



The Mountaineering Council of Scotland

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Dear Sir

Application 15/P/3/0279

Erection of 24 Turbines of 125m blade-tip height at Sandy Knowe Wind Farm

Introduction

We comment below on the proposed development and raise specific concerns regarding errors in the ES assessment relating to tourism and recreation.

The Proposed Development

The MCOFS raises no objection to the proposed development. (For the avoidance of doubt, this should not be read as support for the development.) It is sited in an area which lies outwith our criteria for detailed consideration of proposed developments. In addition it is within an extensive area already heavily modified by mineral extraction and commercial forestry operations and in which, taking into account consented as well as currently operational wind farms, the most characteristic upland landscape feature will in future be wind turbines.

In such circumstances, the addition of further turbines will have little impact on an already largely depleted mountaineering resource. (Figure 24b of the application lists 887 operational and 606 consented turbines within 60km of the proposed development site.)

Error regarding hillwalkers' attitude to wind farms

The developer's assessment of hillwalkers' opposition based on the interpretation of published research is flawed in that it concludes that the group is not "less opposed" to wind farms.

Para 13.7.71 of the ES states:

"Walkers are less opposed to wind farms: 'Interestingly, the proportion of respondents whose main activity was indicated as walking / hillwalking and who indicated a negative attitude towards wind farms (19 %) was lower than the overall figure of 25 %. This group also had the most positive attitude (45 %) among those categories where the sample size was of sufficient size for analysis.'"

This myth arises from an error in the Moffat (Glasgow Caledonian University) Report of 2008. The main text of that report also stated:

“Analysis of attitudes based on the main visitor activity undertaken by respondents is shown in Table 4-14. Only a small number of these categories had sufficient responses to provide meaningful analysis and within these it can generally be concluded that none deviated significantly from the figures for the sample as a whole.” [pp116-7, added emphasis]

Clearly the report was poorly drafted since both of these statements, made in sequential paragraphs, cannot be true.

The MCoFS has confirmed the lack of difference by reanalysing the data as presented in the report. The original analysis is not well presented and the base numbers had to be estimated for the reanalysis. The 95% confidence intervals – a standard measure of whether subgroups within a sample survey are likely to be truly different – for attitudes to wind farms are:

	Positive	Negative	
All respondents as published	39%	25%	p115, Table 4-11, assumed n=380
All respondents 95% ci	34-44%	21-29%	
Hikers, hillwalkers as published	45%	19%	p117, Table 4-14, assumed n=71
Hikers, hillwalkers 95% ci	33-57%	10-28%	

The overall sample size, and even more so the hillwalker subgroup size, is small. The 95% confidence intervals are correspondingly wide and overlapping, indicating no statistically significant difference between the overall sample and the hillwalker sample.

We may conclude that the myth that hillwalkers are more positive towards wind farms than general tourists is derived from an error of drafting and/or statistical interpretation. Its repeated use in planning applications by developers who have simply lifted text from the original report, rather than taking the time to assess the base data, is wrong and utterly misleading.

Error regarding trend in tourist discouragement by wind farms

The ES states (13.7.91)

“The review of comparative research above demonstrates that over the last five years attitudes towards wind farms have not changed significantly. For example similar results are evident in the 2008 Review of ‘The Economic Impacts of Wind Farms in Scottish Tourism’ and the 2013 You Gov Scottish Renewables survey results. The proportion of negatively affected respondents remains constant at approximately 25-26%. If anything, support for wind farms - those unaffected by their presence or those who don’t know – has remained approximately the same at c.75% of respondents, with those uncertain having declined from 36% to 5%.”

It is unclear how this conclusion can be drawn from the sources cited.

The MCoFS published [Wind Farms and Changing Mountaineering Behaviour in Scotland](#) (March 2014). As context, this included an analysis of general tourist surveys. In surveys up to 2008 fewer than 10% of respondents, usually much fewer, stated that they would be discouraged from (re-)visiting an area by the presence of a wind farm. The Moffat Report’s survey – the “2008 Review” referred to above - gave a figure of 1-2% discouraged. VisitScotland research undertaken in 2011 found that the 17% of Scottish and 18% of UK respondents would be discouraged by the presence of a wind farm. A YouGov survey commissioned by Scottish Renewables in 2013 found that 26% would be discouraged. This possible trend is suggestive of a lagged adverse response to the increase in turbines constructed and visible in the landscape. Interestingly, when Scottish Renewables repeated its survey in 2015 it did not ask this question, possibly because it realised the risk of obtaining results that would confirm a trend it would prefer to ignore.

By any statistical standards, a change in six years from <10% to 26% discouraged cannot be described as remaining constant.

Conclusion

Despite these errors, the MCofS concurs with the ES's judgement that:

“13.11.5 It can therefore be concluded that the significance of the permanent effect of the Proposed Development on the tourism and recreation facilities in the study area would be limited and is therefore assessed as being of minor scale and not significant. “

But we do so for reasons that differ from those advanced in the ES and that are grounded in a more nuanced understanding of the hillwalking segment of the tourist and recreation market.

The MCofS does not agree with the simplistic belief of the ES that

“... there is a strong comparative evidence base to suggest that visitor/ tourism behaviour is not adversely affected by the presence of wind turbines and that the predicted negative behavioural response to such developments i.e. visitors staying away, does not materialise.”

It is our view that there is a sufficient evidence base to suggest that some types of visitors/tourists *are* affected by the presence of turbines and this does lead to them staying away. To determine the specific impact of a specific development requires an analysis of the specific motivations driving local visitors, not reliance upon broad generalisations across the tourism market as a whole. In the case of Sandy Knowe, however, such an analysis suggests that the impact on the local economy from a reduction in hillwalking visitation would be minor since upper Nithsdale attracts little of the highest-spending hillwalking market segment - non-local hillwalkers whose primary motivation when selecting a destination is an area's scenic landscape/wild land reputation.

We hope that this response will be helpful to the developer as they strive for accuracy in future environmental statements, and of assistance to the local authority when interpreting future applications for wind farms in areas which may have a tourism interest.

Yours sincerely

David Gibson
Chief Officer