



# 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](mailto:david@mcofs.org.uk)

Roslyn Keenan  
Admin Officer  
Local Energy and Consents  
Scottish Government  
150 Broomielaw  
Glasgow  
G2 8LU

By email to [EconsentsAdmin@scotland.gsi.gov.uk](mailto:EconsentsAdmin@scotland.gsi.gov.uk)

14 December 2015

Dear Sir

## **OBJECTION TO SECTION 36 APPLICATION FOR UPPER SONACHAN WIND FARM ON LAND IN UPPER SONACHAN FOREST, NEAR PORTSONACHAN, ARGYLL**

### **1. Introduction**

Ecotricity, through a subsidiary company, has applied for planning permission for 19 wind turbines of 136.5m blade-tip height at base elevations of around 240-400m OD on north-facing forested slopes between Lochs Awe and Fyne.

The Mountaineering Council of Scotland believes the proposed development is of such a scale, in terms of both number and height of turbines, that it would have an unacceptable visual impact upon the important mountaineering resource of Ben Cruachan.

We object to the application on this basis.

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

The MCofS is an independent organisation with more than 12,700 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 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.

The MCofS assesses a large number of development schemes and only objects to the few which we regard as a directly threat to mountaineering interests – less than one in twenty.

### **3. Material considerations**

#### **a) Preamble**

Landscape and visual impact assessments are presented within an objective structure but are ultimately subjective judgements commissioned by the developer. In our experience, such assessments consistently downplay the impact of proposed development. The MCofS - composed of and representing experienced 'consumers' of mountain landscapes - believes its own judgement of impact upon mountain landscapes and the mountaineering experience to be no less 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.

#### **b) Need**

A rationale is presented for the proposed development in terms of the need for the UK to continue to develop, at pace, low carbon forms of electricity generation. This is most certainly not disputed by the MCofS. But it does not follow that this general need supports this specific development in this particular location. There is no shortage of alternative schemes being proposed which could produce the 0.05% of GB electricity consumption that Upper Sonachan is predicted to produce, on average (158.5GWh/303TWh (Planning Statement para 3.5.2/DUKES data for 2014)).

There is a major bottleneck in deployment, with many consented schemes not even begun construction. Consenting further schemes with long lead times will merely add to this backlog. In this case, the 14-month construction period would be preceded by an 18-month tree-felling period, making it unlikely that it would be in operation prior to 2019 were planning consent to be granted as early as mid-2016 and work able to start immediately thereafter. This is doubtfully consistent with the "urgent" need for more onshore wind capacity expressed in the Planning Statement (cf para 5.12.3).

Need should be regarded as a minor issue in determining the application. Few dispute the need for more low-carbon generation (though there are differing views on the technology mix required). But that does not give any particular proposal a free pass regardless of site-specific issues.

#### **c) Landscape and visual impact**

The development site itself is unexceptional, being typical of the commercial forestry common in Argyll and without any particular topographic interest. There is no mountaineering interest in the site itself.

Three mountain viewpoints are included in the Environmental Statement. These are not the only mountains experiencing potential impacts but they are adequately representative of the main mountain areas from which the development would be viewed and we structured our assessment of visual impact around them.

We concluded for Ben Lui and Ben Ime that the development would have limited impact. It is around 20km distant from these viewpoints and, more importantly, would be seen in a direction in which wind farms are beginning to, and are likely increasingly to, characterise the landscape.

We concluded for Ben Cruachan that the development would have a substantial and significant adverse visual impact. The proposed development is around 10km from Cruachan and throughout the traverse of this iconic and highly popular mountain the movement of its pale turbine blades would be very apparent in any southward view, backclothed by dark woodland and moorland.

We do not agree with para 5.2.33 where it states that "The predicted significant visual effects on hills surrounding the Development Site, particularly those in the vicinity of Annat including Ben Cruachan, are considered to be acceptable, taking account of all aspects of hillwalking as a recreational and tourist activity (i.e. not merely views from hill summits) and due to the lack of immediate proximity ... "

Views are indeed not the only reason for hillwalking, but they are a key reason and one very important to our members. Moving structures at a distance of only 10km would have a marked adverse impact upon the experience of the hills, much more substantial than the other intrusions mentioned in the quoted paragraph, such as static lattice pylons less than half the height.

While not directly part of the on-mountain experience, we note that the proposed development sits within a Regional Scenic Area (formerly Area of Panoramic Quality) and will be prominent in low-level views from around north Loch Awe.

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

The MCofS faced a particular difficulty in assessing the proposed development because of the unhelpfully random sequencing of wind farm applications in mid-Argyll. The south-facing wireline for Viewpoint 1 (360°) shows the problem clearly, with multiple separate proposals at different stages of development. The MCofS has not objected to any proposal south of Upper Sonachan in the area between Lochs Awe and Fyne. Nor has it objected to those west of Loch Awe. We recognise that the effect of Scottish Government energy and planning policy will be to create extensive landscapes typified by wind farms across large parts of Scotland. Mid-Argyll appears destined to be one of those landscapes.

The unhelpful sequencing of applications in this area means that this development, the northernmost proposed scheme, closest to the mountains and with marginally the highest turbines and thus maximum impact, will be considered before the pattern further south is established.

