



## The Mountaineering Council of Scotland

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Dear Sir

### **THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2000. SECTION 36 APPLICATION FOR THE PROPOSED CAPLICH WIND FARM, 5 KM FROM OYKEL BRIDGE, SUTHERLAND**

#### **Objection to Section 36 Application for Caplich Wind Farm**

##### **1. Introduction**

Muirhall Energy has applied for planning permission for 20 wind turbines of up to 132m blade-tip height at base elevations of around 220-360m OD.

The Mountaineering Council of Scotland believes the proposed development is of a scale and form which is entirely unsuitable for this location. The proposed site is an unexceptional area of damp moorland slopes and gentle rocky ridges. However, the visibility of the proposed development from surrounding hills, in particular the remarkable landscapes of Assynt to the west and northwest, would be profoundly damaging to mountaineering and tourism interests in the wider area.

The Mountaineering Council of Scotland objects to the proposed development on the grounds of significant adverse visual impact, detrimental to the reputation of the Assynt mountains and thus to their tourism potential.

##### **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**

A large wind farm in this location would be utterly incongruous and a significant detraction from the experience expected by mountaineers and other visitors to the dramatic peaks of Assynt. The impact on the Coigach-Assynt NSA would be significant, adding to the incremental whittling away of the special qualities of the NSA which, if allowed to continue, will eventually result in a National non-Scenic Area.

Although the site of the proposed development is not itself a remarkable landscape, the proposed development will change key physical wild land attributes of the Wild Land Area it is partly located in and of surrounding WLAs, diminish the sense of wildness and reduce it to just another landscape with a commonplace wind farm. As with the NSA, consent to the proposed development will encourage continued whittling away of wild land qualities until there is no quality left.

The main existing wind farms in sight are 8-10 km further away from Assynt and the proposed development therefore would represent a significant step westward of the wind farm landscape that already characterises the Lairg area, to which MCofS has made no objection.

We offer a more realistic interpretation of the, largely outdated, evidence available on the extent to which wind farms discourage visitors. Assynt is currently well-placed to benefit from the redistribution of mountaineering spend from areas with wind farms to areas without them, which research undertaken by the MCofS has suggested is a significant possibility. Continued encroachment by wind turbines will weaken that selling point. The proposed Recreational Enhancement Fund, which is unsupported by evidence, is unlikely to be an effective counter to the potential disengagement from the Assynt mountains of a large section of the tourist market

We also comment briefly on access, decommissioning and turbine colour.

### **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, the images in this application that we have used to form our appreciation of the proposed development in relation to mountaineering interests are adequate, though hazy, for distances up to around 15km from the proposed development. For distances beyond this they are too hazy to demonstrate impact under clear conditions.

## b) Landscape and visual impact

The applicant describes the site as: “a west south west facing bowl of land ... enclosed by ... hills and tops ... This bowl faces towards the A837, but is partly separated from it .... As such it faces away from the Wild Land Area and away from the various hills which make up the Ben More Assynt range. From these higher and more distant hills, views down into the bowl can be seen, but local topography near to the site still provides containment, and the turbines would be backclothed against the land, rather than seen against a skyline.” (ES para 3.5)

This is a barely adequate description of a much more complex topography even if the proposed development were to be at ground level. (For example, Inset Figure 3C shows the bowl but not how the turbines spread onto the ridge to its north and over the ridge to its east.) However, this description certainly does not apply when the proposed development consists of 80m high towers, topped by rotors of 104m diameter (132m blade-tip height). Viewpoints 7 (12km to the NW), 6 (10km to the SE) and 1 (3km to the WSW) show clearly that the term bowl is misleading in the context of the development proposed. The main topographic shielding of the site is to its east and northeast, with the development in plain view from the surrounding Wild Land Areas and largely open towards from the various hills which make up the Ben More Assynt range, quite the opposite of the description quoted above from paragraph 3.5.

