

PROPOSED WIND FARM DEVELOPMENT AT DORENELL

Public Local Inquiry

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Scottish Rights of Way and Access Society

Introduction

1. ScotWays' concern about this proposal arises from the boldness of its location and its consequent effects on open-air recreation. If consented, it will be one of the most elevated wind farms in Scotland, with 32 of the turbines above 1750ft, ten of which are virtually at or above 2000ft¹. It will be draped over the crest of a long ridge, with consequent wide potential visibility, and will use 126m high turbines, which are at the top end of the range in general use at terrestrial wind developments. The outcome will have serious adverse effects on the recreational amenity of the site and its setting. I summarise our case under the ten following headings.

Recreational value

2. In my judgement, the land proposed for development and its setting has very good recreational value. There is no formal means of ascribing recreational value to land, compared to the processes used for the identification of conservation significance. But it is self-evident that there is a concept of value in land for recreation: people can ascribe such value to land for its intangible qualities – say, their appreciation of its varied aesthetic qualities, especially its scenery; they may value it for the utility of the physical attributes or features that can be enjoyed there for their own recreation; or they may value the ease with which the place can be visited and enjoyed – its accessibility: alternatively, as in this case, its remoteness through relative inaccessibility.

3. For this case, the prime elements of recreational value are:

- the extent of open land of near-natural and wild character, relatively unspoiled by human intervention;
- the degree of isolation of the area proposed for development, needing a reasonable walk-in from all directions to reach it;

¹ *The Windy Standard and Millennium wind farms and a few others are close to the same altitude range, although smaller, and there are other new proposals at the same altitude*

- it is not heavily visited, adding to the sense of this being a lonely place;
- the soft and mainly unspoiled and near-natural landscapes have attractive scenic quality;
- from high ground, the panoramic vistas are extensive, although there is an increasing degree of intrusion from other wind developments; and
- historic tracks cross it and make cultural links with the past.

Wildness

4. As stated above, the development site and its setting have qualities of wildness. This is not prime wild land, compared to some of the more rugged and remote terrain of northwest Scotland, but the area scores well against the broad criteria for wildness set out in the SNH policy paper, in terms of remoteness and near natural character and the experience of solitude. Generally the impact of land use is light: there is some fencing on the margins and other detractors, mainly the bulldozing of older tracks, also forestry to the north end of the site area, and this is not rugged terrain. But the open and near-natural quality of the landscape, along with its adjacency, indeed, contiguity to the south with land of similar character, augments the degree of perceived naturalness. People who use the area for these qualities are mainly walkers, some on long cross-country treks, others are there to ascend the tops, in particular the Corbett of Corryhabbie Hill², and there are off-road cyclists and some cross-country skiers: two of our members, with experience of the area in winter, commented independently on its arctic qualities.

The related experiential qualities

5. People value the benefits they gain from participation in active pursuits: some of these benefits are physical, through healthy exercise giving them a sense of enhanced well-being, while other more psychological benefits come from the pleasure and inspiration they get from contact with a more natural and challenging world. Amongst these experiential benefits is the independence of action that open-air recreation offers, also a sense of freedom from the hustle of modern living; and, for some people, the opportunity for challenge and hazard. So, the outdoor experience is multi-faceted, bringing together a range of human motivations and values. The aesthetic and the intangible qualities people gain from their use of it – the experiential qualities – are important here: this is a lonely place, where solitude can be enjoyed, along with some challenge in a near-natural setting. Any wind

² *Cooks Cairn was listed in Munro's tables as a Corbett into the 1980's*

development on this hill, especially, a development of this scale, would simply erase the remote and lonely character of the place.

The potential wide visibility of the proposal on high ground

6. Scotland's upland terrain is characterised by a series of erosion surfaces. This is a distinctive landform feature, here and elsewhere in upland Scotland, and the basis for the long open views and visibly far-distant horizons that can be experienced on ascending the higher and tops. These long vistas can give a spacious quality to the landscape, especially where subsequent dissection of the land by erosion is concealed in the view from gently rounded tops. So this is a landscape that is highly sensitive to the adverse effects of large constructions with inherently high visibility, located such that they intrude as skyline features.

Effects on public rights of way

7. ScotWays' letter of objection (CD-L8) sets out our main concerns over the effects of the proposal on public rights of way crossing and adjacent to the site (Fig 6.19) of the ES. The details need not be repeated here but, compared to the claimed sensitivity of locating turbines in relation to habitat and species, the process of locating turbines has paid no attention to these ways, and to the effects on people using them. Thus the line of the Steplar and GM18 are used as convenient access roads from which to erect turbines, at obtrusively close distances to these ways, and with two turbines (8 and 18) apparently on top or almost on top of them. These are routes in open country, and the visual effects of development on the users of these ways will be continuous and progressive over a long distance, as they approach Cooks Cairn, whatever the direction of travel. Apart from erasing the character and intangible qualities of the place, walking through or under turbines is threatening and unpleasant: for riders with nervy horses, there are hazards.

