



# THE MOUNTAINEERING COUNCIL OF SCOTLAND

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Planning Officer  
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Dear Mr. Mudie

## **Corriemoillie Wind Farm 09/00693/FULRC - Mountaineering Council of Scotland comments**

The Mountaineering Council of Scotland (MCoFS) is the representative body for hill walkers, climbers and ski-tourers. As the only national representative body of the sport of mountaineering in Scotland, we have 10,500 members, and are recognised by the Scottish Government as representing the interests of all mountaineers.

All section references are to the non-technical Summary (NTS) unless stated otherwise.

### **4. Policy Context**

This section neglects to mention policy documents that are of equal relevance and importance as SPP6. Planning policy documents were never designed to be read in isolation as developments, whatever their nature, have implications for a wide range of policy areas. NPPG 14 is hugely important in this context, and the MCoFS is dismayed to think a developer is unaware or disinterested in this. Wind farm siting and design is not a simple issue of inside or outside a designated site as this section suggests, alongside the previous section. NPPG14 provides the policy basis for wild land qualities, which are not confined to designated sites. The NPPG 14 definition (glossary) should be used; "Wild Land: uninhabited and often relatively inaccessible countryside where the influence of human activity on the character and quality of the environment has been minimal." The current character of the area under study is that of wild land under this definition. Particular care should be taken in assessing the wild land and impact as paragraph 16 of NPPG14 states that, "planning authorities should take great care to safeguard their wild land character. This care should extend to the assessment of proposals for development outwith these areas which might adversely affect their wild land character." This assessment must be based upon agreed definitions and quality assessments. The current ES does not deliver the necessary assessment of impact required for the careful decision required by NPPG14. The development application must either be refused, or a sufficient wild land impact assessment carried out.

25. As stated in the NTS, Sections 25 and 37 (2) of the Town and Country Planning (Scotland) Act 1997 (as amended by The Planning etc (Scotland) Act 2006), require that planning decisions be made in accordance with the Development Plan, unless material considerations indicate otherwise. The supplementary guidance must also be considered, and in this context applies to the Highland Renewable Energy Strategy (HRES). This development is in the HRES area category of "presumption against development." The MCoFS consider the impacts do not warrant setting aside this presumption for the reasons expressed in this communication.

### **5. Landscape and Visual**

31. This section states "a key factor to the development has been the consideration of the consented Lochluichart Wind Farm adjacent to the proposed site." It is unclear what this means, but alarming to consider this may be justification on the basis that the area has already been impacted by an adjacent wind

farm. This is not a brownfield site but essentially an area of quality wildness that has already had a detrimentally impacting wind farm consented, and should be treated as such.

33. It is not explained why the conclusion was reached that there will only be “localised significant effects on landscape character and views in the vicinity of the site” in “limited parts of Rounded Hills and Undulating Moorland landscape character type, up to around 3km from the site, where there is visibility of Corriemoillie.” Within 3 km of the site, the development will be the overwhelming feature in the landscape and define the character of the area up to and beyond this limit. Figure NTS 2 illustrates that this important tourist road route, already impacted by a large dam on one side of the road, will be dominated on the other side of the road by the wind farm in the vicinity of the Aultguish Inn. Policy T6 Scenic views states that “the Council will protect important scenic views enjoyed from tourist routes and viewpoints, particularly those specifically identified in Local Plans. There will be a presumption against development in narrow areas of land between roads and railways and open water.” Narrow is not defined, but the area of land between the A835 and the A832 in the area of Corriemoillie is approximately 5 kms, with an already consented windfarm. In such a narrow strip of land between two popular tourists routes should mean that Policy T6 applies and therefore the wind farm should not be consented. Figure NTS 3 also shows how the wind farm would completely alter the landscape view from Ben Wyvis, turning a view defined by lack of visible modern man made features into a context for the dominant feature of a windfarm. The MCofS considers this to be unacceptable as it will exacerbate the impact caused by the consented Lochluichart development.