Although the landscape of the site of the proposed development is in itself unexceptional, it will be overwhelmed by the proposed development. The highest turbine bases are at c.360m OD (T7) and c.350m OD (T6). The blade tips will reach c.490 and c.480m respectively. The northern ridge of the so-called bowl, which is the highest point of the effective proposed development area, lies around 390m altitude and within the area occupied by turbines the highest point is 372m. The mapped site includes a north eastern section which reaches c.490m and which appears to have been retained from the original scoping area simply to enable the statement to be made that no turbines are proposed for the highest part of the site. This is circular since if no development is proposed for the area, then it should not be regarded as part of the proposed development site.

The proposed development will form a focal point in otherwise tranquil, gently rolling moorland. It will attract the eye whenever in view, regardless of the intention of the viewer. For that reason the objectively ‘small’ change in landscape character type for CSL5 and CSL6 provokes a much greater change in the perceived experience of the landscape by the viewer who visits these areas for their natural vistas.

Residual landscape effects during operation on CSL3 are understated. We agree that the effect to the north extends to around – actually somewhat over – 5km. However the effects on the south of Glen Oykel are in the 5-15km range. We also regard the local effect on CSL1 south of Glen Oykel (south of Ruith-cnoc), around 7km from the proposed development site, to be greater and more significant than stated.

Visual impacts for most mountain viewpoints are understated since they fail to take account of the perceptual impact on mountaineers and others who choose to visit this area because of its lack of modern built artefacts away from the main transport network and settlements. A large wind farm is perceived as utterly incongruous and a significant detraction from the ‘wilderness’ experience expected. Impacts are also understated in that reference is made in the ES to most of the mountain viewpoints assessed currently having visibility of wind farm development but this fails to take account of distance. The proposed development is 8-10km closer than existing wind farms.

The MCoFS places a higher value on the Coigach-Assynt NSA than does the ES. The ES notes that: “Of the special qualities identified for the NSA, the proposed development has the potential to affect its “*significant tracts of wild land*” by introducing modern development into a landscape adjacent to the NSA which is noted for its “*absence of modern artefacts, or overt human activity*” which “*emphasises the feelings of openness, remoteness and wildness.*” (Section 4.8.1) It then argues, sometimes at a tangent (e.g. the presence of human activity on the coast of the NSA is irrelevant to judging the impact of a development well inland), that the proposed development will have no material impact on the qualities of the NSA. And, it argues, if there are any, they are minor and can be offset by a recreational fund (discussed below).

The MCofS does not agree and regards the impact as significant, adding to the incremental whittling away of the special qualities of the NSA which, if allowed to continue, will eventually result in a National non-Scenic Area.

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

The cumulative ZTV appears to show that most of the mountain viewpoints already have sight of existing windfarms, the implication being that the proposed development would therefore have little additional impact.

The ES seeks to downplay what would be a significant extension of the wind farm landscape that already characterises the Lairg area by referring to Caplich being 'seen in combination with other wind farms in wider/panoramic/views out of the NSA'. In practice, the main existing wind farms in sight are Rosehall and Achany, which appear as a single wind farm. The proposed development would sit around 8km closer to Ben More Assynt and around 10km closer to Cul Mor than Rosehall-Achany. From viewpoints to the west, Caplich would be much closer in the view (cf Fig 4.24, where the operational wind farms are largely obscured by the haze while the photomontages show Caplich in clear view). From viewpoints to the south and north, Caplich would appear as a significant step westward in the angle of view with wind farms visible (cf Fig 4.21, cumulative wireframe E; Fig 4.23 cumulative wireframe C; consented and operational wind farms only).

### **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 partly on wild land – in the Reay-Cassley Wild Land Area (WLA) - and by imposing large built structures will have an adverse impact upon its physical attributes and perceptual responses.

Our objections to the development from a wild land perspective relate to the visual impact upon the Reay-Cassley, Inverpolly-Glencanisp, and Rhidoroch-Ben Dearg-Ben Wyvis Wild Land Areas. This has already been covered in the two sections above.

