

Attn. Andrew Manson
Scottish Government
Energy Consents Unit
4th Floor, 5 Atlantic Quay
150 Broomielaw Glasgow G2 8LU

VisitStraiton
18 Main Street
Straiton
Maybole
South Ayrshire
KA19 7NF

representations@scotland.gsi.gov.uk

visitstraiton@gmail.com

<http://visitstraiton.com>

10th March 2014

Dear Andrew Manson,

RE: Glenmount Wind Farm, proposed by RWE Npower renewables,
near Dalmellington, East Ayrshire.

In addition to objections which we will be making separately as concerned individuals, we (the undersigned) would like to object to the proposed Glenmount Wind Farm, which we believe would have a damaging effect on a healthy local tourist industry in Straiton.

In brief, we believe that the integrity of the Galloway Forest Park, the Galloway Forest Dark Sky Park and the Galloway and South Ayrshire Biosphere as tourist destinations are threatened by a development on such a large scale very near the major tourist route from the Central Belt to Dumfries and Galloway, the A713; we believe the development is too close to Loch Doon, as well as to the nationally significant Designed Landscape of Craigengillan.

In April 2013, we also produced a report on tourism in Straiton, *Wind Farm Development & Tourism in Straiton: a case-study of tourist provision for the Galloway Forest Park and the Galloway Forest Dark Sky Park*. The report is attached with this letter as a separate PDF¹ and we request that the information which it contains about tourism in Straiton is considered as part of our objection to the Glenmount plans.

*

We welcome the fact that a tourism assessment was carried out, and that local businesses were consulted. However we do not accept the conclusions of the **Socio-Economics And Tourism**, which forms Chapter 13 of the main report [hereafter the **RWE ES**] on the proposal.

*

We find the RWE ES disappointing in that it offers no new empirical evidence about tourism in the area and the likely impact of Glenmount wind farm.

The structure of the RWE chapter on Socio Economics, in particular in relation to tourism, is to describe tourism resources and facilities, and then to attempt to use general tourism surveys, in particular the Moffat report, to show that there will be no effect on tourism - something which the Moffat report does not do (as it considers economic effects on tourism only nationally and recognises that local tourism will decline in the presence of wind farm construction).

We find the arguments that the community funding could be used to improve the tourism offering around Loch Doon in the wake of Glenmount's construction to be specious and bordering on the offensive.²

¹ VS-tourism-report.pdf

it is also available online at <http://visitstraiton.com/about/about-this-website/>

² RWE ES paras 3.7.25, 3.7.40

We also note the comment in the Moffat report that "The evidence is overwhelming that wind farms reduce the value of the scenery".³ Having constructed tourism businesses on the basis of the exceptional scenic qualities of this area, it is difficult to imagine who would really think that an increase in community funding would offer any compensation at all for a development in an exceptionally beautiful area which would, according to the Moffat report, "in effect ... industrialise large areas of wilderness".⁴

We completely refute the assertion that the construction of the Glenmount wind farm would result "in a negligible change in the propensity of tourists visiting the Local Area" and point to evidence which substantiates this.

Traffic

Traffic during the construction process will be very heavy in the communities of Straiton and Kirkmichael. All tourism businesses in and near Straiton will be affected by this - and some will lose business as a result.

Given that the traffic for Glenmount is planned to last for two years, this could ultimately result in serious losses for some of the small businesses in Straiton. We would like to know what arrangements might be made for financial compensation for this type of loss. We are also concerned at the huge cumulative effects which could arise from the combined increase in traffic from the proposed Glenmount, Dersalloch, Keirs Hill, Linfairn and Knockskae wind farms.

Detailed attention will be given to the traffic issue in the objections submitted by the Crosshill, Straiton and Kirkmichael Community Council, and by Save Straiton for Scotland. We would like to add our voices to these concerns.

Ecology - Avian and non-Avian

The natural environment of Loch Doon, the Straiton Hills, and the Galloway Forest are one of the key attractions for visitors - and so we, as tourism businesses, have a strong vested interest in the protection of that environment.

