



## The Mountaineering Council of Scotland

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Dear Sir

### **Objection to Section 36 application for Whitelaw Brae Wind Farm**

#### **1. Introduction**

Whitelaw Brae Windfarm Ltd (2020 Renewables) has applied for planning permission for Whitelaw Brae Wind Farm of 14 wind turbines of 133.5m blade-tip height at base elevations of around 370-440m OD on an area of steep-sided rolling hills and ridges leading to open upper slopes in the upper Tweed Valley.

The Mountaineering Council of Scotland (MCoFS) believes the proposed development, within the Tweedsmuir Uplands Special Landscape Area (SLA), immediately alongside an area of substantial mountaineering interest – the Tweedsmuir hills – part of which is the Talla-Hart Fell Wild Land Area – would have severe landscape and visual impacts and would diminish the local tourist and recreation resource. We object to the application on these 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 tourists. 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.

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 [Protecting Our Mountains](#). This 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. To date we have objected only to around one in twenty applications and to only one other in south-eastern Scotland – Earlsbaugh, adjacent to this proposed development

### **3. Summary**

The MCoS believes that the proposed wind energy development would cause significant and unacceptable harm to the landscape setting of the Corbetts and other high ground of the Tweedsmuir Hills. This is a popular and easily accessed area, important as a recreational and tourism asset, unparalleled south of the Highlands except for the similarly modestly sized wild upland of the Merrick-Rhinns of Kells in Galloway. It lies within a regionally designated landscape and adjacent to a nationally defined Wild Land Area. It represents a significant leap across the River Tweed from the existing extensive Clyde Wind Farm (with approved extension) towards the core wild upland of the Tweedsmuir Hills.

### **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 always downplay the impact of proposed development. This application is no exception. The MCoS - 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 photomontages in this application often have a rather washed-out appearance. This can be seen in the field by comparing the Environmental Statement's photography of the Clyde Wind Farm with the reality on any sunny day – just the kind of day when most people take to the hills.

Photomontages seldom show the extensive gravel roads associated with development and which, when a site is overlooked by higher viewpoints as this one often would be, can have a significant visual impact in their own right. The photomontages with this application do not show the associated roads.

#### **b) Location and landscape setting**

The proposed development is located in the upper Tweed Valley on steep-sided rolling hills and ridges leading to the open higher slopes of one of the few large (though compact) areas of ground above 600m in the Southern Uplands. Most of the Tweed Valley upstream from Tweedsmuir is commercial forest. The proposed development site sits in the most extensive area of open land, with its complex topography forming an attractive middle ground in views outward (broadly westward) from the Tweedsmuir Hills, linking the hills and the river valley organically before the ground rises to the visual contrast of the Clyde Wind Farm topping the western valley slopes.

The proposed site lies within an area designated by Scottish Borders Council (SBC) for its landscape beauty – the Upper Tweed Special Landscape Area. In the current SBC Consolidated Local Plan, the definition of an SLA is intended as protection against development that could have a significant adverse landscape impact, with such development only being permitted where the impact is clearly outweighed by social or economic benefits of national or local importance.

The proposed site is within an area defined as of “moderate constraints (higher)” and overlooked by an area defined as of “significant protection” in SBC Wind Energy Spatial Strategy. (In the 2001-2018 Structure Plan the wording used is “Potentially Sensitive” and “sensitive”.) In the draft Local Development Plan currently under examination the proposed development site is shown as having no capacity for turbines of over 50m height and low capacity for turbines under 50m. The site also lies within a zone shown as “where cumulative impacts limit development”.

The applicant's Environmental Statement (ES) misuses the Landscape Capacity and Cumulative Impact study carried out by IronsideFarrar for SBC (July 2013) to support its case for development at Whitelaw Brae, located east of the Tweed.

For example, the ES states: “In conclusion, the [IronsidesFarrar] study does state that there are large areas suitable for turbine and wind farm development within this LCA and that an assessment of the cumulative effects of current operational and consented development indicates that there is remaining capacity for further large scale turbine development.” (para 5.66)

This seriously misrepresents the IronsidesFarrar study’s conclusion, which is explicit that the capacity identified lies west of the Tweed, not east where this development is proposed. The IronsidesFarrar study identifies an ‘Area with higher capacity for large/very large wind turbines’: “The western Upland area of the Southern Uplands ... [is affected by Clyde and Clyde Extension wind farm] up to and within the Scottish Borders. It is envisaged that strategically this area could extend into the Scottish Borders in areas of lower prominence, settlement pattern, intervisibility and on the less complex landforms with less complex patterns. **The A701 and Tweed Valley could in this instance act as a natural boundary to further turbine development in the Central Southern Uplands of the Scottish Borders.** (IronsidesFarrar p64, added emphasis)