We disagree with the perceptions of the assessors responsible for the wild land assessment. The proposed development will change key physical attributes, diminish the sense of wildness and reduce "arresting / inspiring qualities, sense of awe -prospect" to just another landscape with a commonplace, and therefore dull, wind farm.

### **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 the Scottish Parliament report 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.

In common with many applications, this application cites (in 5.2.4.1) as fact an error in the GCU report. A proper analysis of the data, with confidence intervals, shows - as the detail of report itself states - that there was no significant difference between tourists who gave their main activity as walking/hill-walking and the rest of the sample. The detail of the correct calculation is available from MCoFS on request. The authors of the report ignored their own analysis and, for reasons known only to themselves, stated elsewhere in the report and in the summary - which we suspect is all that is usually read of the report - that there was a difference. There was not.

The applicant provides a typical static account of the extent to which visitors are deterred from an area by the presence of wind farms, citing studies individually and separately without considering whether they are telling an evolving story over time in relation to the increasing number of turbines in the Scottish landscape and to (prospective) visitor reactions. In studies across the UK undertaken prior to 2008 the proportion discouraged was under 10%. In the GCU study already referred to it is cited in the ES as 1%. (Our own reading is 2% but the number is tiny whichever figure is taken.) The applicant cites VisitScotland research published in 2012 which showed that around 17-20% of tourists could be deterred by a wind farm. The applicant also cites a Scottish Renewables survey in 2013 that found 26% discouraged. Although there are few recent data points it is possible, to put it no more strongly, that increased numbers of turbines over time is impacting increasingly upon intentions. (Data taken from secondary analysis of population surveys in [Wind Farms and Changing Mountaineering Behaviour in Scotland](#) (MCoFS, March 2014).)

The Biggar Economics study cited (5.2.4.4) is a simple correlational analysis at broad geographical level. It is entirely possible to have a reduction in tourism in one part of a large area such as Highland Council countered by an increase in another part. At a Scotland-wide or local authority scale embracing the whole of the tourism offer, loss of some visitors to some places might not matter. For those places affected it matters a lot.

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 locally important market. Our report cited above was mainly concerned with 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. There was a miniscule positive impact among respondents (preference for wind farms), showing an overall substantial negative impact. At best this will lead over time to some redistribution of mountaineering tourism and recreation spend away from areas with wind farms to areas without. Assynt is currently well-placed to benefit from such redistribution. At worst it will divert spend to areas outwith Scotland, if turbine-free areas in Scotland are seen as too few, too fragmented or too small to offer a real choice of destinations.

The assessment of tourism impact in the ES shows no understanding of the psychology of outdoor tourism's engagement with the landscape, and particularly of the attitudes of those drawn to Scotland's wilder mountain landscapes. For example, it refers to walkers using the Scottish National Trail doing so "in order to complete a long-distance challenge. These visitors come to the area for the specific purpose of completing the challenge. As the presence of a wind farm along the route will have no impact on their ability to complete the challenge, it is therefore highly unlikely to affect their enjoyment of it." (5.4.1) Certainly such long distance routes provide a challenge, but

they are seen by most participants as primarily about the experience of being immersed in travelling through a wonderful landscape. If the experience is diminished, for most people the challenge alone is not sufficient to maintain interest. Mountaineering is an aesthetic as well as an athletic experience.

The assessor shows a similar misunderstanding in referring to Munro-baggers not being deterred (5.4.5). This is certainly true of a 'baggers' *first* visit but very few hill-walkers bag the Munros and retire. They revisit, repeatedly, areas in which they have found the outdoor experience to be particularly rewarding. It is not first visits that wind farm development jeopardises: it is the continuing train of repeat business.

Viewpoint 12 shows a classic Scottish mountain view, from the summit of Suilven looking over the eastern ridge. The photomontage shows the proposed development in the background appearing nearly level with Meall Mheadhonach – the summit of the eastern ridge. This is not an image to attract mountain tourism to Assynt.