8. Of the three prime rights of way, the Steplar is the route with most historical significance, being the traditional direct route from Tomintoul and Glenlivet towards Upper Cabrach and onwards to Rhynie. It is a fine route, noted in the 1930's version of the SMC Cairngorms Guide as being well marked on the ground at its highest point, an indication of significant use in the past. This way has been crudely bulldozed in the manner done in the 1970s on many upland estates, especially in the eastern Grampians. The limited provision for drainage on these routes has not been properly maintained, with the outcome of severe local washout. Nonetheless, it is a route of character, promoted and used for walking and mountain biking.

Scotways has recognised it as a heritage route in its Heritage Paths project, and it is a core path.

Effects on surrounding viewpoint hills

9. The ZVI map Fig 9.4 illuminates the extent to which this proposal would be highly visible from almost all the popularly visited (and also the less popular) local hills, some close to the settlements on lower ground and part of the recreation space for the people of these burghs. This is a consequence of the high elevation of the site proposed for development. Some of these hills have been used as viewpoints in the landscape analysis, and the effect at the closer or most visited of these hills will be serious, for example, Ben Aigan, Ben Rinnes, Tap o Noth, the Buck, and adjacent Corriehabbie Hill. Increasingly, there will be few directions on the tops without wind development in view.

Care of natural beauty and amenity

10. We have commented lightly in SW/3 on some aspects of the landscape assessment that touch on the enjoyment of open-air recreation. The professional appraisal of the impact of wind developments does not serve the recreational interest, given that the outcomes of these assessments can conclude that major development of this kind is acceptable in near-natural settings at high elevation. Nor does the methodology account for (at least, not explicitly) the intangible elements of public enjoyment, nor the aesthetics that create the intrinsic appeal and the values that underpin enjoyment of the outdoors. It is a worry that there is such a gap between professional assessment and the commonsense view of concerned and informed members of the public – those who value and are ‘consumers’ for fine landscapes. The statutory test is for conserving natural beauty and amenity (SW/2), reflecting a public interest in the safeguard of scenic value; indeed a serious approach to sustainable tourism should start with action to care in the long-term for the scenic resource that attracts visitors.

Growing cumulative effects

11. There is a growing issue over the number of wind farm developments in the area, both in Highland and to the east in Aberdeenshire, and their consequent effects on public enjoyment. Cumulative effects are conventionally assessed from a static stance, which does not account properly for the sequential, repeated and accumulated experiences, as visitors and others participate in outdoor recreation or move around the area for other purposes. The existing and recent consents for wind

development, along with the current proposals, are wrapped around the north and east of National Park, with Dorenell sitting in a critical midway position, being the largest and closest proposal to the Park. A strategic view of this pattern points to the desirability of maintaining as clear envelope as possible outwith the Park, on land with obvious continuity in character with it.

Claims for support from public opinion

12. It is asserted in the ES that there is wide support for wind development at this site from visitors to the area. These survey-based arguments are, in our view, not robust and they are challenged in paras 2-6 of paper SW/3.

The public policy context

13. Detailed debate about the policy context for the development at Dorenell is for another session of the inquiry. However, the proposal is a bold challenge to local determination of planning and related policy. At this location, Moray is a relatively narrow territory and any strategic assessment for large-scale renewables development has to acknowledge the combined outcomes of the strategies for Moray, Highland and Aberdeenshire. All three documents identify that the uplands in the wider setting around Cooks Cairn are not preferred for wind power developments. We place weight on the consistency of approach taken by the public bodies mentioned above. Other points of policy support are mentioned in paras 7-8 of SW/2.

Summary

14. In our view this proposal is:

- of a scale, and high elevation, that will be obtrusive and damaging to the recreational value of the area, both land in proximity to the site and also places used for open-air recreation within its wider setting;
- it will have adverse effects on the wild and lonely character of this part of Moray, thereby erasing the experiential qualities people enjoy there;
- if consented, it will substantially reduce the relatively free of wind-development envelope to the north of the National Park; and
- by its scale and effects on amenity it challenges the protection of fine landscapes, being in an AGLV.

15. If consented in full, a remedial diversion for the Steplar is required, as set out in our letter of objection: this should be part of the capital cost of development, and not

a matter pushed aside for action under the proposed community funding package. But in ScotWays' view, the proposal should be refused as an entirely inappropriate development.

John W Mackay