



The Mountaineering Council of Scotland

The Old Granary
West Mill Street
Perth PH1 5QP
Tel: 01738 493 942

Please reply by email to david@mcofs.org.uk

By email to Econsents_Admin@scotland.gsi.gov.uk

Roslyn Keenan
Administrator
Energy Consents Deployment Unit
4th Floor, 50 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

18 February 2014

Dear Sir

THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2000. SECTION 36 APPLICATION FOR THE PROPOSED MACRITCH HILL WIND FARM ON LAND CLOSE TO BACKWATER RESERVOIR, KIRRIEMUIR, ANGUS

Objection to Section 36 Application for Macritch Hill Wind Farm, by Backwater Reservoir, Kirriemuir, Angus

1. Introduction

Eneco Wind UK Ltd has applied for planning permission for 18 wind turbines of up to 125m blade-tip height at base elevations of around 320-480m OD in two disconnected arrays, 3km apart.

The Mountaineering Council of Scotland believes the design of the proposed development is incoherent and that it should be regarded as two separate developments combined in a single application.

The Mountaineering Council of Scotland does not object to the southern array (Turbines 1-9, 17 & 18).

The Mountaineering Council of Scotland objects to the northern array (Turbines 10-16) on the grounds of landscape and visual impact detrimental to mountaineering interests in the adjacent area, much of which lies within the Cairngorms National Park and much of which is also in Wild Land Area Lochnagar-Mount Keen.

2. The Mountaineering Council of Scotland (MCofS)

The MCofS is an independent organisation with more than 12,500 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.

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. 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.

3. Summary

The MCofS believes that the proposed site does not have the capacity to support a commercial wind energy development of the design proposed without significant and unacceptable harm to the landscape setting of nearby Munros, Corbetts and some other significant local hills, all important as recreational and tourism assets, lying in close proximity to the north and at a somewhat greater distance to the northeast.

It is the proposed northern array that has the greater impact. Although the ZTV for the southern array shows a not dissimilar foot print to that of the northern array, the southern array is 4-5km further south (away) from the main areas of mountaineering interest. While there would be wind farm visibility if the southern array only were to be consented, the impact at this greater distance would be sufficiently diminished to be judged non-detrimental to mountaineering interests.

The proposed development lies just over 1km from the Cairngorms National Park, just over 3km from Wild Land Area Lochnagar-Mount Keen, and around 7km from the Deeside and Lochnagar NSA. In all cases it is the thrust of the northern array towards the more naturalistic uplands and away from clearly man-made landscapes that causes the MCofS concern.

In most mountain views the two arrays would be seen as two separate wind farms, not one cohesive development, with the southern array seen in the context of the foothills' transition to a man-made landscape while the northern array would be seen as an imposition upon a 'natural' landscape.

MCofS believes that the southern turbine grouping has the potential to enhance the local recreation resource within the area accessed via Backwater, depending on how community benefit or other developer funding is allocated, without excessively diminishing the wilder mountaineering resource in the wider area. In contrast, the northern turbine grouping would be detrimental to the wider mountaineering resource and recreational enhancement within the Backwater area would not compensate for this loss.

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. For the most part, those images in this application that we have used to form our appreciation of the proposed development in relation to mountaineering interests are commendably clear. Those for Viewpoint 5 Creag Leacach are an unfortunate exception.

Photomontages seldom show the extensive gravel roads associated with development and which, can have a significant visual impact in their own right. The photomontages with this application do not show the associated roads.

b) Landscape and visual impact

The MCoS recognises that the applicant has made considerable efforts through the design process to minimise the effect of the proposed development upon the landscape, in particular by removing turbines from higher ridge-tops. It is therefore unfortunate that the final design lacks coherence by consisting of two visually disconnected turbine arrays.

One array (Turbines 1-9, 17 & 18) lies to the east of Backwater Reservoir (with base elevations around 320-390m OD) in a mixed landscape on the slopes of hills that rise sharply from the reservoir to summit elevations of around 500m altitude.

The other array (Turbines 10-16) (with base elevations around 350-480m OD) lies north of the Backwater Reservoir, 3km from the nearest turbine of the southern array, and straddles a prominent open moorland ridge, with extensive plantation forestry on its western slopes, that rises to a shoulder at 631m before rising over a further 2km to a summit at 689m on the Cairngorms National Park boundary.

The Non-Technical Summary states: "The Proposed Development would be set beyond the simple, extensive moorland landscape that characterises the edge of the National Park, within a more complex landscape mosaic composed of Backwater Reservoir, commercial forestry, farmland and intensively managed muirburn moorland, all of which demonstrate clear and on-going human intervention." (para 3.2.11) We accept this opinion for the southern array.

However, we do not agree that this is the case for the northern array, other than the existence of muirburn. Northern views of the northern array are not strongly affected by overt human intervention, which mainly lies in the glens and lower slopes in this area. Instead they show a continuation of the simple extensive moorland landscape that characterises the uplands prior to the transition to a more lowland, managed landscape. The interruption of this by pale vertical structures with moving blades, pushing forward into the uplands as a separate group of turbines, will radically change the feel and experience of this landscape.

