



The Mountaineering Council of Scotland

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Dear Sir

Objection to the Proposed Longburn Wind Farm

The Mountaineering Council of Scotland (MCOFS) objects to the proposed development on the grounds of visual impact and recreational detriment. We do so particularly to protect the integrity of Cairnsmore of Carsphairn, a listed Corbett, as a significant hill-walking resource.

1. Introduction

Longburn Wind Farm Ltd (Burcote Wind Ltd) has applied for planning permission to develop a wind farm comprising 10 wind turbines of 134m blade-tip height at base elevations of around 240-310m, east of Carsphairn village.

The MCOFS has not objected to wind farm applications in the northern half of the view from Cairnsmore of Carsphairn. We accept that this view is already and will be increasingly characterised by wind turbines. Nor have we objected to applications on the east of the Glenkens lying further south, more distant from Cairnsmore of Carsphairn. The MCOFS has objected to one previous (withdrawn S.36) application to the immediate south of Cairnsmore of Carsphairn. We understand that a new application for this site, Quantans Hill, is due to be submitted to Dumfries and Galloway Council. We have also objected to two recent applications (Windy Rig and Lorg) immediately east of Cairnsmore of Carsphairn for similar reasons to those set out here.

2. The Mountaineering Council of Scotland (MCofS)

The MCofS is an independent organisation with 13,000 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. We also act in Scotland for the 80,000 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 regarded 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](#).

3. Summary

The MCofS believes the proposed site does not have the capacity to support a wind energy development of commercial scale without unacceptable harm to the context of the mountain landscape of Cairnsmore of Carsphairn and the quality of experience of hillwalkers on that hill and those on the Southern Upland Way.

4. Material considerations

a) Preamble

Landscape and visual impact assessments are ultimately subjective judgements. It is the experience of the MCofS that such judgements in Environmental Statements do not reflect the majority of hill-walkers' judgements. This, at least in part, reflects the process by which a judgement is reached and the unspoken values underpinning it. Professional assessors break down the assessment into multiple component parts and assess each component. Hill-walkers experience the hills in a holistic, gestalt manner. The MCofS does not question the technical competence of professionals contracted by developers to undertake LVIA. However, the MCofS composed of and representing experienced 'consumers' who enjoy mountain landscapes, believes that its own judgement of impact is no less valid insofar as the mountain experience is concerned.

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; blades move and wave at the onlooker, catching the attention. When back-dropped against darker ground, as is the case when viewed from overlooking hills, their prominence is increased.

The differences between professional and consumer judgement can be illustrated with reference to viewpoint 16 (Alhang). From this elevated position the turbines would be seen backclothed by moorland and forestry, at a distance of around 7-8 km, with the motion of the blades unavoidably

obvious, and in a different context to and slightly separated from Wether Hill wind farm (c. 3km gap) while extending the foreground view of wind turbines westward from Wether Hill . This would be regarded as a significant detriment to their enjoyment of the hill by most hill-walkers, but is judged professionally to have no significant visual effects.

b) Visual impact

Cairnsmore of Carsphairn is a Corbett (a Scottish hill between 2500 and 2999 feet high) and a deservedly popular hill of significance to Scottish mountaineering. Despite substantial plantation forestry and extensive wind farm development (operational and consented) in its northern 180°, to which MCofS has not objected, it retains a wild feel with extensive open views southward.

The Planning Statement is disingenuous in claiming it is consistent with the Dumfries and Galloway Wind Farm Landscape Capacity Study. The Southern Uplands with Forest LCT in the Ken and Carsphairn area is stated in the Study to have more constraints than the Eskdalemuir area of this LCT, with specific mention made of the constraint of “The proximity of the dramatic sculptural hill of Cairnsmore of Carsphairn to parts of this character type.” (p.148) The quotation in the LVIA chapter at para 6.3.3 and repeated in the Table on page 6.40 is somewhat misleading since it is introduced as if it refers specifically to the Ken LCT unit when it actually refers to the whole Southern Uplands with Forestry LCT and correct use of the Capacity Study would have noted that the suitability of the Ken unit was qualified.

With regard to the Narrow Wooded Valleys LCT (Water of Ken) within which only one proposed turbine is located but which is overshadowed by the whole proposed development, the Capacity Study is quite clear: “There is no scope for large and medium scale typologies to be accommodated within this character type without significant adverse impacts occurring on key landscape and visual sensitivities.” (p.47) It is of note that the majority of this LCT will have theoretical visibility of 7-10 turbines, which might be considered ‘dominating’, though we acknowledge that in areas this may be screened by forestry plantations depending on their stage of rotation.

