



# THE MOUNTAINEERING COUNCIL OF SCOTLAND

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23/6/08

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## **Dorenell Wind Farm (Environmental Statement) – Infinergy (Moray Council)**

### **Mountaineering Council of Scotland Response**

#### **Scope of concern**

The Mountaineering Council of Scotland (MCoS) 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 10,000 members. We aim to represent the interests of all mountaineers.

The bases of our interest in Dorenell are:

1. Access to mountaineering areas
2. Conservation of mountaineering areas
3. Landscape of mountaineering areas

All page references are the Non-technical Summary (NTS) unless otherwise indicated.

#### **Chapter 3 – Regulatory and Planning Context**

On page 5 it is noted that Section 25 of the Town & Country Planning (Scotland) Act 1997 states in reference to Development Plans that “the determination shall be made in accordance with the plan unless material considerations indicate otherwise.” The Development Plan should be “given primacy in determining the application.” It is further noted that SPP6 is a “material consideration,” and on page 59 that the “SPP6 highlights in particular that local designations should not act to unnecessarily “frustrate” suitable renewable energy development.” This is true; however a large proportion of Moray is not designated, hence in the Council-wide context the local designation of AGLV is not “frustrating” renewable energy development, but guiding it to appropriate locations. This is a primary purpose of the plan, and indeed SPP6. The AGLV provides guidance that other locations in the local area may be more appropriate in order to protect the small proportion of Moray that qualifies as an AGLV. The proposed site is not on the edge of the area, but in the heart of the AGLV. Further to this, the SPP6 Annex A policy for wind farms over 20MW states, with respect to regional and local natural heritage designations, that “in some instances, such designated areas may represent those places most valued for their scenic character within a local authority area. This leads to a higher value being placed on them and, in such circumstances, a more cautious approach to development.” Moray Structure Plan (page 26) states that with respect to AGLVs; “within these designations, priority must be given to scenic quality.” In addition, the Wind Energy Proposals in Moray - Supplementary Planning Guidance in section 3.2.1 defines such areas as “areas which the Council consider to be unsuitable for wind farm development because of their high landscape, nature conservation, tourism and amenity value. Areas falling within the Unlikely category include: ... AGLV.” The proposed location is even categorised as “Unlikely” for a small wind farm of less than 10 turbines.

The Cairngorms National Park is 2.4km distant, and it should be noted that the National Parks (Scotland) Act 2000 sets out four key aims for the park, one of which is “to conserve and enhance the natural and cultural heritage of the area.” This includes the landscape.

In conclusion to the analysis of interaction of the relevant Acts, plans, designations and SPPs it would seem that the application of the Development Plan as written, avoiding the AGLV (within which this proposal is situated) supports the SPP6 as intended, and hence should be applied as written as there is no overriding reason for accepting the “moderate adverse impact on the landscape resource and a moderate adverse impact on the visual resource” (quoted from the LVIA on page 2).

## Chapter 9 - Landscape and Visual Impact Assessment

For many tourists and recreationists the interaction with the wind farm will be through the landscape and visual impact. There is a significant overlap of issues in chapters 9 and 21, so the landscape-relevant issues are discussed under this heading.

There is a significant close-up impact from 4 of 22 viewpoints, however, this is a serious underestimate of genuine impact on walkers in the area due to the selection of viewpoints. Many popular routes and viewpoints in the near vicinity have not been included in the analysis. Chapter 21 reports that walkers are the most negative group about the impacts of the wind farm, hence the hills selectively reported in the ES do not necessarily reflect sensitive viewpoints in the locality. There are several much closer, and likely to have more of the view dominated by the proposed wind farm (see table below). Only views from three of these popular hill walking locations have been considered, and they are not the closest locations, neither has the impact been analysed on the Rights of Way adjacent to the site. The Wind Energy Proposals in Moray - Supplementary Planning Guidance in section 2.3.2 states that the impact of the wind farm varies according to distance from viewer, and rates <2km as “likely to be a prominent feature,” 2-5km as “relatively prominent,” and 5-15km as “only prominent in clear visibility – seen as part of the wider landscape.” The following table presents important summit locations for recreation in ascending order within 15km of the proposed Dorenell wind farm site:

Mountain name	Distance from Dorenell site	Moray Council distance assessment	Turbines visible	Illustration figures
Cooks Cairn	within site boundary	Likely to be a prominent feature	49-59	None
Corryhabbie Hill	3km	relatively prominent	37-48	None
Little Geal Charn	6km	prominent in clear visibility		9.19 a & b 9.46
Ben Rinnes	8km	prominent in clear visibility	37-48	9.25 a & b 9.50
Carn Mor	8km	prominent in clear visibility	13-24	None
The Buck	13km	prominent in clear visibility	49-59	None
Tap o’ Noth	14km	prominent in clear visibility	49-59	9.14 9.42

Ben Rinnes, Little Geal Charn and Tap o’Noth are the only popular nearby summits within this list included in the viewpoint analysis in the full text and figures of the Environmental Statement.