It is claimed that "The Proposed Development would be located within a steep-sided valley landform. The valley is dominated by the presence of the Backwater Reservoir, a large artificial water body, and as such differs in character from the other Angus Glens nearby. The iterative design process has sought to maximise the benefits of the surrounding landform in terms of visual screening and this has resulted in a scheme which would have only a relatively localised influence upon landscape character and views." (Planning statement - 4.3.57) This is a fair description of the setting of the proposed southern array but not of the northern array, which lies on a ridge rising linearly away from, and on the same axis as, the valley containing the reservoir.

In the following paragraphs we analyse the visual impact of the proposed development upon mountaineering interests.

Two Munros, Mayar and Dreish, and the Corbett Monameanach all lie within 8km of the proposed northern array. Two other prominent local hills also lie within 8km – Mount Blair and Cat Law, the latter being the closest popular hill at just over 5km distant from the southern array. Within 15km of the northern array lie two further Munros, Glas Maol and Craig Leacach, and the Corbett Ben Tirran. Many more distant Munros would have some visibility of the proposed development, most often of the southern array and therefore at a greater distance and as part of outward views from the hills to more overtly managed hill-foot and lowland landscapes. We regard the effect only on the hills named in this paragraph as potentially significant.

That only eight significant hills are proximally and directly affected might seem inconsequential; however this must be seen in the context of the special resource offered by the deep Angus glens

and the high rolling peneplain of which these hills are the highest points. This is a particularly attractive landscape, offering big skies and high, wide horizons within easy reach of large urban populations, and thus visited repeatedly by local mountaineers as well as attracting visitors from a distance.

The specific issues differ depending on the orientation of the proposed development to the specific hill, as tabulated below.

Hill (ES viewpoint number)	Proximity	Horizontal extent *
Ben Tirran (1&2)		Concern (c.20°)
Cat Law (6)	Concern - N & S arrays	Concern (c.60°)
Mount Blair (16)	Concern - N&S arrays	Concern (c.50°)
Monameanach	Concern - N array	Concern (c.20°)
Dreish (3)	Concern - N array	
Mayar (20)	Concern - N array	
Glas Maol (4)		
Craig Leacach (5)		

* horizontal extents were estimated and should be regarded as illustrative

From the first four hills tabulated above, the development is seen side-on, giving an extent of c.7.5km between the southernmost and northernmost turbines. Seen in close proximity, especially from Cat Law and Mount Blair, the two separate proposed arrays occupy a substantial part of the view. This is clearly seen on the photomontages from or close to these hills. Viewpoint 2 is of particular interest since it shows the two disconnected proposed arrays with the operational Drumderg wind farm visible at a greater distance between them. (We must also express surprise at the pointless inclusion of Viewpoint 1, with little visibility of the proposed development, but no viewpoint located on the summit slopes of Ben Tirran itself).

From the second four hills, most particularly Dreish and Mayar, the two arrays also appear separate but the main concern here is the thrust into the hills of the northern array. This is particularly well seen in Viewpoints 3 and 20 where the northern array is seen as approaching much closer than either the southern array or the extant Drumderg wind farm (cf. also viewpoint 19). Even when the visibility of the southern array is greater, as in viewpoint 4, the c.4km closer approach of the northern array is perceived as presenting a greater visual threat.

The southern array could be perceived as an addition to an already altered, albeit naturalistic, landscape where obvious human influences are prevalent. The northern array could be perceived as a substantial intrusion of large, out-of-place structures into a landscape where currently the hand of man appears to lie lightly. Rather than appearing 'subserving' to the hills – as the ES would have us believe – the turbines would have the appearance of a mechanical army marching into the hills.

While acknowledging, and attempting to dismiss, the Ironside Farrar Landscape Capacity Study of Angus which concluded that the Mid-Highland Glens had limited underlying potential capacity for turbines, the ES does not make clear that Ironside Farrar made this statement in relation to turbines of up to 50m blade-tip height. They identify no capacity in the mid-Highland Glens for turbines higher than 50m.

c) Cumulative visual impact

The ES suggests there would be little visual interaction between the proposed development and operational or other proposed wind farms. "The significant landscape effects of the Proposed Development would be localised to the Backwater Valley / Glen Damff area, from which the other schemes would generally not be apparent, and the adjacent part of the Highland Summits and Plateaux where the other schemes would be visible from some locations but from where the Proposed Development would be far more prominent." (para 6.11.6) What the ES only hints at in the first part of this quotation is that the localised effect of the proposed development would fill a 'hole' in operational / consented wind farm visibility – it would be visible in a major part of the foothills where the other schemes are not visible. The second part of the quoted sentence is less misleading: the proposed development's ZTV overlaps with that of other wind farms (notably the

'southern cluster' of wind farms referred to in the ES) but it is positioned substantially further into the hills and thus much more intrusively eye-catching.

