairack. The same may be said of the Meall a'Cholumain communications mast, though being a single point its impact is much less than the linear BDOHP. However the existing landscape detractors do not justify inflicting further damage.

The proposed Culachy development would inflict much greater damage, visible over a much wider area by virtue of the height of the turbines and more eye-catching by virtue of the movement of the

turbine blades – up to 149.5m high compared with the pylon tower height of up to 65m.<sup>1</sup> It would also retain the supposedly temporary construction track in perpetuity. Figures 4.20d, 4.22f, 4.27d and 4.28d show the impact from different directions and it is clear that the landscape impact of the BDOHP is wounding compared with the fatal damage that the proposed wind farm would inflict.

The visual impact of a wind farm diminishes with distance but we do not accept that only within 15km are there significant effects (Para 4.199).

The perceived vastness and openness of the Scottish landscape is an illusion since the hills are typically only of modest height and shrink to mundane dimensions when large vertical structures are provided as ‘yardsticks’, giving a diminished sense of scale and grandeur.

It is claimed in the ES that from hills over 25km away the proposed wind farm would “*occupy a relatively small proportion of the expansive, often panoramic views provided from these summits. Moreover, the proposed wind farm would be backclothed by topography and so only evident during periods of good to excellent visibility and/or when sunlit. Consequently, the magnitude of change experienced at such viewpoints would generally be Negligible, equating to a Moderate/Minor residual effect on the amenity of hill walkers on these summits.*” (Para 4.196)

In fact turbines are readily visible over these distances, especially on the clear days that delight the mountaineer. (It is not unusual for one of the MCoS assessors of this application to see the movement of the blades of Griffin Wind Farm at 30km distance from his home.) It is impossible to separate the assessment of the proposed scheme from the present massing of turbines around Fort Augustus and while individually each scheme might argue that it occupies only a small proportion of an expansive view, these expansive views are increasingly of wind farms. Figure 4.25a shows that the expansive view from a relatively distant summit (32km away) looking towards Culachy is of nearly 90° of consented wind farms

Notwithstanding this, we agree that the main impacts are upon the nearer hills. The ES tries, as they do, to downplay the effects but there are major and significant effects upon several Munros and Corbetts as well as on the lower hills around the Corrieyairack Pass and on the Wade Road.

Repeated reference is made in the ES to the ‘existing’ BDOHP access road. This was consented nationally as a temporary construction access only, with a condition specifying that it be removed thereafter. The ES itself states: “*RES understand the temporary BDOHL access track is due to be decommissioned prior to October 2016.*” (para 2.3) It should therefore not be considered as an ‘existing’ track but as a new track for the purpose of this application. The impact of the very extensive roading required to reach the wind farm should be considered as a whole in assessing the desirability of the proposed development. The suggestion in the ES that the proposed development will “improve” the current condition and appearance of the BD construction track (para 4.131) should be discounted since the track is required to be removed under the currently applicable planning conditions, and its current condition and appearance is therefore irrelevant. (We are aware that many applications for permanent retention of sections of this temporary track have been made to local planning authorities and that almost every one has been thoughtlessly consented, largely dismantling the mitigating condition of temporariness attached to the original planning consent. We are not aware of a prior application for retention at Culachy.)

### **c) Cumulative visual impact**

The cumulative ZTVs in the Environmental Statement are the most unhelpful we have encountered in any application. Six 3-way ZTVs and one 2-way ZTV, with some logical and some peculiar combinations of wind farms, is almost impossible to comprehend. A single ZTV showing the combined effect of all other wind farms and the additional effect of the proposed development would have been very much more informative. However, the fact that the cumulative ZTVs involve 11 wind farms and two extensions, eight of which are operational or consented, makes a point in itself about cumulative impact in this area.

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<sup>1</sup> This is the stated maximum height of pylons on the BDOHP. The local height is not known to us.  
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The applicant considers the proposed development to be “in accordance with the emerging pattern and scale of developments in the area.” (Planning Statement p.54) The applicant’s description of that pattern (actually described as two patterns, differing west and east of the Great Glen, cf Para 4.100) attempts to give form to a developer-led pattern of opportunistic applications which has produced a hotchpotch of wind farms of different sizes (from 4 to 69 turbines in stand-alone schemes) and varying turbine heights (100-150m including the present application), with some developments almost adjacent and others 8-10km apart. The only consistent element to the ‘pattern’ is that large wind turbines will be the key landscape characteristic over a remarkably extensive area at the heart of the Highlands. Certainly it will be so for mountaineers, walkers and other active tourists.