We have studied the chapter in the RWE ES on Ornithology and are attaching our response to it as a separate document.

Given the number of wind farm applications and the number of documents which each contains, it is difficult to study all the sections of each application in the detail which is required - we have not had the opportunity at the time of writing to study the RWE ES chapter on non-Avian ecology and would like to reserve the right to continue our response to this and other chapters at a later date.

East and South Ayrshire Landscape Wind Capacity Studies

"No scope" for wind turbines over 20m in height

We wholeheartedly agree with the findings of the **East and South Ayrshire Landscape Wind Capacity Studies [E&SALWCS]**, produced in conjunction with Scottish National Heritage [SNH] that there is "no scope" for wind turbines over 20m in height in the area of the Glenmount application.

³ *The economic impacts of wind farms on Scottish tourism: a report for the Scottish Government*. The Moffat Centre for travel and tourism business development, Glasgow Caledonian University, March 2008 [Moffat report], p. 283

⁴ Moffat report, p. 34, referring to all wind farms involving large numbers of turbines sited on exposed ground.

The East Ayrshire Landscape Wind Capacity Study includes the area of the proposed Glenmount Wind Farm in a new designation, Character Type 21: "Rugged Uplands with Lochs and Forest". The guidance for development (para 15.3, p. 69) states "The study found there to be *no scope* for larger development typologies to be sited in this landscape." It recommends that turbines over 20 metres should not be considered for this landscape:

"Smaller turbines <50m would not fit with the expansive scale of the higher hills of this landscape. They would also have a similarly detractive effect on the often complex landform of this landscape and would impact on wildland qualities, particularly experienced within the more rugged core hills. There would however be some very limited scope to site small turbines <20m so associated with more settled lower hill slopes."

The South Ayrshire Landscape Wind Capacity Study also includes the new designation "Rugged Uplands with Lochs and Forest" - which covers much of the South Ayrshire portion of the proposed wind farm. It also concludes (para 22.3, p. 37) that there is "no scope for larger development typologies to be sited in this landscape" and that no turbines over 20 metres should be considered for this landscape.

Intimate Pastoral Valleys have "no scope for the large and medium typologies (turbines >50m)"

The proposed access route, as well as construction compounds, substation and control buildings fall mainly within South Ayrshire's designated landscape type 13: "Intimate Pastoral Valleys" - and it appears that turbines 1 and 2 are very close to the boundary of this landscape character type. Guidance for Intimate Pastoral Valleys is that there is "*no scope* for the large and medium typologies (turbines >50m)" (para 13.3, p. 58).

Wind farm development should be directed away from Loch Doon and the Carrick Hills

We also wholeheartedly agree with the conclusion of the South Ayrshire Landscape Wind Capacity Study [SALWCS] "**A recommended landscape strategy**" that a principal objective of the planning strategy should be to

"Maintain the rugged scenery and sense of wildness associated with Loch Doon and the Carrick Hills by directing wind farm development away from this landscape and ensuring that development sited in surrounding landscapes avoid significant impact on its setting and experiential qualities."⁵

RWE Environmental Statement and RWE Non-Technical Summary both fail to address the 2013 E & S Ayrshire Landscape Wind Capacity Studies

The E&SALWCS state quite clearly that the landscape characterisations they contain **have been updated** from the Ayrshire Landscape Assessment of 1998:

"This capacity study has been informed by the landscape characterisation set out in the Ayrshire Landscape Assessment (LUC 1998). The landscape character types set out in the 1998 study have been reviewed in the field. Some minor changes have been made to the boundaries of some landscape character types and this is explained in the introduction to each of the sensitivity assessments set out in the following sections of this report. **In addition, a new landscape character type has been classified in the area centred on Loch Doon and the Carrick Hills and called the Rugged Uplands, Lochs and Forest (21)**"⁶

⁵ p. 70, para 25.7

⁶ p. 11, para 2.5 of S Ayrshire LWCS

RWE NTS is out-of-date

However, the RWE Non-Technical summary states⁷: "The proposed development is largely situated within the Foothills Landscape Character Type" - this is out of date information. The new designation for the area of Glenmount is "Rugged Uplands with Lochs and Forest", as noted above.

