



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

Roslyn Keenan
Administrator
Energy Consents Deployment Unit
4th Floor, 50 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

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Dear Sir

ELECTRICITY ACT 1989 THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2000: SECTION 36 APPLICATION FOR PROPOSED WEST GARTY WIND FARM ON LAND 4KM WEST OF HELMSDALE

1. Introduction

Muirden Energy LLP has applied for planning permission for 18 wind turbines of 120m blade-tip height at base elevations of around 390-510m OD on the open southern and eastern ridges of Beinn Mhealaich.

The Mountaineering Council of Scotland has reviewed the proposed development carefully and has concluded that it does not fully meet its criteria for an objection – mainly due to its distance from main areas of mountaineering interest. There is mountaineering interest in some nearby hills. Beinn Dhorain to the west is a Graham and is the nearest hill to the proposed development (3.9km) included in a Scottish Mountaineering Club guide. Morven, 13.6km to the north is another Graham and a regionally significant hill due to its isolated position and distinctive topography.

Both these hills would have uninterrupted views of the proposed development. This would have a particular impact upon Beinn Dhorain which already has Gordonbush wind farm closely in view to its west and Kilbruar wind farm at a greater distance to its south.

On balance, however, the detriment to mountaineering, while not insignificant, is insufficient at a national level for the MCofS to trigger an objection. Nonetheless the MCofS has a number of concerns about the proposed development and we offer these comments below as an input to the Consent Unit's consideration of the application.

For the avoidance of doubt, an absence of an objection should not be interpreted as support for the proposed development.

2. The Mountaineering Council of Scotland (MCofS)

The MCofS is an independent organisation with more than 12,000 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 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 [Protecting Our 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

The MCofS believes that the proposed site is of doubtful suitability for a wind farm development:

- It would be detrimental to the local mountaineering resource, though not sufficient from a national perspective to trigger an objection.
- It would narrow an important gap in a pattern of operational and consented wind farms that now occupy a belt of land, typically 10-30km inland, stretching from the north coast of Caithness to east of the Spey.
- The Environmental Statement too readily dismisses concern about impact on tourism and recreation.
- Fencing proposed in the deer management plan has access implications.

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 and significance 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. The photomontages with this application appear to give a realistic impression (without movement) of the appearance of the proposed wind farm. It is regrettable that the viewpoints of particular mountaineering interest are presented only as wirelines and not photomontages.

b) Landscape and visual impact

The proposed development is located within the *Moorland slopes and hills* LCT which is judged in the ES to have a low capacity for further wind turbine development (para 7.5.3.1). In apparent contradiction to this judgement, with which MCofS agrees, the proposed development is judged in the ES acceptable with its landscape effects 'not significant'.

It is the judgement of an experienced MCofS assessor that the LVIA downplays the level of effect and its significance on:

- Moorland slopes and hill LCT
- Lone mountains LCT
- Loch Fleet, Loch Brora and Glen Loth SLA
- Flow Country and Berriedale Coast SLA

- Causeymire-Knockfin Flows Wild Land Area
- Viewpoint 20 (Morven)

The proposed development is located within a stretch of coastline where high ground rises directly from the coast, giving a distinctive 'sense of place' compared with the gentler coastline south of Golspie and the open cliff-top coastline north of Dunbeath. It is of note that wind farms approved in the area have been on the inland side of the coastal hills, and narrowly outside the SLA, not on the hills themselves and well inside the SLA.

An application for a wind farm at Dunbeath was refused in June 2013 because of its impact *inter alia* on landscape and recreational interests. That refusal is very relevant to the present application.

c) Cumulative impact

The conventional 60km radius for assessing cumulative impact is inadequate in this case. A wider pattern is emerging where the moors and modest rolling hills that typically lie inland from the Moray Firth coast, from Caithness to east of Elgin, are becoming an extended wind farm landscape. For an overall distance of about 200km, a belt of land, typically 10-30km inland, has operational or consented wind farms spaced irregularly but typically less than 20km apart, meaning an individual on these hills or moors is seldom more than 10km from a wind farm. This repetitive pattern is already the characteristic landscape of some areas and the pattern will fully develop as already-consented wind farms are built.