The proposed development will have a substantial effect upon parts of the Galloway Hills RSA, proximally Cairnsmore of Carsphairn and more distantly the Rhinns of Kells, and the Southern Upland Way (SUW).

The ES (Chapter 6) downplays any effect on the Galloway Hills RSA by focusing its assessment on views of the Rhinns of Kells. The RSA also includes Cairnsmore of Carsphairn about which the RSA analysis is silent. The effect on this latter area would, we judge, be substantial and significant, but that is ignored. We also question how viewing the Rhinns of Kells skyline over whirling turbines backclothed by land (cf viewpoint 10 or 17) can be said not to compromise any of the special qualities of the RSA. The effect of backclothing is well seen in the image from Viewpoint 20 where the backclothed lower sections of the extant Wether Hill turbines are visible but not the sky-lined

upper sections. The backclothing of the Longburn turbines even from this modest elevation is also apparent. Indeed, taken as a whole the viewpoint images are remarkable for the extent to which all except those very close to the proposed development are backclothed, heightening the contrast between the proposed development and its naturalistic setting.

Before analysing those viewpoints of relevance to our interests, we note that the selection of Mulwhanny (Viewpoint 17) is odd since it is a very minor summit not on any list known to us and in a cul-de-sac almost entirely surrounded by forestry land. It is not surprising that it shows few signs of recreational use. We have discounted it here.

Viewpoints 13, 14, and 16 represent the Cairnsmore massif and adjacent northern hills. The LVIA downplays impact and suggests only one impact is significant (Vpt 13). We disagree and regard all three as showing major significant impact. All are within 7km and look down on the turbines contrasted against backclothing vegetation. Distraction by blade movement is unavoidable in this context. We acknowledge that there is some screening of turbines by landform from Cairnsmore of Carsphairn itself (Vpt 14) but most of the rotor sweep of six turbines and the blades of 3-4 others will be obvious and the visual distraction of their movement unavoidable.

Viewpoints 5, 7 and 19 represent the SUW. All are regarded as having significant impacts and we agree, though we would rank the effect in all cases as major compared with the downplaying for some viewpoints in the LVIA.

Viewpoints 20 and 21 represent the north part of the Rhinns of Kells. We disagree with the 'not significant' assessment for Vpt 20. Although the exact location seems rather oddly chosen, the image clearly shows that the proposed development will be close enough for the blade motion to be eye-catching, contrasting against the backclothing especially in the afternoon sun. We rate this impact as significant. We discount viewpoint 21 since the insertion of apparently sunlit turbines is unduly artificial against a murky baseline photograph. In reality we expect a significant impact in afternoon sunshine but those are not the conditions represented.

The MCoS does not accept the conclusion of the LVIA analysis that "All significant visual effects are from viewpoints within 5km of the Proposed Development ..." (para 6.10.6). We think this reflects the value base of the assessors and it does not match the value base of hill-walkers. From the latter perspective significant visual effects are experienced if blade movement is distracting even when not looking directly at a wind farm. It is not easy to put a number on this since it depends on context and scale. For example, Figure 6.12.13f suggests that skylined Wether Hill blade movement might not be distracting (at around 9km from Beninner) while backclothed Longburn turbines, both nearer (at around 5-7km) and larger, clearly would be. Yet Figure 6.12.14f taken just half an hour later from Cairnsmore of Carsphairn, slightly further from both developments suggests that Wether Hill movement might also be distracting. A slight change in sun angle, light intensity or atmospheric clarity can make such a change.

In summary, the visual impact will be substantial and detrimental to mountaineering interests.

c) Cumulative visual impact

Scottish Government energy policy has already set the scene for there to be substantial cumulative impact from wind farms in this part of Scotland. The question, therefore, is where the line should be drawn between the exploitation of one asset (wind, for variable electricity output) and the protection of another asset (mountain landscapes, providing a healthful experience).

We do not understand the absence of the nearby Quantans Hill proposal from the cumulative impact assessment. While the previous application for this site was withdrawn, we understand that there continues to be an interest in wind farm development and that an application may be made during 2016. It should surely have been considered as a 'scoping' wind farm.