The area around Fort Augustus and the western Monadhliath hills has a substantial number of consented wind farms, most of which have yet to be constructed. Of 77 Munros and Corbetts within 35km of the proposed Culachy development, 35 would have visibility of Culachy. Of these 35: three are within sight of 6 consented wind farms, six within sight of 5, ten within sight of 4, eight within sight of 3, seven within sight of 2, and one within sight of 1. This level of cumulative visibility might be interpreted in two ways. One interpretation would be that wind farms are prevalent in the area and another wind farm would make no difference. The other would be that the continual accretion of wind farms in this area is going beyond a tipping point which will lead, in due course once all are built, to a major realignment of tourism and recreation interest in the area. The developer seeks to encourage the former interpretation. The MCofS is strongly of the latter view.

It is also necessary to look at the location of the proposed development. It does not sit ‘inside’ the visual footprint of existing wind farms but extends the development footprint. Figure 4.6 shows this clearly. There are seven Munros and Corbetts within 15km of the proposed development. For five of these, Culachy is the closest proposed wind farm (by 2 km for one and by 7-8.5 km for four).

In seeking to discount the cumulative impact, the developer simply highlights the excessive impact developing around Fort Augustus. Referring to the Loch Lochy & Loch Oich SLA, the ES states that visibility would be “*confined to a small number of elevated viewpoints including the summit of Creag nan Gobhar, the summits of Ben Tee, Meall Dubh, Meall nan Dearcag, and Sron a Choire Gharbh. Viewed from these positions the Proposed Wind Farm would be seen in conjunction with the existing Beinneun, Bhlairaidh, Corrimony, Corriegarth, Dunmaglass, Millennium and Stronelairg, as well as the proposed Aberarder, Corriegarth Extension, Dell and Millennium South wind farms. The Beinneun, Bhlairaidh, Corrimony, and Millennium wind farms represent the closest and most prominent wind farms in views from this location, occupying the majority of the view to the north. In contrast, the Aberarder, Corriegarth, Corriegarth Extension, Dell, Dunmaglass and Stronelairg wind farms would be seen distantly to the northeast (i.e. at locations over 25 km from the viewpoint) on the Monadhliaths, but would still be clearly legible due to the number of [sic] scale of turbines in each scheme. The Proposed Wind Farm would be seen in the same direction as the Monadhliath developments but closer to the viewpoint.*” (Table TA4.3)

This is hardly a description to lift the soul and encourage people to come and stay in Fort Augustus to climb its local hills.

#### **d) Wild land**

The mountain experience in Scotland is closely connected with the wild land character of the landscapes in which most mountains are located. Almost all Munros and Corbetts are within Wild Land as mapped by SNH.

The proposed development sits in the northern corner of the Braeroy-Glenshirra-Creag Meagaidh Wild Land Area (WLA). This WLA was part of a much larger area of wild land originally, which was redrawn before the definitive map was published to enable the government to consent Stronelairg wind farm. Therefore we are not dealing with the corner of a large Wild Land Area but with a corner of a WLA already fragmented to accommodate energy infrastructure (wind farm, hydro scheme, power line).

The northern part – Monadhliath WLA – is being damaged by wind farm consents around its margins (but mostly outwith it) and now the southern part is under threat from this and the mooted Aberchalder scheme, also within the WLA.

We found the Wild Land analysis (Technical Appendix 4) unhelpful since it dissects the landscape into Scotland's excessively detailed character types and rates them for each characteristic. This does not reflect the holistic way that real people experience and respond to landscape.

The applicant's arguments to the SNH consultation on wild land in 2013 failed to get the Wild Land boundary redrawn to exclude their proposed development site and their repetition of them here should carry no weight. The proposed development site is mapped as Wild Land and the fact that, like most wild land in a long-settled, intensively developed country, it is not unblemished is no reason to allow unnecessary development within it.

Nonetheless, the applicant persists with the standard wind farm industry approach for wind farm proposals sited within defined WLAs, arguing that this development is acceptable because it is at the edge of the WLA and the land is of poor wildness quality.