RWE ES is out-of-date

Similarly, the RWE ES is also out of date in respect of the Landscape Character types: It states under the heading, "Landscape Character" that the character studies which it is using are the Ayrshire Landscape Assessment, No 111, 1998 and the Dumfries and Galloway Landscape Assessment; No 94, 1998. and that ... "The proposed development site is located mainly within the 'Foothills' Landscape Character Type and partially within the 'Foothills with Forests' Landscape Character Sub-Type."⁸

RWE recognise that the Landscape Character types are the way in which developers can determine those "Key characteristics [which] are considered by SNH to be prime targets for monitoring change and act as landscape indicators for decision making, as they encapsulate the predominant aspects of landscape character in the study area."

However, as already noted above, SNH has updated its 1998 Landscape Assessment in the form of the E&SALWCS - in particular by introducing a new landscape character type for the area around Loch Doon.

Appendix 6.2 (Landscape Character Types) not updated to reflect new Loch Doon classification

Also out of date are the descriptions of the landscape character types given in RWE ES Appendix 6.2 Volume IV, and the map of landscape character types given in Figure 6.1.3.

Appendix 6.3 (Assessment of Effects on Landscape Receptors) not updated to reflect new Loch Doon classification

As a consequence of the failure to update the Landscape Character Types, Appendix 6.3 (Effects on Landscape Receptors) is also out of date.

LVA not based on current Landscape Character Types

As a consequence of the failure to update the Landscape Character Types, the LVA (chapter 6 of the RWE ES) is also out of date.

S&EALWCS known to the developers, but key documents not updated to reflect this

The S&EALWCS were published in July 2013, and were known to RWE before publication of their application documentation. The Landscape Capacity studies are discussed in both the ES and in the Policy and Planning Supporting Statement.

We are very concerned, however, that the Non-Technical Summary [NTS], as made available to the general public by RWE, does not, according to the [Planning Advice Note 1/2013 Environmental Impact Assessment: Definition](#) provide ... "an objective summary of the findings of the EIA"

Page10 of the NTS, in addressing the local policy framework, notes the "following local and regional planning documents: Ayrshire Joint Structure Plan (AJSP) (2007); East Ayrshire Local Plan (EALP) (2010); East Ayrshire Local Development Plan (EALDP) (In Preparation);

⁷ p. 13

⁸ Paras 6.6.14 to 6.6.16

South Ayrshire Local Plan (SALP) (adopted April 2007); and South Ayrshire Proposed Local Development Plan (SALDP) (In Preparation)."

It goes on to state, (p. 11) that "There is a general presumption in favour of wind farm development at the subject site subject to normal planning and environmental criteria being addressed." This statement concludes the NTS chapter on planning and so is an important statement by RWE about the planning context of the application: we do not doubt that the error is inadvertent, but nevertheless, this key statement about the planning context of the Glenmount application, as presented to the general public, **is not true**.

The NTS does not, therefore, provide, ... "an objective summary of the findings of the EIA" Instead it appears to reflect the developers' thinking at the feasibility stage and not the findings of the EIA. After the publication of the East and South Ayrshire Landscape Wind Capacity Studies, the EIA was updated, but the NTS was not updated to reflect the new approach of the EIA.

Our view that the NTS is not a truthful and up-to-date summary is supported by the following:

FIRST: In the EIA there is a detailed discussion of all relevant planning policies and documents including the Landscape Wind Capacity Studies, but **it is not stated** that "There is a general presumption in favour of wind farm development at the subject site subject to normal planning and environmental criteria being addressed" as claimed in the NTS.