34. The cumulative effects are misrepresented in the NTS due to lack of inclusion of developments with which Corriemoillie would add impact. Views of Fairburn, Novar and Beinn Tharsuinn Wind Farms are considered, but the cumulative impact of consented Lochluichart wind farm, literally adjacent to Corriemoillie, has been ignored in the NTS (although some relevant figures are included in the longer document), as has cumulative impact of applications under consideration including Glenmorie wind farm and Kildermorie hydro scheme. This is partially corrected in the full Environmental Statement (ES), but still ignores the impact of, for example, the 360 degree views from Ben Wyvis summit where the cumulative impact will be that scarcely any direction of view will be free from significant wind farm views. As it stands the cumulative assessment is inadequate and does not follow the SNH guidance. No decision can be made reliably on this development application until a full assessment is conducted and consulted upon.

35. The issue raised in the previous paragraph is compounded by the fact that one of the severely cumulatively impacted locations (Ben Wyvis summit and the whole of the ridge) is part of an Area of Great Landscape Value (AGLV). Policy G6 Conservation and promotion of the Highland heritage states that “the Council will seek to conserve and promote all sites and areas of Highland identified as being of a high quality in terms of nature conservation, landscape, archaeological or built environment.” “This includes local landscape designations such as Areas of Great Landscape Value (AGLV’s) that are identified within local plans.” Additionally, PAN 45: Renewable Energy Technologies states that “a cautious approach is necessary in relation to particular landscapes which are rare or valued, such as National Scenic Areas and proposed National Parks and their wider settings .... In a regional context care should also be exercised within Areas of Great Landscape Value and Regional Parks.” (paragraph 75). The reasoning that “the wider area of the NSA [mistake and should read as AGLV] would experience less change (if any)” is not a reason to downgrade the impact from significant as it is the integrity of the AGLV that is relevant as due to the non-flat topography there would be unlikely to be anywhere that would be visible from the whole AGLV.

36. The reasoning that the impact is lessened by the “scale of the wider landscape, its uniformity and strong character and its capacity to accommodate a wind farm” is flawed. It is the uniformity and lack of significant modern man-made features that is precisely the characteristic that will be removed by the addition of a dominant feature such as a wind farm. The larger the feature (spread of turbines, the greater will be the removal of this defining feature. Lochluichart, as consented will significantly damage this feature and any addition of further turbines as in the current application will move beyond any capacity for the landscape to absorb due to the proportion of views and arc of any particular view being dominated by wind farm features. No level of design mitigation would reduce this additional stress on the landscape to an acceptable level.

## **6. Ecology**

The MCofS has concerns regarding the impact on the Annex I habitats: dry heath/acid grassland, wet heath/acid grassland and blanket bog. The latter 2 are of particular concern as these are carbon sinks, hence their loss and wider disruption to their hydrology will result in reduced claim for the level of any potential climate change benefits from the development. Highland Structure Plan Policy GSP14 - Habitats and Species commits planning decisions to fully consider the implications on European priorities. "The Council will encourage the management and maintenance of areas supporting the following habitats and species ...:

- Habitats and species listed under Annex I of the EC Habitats Directive;
- Habitats and species of community interest listed in Annexes II, IV, and V; and
- Habitats of naturally occurring wild birds, particularly those in Annex I of the EC Birds Directive and migratory species.

All these resources will be given full consideration in the assessment of development proposals that may affect them, and developments that are judged likely to have significantly detrimental effects shall not accord with the plan." We are also concerned that the impacts on the water vole colonies are only considered with respect to water quality, and no mention is made in the NTS of the impact of disturbance by traffic, site workers and heavy engineering works. The impact of disturbance is acknowledged with respect to birds in section 66, and mammals must be treated with no less seriousness, despite less power advocacy bodies.