On the principle of development in WLAs, SPP2 and NPF3 provide an ambiguous level of protection for WLAs. On the one hand WLAs are an important national asset to be safeguarded:

“We also want to continue our strong protection for our wildest landscapes – wild land is a nationally important asset.” (NPF3 para 4.4, added emphasis)

“Wild land character is displayed in some of Scotland's remoter upland, mountain and coastal areas, which are very sensitive to any form of intrusive human activity and have little or no capacity to accept new [wind farm] development. Plans should identify and safeguard the character of areas of wild land as identified on the 2014 SNH map of wild land areas.” (SPP2 para 200, added emphasis)

On the other hand

“Recognising the need for significant protection, in these areas [Group 2, including Wild Land] wind farms may be appropriate in some circumstances. Further consideration will be required to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation.” (SPP2, Table 1, page 39)

Nonetheless, it appears clear to the MCoS that the intention of SPP2/NPF3 is that siting of commercial-scale wind farms, especially with turbines nearly 150m high, in WLAs should be an uncommon or even exceptional occurrence, justified by the particular circumstances of the individual case.

Such a circumstance might arise if there was a dearth of developments coming forward to achieve the Scottish Government's renewable energy goals. This is not the case. There is a substantial, undiminished stream of wind power and other developments coming forward and being consented, including developments elsewhere in Scotland by the applicant (e.g. Hill of Towie and its extension to which MCoS has made no objection).

Therefore Culachy cannot be considered a necessary, and still less an essential, development for the continued momentum of renewable energy in Scotland. Its anticipated contribution to electricity generation (equating to only 0.25% of the electricity generated in Scotland in 2013<sup>2</sup>) can easily be provided through consenting of other development proposals, not located in a WLA. In contrast, wild land cannot be 'created' in alternative locations: it is where it is. It is for the applicant to prove that this development is needed in this location. The MCoS is convinced that it is not,

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<sup>2</sup> Expected Culachy annual output 131,258MWh (from applicant's carbon calculator spreadsheet). Scotland 2013 generation 53,071,000 MWh (Scottish Government). Note that this accepts the developer's predicted 34% load factor which appears optimistic: Millennium achieved 26% in calendar year 2014 and Farr 27% (Variable Pitch website). Both are hill-top locations with less topographic wind obstruction than would seem likely at Culachy. If Culachy's performance is modelled using the Farr load factor, its expected output would be only 0.2% of Scotland's 2013 generation.

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and concludes that to consent a wind farm at Culachy would run contrary to Scottish Government policy in relation to WLAs as stated in SPP2 and NPF3.

As a second line of justification the applicant seeks to paint the site as poor quality Wild Land, making reference, for example, to the site as of “*limited naturalness, largely due to the influence of a number of highly prominent constructed and man-made elements and contemporary land uses including sections of the BDOHL, existing tracks and drainage channels. It is also highly influenced by the adjoining General Wade’s Military Road, existing telecom mast at Meall Cholumain, and the prominent turbines at Millennium Wind Farm which form a backdrop in views to the northwest. This area is also relatively accessible ...*” (para 4.158)

We do not dispute these blemishes, though the ES overstates the effect of some by mixing low-visibility ground-level and high-visibility vertical elements and proximal and distant features. What the proposed development would do, however, is to intensify substantially unnatural elements of the landscape within the northern corner of the WLA, while boosting the visibility of development further south – i.e. closer and deeper into the WLA – than does any of the existing man-made artefacts.

#### **e) Public access during construction**

The MCoFS appreciates the need for construction activity to have due regard to both operator and public safety. However, restrictions on access should apply only to areas of active construction and be for the minimum time necessary. There should be no need to interrupt use of the Wade road right of way and if this cannot be avoided, then an acceptable deviation must be in place, not just ‘where possible’ (Design & Access Statement, p.10).

Our experience has been that, with good information and signage accompanied by goodwill and common-sense on the ground, construction activities are not incompatible with public access, including shared use of access tracks, especially since many people would in any case choose not to go to a hill which is a construction site.

#### **f) Decommissioning**

If consent for the development is granted, there should be a condition requiring the removal of all access roads, including any retained BDOHP roads, on decommissioning. The general premise on which wind farms apply for temporary planning permission is that their impacts are reversible. While we are sceptical about the real degree and speed of restoration that can be achieved on such sites, retaining roads would be incompatible with the supposed transience of the development.