And again in discussing areas where cumulative impact limits further development: “The objectives governing the area are:

- Promote the contained development of a wind farm cluster, **using the strong landscape feature of the Tweed Valley and A701 as a barrier to limit development spreading east** across the Southern Uplands;
- Preventing the Uplands area of the Southern Uplands (east of the Tweed Valley and A701) from becoming a *Landscape with Occasional Wind Turbines* by **maintaining this landscape as a Landscape with no Wind Turbines** creating a gap between potential clusters of turbines.” (Ironsides Farrar p66, added emphasis)

Figure 6.1 of the IronsidesFarrar report shows the proposed development site as low capacity for turbines 25-50m high and no capacity for turbines higher than this. ‘Medium capacity’ for turbines of 100+ m is mapped only west of the Tweed, running alongside the (now-consented) Clyde extension, north to the operational Glenkerie Wind Farm and then curving NW on high ground around Culter Fell. This capacity guidance was adopted for the draft Local Development Plan which is currently being reviewed by the DPEA.

The proposed development site abuts and is overlooked by a Wild Land Area. This is considered under 4e below.

### c) Visual impact

The Tweedsmuir Hills contain three Corbetts (hills over 2,500 feet), which are often ascended in conjunction with other hills over 2,000’, giving a variety of high-level routes, all of which will be adversely impacted by the proposed development at distances of 5-8 km.

The ES states: “The assessment has concluded that significant effects on the landscape resource would be restricted to a localised area within 5km to 6km of the Site.” (para 6.5) The MCofS has seen this distance used in a diverse range of wind farm proposals. Such consistency suggests that it has been adopted as a universal standard amongst ES assessors rather than deriving from judgement of the distance at which impacts are significant in relation to the particular characteristics of individual proposals. The effects of this proposed development are significant to around 8km. After that distance the spine of the Tweedsmuir (both north and south of Talla-Megget) itself blocks more distant views. It is, however, the close view from this high and popular range of hills that is of primary concern to the MCofS.

Adoption of this ‘standard’ 5-6km distance allows muddled statements to be made in the ES such as “The proposed development would draw wind energy development closer to valued parts of the landscape (such as the higher hills) within 5km to 6km. Although further away from the proposed development, these areas are valued recreationally and display more wild characteristics than the area of the proposed scheme. A significant effect is anticipated to extend to an area up to 5km to 6km.” (para 6.6)

The general intention, as with most ESs, appears to be to suggest that the proposed development will not (significantly) impact on the higher and valued hills. We very strongly disagree with this assessment. Even the ES itself seems to disagree: "Effects on views from eight out of 22 viewpoints were identified as being significant, all located within an area up to 3km to 4km of the Site with the exception of three hill summits to the south and east (Hartfell Rig, Firthhope Rig and Broadlaw) which lie up to 7.5km from the Site." (para 6.10) But, again it then deploys the standard 5-6km to downplay the importance of this effect: "Whilst some significant effects would occur, these would be contained within a localised area of around 5km – 6km from the proposed development, with the exception of a few individual effects to views from a small number of elevated summits." (para 6.20)

We concur with the ES where it states that: "... it is considered likely that the proposed development would appear separate from this other [i.e. operational and consented] wind energy development from many parts of the SLA and may appear to draw this type of development closer to some of the more valued parts of the SLA including the higher hills and areas displaying greater characteristics of wildness." (para 6.152) We would, however, replace the conditional language with the certainty that it *would* draw development closer and be clearly perceived as so doing. Viewpoint 22, located within the site of the Clyde Extension, shows unambiguously how the proposed development would move the wind farm landscape forward across the valley of the Tweed to confront at close quarters the main body of the Tweedsmuir Hills.

The enormous operational Clyde Wind Farm development, with consented extension, dominates the western side of the upper Tweed Valley. The operational Glenkerie Wind Farm (extension refused 8 Dec 2014), also west of the Tweed, demonstrates the disproportionate visual impact that a small development detached from a major wind farm landscape can have. The proposed Whitelaw Brae development, similarly to the Earlshaugh application to which we also object, would leapfrog the Tweed and place development closer to the hill core of the Tweedsmuir Hills. To quantify this, the typical distance from which the Clyde Wind Farm (and extension) would be viewed from the Tweedsmuir Hills is c.9-12km. The typical distance of Whitelaw Brae would be c.6-8km.