We welcome the fact that Shepherd's Rig is listed in the ES as unlikely to progress to an application. This was another scheme threatening the southward aspect of Cairnsmore of Carsphairn. Many other proposed and consented schemes in the wider area have avoided this aspect and/or been set at a sufficient distance from Cairnsmore of Carsphairn that their impact is not fatal to the mountaineering interest of the hill (e.g. Margree to the south, Whiteside Hill and Black Hill to the ENE). Where closer and discordant applications have been brought to the MCofS' attention, we have objected as noted in this objection's introduction (Section 1).

All of the current proposals seek to push development closer to the core mountain area, to separate Cairnsmore of Carsphairn visually and psychologically from the Rhinns-Merrick heartland.

It is sophistry for the ES to recognise that there will be cumulative impact but to seek to argue that it is not this developer's scheme that will be the significant factor. Any of the proposed schemes to which MCofS has objected, including this proposal, would individually be severely detrimental to the recreational mountaineering interest of Cairnsmore of Carsphairn. Any combination would exacerbate the detriment intolerably.

The sequential assessment for the SUW appears to imply that the effect of the proposed development is significant but only local and so does not really matter. Individual wind farm applications consider 'their' section of the SUW but the overall effect of repeated exposure to wind farms is never considered. An analysis of wind farm visibility (operational and consented) over the full length of the Southern Upland Way would be a useful contribution to the assessment of cumulative impact on tourism resources in Southern Scotland. It would put into context the repeated claims by developers of 'very localised' impact. The MCofS regards the impact on the SUW, both locally and cumulatively, to be significantly adverse.

In summary, the proposed development is undesirable individually and the potential for cumulative impacts compounds this undesirability.

d) Socio-economics

Mountaineering is a substantial contributor to tourism and recreation spend in specific parts of Scotland. It is a niche but important market. In response to superficial analysis of general public surveys repeatedly quoted by developers, as in this proposal, the MCoFS has undertaken primary research specifically on mountaineers' behaviour in relation to wind farms. We refer to this later.

We despair of the repeated misinterpretation by applicants of the limited information available on tourism and wind farms. This ES yet again repeats the canard that hillwalkers are more in favour of wind farms than other tourists (appx 13.4, p1). This is derived from a drafting error in the GCU report of 2008 and has been perpetuated in subsequent literature reviews, all of which have been heavily based on this report in the absence of substantive new research but which are often presented, as they are in Appx 13.4 here, as if they are based on multiple original studies.

In the GCU report, one paragraph on p116-7 states that there is no difference between walkers and non-walkers in the sample; the very next paragraph states that there is a difference. The Executive Summary largely repeats the second paragraph. Has no one other than MCoFS actually read the study and realised that both paragraphs cannot be true?

A proper statistical analysis of the data confirms that there was no significant difference between tourists who gave their main activity as walking/hill-walking and the rest of the sample. The overall sample size of the study, and even more so the walker subgroup size, is small. The 95% confidence intervals are correspondingly wide. Indeed, the only conclusion that can be drawn is that the sample sizes are too small to draw any conclusions.

We are at a loss as to how the ES reaches the conclusion that attitudes have not changed significantly. It claims "similar results are evident in the 2008 ... [GCU study] ... and the 2013 YouGov Scottish Renewables survey results. The proportion of negatively affected respondents remains constant at approximately 25-26%." (Para 13.6.49) Have the authors of this part of the ES ever read the GCU study or just relied on summaries?

A more careful analysis shows that in studies (of very variable quality) undertaken at locations across the UK 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 GCU study 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. Although there are few post-2008 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 from affected areas. It is surely just coincidence that after MCoFS analysis showed this potential trend, neither VisitScotland or Scottish Renewables have included the question in subsequent surveys. (The full secondary analysis of population surveys is reported in [*Wind Farms and Changing Mountaineering Behaviour in Scotland*](#) MCoFS, March 2014).

The MCoFS has undertaken its own research among mountaineers, described in full in the above report. We accept that this is a particularly landscape-sensitive group and we do not seek to generalise their experience to all Scottish tourism, much of which is urban or event-based. There may, however, be some overlap of attitudes with visitors to areas where landscape is a particularly important driver of general tourism.

The MCoFS report asked about mountaineers' behavioural response to wind farms. It found that over half 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%), to take more trips away from Scotland (9%) and to take fewer trips to Scottish mountains (7%). This question was criticised for not allowing a positive response. We thus included that option when running a members survey in early 2016, The results in the table below are broadly consistent with those previously obtained: very few hill-walkers are attracted by wind farms, many just thole them and some actively avoid them.