## **7. Ornithology**

It is states that "best practice will be necessary to reduce the possibility of illegal damage, destruction or disturbance to occupied bird nests during the construction phase." The MCofS objects strongly and would be greatly concerned if the Council were to accept a development where the potential for illegal activity was merely to be reduced was considered satisfactory.

## **8. Forestry**

Along with the concerns regarding partial loss of potential carbon balance benefits due to damage to carbon sinks in wet heath soils and peatland, this concern is compounded by the removal of forestry. Forests are important carbon sinks that already exist. Depending on the end-use for the timber, the carbon payback period for the development is likely to be far into the future.

75. The claim that "tree removal will provide opportunities to re-establish near 'native' conditions" is not well-founded. "Native" conditions for this area have not been adequately researched and whether the area would be naturally wooded or heathland has not been proven. Any claims that the introduction of numerous large man-made objects being a return to "native conditions" should be treated with the scepticism it deserves.

79. The previous comments equally apply to the claim of the development providing "opportunities for conservation and landscape improvements that will provide local and regional benefits." The claim of promoting "use of the site by bird species including Black Grouse" should also be treated carefully. Black Grouse are woodland edge species and the claim of returning the site from forestry to heathland does not fit with the ecological requirements of this species.

## **13. Socio-Economics, Tourism and Land Use**

135. Paragraph 19 in SPP6 states that, "any benefit, including mechanisms for negotiating with communities, is offered entirely at the discretion of the developer. Benefits that cannot be considered material in planning terms should not be taken into account when assessing whether a specific proposal is acceptable." The MCofS considers it wholly inappropriate to include promises of sweeteners of "a community fund worth over £2.7m over the project's 25 year operational" in a planning application document where such offers as elements in a planning decision are against national planning policy. This must not be permitted to be taken into consideration for the granting of planning permission as is against national planning policy. Such offers and suggestions of such offers must discouraged in future planning applications from any developer.

140. This section downplays the impact of views on those that come to the area, and residents, to enjoy access in the surrounding hills. It claims that "hill walkers may observe the proposed Wind Farm." Correctly

expressed, hillwalkers definitely will from many surrounding popular summits and high level routes, including those in Areas of Great Landscape Value. This section also claims that “the cumulative effect of a number of wind farms on views may also be a consideration.” Again this is incorrect as the cumulative effects will have an impact, definitely this is a consideration. The claim that the “impact from the closest summit – Ben Wyvis was assessed as being of moderate significance during operation” is downplaying the impact. Hill walkers are sensitive receptors and the clear, uninterrupted broad arc of Corriemoillie in addition to the Lochluichart and Fairburn turbines will result in that view losing its appeal of relative wildness and open broad expansive grandeur. The southern Fannich such as Meall Gorm are a comparable distance from the development as that to Ben Wyvis. Cumulative impact from this area has not been sufficiently taken into consideration. Additionally, the prospect of the view of Glenmorie in the opposite direction will render the view in most directions from the whole of the Ben Wyvis ridge, a wind farm dominated landscape. This is a significant impact in all directions and is unacceptable. One wind farm in this area of wildness is already beyond absorption capacity.

144. Although it is claimed that “the potential socio-economic and tourism effects of the proposed Wind Farm are considered to be not significant”, this does not take into consideration the significant reduction in quality of the experience and the integrity of the AGLV and the NSAs for which Highland Council is responsible for the stewardship on behalf of for the nation.

#### **14. Other Considerations**

There is no mention of the impacts of grid connection, its siting and design. This is an integral element of the development and must be treated as such in the planning system.

#### **15. Conclusions**

156. Unlike the ES (it should be noted that EIA Regulations do not clearly define judgment of significance), the MCofS does consider the effects, even after the efforts at mitigation, are significant in terms of landscape, visual amenity and ecology, and that there is insufficient other human benefits to warrant the development being consented.

Please do not hesitate to contact me to discuss these issues further.

Yours sincerely

Hebe Carus  
Access & Conservation Officer