#### **g) Socio-economics**

It is a matter of regret to MCoFS that VisitScotland continue to recommend that applicants use the now well out of date research by Glasgow Caledonian University published in 2008 (Moffat Report), with fieldwork undertaken in 2007 when onshore wind capacity in Scotland was one quarter of the present operational level. Most subsequent secondary reviews, including those cited in this application, rely heavily upon this source with little new primary research undertaken in recent years.

We do not agree with the applicant that VisitScotland’s 2011 Wind Farm Consumer Research and the 2013 YouGov Poll undertaken by Scottish Renewables demonstrate that wind farms do not have an adverse impact on tourism in Scotland. In studies across the UK undertaken prior to 2008 fewer than 10% of respondents expressed the view that they would be deterred from visiting an area by the presence of a wind farm. In the Moffat Report itself it was a mere 2%. VisitScotland’s research published in 2012 showed that around 17-20% of tourists would be deterred. The Scottish Renewables survey in 2013 found that 26% were discouraged.<sup>3</sup> Although there are few

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<sup>3</sup> When Scottish Renewables conducted a new survey in 2015 this question was not included in the reported results. It was presumably omitted from the survey to avoid any risk that the possible rising trend of discouragement identified by n:\mcofs objection to planning application 14-04782-ful culachy wind farm 24032015.docx

recent data points it is possible, to put it no more strongly, that the steadily increasing visibility of turbines in the Scottish landscape is being reflected in a rising trend of visitor discouragement. (Data taken from secondary analysis of population surveys in [Wind Farms and Changing Mountaineering Behaviour in Scotland](#) (MCofS, March 2014).

Mountaineering is a substantial contributor to tourism and recreation spend in highland Scotland, worth at least £600 million a year. It is a niche but important market. Our report cited above mainly presented the results of a new survey of mountaineers and their behavioural response to wind farms. It found that 56% would adapt their future walking and climbing plans in response to the increasing number of wind farms in Scotland. The most common reaction was to avoid areas with wind farms (40%) and to take more trips away from Scotland (9%). Those respondents living outside Scotland were twice as likely as Scots to reduce the frequency of their visits to Scottish mountains: 27% would do so. There was very little positive preference for wind farms, showing an overall substantial negative impact. At best this will lead over time to a redistribution of tourism and recreation spend within Scotland to areas without wind farms. At worst it will divert spend from Scotland.

The full deterrent effect on visitors of wind farms around Fort Augustus has yet to be felt. It is remarkable how few of the consented turbines in the area have been constructed to date (cf Fig 4.7). The real impact of the current rush to industrialise the hills around Fort Augustus and the western Monadhliath will only become apparent towards the end of this decade, by which time it will be far too late for regrets. People come to the Highlands of Scotland for many reasons but its magnificent scenery is the backcloth to the majority of visits. If every landscape becomes a 'landscape with turbines' then each landscape's regional distinctiveness is eroded or even lost. The spread of turbines is making Scotland's extraordinary landscapes seem increasingly ordinary and similar. People do not return to places that they have found 'ordinary'.

## 5. Other matters

If the development is consented, then we agree with the ES that, because the turbines will often be seen backclothed by moorland, a darker more recessive grey than the standard light grey – designed to minimise visibility against the sky – may be a more appropriate colour (para 4.128).

## 6. Conclusion

The proposed site does not have the capacity to support a commercial wind energy development without significant and unacceptable harm to the landscape setting of Wade's road and significant adverse visual impact upon local Munros and Corbetts. The proposed development intrudes into a Wild Land Area, identified in Scottish Planning Policy 2014 as requiring a high level of protection, which has already been redrawn to accommodate energy infrastructure. Cumulative impact is a major factor since this proposed development would notably increase the sense of encirclement of Fort Augustus by wind farms.

The proposed development offers an energy contribution and presumed CO2 reduction that would be far outweighed by its immediate damage and by the effect of a further southward thrust of the wind farm landscape already consented – and still mostly awaiting construction – around Fort Augustus and the western Monadhliath. It would be the coup-de-grace to a blemished but still viable landscape.

Yours sincerely

David Gibson  
Chief Officer