The recent refusal of consent for Ardchonnel makes it particularly difficult to envisage what the future overall pattern of wind development in the area might be. (Were an urban development to be proposed of the scale represented by the totality of wind farm projects in this area, the first step would be the preparation of a masterplan to guide development overall. By comparison, the local spatial guidance permitted under Scottish Planning Policy is an exceptionally weak form of planning, helpful neither to developers nor to other interests.)

The MCofS has contributed to scoping reviews of Bailemeanach and Blarhour wind farms, the two proposed developments nearest to Upper Sonachan. Our primary purpose in contributing to scoping is to ensure that the evidence base presented in environmental statements is adequate to allow proper assessment of potential impact upon mountaineering interests. However, engagement at this stage also allows us to form a preliminary view of the likely acceptability of a development in a particular location. It is of note that our preliminary view (without prejudice to our response to any future planning application) in respect of both Bailemeanach and Blarhour was not negative. This reflected our assessment that there would be some mountaineering impact, but distance and aspect would mainly orient visibility southward, away from areas of mountaineering interest. The cumulative ZTVs (7.20g, 7.20i) support our preliminary assessment of the impact of these proposed wind farms and, in contrast, emphasise that the primary adverse impact of Upper Sonachan would not be cumulative but individual because of its open location on the northern slopes rather than within the undulating uplands between Lochs Awe and Fyne.

We note in passing that Figure 7.20e is listed as CZTV of Ardchonnel and Upper Sonachan but in fact repeats Figure 7.20a (A'Chruach).

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

The MCofS appreciates the need for construction activity to have due regard to both operator and public safety. In line with SNH guidance, restrictions on access should apply only to areas of active construction and be for the minimum time necessary. We welcome the statement of intent at paragraph 5.3.62 of the ES which implies that this is the approach to be taken. The Design and Access Statement, however, might be read to imply a more restrictive approach is intended (para 4.5.5).

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. We agree that current use of the site is minimal.

## f) Socio-economics

Whether people, in the abstract, support or oppose wind power is irrelevant to the question of whether or not this specific development in this particular location is acceptable. General survey data is of no relevance to the specifics of this decision.

Referring to Scottish Renewables 2013 research, the ES states that “These results accord with the findings of previous studies including Visit Scotland’s Wind Farm Consumer Research (2012) ...” (Appx 14.1 para 1.1.7). This is not the case, as becomes clear if the research surveys on this topic are placed in time sequence.

In studies across the UK undertaken prior to 2008 fewer than 10% of visitors stated they would be deterred by the presence of a wind farm. In the Moffat report of 2008 it was a mere 2%. In the VisitScotland research published in 2012 it was 17-20%. In the Scottish Renewables survey of 2013 it was 26% (data taken from secondary analysis of population surveys in [Wind Farms and Changing Mountaineering Behaviour in Scotland](#) (MCofS, March 2014).)

Although there are few recent data points it is possible, to put it no more strongly, that the increasing visibility of turbines as wind farms multiplied was also having an increasing impact upon (re-)visiting intentions. It is of note that Scottish Renewables repeated its survey in 2015 but dropped the relevant question, presumably afraid that another data point might confirm a trend it would not wish to acknowledge.

The applicant's tourism assessment repeats dated evidence from the Moffat Centre (2008), which Scottish Government and VisitScotland continue to promote despite its conclusions relying upon fieldwork undertaken in 2007 when onshore wind capacity in Scotland was less than one quarter of the present operational level, with almost as much again currently consented but not yet operational.

In most fields of study, such a substantial and rapid change in context would stimulate new in-depth research, particular given the suggestive survey trends regarding visitor deterrence noted above. However, apart from the limited surveys cited above, most subsequent ‘research’ has simply consisted of secondary reviews, such as Aitchison (2012) cited in the ES, and thus relies heavily upon the original Moffat Centre report, providing no new evidence.

MCofS has undertaken its own primary research amongst mountaineers and hillwalkers. To the best of our knowledge this is the only primary research that has been undertaken with any specific Scottish market segment. Our report cited above presents the results. In brief, 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 a net substantial negative impact. At best these stated intentions may lead over time to a redistribution of tourism and recreation spend within Scotland to areas without wind farms. At worst it would divert spend from Scotland.

Given the sensitivity of hillwalkers to the visual and other impacts of wind farms, it is surprising that the ES assessment of effects on walking and cycling mentions Ben Lui and Ben Ime by name but not the much closer Ben Cruachan (para 14.5.80). The MCofS does not agree with the ‘professional judgement’ expressed in the ES that the proposed development “is unlikely to form the basis of a narrative which would lead to poor representation of the area in the reporting of it and hence to a (sic) associated long term socio-economic disbenefits.” (para 14.5.81)

Our experiential judgement is that it will do so. In terms of mountaineering activity and spend, this would mean that locally-resident hill-walkers would still continue to walk locally; baggers would still make short visits to bag their desired hill(s) with only a brief stay in the area; but repeat visits and longer stays would diminish.

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. People come to the Highlands of Scotland for many reasons but its magnificent scenery is the backcloth to the majority of visits, not least mountaineering visits. If every landscape becomes a 'landscape with turbines' then regional distinctiveness is diminished 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'.

#### **4. Conclusion**

Having carefully assessed the proposed development, the MCofS is of the view that it directly threatens to diminish significantly the quality of mountaineering experience on Ben Cruachan.

Given the iconic nature of this mountain and its popularity, we judge this impact as sufficiently important in itself as to require that the MCofS object to the proposed development.

Yours sincerely

David Gibson  
Chief Executive Officer