There are only four gaps in this pattern. One is Inverness city. A modest 20km gap in Morayshire at Dava Moor has a current application pending decision. The Ben Wyvis gap has seen two large applications, both refused with an appeal against the latest refusal pending. The coastal hills from Dunbeath to Brora constitute the largest gap, with nearly 70km between Gordonbush and Buolfrulich. West Garty, if approved, would reduce that gap to 50km and mean that one or other wind farm would be in sight from almost all the high ground within the reduced gap – the kind of hand-railing that already exists south of the Moray Firth.

It is clear both from theoretical studies and from practical experience that concentrating turbines into particular areas in large numbers creates much less visual impact overall than stringing out small clusters across large areas, such as has happened around the Moray Firth.

We believe that the refusal of Dunbeath wind farm set a precedent for safeguarding the area between Gordonbush and Buolfrulich from wind farm development. We do not accept the developer's suggestion that the proposal should be accepted because it "would uphold the existing separation distances considered appropriate between consented wind farm developments in the LCT." (para 7.5.3.1) To date it has not been considered appropriate to allow a link to develop between the Caithness and east Sutherland wind farms, and this position should be maintained.

d) 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. We therefore welcome the developer's stated intention (para 5.9) to remove all roads.

e) Access

The MCofS appreciates the need for construction activity to have due regard to both operator and public safety. Restrictions on access should apply only to areas of active construction and be for the minimum time necessary.

The Deer Management Plan included as Appendix 11 proposes (para 3.3) to erect a deer fence from Crakaig to Portgower parallel to the A9. This 6km fence will deter public access except at the

gate to the wind farm road. We accept that this would only affect a few people and the creation of specific crossing points would involve disproportionate expense.

We suggest, therefore, that the fence should be constructed in such a way as to facilitate scaling it: the mesh should be large enough to admit a boot and it should not be electric.

f) Socio-economics

The assessment of tourism impact in the ES is typical in its focus on a few studies, all of which ultimately rely heavily upon the outdated Moffat Study whose fieldwork was undertaken in 2007 when operational wind farm capacity in Scotland was less than one quarter of its current level. The update by ClimateXchange (also cited) had very limited new data on which to draw.

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 particularly reliant upon the quality of the landscape as an attractor. The MCofS has conducted research on mountaineers' attitudes and stated behavioural intentions and it is clear that the majority of mountaineers are minded to be avoid areas with wind farms ([Wind Farms and Changing Mountaineering Behaviour in Scotland](#) MCofS, March 2014).

This report also analysed the trend in general population behavioural intentions. In studies across the UK undertaken prior to 2008 under 10% of tourists stated that they would be deterred by wind farms. In the Moffat study itself it was 2%. VisitScotland research published in 2012 reported 17-20% deterred. A survey commissioned by Scottish Renewables in 2013 found 26% discouraged. Although there are few recent data points it is possible, to put it no more strongly, that increased visibility of wind farms is now beginning to impact upon intentions to visit in a way that it did not when wind farms were seen as a novelty.

It might be anticipated that if such behavioural intentions are acted upon there will be a redistribution of tourism and recreation spend from areas with wind farms to areas without, including to areas outwith Scotland. This may not be apparent in gross regional statistics because people come to the Highlands of Scotland for many reasons and trends in any one segment of the total market (e.g. type of visitor, specific location) can be masked by changes in other segments. The overall result, though is a smaller total level of visitation and spend than there would otherwise have been

It is notable that the Pre-Application Consultation Report contains results, albeit incompletely reported, that suggest limited support in the vicinity of the proposed development for more onshore wind power and even less support for the development itself.

5. Other matters

The MCofS does not normally comment on developers' theoretical calculations of spending and jobs that a development might produce. However, we did observe in passing that Tables 16.10-16.12 and their discussion appear inaccurate. The confusion appears to arise because figures are presented for Highland, Scotland including Highland, and UK including Scotland. This appears to have led to some double counting, inflating the number of MYE jobs and thus GVA impact.

6. Conclusion

The proposed development offers an energy contribution and presumed CO2 reduction that would be far outweighed by its damage to a distinctive and largely unimpaired landscape.

It would have limited direct impact upon national mountaineering interests, and for that reason the MCofS has not made a formal objection, but it would add to the growing sense that the Moray Firth area, on- and off-shore is being developed as one giant spatially-scattered wind power station and thereby discourage mountaineers and other visitors for whom quality of landscape is an important consideration.

Yours sincerely

David Gibson
Chief Officer