The effect is clearly seen in the photomontages from Viewpoints 9 to 11 where the washed-out quality of the baseline photographs emphasises how the operational Clyde turbines appear as significantly more distant and more recessive than the proposed Whitelaw Brae development. Viewpoint 15 shows how the proposed development thrusts forward from the Clyde Wind Farm, breaking new ground east of the Tweed, distinctly separate from but very close to the Clyde wind farm landscape.

We therefore cannot agree with the assessment that: "... the proposed development is not considered likely to compromise the integrity of the SLA, although there may be a recognised reduction in the perceived value of this western part." (para 6.153) On the contrary, we consider that it would remove the specialness that merited designation of the landscape in the first place.

#### **d) Cumulative visual impact**

We agree with the cumulative ZTV that visibility of wind farms is pervasive across large sections of the Tweedsmuir Hills but a ZTV only shows visibility not relative distance/prominence. As already noted, all other operational and consented wind farms are at a greater distance from the Tweedsmuir Hills and on the other side of the Tweed Valley or at some distance to the south. They have a different topographic relationship to the Tweedsmuir Hills than would Whitelaw Brae (or Earlshaugh), which transgresses the Tweed and distinctively thrusts towards the Tweedsmuir Hills, as is clearly shown in the cumulative viewpoint wireframes.

Even the ES has to concede that: "... (Hartfell Rig, and Broad Law) are anticipated to experience a significant cumulative effect resulting from the addition of the proposed development to the baseline scenario of cumulative sites considered. This is due to the proposed development drawing wind turbine development closer to these hill summits." (para 6.18) Contrary to the ES assessment, we judge that this statement also applies to Firthhope Rig.

The assessment of cumulative impact makes the assumption that Earlshaugh wind farm will be consented and thus allows the impact of Whitelaw Brae itself to be downplayed. The approval of either application would be disastrous for the Tweedsmuir Hills as a destination for hillwalkers.

### e) Wild land

This ES sees yet another developer attempting to undermine officially-recognised Wild Land as a proper constraint on wind farm development. The argument in every case takes the same form: a subjective assessment by professionals paid for by the developer concludes that the defined wild land is not really that wild and by happy coincidence is least wild/most damaged where the developer wants to construct a wind farm. In this application: “It is therefore concluded that, in general, although meeting the requirements of wild land, the WLA did not meet the highest standards of true wildness. A wild land quality value of Medium is therefore concluded for the WLA overall, reducing to Low in the north-western part [adjacent to Whitelaw Brae] and around the periphery ...” (para 6.164)

To be clear, SNH’s Wild Land Areas map did not set out differing categories or grades of wild land. It set out Wild Land Areas all of which, in their entirety, were regarded as deserving of protection in SPP 2014.

The mountain experience in Scotland is closely connected with the wild land character of the landscapes in which most mountains are located. Wild land, even of compromised quality (as is almost inevitable in such an intensively-managed small country as Scotland), is an exceptionally rare characteristic in southern Scotland, with only the Tweedsmuir Hills in the east and Galloway Hills in the west qualifying. This gives added weight to the importance to be attached to national policy promoting the protection of wild land.

“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.” (SPP 2014 para 200, added emphasis)

It appears clear to the MCofS that the intention of SPP 2014/NPF3 is that siting of commercial-scale wind farms in Wild Land Areas should be an uncommon, or even exceptional, occurrence, justified by the particular circumstances of the individual case. While this proposed development is not in the Wild Land Area, it is sufficiently close (<1km) as to raise similar issues and justify being treated in a similar way.

Particular circumstances justifying development 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. Therefore Whitelaw Brae 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 0.2% of Scottish generation in 2013)<sup>1</sup> and reducing CO<sub>2</sub> emissions (0.1% of Scotland’s consumption-based emissions and 0.15% of production-based emissions)<sup>2</sup> can be provided through consenting of other development proposals, not located near a nationally important and regionally very scarce landscape resource. 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, abutting onto the only Wild Land Area in south-eastern Scotland. The MCofS is convinced that it is not.

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<sup>1</sup> Whitelaw Brae = 50.4MW x 0.28 = 123.6 GWh per year. Scottish electricity production in 2013 = 53,071 GWh.

<sup>2</sup> Whitelaw Brae = assumed saving of 82 kt CO<sub>2</sub> per year. Scottish consumption-based emissions in 2010 = 80Mt CO<sub>2</sub>e; production-based emissions in 2012 = 53Mt CO<sub>2</sub>e

## **f) Decommissioning**

If consent for the development is granted, there should be a condition requiring the removal of all access roads on decommissioning. The general premise on which wind farms apply for temporary planning permission is that their impacts are reversible. Retaining roads specifically constructed for the development (as proposed in this application at para 3.146) would be incompatible with its supposed transience.

