



## 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)

Theresa McInnes  
Energy Consents and Deployment Unit  
Scottish Government  
4th Floor  
5 Atlantic Quay  
150 Broomielaw  
Glasgow  
G2 8LU

5 January 2015

Dear Sir

**Response by the Mountaineering Council of Scotland to:  
Electricity Act 1989 Section 36 Further information on the proposed Allt Duine Wind Farm,  
Kincaig, submitted by RWE Innogy Ltd on 14 November 2014**

### Introduction

The further information submitted consists of a "Wild Land Impact Assessment" of the effects of the Allt Duine Wind Farm on Wild Land Area 20 (WLA 20), undertaken by two people. For all the appearance of objectivity, impact assessments are ultimately subjective judgements paid for by the developer. In our experience, such assessments repeatedly downplay the impact of proposed development. This assessment is no exception, even though the assessors placed "limited weight ... on anticipated change to the perceptual response in this assessment. The intention is not to diminish the importance of the perceptual response which wild land evokes, but to avoid the subjective nature of this aspect of experiencing wild land to influence [*sic*] the assessment of impacts on it". The MCofS - composed of and representing very experienced 'consumers' of mountain landscapes - believes its own judgement of impact to be of equal validity to 'professional judgement'. We agree that perceptual responses are subjective, but landscapes are important for the response they evoke: such responses are what attract our members to certain areas and deter them from others.

### Response to the further information

The assessment is constructed to downplay the impact of the proposed development. It argues that the area identified as Wild Land is not really wild; that other wind farms are visible, and therefore that that the proposed development would have little impact.

The reductionist approach taken by the assessors - defining discrete areas and assessing impact upon them separately - allows judgements of impact to be made that are not sustainable with a more holistic approach. The experience of wild land is not about discrete destinations but about the overall journey. For example, it is assessed that Area C would not be affected by the wind farm. But this ignores the need to reach Area C to be able to experience its qualities. If Allt Duine was built, then most routes into Area C would have visibility of Allt Duine. The experience of the destination would be marred by this memory of the journey.

Much is made by the assessors of the impact of already-consented wind farms upon WLA 20. We concur that the quality of much of WLA 20 is degraded by these consents. However, it is not

completely destroyed. There are two substantial areas without visibility of wind farms: in the south and in the north-east. Allt Duine is located in the latter. The assessors note that three-quarters of WLA 20 would not have visibility of the proposed development. What they fail to note, but what is abundantly clear from Figure 9, is that most of the 25% with visibility of Allt Duine does not have visibility of any other wind farm. Allt Duine fills the cumulative ZTV 'gap' in the north-east of WLA 20 so well that one could almost imagine it had been designed to obliterate it.

Again, the reductionist approach obscures this and allows misleading comments such as :”Where Allt Duine would be visible from these summits [on the central ridgeline], it would mostly be seen with one or more of the operational or consented wind farms which occur to the north, west and south west of WLA 20.” (p.24) In fact, Allt Duine would introduce a wind farm in a totally new direction. Sitting on a central ridgeline summit (e.g. Carn Coire na h-Easgainn) looking east would give a clear and very close view of Allt Duine with all other wind farms at one’s back. Further north or south on this broad ridge peripheral visibility of other wind farms while looking east would be possible but could be avoided by choice of orientation. If Allt Duine was built, there would be no choice of orientation on the central ridge that avoided wind farms being in view.

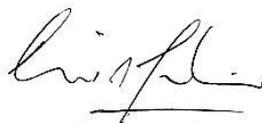
In their conclusion the assessors argue that the wind farm site affects only lesser quality wild land. We believe that SNH’s publication of the final Wild Land map with WLA 20 essentially unchanged from the Core Areas of Wild Land map, despite RWE Innogy’s consultation response pressing the case for the proposed wind farm site to be excluded, shows that all of the land within WLA 20 contributes to the sense of wildness that can be experienced there. Seeking to differentiate grades of wild land in order to find the least harmful location for a low-impact development that cannot be located outwith a WLA might be an acceptable argument in certain circumstances. It is not an argument that should carry any weight in seeking to justify a high-impact wind farm development.

In passing, we note that this is yet another wind farm development described as located in a ‘bowl’. We are amazed at the variety of topographies to which wind farm developers can apply this term.

## **Conclusion**

Wind farm promoters – whether acting individually but similarly from a shared common interest (and a shared pool of advisers) or acting in collusion – are engaged in a consistent pattern of behaviour the intention of which is to undermine and over-ride the stated intent of Scottish Planning Policy 2014 to afford increased protection to wild land from wind farm development. The under-playing of the impact of Allt Duine on WLA 20 in this assessment is typical of that pattern, particularly in its reliance upon the visibility of other wind farm developments to justify a further extension of visibility by consenting the proposed development. It is part of a deliberate process of attrition - the planning equivalent of a military rolling barrage, steadily pushing development towards and into Wild Land. Such a process may find favour with some in Scottish Government, but it is wholly contrary to the stated intent of Scottish Planning Policy 2014.

Yours sincerely



David Gibson  
Chief Officer