SECOND: The EIA recognises that the Landscape Wind Capacity Studies have changed the planning situation. On p. 188 (para. 3.5.13) the EIA states that,

"At the feasibility stage it was concluded that, subject to appropriate mitigation the proposed wind farm was not in conflict with national or local planning policy. Since the feasibility stage, East and South Ayrshire have published Landscape Wind Capacity Studies (July 2013), the aim of the studies being to inform strategic planning for wind energy development and guidance on the appraisal of individual wind farm proposals."

Para 3.5.13 of the EIA clearly indicates that the publication of the Landscape Wind Capacity Studies has

A: altered the developers' prior position that the proposed wind farm "was not in conflict with national or local planning policy".

B: introduced a conflict between the proposal and existing planning policies.

C: apparently left the developers unable any longer to claim a "general presumption in favour of wind farm development".

The NTS has not been revised to reflect this and therefore does not provide an objective summary of the findings of the EIA.

We feel that the NTS does not perform its function as required. To enable the public to inform themselves fully about the proposed wind farm, it is essential that the NTS accurately reflects the planning constraints which exist, the intentions of the developer in relation to those planning constraints and the findings of the EIA in relation to those constraints.

Although this matter was raised with The Energy Consents Unit and RWE, it has not, at the time of writing, been satisfactorily resolved.

Socio-economic Field Study

We note with interest the Socio-economic Field Study, (appendix 13.1) and are pleased to see that VisitStraiton is mentioned as a consultee.

It is regrettable that the Field Study as published contains errors: it reports that on the topic of average expenditure by visitors to the area, "one tourism providers [sic] estimated that weekly spending of between £50 and £100 per visitor [sic]." Grammar apart, it is clearly unlikely that average expenditure could be estimated at such a low figure: this was in fact the estimated *daily*, not weekly, expenditure. More regrettable than the error, however, is the fact that no obvious purpose has been served by undertaking a "socio-economic field study". It is not obvious to us why this series of interviews was undertaken, as very little use is made of the information which they collected.

The introductory paragraphs to the "Field Study" indicate that as "the existing evidence base already includes previous visitor surveys that explored the impact of wind farm development on decisions to visit ... [therefore] it is difficult to see what further evidence a new visitor survey would add."

Clearly this is correct, we don't know what evidence a new survey would have produced, because the new survey wasn't undertaken, and so there is no new evidence. We consider this an opportunity missed, and regret that the authors of the "Field Study" did not pursue this avenue.

The "Field Study" continues, "Surveys of tourists do not measure the impact of a wind farm on tourism as an economic sector. Rather, they gather data on perceptions and opinions of wind farms and so are not of great value to an economic impact assessment."

It is interesting that the authors of the "Field Study" think that "data on perceptions and opinions of wind farms" are "not of great value to an economic impact assessment." This is peculiar - as one of the principal sources of "data on perceptions and opinions of wind farms" is the Moffat report, which is entirely based on such data and which is frequently cited in Chapter 13 of the RWE ES as demonstrating that there is no economic impact on tourism from wind farm development.

We feel strongly that the RWE ES cannot have it both ways: if surveys that "gather data on perceptions and opinions of wind farms" are indeed "not of great value to an economic impact assessment", then they must discard the entire Moffat report and other similar reports.

If on the other hand, they feel that the Moffat report is significant, it begs the question, why did they not, after all, conduct their own survey in relation specifically to Glenmount.

We can only conclude that empirical surveys were not conducted for other reasons altogether - perhaps because the results were likely to be detrimental to the cause of wind farm development in this area.

We find the approach taken to this issue to be deceptive.

We have major reservations about the Moffat report and more particularly the way in which it has been interpreted: however we do not, as do the authors of the "Field Study", wish to suggest that the Moffat report is "not of great value" - merely that it is inaccurate in certain details, and that its conclusions have been seriously and widely misrepresented.

By attempting simultaneously to validate the Moffat report and invalidate empirical studies of tourism in relation to Glenmount, the authors of the "socio economic field study" have revealed that they are offering no clear criterion of what does or does not constitute evidence of economic impact. As such we consider that their implied objective of "developing a site-specific methodology" for studying the socio economic effects of Glenmount has not been met.