The conclusion is that there remains a “moderate adverse impact on the landscape resource and a moderate adverse impact on the visual resource,” which is “significant under ES regulations” (p23).

NB. Please note, there is a problem with the Ben Rinnes 9.25b photomontage as the visible turbines to the right of the photograph are a different colour than the others, and consequently do not appear visible, although would be as visible in reality as the turbines to the left are the same size and against the same background.

### **Cumulative Impacts**

There are “10 other existing, consented and proposed wind farms in the study area.” This is a huge concentration of wind farms, and in this most southerly tip of Moray, adjacent to the Cairngorms National Park it needs to be considered if capacity has been reached. It is incorrect to say that “if the proposed Kildrummy wind farm was developed in advance of Dorenell, many of the predicted impacts of the proposed Dorenell Wind Farm would be diminished” (p23). The contribution of Dorenell would decrease, but, the total impact would be greater due to the cumulative impact. It is not explained whether the “non significance under ES” of cumulative impact was dependent on Dorenell being subsequent to Kildrummy, but would seem to support the fear that the more wind farms in an area, the greater probability more will be consented. Such action would be illogical, especially in this sensitive part of Moray as the cumulative impact will continue to reduce the quality of the visitor and resident experience of their landscape.

Figure 9.50 clearly illustrates how the accumulation of wind farms can have the potential to visually put a ring of wind farms around a viewpoint, leaving no angle of the view free of turbines. The cumulative visual impact on walkers (visitors and from the local community) is difficult to analyse due to the number of popular locations close to Dorenell that have been omitted from the ZTVs, but will be greater than that illustrated due to the selection of viewpoints analysed and illustrated.

### **Chapter 10 - Ornithology**

Merlin is on the Schedule 1 of the Wildlife and Countryside Act 1981, Amber list and Annex I of the Birds Directive). The study area includes “critical habitat for at least 3 breeding pairs.” Access was not available to the confidential detail, but removal of these breeding pairs would be of concern. Even with the 500m buffer for Schedule 1 nests during sensitive periods. It is unclear whether the construction would alter the habitat to an extent that the breeding pairs would no longer find it suitable breeding territory. If this were the case it would cast doubt on the statement that the “effects on all species of conservation concern would be reduced to non significant levels.” (p25)

### **Chapter 11 – Terrestrial Ecology**

48% of the site is blanket bog. “Active” blanket bog is a priority habitat in the Annex I of the Habitats Directive and includes a large proportion of the NVC communities present at the site; M17, 19, 20, 25. Hence, although the study site has not been designated as an SAC, it does have a very large area of habitats that are qualifying features for other European designated sites, so this is a site of significant value. Internal access tracks, as mapped in the plan, will cross Class 1 Habitat areas (p13). The mitigation proposed in page 27 of rewetting an area equivalent to that of blanket bog lost would be unsatisfactory as the processes of bog formation are slow and recovery of vegetation at this altitude would be very very slow. It is therefore questionable whether this presents a genuine mitigation within the timescale of the operational period.

### **Chapter 21 – Tourism and Recreation**

It is not the “improvement” with reduction in the turbine numbers that is the issue, but the visual amenity and landscape quality reduction in the proposal put forward for consent. This section states

the importance of outdoor recreation in the area, especially walking. There have now been a number of problems with continued access in the vicinity of renewable developments e.g. Glendoe and Millennium. During the construction phase, the project plan must guarantee that access can continue to be taken along the Right of Way from Bridgehaugh past Glenfiddich Lodge and continue on south-west. This is a popular route to the Corbett, Corryhabbie Hill, and the Graham, Cooks Cairn. Summiting these categories of hill is a common recreation, and must remain accessible.

Interpretation of the wind farm is certainly an interesting idea, as long as any signage is not on the open hill. This action will not mitigate the reduction in landscape quality.

NB. The consultants should note that the last weekend in August is not a Bank Holiday in Scotland. Visit Scotland analysis suggests that a majority proportion of visitors to areas like this are from domestic origin, hence it is suggested in future that surveys of visitors (if intended to reflect a cross-section of visitors at a peak long weekend), should conduct surveys in Scotland during UK or Scottish holidays.

## **Chapter 25 – Summary of Mitigation**

“Unless there are overriding reasons, infrastructure (tracks/turbines etc) will not be located within: ... areas classified as Class 1 habitat under the EU directive ...[or] breeding grounds for raptors and waders” (p52). However, in the final proposal, tracks are located in these areas. It does not seem justifiable that 1 or 2 extra turbines are an “overriding reason.”

It is agreed that landscape impacts “due to their nature cannot be offset” (p53). This serves to emphasise the importance of avoidance of overly sensitive locations when wind farms are consented.

The MCofS objects to the impacts on landscape, biodiversity, and possibly access subject to further information. Please do not hesitate to contact me to discuss these issues further.

Yours sincerely

Hebe Carus  
Access & Conservation Officer