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 site lies close to wild land and by imposing large built structures upon southward views will have an adverse impact upon the physical attributes and perceptual responses of the Lochnagar-Mount Keen Wild Land Area. We do not agree with the ES claim that: "... the principal source of wild land character from locations that would be affected is derived from the expansive views looking away from the Proposed (*sic*) Development, across the mountain landscape, which would remain the dominant influence upon character." (para 6.7.19) It is characteristic of ESs to claim that the effect of a development is minor if the receptor does not look at the development. Traversing wild land involves 360° vision, not blinkers.

Other wind farms are visible from the WLA but at much greater distance than the proposed development, especially the northern array.

Overall, we judge the impact of the proposed development (mainly the northern array) upon Wild Land Area Lochnagar-Mount Keen to be greater than is stated in the ES (Appendix 6.8) and significantly adverse.

e) Public access during construction

The MCoFS appreciates the need for construction activity to have due regard to both operator and public safety. Restrictions on public access during construction should apply only to areas of active construction 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 to an area 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 on decommissioning. The general premise on which wind farms apply for temporary planning permission is that their impacts are reversible. Retaining in perpetuity roads specifically constructed for the development would be incompatible with its supposed transience.

g) Socio-economics

The applicant quotes from the usual research cited by developers to assert that wind farms have a negligible effect on tourism, in particular relying upon the now well out of date research by Glasgow Caledonian University published in 2008, with fieldwork undertaken in 2007 when onshore wind capacity in Scotland was one quarter of the present level. All subsequent reviews, including those cited in the ES, rely heavily upon this source since there has been no substantive independent research carried out subsequently, despite the dramatic change in baseline conditions.

The ES several times refers to those likely to be deterred by the presence of a wind farm as 'only a minority' and a 'relatively small' number. We contend that the numbers are not small in the context of individual businesses and that they appear to be increasing as the visibility of turbines across Scotland increases. In studies across the UK undertaken prior to 2008 the proportion of visitors potentially deterred by the presence of a wind farm was under 10%. In the GCU study cited in the ES it was a mere 2%. VisitScotland research published in 2012 showed that around 17-20% of

tourists could be deterred by a wind farm. In 2013 a survey commissioned by Scottish Renewables found 26% would be 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 upon visitor intentions. (Full detail of this secondary analysis of population surveys is 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 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. Amongst 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 spends away from areas with wind farms to areas without. At worst it will divert spend to areas outwith Scotland.

In respect of this proposed development, and depending on how Community Benefit or other developer funding is applied, the MCofS believes that the southern turbine grouping has the potential to enhance the local man-made recreation resource within the area accessed via Backwater (cf. para 13.4.77) without excessively diminishing the wilder mountaineering resource in the wider area. In contrast, the northern turbine grouping would be so detrimental to the wider mountaineering resource, mainly lying in and accessed from adjacent areas that no recreational enhancement within the Backwater area could compensate for the loss. A proportion of the mountaineering 'market' would then choose to go to places other than the southern Angus glens.

5. Other matters

Section 4 of the Pre-Application Consultation Report tabulates questionnaire responses received at the public exhibitions and, for April 2013 only, postal responses. By presenting the numbers without any interpretative commentary, it may leave the reader with the impression that the majority opinion changed over time from being opposed to the proposed development to being favourable towards it. This cannot be concluded from the data presented. The respondents were self-selected rather than a random sample, and the final questionnaire had a stronger focus on how respondents would like to see community benefit spent which might also have influenced which people chose to complete it. Standard 95% confidence intervals for proportions can be applied as a guide to the robustness of the data. With such small base numbers (range 20 to 36) it is not surprising that none of the six proportions – support / opposed for three response rounds – is significantly different from any of the others. The data gathered is not a reliable guide to public attitudes to the proposed development.

6. Conclusion

The MCofS believes that the proposed site does not have the capacity to support a commercial wind energy development of the design proposed without significant and unacceptable harm to the landscape setting of significant nearby hills, all important as recreational and tourism assets, and many of which lie in the Cairngorms National Park and the Lochnagar-Mount Keen Wild Land Area.

The design of the proposed development is incoherent and that it should be regarded as two separate developments combined in a single application. In most mountain views the two arrays would be seen as two separate wind farms, not one cohesive development, with the southern array seen in the context of the foothills' transition to a man-made landscape while the northern array would be seen as an imposition upon a 'natural' landscape.

The MCofS does not object to the southern array (Turbines 1-9, 17 & 18).

The MCofS objects to the northern array (Turbines 10-16). It would damage mountaineering and tourism interests through its landscape and visual impact.

Although the ZTVs for the two arrays appear broadly similar, the southern array is 4-5km further away from the main areas of mountaineering interest. While there would be wind farm visibility if the southern array only were to be consented, the impact at this greater distance would be diminished to a level that could be deemed not unacceptable to mountaineering interests.

Yours sincerely,

David Gibson
Chief Officer