Citation of VisitStraiton report and website welcome, but incomplete

We would like to acknowledge the citation of our report *Wind Farm Development & Tourism in Straiton: a case-study of tourist provision for the Galloway Forest Park and the Galloway*

Forest Dark Sky Park: in paragraph 3.6.28 it is mentioned, and some of the information which it contains is listed. We note however, that the authors do not engage with any of our arguments in relation to the difficulties of combining large scale wind farms with scenic and activity tourism of the type which we are currently developing in Straiton.

Absence of rational methodology

The RWE ES states that "There are no recognised standards, guidelines or methodologies for assessing wind farm effects on socio-economics and tourism for the purposes of an EIA. In order to identify and assess the significance of predicted effects, this assessment has therefore been based on a professional judgement about the degree of change from the baseline likely to result from the proposals."⁹

The fact that there are "no recognised standards, guidelines or methodologies" does not by itself excuse the absence of a rational or self-contained methodology in this report.

As noted above, there is no methodology in the "Field Study" described in Appendix 13.1. What is described as a "methodology" in paragraph 13.4.3 of the RWE ES consists almost entirely of "Description". This "Description" is of little use on its own, as no rational consideration is subsequently given to what is described.

The citation of the VisitStraiton report falls into this category. Part of its contents are listed. The arguments it presents are not addressed. No conclusions are drawn from the evidence it presents one way or another.

The same technique is applied to all other documentary evidence which does not support the argument for developing a wind farm.

Chapter 13 "describes" among other things, the following:

- the strong reservations of SNH
- the strong opposition of Dalmellington community council
- the strong opposition of the BHS ("the largest reaction of any of the plans put before our members")
- the contents of the VisitStraiton report

It then fails to address what all of these bodies have to say and eventually reaches the anodyne conclusion that "There are not considered to be any long term effects on the tourism sector due to the lack of significant effects during the construction and operational phase."

Description, followed by an analysis which pays attention only to those arguments which favour the development, followed in turn by favourable conclusion is not a methodology.

Unusually high threshold of figures for negative effects on businesses - no empirical evidence offered for these figures

In table 13.2, the report gives the figures which it considers represent a "Negative effect" on individual businesses:

⁹ Para 13.4.14.

Significance	Individual Business
Major Negative	-20%
Moderate Negative	-10% to -20%
Minor Negative	Up to -10%

No explanation is given for this choice of figures, and we consider them arbitrarily high. By contrast, for example, the authors of the report on Socio-Economic effects for at least two other nearby windfarms (South Kyle and Keirs Hill) use significantly lower figures for assessing the negative effects on businesses, as follows:

low impact = <10%;
medium impact = 10-15%; and
high impact =>15%.

These figures appear in another report for an energy company wishing to develop a wind farm, and so are not likely to be unduly favourable to the idea of wind farms causing economic damage to tourism businesses. The figures are given an explanation, which indicates that they are based on the results of business surveys, as follows:

"The definitions of Major Negative taken as >15% on business turnover, Moderate Negative taken as 10-14%, and Minor Negative taken as <10%, are based upon wide market experience. In tourism related business surveys across Scotland and elsewhere, respondents have generally stated that 15% or >15% reductions in turnover is critical to business sustainability/survival, but 10-14% represents a moderate impact which can be recouped through marketing, cost saving and similar market responses, and <10% is subsumed within general changes in trading conditions.¹⁰

The figure for "high impact" is 25% lower in the PBA Roger Tym study cited than it is in the BiGGAR Economics' chapter 13 for RWE at Glenmount: and given that the PBA Roger Tym figure is based upon some empirical evidence in the form of surveys of tourism related businesses, we are inclined to think that it is probably a more accurate figure than that of BiGGAR Economics who, as seen above and described in paragraph A13.1, have reservations about the validity of data collected by properly conducted surveys, and so have chosen not to do any, preferring instead to hold interviews and then describe them.

For this reason, it is impossible to have confidence in those parts of any economic modelling which are based upon these particular figures.

