



# THE MOUNTAINEERING COUNCIL OF SCOTLAND

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## DESIGNING WINDFARMS IN THE LANDSCAPE

### Mountaineering Council of Scotland Response

The Mountaineering Council of Scotland (MCoFS) is recognised by the Scottish Government as the representative body for hill walkers, climbers and ski-tourers. We have 10,000 members, and aim to represent the interests of all 400,000 mountaineers on issues relevant to access to, and conservation of, Scotland's mountaineering environment.

The comments below are structured around the sections in the consultation document for ease of consideration.

#### 2 Consents Framework

P5

It is vital that windfarms are granted only temporary consent so, as noted in the consultation document; they can be reviewed at the end of the term and removed if necessary. The document advises that this is beneficial in case the site has become recognised as inappropriate. Should this be the case, then MCoFS believes that a full restoration be required as a consent condition in the event that after the term of consent, that no further use exists for the foundations and associated tracks. The necessary techniques should be used to return habitats and visual landscape to their original state. Concrete blocks and tracks, or visible evidence of these are not an acceptable part of a landscape unless there is a functional purpose to their existence. Otherwise would be to accept a permanent ground disturbance rather than the temporary one of a full restoration. MCoFS, therefore, does not agree with the assertion that a full restoration should be avoided "in the interests of avoiding further ground disturbance." The full restoration should be funded through the income from the development.

#### 3 Wind Turbines

P6

The MCoFS welcome the recognition of the key impact of access tracks. This is particularly important, not just due to their significant impact on the landscape, but also because there are

consequent impacts beyond the confined area of the windfarm. Windfarms are often located in relatively remote areas, and hence often require long sections of track through relatively wild areas, so having an impact well beyond the windfarm site. This needs to be fully considered in decisions about the acceptability of windfarm locations. There is a relatively small and finite area in Scotland of land with characteristics of wildness, and a track running through an area can have a disproportionate impact beyond the actual area on the ground. This also applies to paths being upgraded to tracks. Construction techniques and design are also very important in terms of landscape sense, and the planning system has regularly failed to ensure enforcement of the planning system or been used to promote good design where tracks are consented. SNH must have a role in securing appropriate location and good design of tracks, even outwith designated sites. A photograph of a track has been appended to illustrate the type of track that has recently been constructed on Carn na Saobhaidhe in the Monadhliath, about which Highland Council appears not to be concerned.

P7

The MCofS greatly welcomes the statement regarding the apparent reduction in size of the expansive landscapes of continuous high ground due to large turbines. However, we are very concerned that the Southern Uplands alone is singled out as an area where this is a concern. This is very much the case in areas that are being targeted by numerous developments such as the Monadhliath. Additionally, this statement about the need for careful consideration of large turbines in plateau landscapes seems to contradict the previous paragraph which states that open, upland landscapes are appropriate for large turbines. This needs to be clarified. These very areas are often the most apparently untouched by human-made features and as turbines and tracks have a disproportionate impact when such elements are added to the landscape. These are also landscapes within which constructing a discretely located access tracks is difficult. These undulating upland areas are also very important features on an international level, often being peat soils and habitats which provide large carbon storage services.

The MCofS strongly agrees with the statement that a variety of turbine sizes must remain an option. Each windfarm must be assessed on the specific circumstances, and “site-specific landscape advice is required.”

#### **4 Windfarm Siting and Layout**

P9

LCA does not measure people’s experience of the landscape or significance of a change, only characterises it. Article 6 of the European Landscape Convention states in C1b states the importance of “taking into account the particular values assigned to them by the interested parties and the population concerned.” The LCA are facts that must be interpreted through the values places on the categories by the interested parties and population. MCofS strongly disagrees that the apparently untouched by human hand landscape of “large scale, extensive, open, ‘windswept’ landscapes lacking focal elements are better able to accommodate large windfarms.” These are the very landscapes that encompass Scotland’s remaining areas of wildness and as such are a resource in themselves due to their lack of man-made “focal features” and hence targeting these areas for large windfarms will effectively remove this resource, important for cultural and landscape distinctiveness of Scotland. The SNH Commissioned Report No. 291 *Public Perceptions of Wild Places and Landscapes in Scotland* revealed that 91% of a representative sample of Scotland’s residents valued wild places as a characteristic, and that these characteristics were highly associated with mountains, hills and moorland. The same study also found that of a range of detractors, “wind turbines would decrease the wildness of an area most significantly” (main finding in preamble). This is the very landscape that the consultation document claims (“large scale, extensive, open,

exposed, ‘windswept’ landscapes, lacking focal elements”) are “better able to accommodate large windfarms.” This statement in the final paragraph of this section must be edited in line with the European Landscape Convention which the UK Government ratified. It should not encourage development in areas which the vast majority of the population of Scotland value so highly.

Many areas of “wildness” lie outwith designated sites and hence receive no protection through that channel. The consultation document does not recognise the fact that much valued landscape is not in a designated site. Report No. 291 illustrates that landscape value cannot be measured by whether or not the area is designated. This needs to be made clear to readers of the final document. The MCofS is particularly concerned in the light of the SNH review into its staff involvement in planning cases outwith its statutory duties with respect to designated sites. It is vital that SNH continues to make comment on developments outwith designated sites that nevertheless have the potential for impact on valued landscapes such as areas of wild character.