Q. Does the increasing number of wind farms in Scotland's mountain landscapes affect your plans for walking and climbing? Please give the answer that best describes your position.

2016	survey date	2014*
2%	It encourages me to go more often, I like to see wind farms when in the mountains	-
31%	It has no impact	28
44%	It does not affect my plans, but I prefer not to see wind farms when in the mountains	15
22%	I go to the mountains just as often, but avoid areas with wind farms	49
1%	I go to the mountains less often	7
1439	N total respondents (=100%)	966

* The response options were different in 2016 and this is a best fit of the 2014 responses to the 2016 categories.

It is likely that there will be some change over time towards a redistribution of tourism and recreation spend from areas with wind farms to areas without. Bearing in mind that many consented wind farms in mountainous areas are not yet built, this process of redistribution has barely begun.

With specific reference to the proposed Longburn development, as wind farms press in upon a compact upland such as Cairnsmore of Carsphairn, we can predict that visibility of wind farms from high ground will change the behaviour of a significant minority of mountain-going visitors.

As a simplification we can divide hill-walkers into three groups: local walkers (say, within an hour's drive) wanting to climb a local hill; 'baggers' wanting to climb all hills on a list; and repeat visitors.

Local walkers contribute relatively little additional to the local economy – a meal or a small local purchase - but gain great pleasure without a long journey. If local hills become less attractive, it is likely that some of their walking will be done further afield with a small local financial loss and adding to traffic and carbon emissions.

Baggers will climb a desired hill regardless of its level of attractiveness. There will be some local expenditure, sometimes involving an overnight stay, and only a single or small number of visits until the local hills on the chosen list are all climbed.

Repeat visitors may have first visited as baggers or for other reasons. Once they find an area attractive, they will make repeat visits often over a long period of time with varying but possibly significant expenditure levels depending on the desired type of accommodation, standard of food, etc.

As an example, one of the MCofS assessors of this application has been logging trips to the area since 1974, most recently in 2015, with accommodation ranging from tent and bothy to B&B and hotel. If such visitors initially find an area unattractive, they will never become repeat visitors. If already repeat visitors they may choose to turn their attention to areas, local or more distant, that provide a higher level of satisfaction. This is very much what the results of the MCofS surveys of mountaineering behaviour and wind farms suggest. The exact level of displacement may depend upon other factors such as the intensity or intrusiveness of wind farm development, or factors unconnected with wind farms such as other attractions or family links.

The applicant's Planning Statement makes an assessment that consenting the wind farm would be consistent with policies seeking to enhance the recreational offer within Dumfries and Galloway. We do not agree. It will degrade a distinctive regional recreational offer (hill walking on Cairnsmore of Carsphairn and adjacent hills) and replace it with the facilitation of on-site unadventurous strolling. This is a trade-off between different tourism/recreation markets with, we would argue, an overall long-term negative balance for the recreational economy of the area.

There is not a "strong evidence base" on tourism and wind farms. At best the evidence is no more than suggestive. It suggests that a proportion – a minority but not an insignificant one – of general tourists and, more pertinently, of mountain-goers are discouraged from (re-)visiting by the presence of wind turbines. While survey results are mixed, not least because of varying methods and quality, there is nothing to suggest that this proportion is diminishing. Given the importance of mountain recreation in the Carsphairn area, we conclude that the risk of an adverse impact upon tourism/recreation should the proposed development proceed would be high.

5. Conclusion

The planning authority needs to balance the benefits and detriments of the proposed development. The detriment to the mountaineering community on whose behalf we speak is set out in this objection. The national benefit consists of an exceptionally modest 20MW (0.3%) addition to the 6,800 MW of consented renewable energy developments not yet even begun

construction (Scottish Government *Energy Statistics for Scotland* June 2016). Such a minor contribution can easily be achieved by the location of generating capacity elsewhere, with fewer adverse impacts; for example the Wether Hill extension, to which the MCofS has not objected.

In recent years Cairnsmore of Carsphairn has been subjected to a continuous assault from wind farm developers seeking to drape a noose of turbines around it. We look to Dumfries and Galloway Council to recognise the importance of retaining mountaineering interest in the upper Glenkens and to protect the shrinking mountain resource remaining unaffected by wind farm development.

Yours sincerely

David Gibson
Chief Executive Officer