Poor quality citations suggest failure to understand sources

Ayrshire and Arran tourism strategy

Paragraph 13.5.11 purports to describe the Ayrshire and Arran Tourism Strategy and reads as follows:

"Tourism policy in the area is guided by the Ayrshire & Arran Tourism Strategy 2012/17, which was prepared by the Ayrshire Economic Partnership. The main objectives within the strategy are to increase visitor numbers in the area by 10% and to increase annual visitor spend by 20%. The strategy identifies eight attributes of Ayrshire & Arran that attract tourists and have the potential to develop and grow:

¹⁰ PBA Roger Tym, in para 16.137 of the Environmental Statement (2013) for Keirs Hill Wind Farm.

- Culture & Heritage, including Burns Activities & Natural Environment;
- Golf;
- Sailing;
- Arran;
- Food & Drink Islands;
- Weddings & Civil Partnerships;
- Business Tourism; and
- Events & Festivals."¹¹

You may do a double-take reading this list: I would quite like to get involved in Burns Activities, (bound to be fun, could be rather risqué), and it sounds a good idea to do the Burns Activities on one of Ayrshire's many "Food & Drink Islands".

The list should read as follows, as a list of ten, not eight, tourism offers:

- Culture & Heritage, including Burns;
- Activities & Natural Environment;
- Golf;
- Sailing;
- Arran;
- Food and Drink;
- Islands;
- Weddings and Civil Partnerships;
- Business Tourism;
- Events and Festivals;¹²

This is not just an amusing misprint: it also indicates clearly that BiGGAR Economics researchers have not taken the time to read anything about the tourism offers on the pages which follow, where, for example, they would have found that Ayrshire and Arran have the following considered approach to Activities and the Natural Environment, an offering which has a "Very Strong" potential yield:

2. ACTIVITIES & NATURAL ENVIRONMENT

Ayrshire and Arran has a varied and accessible natural environment. The countryside, coastline and seas offer a rich variety of landscapes, wildlife, habitats and geology for the visitor to enjoy and experience. There are emerging distinctive offerings and opportunities, such as establishing part of the Galloway Forest Park as the UK's first Dark Sky Park and probably Scotland's first UNESCO Biosphere designation. However, the level of activity tourism is currently low and generally under-developed on mainland Ayrshire, with great potential to develop infrastructure, facilities and build this offering in areas such as walking, cycling, horse-riding and watersports. The market for adventure sports and activities is well established on Cumbrae, and Arran in particular, and opportunities exist to build upon the profile of our islands for outdoor activities. Potential areas of action:

- Product development for walking and cycling, to package products more effectively for particular customer profiles.
- Infrastructure enhancements, such as joining up paths and cycleways, working with communities and businesses to provide improved facilities.
- Promote the development of related hospitality facilities through VisitScotland's various 'Welcome' schemes.

¹¹ Para 13.5.11

¹² Ayrshire and Arran Tourism Strategy 2012/2017, p. 10

- Encourage and facilitate collaboration among providers to overcome fragmentation and offer stronger, packaged experiences, tailored to distinctive market segments.
- Explore ways to attract more adventure and activity operators into the area¹³

We would like to record that we have read Ayrshire and Arran tourism strategy and that we completely agree with its perception that the Galloway Forest Dark Sky Park presents a unique and distinctive tourism opportunity, and that mainland Ayrshire has "great potential to develop infrastructure, facilities and build this offering in areas such as walking, cycling, horse-riding and watersports."

VisitStraiton is currently working actively with Ayrshire and Arran tourism to develop "infrastructure enhancements, such as joining up paths and cycleways." The paths around Straiton, Dalmellington and Loch Doon have been chosen for particular attention and will be marketed for their exceptional quality.

We are absolutely convinced, from our own experience as tourism operators in the area, that the exceptional quality of the walks and cycle paths around Straiton and Dalmellington is based on a perception of scenic value and proximity to wildness which would be absolutely destroyed by the industrial-scale turbines proposed by RWE.