#### P10

MCofS welcomes the recognition that the experience of windfarms is affected by factors such as who the receptor is, how the development is experienced and from where. The MCofS is particularly concerned about this point in an effort to prevent perpetuation of the impression given in the March 2008 report for the Scottish Government, *The Economic Impacts of Wind Farms on Scottish Tourism*. The method used was based on surveying the sectors of tourists that were likely to be among the least sensitive receptors to wind farms in wild places. For this reason MCofS believes that this purported study of the experience of visitors, and hence potential implications for visitors’ behaviour, is misleading. The least sensitive people are likely to be those that remain in close proximity to human –made features throughout their visit. This study was conducted purely based on the experience from manufactured viewpoints such as roads and accommodation, hence only captured the opinions of a sector of visitors. The current consultation document must not perpetuate the thinking that the impact can be measured by the “the numbers of viewers.” The “wildness” study illustrated this point very well in that even if people will never view the area, they still value it.

PAN 45 defines impact related to distance from receptor. It uses the term “prominence.” However, “prominence means having the quality of being “particularly noticeable” (Compact Oxford English Dictionary). This not only depends upon distance, but also turbine size and the factors so correctly referred to in the consultation document considered in comments immediately above. This must be reinforced in the current document in this section when referring to the distances. Hard statistics such as distance are often latched onto in the planning system, as in the case of designated vs. non-designated. Whenever such facts are referred to, it is vital to make it explicit that they are only one of many factors and efforts must be made to integrate less tangible factors as fully into balancing impacts with benefits.

#### P11

Consideration of issues such as focal points have not been apparent in Section 36 applications, hence if this to be a new issue addressed in Environmental Statements it is vital that the meaning of “focal points,” and implications are carefully and fully explained. The consultation document states that “windfarms can be accommodated within a landscape if they do not fundamentally alter the landscape character by becoming the major focal point,” contradicts the assumption that in extensive open upland landscapes, not only windfarms, but those composed of the larger turbines can be accommodated. Often these landscape types have little or no other foci, and hence inevitably the introduction of a windfarm will be the introduction of the “major focal point.” Hence windfarms in these landscapes do introduce a major focal point, hence do fundamentally change the landscape character and hence cannot be accommodated in these simple landscapes.

## P12 Skyline

“Valued landscape” must encompass popular recreational locations and those with wildness characteristics, again the SNH Report No. 291 on wild places is relevant.

## P13 Wild Land

It is unclear what “areas valued for their wild land” actually means in this context. As one of the major issues with respect to windfarm design and siting, this must be explained and that explanation consulted on. Wild land character is greatly influenced by the absence of apparent man-made (especially modern) features, and as such the introduction of an alien element will have profound effects on the landscape characteristics however and wherever within the landscape it is placed. The SNH Report No. 291 provides support for MCoFSS assertion that there should be a presumption against windfarm developments in areas of wildness.

# 5 Designing for Multiple Windfarms

## P12

SPP6 only requires planning authorities to set out a spatial framework for the consideration of windfarm proposals over 20MW. Developments under 20Mw can also have profound cumulative effects, indeed a number of smaller windfarms can have a greater overall effect than a small number of larger developments through impacting on a greater proportion of a view. A number of visual assessments with Environmental Statement for windfarms have recently only considered the proportion of individual arcs of view, and completely ignored the cumulative effect of considering the 360 degree panorama from the receptor site. This does not present the cumulative visual impact. The cumulative visual impact not only relies on the any one view from a location, but all possible views from that location, as well as the views that were experienced en route to that location.

## P15

One of MCoFSS major concerns is realised here, that there may eventually be very few landscapes unaffected by windfarm development. This reduction in resource has already affected a significant proportion of upland landscapes. We urge SNH to strengthen the messages in the document as a first step in the process of design consideration to ensure that the wild resource in Scotland can be enjoyed by future generations.

The distinction between AGLVs and “other areas” must be made explicit. “In some larger AGLVs an appropriate objective may be to accommodate windfarms within the landscape, rather than seek total landscape protection,” blurs the boundary. The statement as written suggests that some larger AGLVs will be treated as “other areas,” and fall into the category of “landscape accommodation” rather than “landscape protection.” This would render the designation meaningless with respect to windfarms. The status of AGLV must be kept distinct from the wider countryside.

## P16

“Within upland landscapes, gentle rolling terrain accommodates windfarms more easily than steep or rugged terrain with its own strong features or landscape foci.” This is not always the case when in the context of wildness where it is the expansiveness, remoteness, lack of modern human made features that give the landscape its character. Areas such as the upland massifs fall into this category such as the Monadhliath.

## P19

“It is preferable to avoid locating and designing additional windfarms that occupy a major proportion of the remaining undeveloped skyline.” From viewpoints such as on popular hill for walking, it would take considerably less than a “major proportion of the remaining undeveloped

skyline,” to have a very significant impact. A more relevant threshold in such circumstances would be to avoid addition windfarms that form any part of the major proportion of the view. The MCofS would suggest this could be based on the proportion of viewing angle arcs containing views of a windfarm.

In relation to Landscape Character, there needs to be a clearer definition of what "appropriate and adequate" means when considering “space between windfarms” to “maintain scale-relationships and a sense of distance.”

It must be emphasised that extensions must be treated with as much rigour as new developments.

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

Yours sincerely

Hebe Carus  
Access & Conservation Officer