Scotland is embarked upon an experiment to test the tolerance of lovers of mountain landscapes to wind farm development, relying for estimates of impact on an outdated, superficially interpreted evidence base. The MCoS cannot with confidence estimate the scale of impact of the proposed development upon local mountaineering tourism. We can say it will be adverse and very much doubt that it will be “negligible” (5.4.5). There are already large areas of the Highlands where those who wish to experience a vista of wind farms can go. The area available to those who do not is shrinking and this proposed development would contribute further to that, disincentivising visits by those seeking to experience wild, open mountain landscapes.

## **5. Other matters**

### **a) Recreational Enhancement Fund (REF)**

A REF is proposed to compensate for the “very small minority of walkers [who] may be discouraged from re-visiting the area due to the presence of the turbines” (5.5.5). This is problematic. Those deterred by the intrusion of turbines into the vista will not be attracted by improved paths or other walking facilities while the vista remains, in their eyes, spoilt. So the success of the REF relies upon attracting new, undeterred, visitors - presumably from a differently motivated market segment - to a remote area that requires a commitment of time and effort to visit.

The two examples cited are not helpful for assessing the likelihood of the proposed REF achieving its goal of attracting/retaining visitors. In both cases the ES describes agreement on funding as if that was a successful outcome. In neither case is it able to give evidence of visitor numbers being maintained, which is real goal. At Kilgallioch the wind farm has yet to be built. At Burnfoot most of the expenditure has been in low-lying areas at the foot of the hills and little appears to have been done to “improve and enhance access to and in the hill range” (5.5.5). No evidence is offered in the ES as to whether the funding is being successful in terms of maintaining overall visitor numbers and spend in this centrally-located urbanised area. We conclude that whether the proposed REF would have the intended effect of retaining/attracting visitors to an area distant from population centres and where a landscape perceived as unspoilt is a primary attractor, is entirely unknown.

### **b) Turbine colour**

If the proposed development is consented, the MCoS would ask that a condition be attached requiring the turbines and blades to be a darker colour than the standard pale grey (cf section 3.15 and page 4.14). While there is no perfect colour for turbines which will inevitably be seen from multiple angles against different backdrops, in this instance the views will overwhelmingly be backclothed by land rather than sky. Figures 4.14.6 and 4.17.6 suggest a darker green-grey colour may diminish the visual prominence of turbines in this location.

## **6. Conclusion**

The Mountaineering Council of Scotland objects to the proposed development on the grounds of significant adverse visual impact, detrimental to the reputation of the Assynt mountains and thus to

their tourism potential.

The proposed site is itself an unexceptional area of damp moorland slopes and gentle rocky ridges. However, the visibility of the proposed development from surrounding hills, in particular the remarkable landscapes of Assynt to the west and northwest, would be profoundly damaging to mountaineering interests in the wider area.

The impact on the Coigach-Assynt NSA and on surrounding Wild Land Areas would be significant, adding to the incremental whittling away of their special qualities which, if allowed to continue, will eventually result in there being no quality to protect.

The main existing wind farms in sight are 8-10 km further away from Assynt and the proposed development would be a significant step westward of the wind farm landscape that already (and acceptably) characterises the Lairg area.

We offer a more realistic interpretation of the, largely outdated, evidence available on wind farm impact on visitor intentions. The trend over time suggests a rising level of discouragement. Assynt is currently well-placed to benefit from the redistribution of mountaineering spend from areas with wind farms to areas without them, which research undertaken by the MCoFS has suggested is a significant possibility. Continued encroachment by wind turbines will weaken that selling point. The proposed Recreational Enhancement Fund, which is unsupported by evidence, is unlikely to be an effective counter to the potential disengagement from the Assynt mountains of a section of the tourist market.

Scotland is embarked upon an experiment to test the tolerance of lovers of Scotland's mountain landscapes to wind farm development, with estimates of impact relying on an outdated, superficially interpreted evidence base. The area of upland Scotland attractive to those who wish to experience wild, open mountain vistas without wind farms is shrinking rapidly and this proposed development would contribute further to that.

Yours sincerely,

David Gibson  
Chief Officer