



The Mountaineering Council of Scotland

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Dear Sirs

Electricity Act 1989 - Response to Section 36 Further Environmental Information on the Proposed Dulater Hill Wind Park, nr Butterstone, Perth & Kinross

The Mountaineering Council of Scotland (MCoFS) previously (letter to ECDU 3 July 2014) expressed concern that the proposed Dulater Hill wind farm would have a significant and intrusive landscape and visual impact in an area of significant importance to hillwalking and to other recreational and tourism interests in southern Perthshire. Although the proposed development did not meet our normal criteria for a formal objection because of its distance from primary mountaineering assets, we nevertheless felt that this was an ill-advised development.

LVIA

We have considered the information provided in the Addendum. It does not, in our view, provide any evidence to set aside or diminish our previous concerns. Its repeated use of language designed to downplay any possibility of adverse impacts strengthens our view that the LVIA, and now the addendum, is shaped by a desire to achieve a particular outcome (consent for the development) rather than to undertake a properly objective assessment. For example:

- Para 3.5.14 simply offers a value judgement with which we do not agree.
- Para 3.5.23 also contains a number of value judgements with which we do not agree. At a distance of approximately 9km the turbines would be prominent in a range of atmospheric conditions; they would intrude into views to the Grampian Mountains and extend the landscape with turbines and bring it much closer to Birnam Hill. Back-clothing by landform would increase the prominence of light-coloured moving structures. The regular layout and even spacing of turbines would not be particularly apparent to the casual receptor whose reaction would be one of incredulity that this area of rural tranquillity could be considered a suitable location for an industrial scale development.
- Figure 3.5 presents a wholly unrealistic image of the proposed turbines as faint smudges at distances of <10km. At this distance not only do the structures appear clearly visible in reality in a wide range of weather conditions, but blade movement is also very evident. It is only possible to make a proper assessment of visual impact from these photomontages if one is very familiar (as are MCoFS assessors) both with photomontages, and their limitations, and the appearance of wind farms under different conditions at different distances in the real world.

- We would question if there is research base to support the, otherwise subjective, statement that an evenly spaced array presents “a coherent positive image of wind energy development” (3.5.64), bearing in mind the complex topography of the local area.
- We disagree with the subjective opinions relating to scale and fit with the landscape (e.g. paras 3.5.75, 3.5.80, 3.5.82) The proposed development sits on a high shoulder with turbine bases up to 350m OD beside the prominent feature of Benachally. This gives blade-tip heights of c.475m within 1.5 km of a summit of 486m. We do not understand how this can be described more than once as the turbines appearing “subservient to Benachally”. A more accurate description would involve words such as rivalling or, considering the visual insistence of moving objects, dominating.

Socio-economic impact

Again, the addendum information, which for the most part is merely a dismissal of most organisations’ concerns, is unpersuasive.

The response to the MCofS in Table 8.1 demonstrates the deep division in the Scottish population between those who care about upland landscapes, possibly a majority of whom seek to avoid areas with wind farms in their leisure activities, and the larger number of people who do not go to the countryside and who have swallowed the misleading half-truths promulgated by developers and their mouthpieces, landscape deniers such as WWF and, shamefully, the Scottish Government. General population attitudes to wind power are not relevant to tourism and recreation impacts of a specific development. It is the attitudes and predicted behaviour of those who do visit and spend money in the area in question that matters. The evidence relevant to such an analysis clearly suggests that an increasing number of people are becoming disenchanted by the incessant growth of turbine visibility in the Scottish landscape and have an expressed intention to avoid areas with turbines in future.

We acknowledge that the evidence on this is limited. It is so because those in a position to build the evidence base appear to be actively avoiding doing so in case it gives an answer they do not want. For example, the 2013 YouGov/Scottish Renewables survey found that 26% of respondents would be discouraged from visiting an area by the presence of a wind farm – consistent with a rising trend from pre-2010 surveys (<10%) then the VisitScotland survey of 2012 (18%) as visibility of turbines in the landscape has increased. The 2015 YouGov/Scottish Renewables survey had the opportunity to repeat the question and establish if there was a trend. Instead they left this question out and asked a safe abstract question about support for wind power “as part of a mix of renewable and conventional forms of electricity generation” without mentioning that the existing diverse mix is rapidly shifting to a predominantly wind-dependent system with almost all renewable capacity being built in Scotland being wind and conventional forms of generation closing without replacement.

Conclusion

The addendum does not reduce our concern that the landscape and visual impacts, and consequential recreation and tourism effects, of the proposed Dulater Hill wind farm would be significantly detrimental. The proposed development does not meet our normal criteria for a formal objection because of its distance from primary mountaineering assets. Nonetheless we wish to place on record the continuing view of the MCofS that this is the wrong development in the wrong location.

Yours sincerely

David Gibson
Chief Officer