## **g) Access**

The MCofS appreciates the need for construction activity to have due regard to both operator and public safety. Restrictions on access, however, should apply only to areas of active construction within the site and be for the minimum time necessary. 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 for recreation to a construction site.

## **h) Socio-economics**

The ES follows a typical pattern in presenting snap-shot information from a selected number of studies in a way which supports the developer's case. The MCofS has, as well as undertaking its own research amongst mountaineers, reviewed the trend over time in tourist attitudes.

In studies across the UK undertaken prior to 2008, fewer than 10% of visitors expressed the view that they would be discouraged from visiting an area by the presence of a wind farm. In the GCU (2008) study referred to in the ES it was 2%, a remarkably low figure perhaps reflecting the novelty value of wind farms at that time. VisitScotland research published in 2012 showed that around 17-20% of tourists could be deterred by a wind farm. In 2013 a Scottish Renewables survey found 26% discouraged. Although there are few recent data points it is possible, to put it no more strongly, that increased visibility of turbines is now impacting more strongly upon visitor intentions. (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 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 more than half (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. Why travel north past the Lake District to an area perceived as less attractive? Amongst all respondents there was a miniscule positive impact (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 from areas with wind farms to areas without. At worst it will divert spend to areas outwith Scotland.

## **5. Other matters**

The applicant's Planning Statement majors on the need for more onshore wind capacity to be consented, but the hold-up is in deployment and grid connections not in capacity consented. Consenting more capacity now will not increase operational capacity more quickly but will add to the deployment backlog. The applicant draws on the Scottish Executive report "Scotland's renewable resource" (2001) to state that Scotland has a potential resource of 11.5GW of onshore wind capacity. While this dated report was theoretical, it is of note that at the time of writing UKWED shows Scotland to have 9.2 GW of onshore wind capacity operational, under construction or consented. It is also of note that the total renewables capacity required to meet the Scottish Government's electricity generation target for 2020 (estimated at 14-16 GW) is now consented (15.8GW at December 2014). We noted above the very small effect the proposed development would have on renewable electricity generation and even smaller effect on Scotland's greenhouse gas emissions.

The observations in the previous paragraph, taken together, suggest strongly that there is no longer an over-riding need to consent unsatisfactory developments simply to meet political targets. Instead the planning system can be restored to balance and more appropriate weight given in decision-making to sustaining local landscape quality, especially when that landscape has an importance far beyond the locality, as the Tweedsmuir Hills do.

We do not have the competence to comment on the wider potential economic effect of the proposed project (Chapter 13) but do have sufficient statistical expertise to recognise the fragility of speculative estimates based on assumptions. From observation of similar large development being undertaken in areas of small population with few specialist skills, we would urge caution on the extent to which theoretical estimates translate into real income in the local area other than for the temporary accommodation (where such is available) of transient workers.

## 6. Conclusion

The ES LVIA concludes: "Where potential significant effects have been identified, these would be mostly limited to areas within 5km to 6km of the Site. Beyond this there would be a small number of significant effects to a limited number of individual, elevated views (up to 7.5km from the Site boundary), but overall the broader landscape and visual effect beyond the 6km threshold is anticipated to be not significant." (para 6.344)

The MCofS very strongly disagrees and believes that the proposed development:

- would cause significant and unacceptable harm to the landscape setting of the Corbetts and other high ground of the popular Tweedsmuir Hills,
- is contrary to the planning intention of Scottish Borders Council to protect the local landscape and to the advice contained in the IronsideFarrar landscape capacity study, despite the applicant's misrepresentation of the latter,
- would have a significant cumulative impact by pushing development across the Tweed, much closer to the core wild hills than existing and consented development,
- would have an adverse visual impact on the only Wild Land Area in south-eastern Scotland, severely diminishing its integrity,
- would diminish the attractiveness of the Tweedsmuir Hills as a recreational destination, with a sustained adverse economic impact on local businesses,
- offers only minor putative benefits which do not justify the long-term damage to landscape and local reputation that it would cause.

The development should be refused, along with Earlishaugh, and the line of the upper Tweed recognised as the natural boundary between the wind farm landscape to its west and the turbine-free landscape to its east, keeping the landscape of the SLA special and protecting the only officially recognised pocket of Wild Land in south-eastern Scotland.

Yours sincerely



David Gibson  
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