Dark Sky Park success dependent on a perception of wildness

The Dark Sky Park has proved incredibly successful as a generator of tourism in Straiton. It is now regularly mentioned as one of the reasons, and sometimes the principal reason that people visit the area.

It is essential that planners and policy makers of the Scottish Government realise that the potential of the Dark Sky Park is incompatible with large-scale turbines on its doorstep. The Dark Sky concept is not **just** about Darkness: it is also about **wildness**, about the ability to go somewhere where the skies are unaltered and pristine, and where you can see natural phenomena in conditions which are unsullied by human occupation and industry.

It is also essential that they realise, as we state in our report that a "Dark Sky Park must, in order to remain 'Dark', be 'Wild' "¹⁴ and that the despoiling of scenic areas and communities on the fringes of the Dark Sky Park by wind farm development, will alienate visitors to the Wilderness areas which they serve. In other words, visitors to the Dark Sky Park have to stay somewhere, and they want to stay somewhere which is a complement to the Dark Sky Park itself.

Poor quality and misleading citations, II

The RWE ES cites the Dalmellington Parish Community Action Plan 2012-2017. In paragraph 13.5.14. the RWE ES states: "Wind farms were specifically mentioned in this Action Plan as 2% of responses stated they disliked the proposed wind farms."

This figure is clearly introduced to suggest the idea that a small number of residents of Dalmellington are concerned about wind farms. What is not stated is that in July 2011, the date of this Action plan, the wind farms proposed would **not** have included the following:

- Keirs Hill (2014: 4.3km from Dalmellington)
- South Kyle (2013: 5km from Dalmellington)
- Benbrack (scoping: 5km from Dalmellington)
- Glenmount (2014: 6km from Dalmellington)
- Linfairn (2013: 11km from Dalmellington)
- Knockskae (scoping: 11km from Dalmellington)

¹³ Ayrshire & Arran Tourism Strategy 2012/2017, p. 11

¹⁴ VisitStraiton: Wind Farm Development and Tourism in Straiton, p. 20

It is highly likely that with this extraordinary concentration of major wind farm applications, in addition to two already in process (Dersalloch and Burnhead, both about 3km from Dalmellington), would significantly increase the percentage of respondents stating that they disliked the proposed wind farms.

In this context, then, the citation of a figure of 2% negative response is completely misleading.

Fallacious and misleading comparisons

Paragraph 13.5.17 of the RWE ES suggests the following:

"Dalmellington has an action plan includes wishes [sic] to develop tourism as a driver for regeneration. The example of Whitelee shows how wind farm projects can help to develop the tourism offering of the surrounding area and help realise national and local ambitions. This is shown by the vision of Whitelee Forest having an outdoor tourism product that can compete with the best in Scotland being realised by Whitelee Wind Farm."

Further on, there is further comment relating Glenmount to Whitelee, which describes

"Whitelee Forest as one of the areas for potential development of outdoor activities tourism. Since 2009, the vision for Whitelee Forest has been realised due to Whitelee Wind Farm, which is a tourism product that is renowned for outdoor activity due to over 130 km of trails for jogging, cycling and horse riding, receiving approximately 200,000 visitors annually. This scale of this change would not be expected for Loch Doon because it is much further than Whitelee from the central belt population but this example does show how wind farms can support tourism and recreation development and how wind farms can co-exist with and even facilitate outdoor activities."¹⁵

These statements and others on Whitelee (paragraph 3.6.20) are misleading.

As we have outlined also in our comments on the Ornithology section of the RWE ES, the vision of a mini-Whitelee is completely unrealisable because of the environmental sensitivities of the Glenmount site.

It is deceptive to suggest that the proposed Glenmount wind farm has a similar potential to Whitelee: the Outline Habitat Management Plan reveals a completely different vision of the proposed Glenmount site in operation.

It is specifically stated, for example, that "Operational maintenance effects upon badger, otter and reptiles are considered to be negligible since they would not differ much from the current levels of farm and machinery on site. The significance of the effects would therefore be of negligible significance (not significant)"¹⁶. This statement is repeated in successive paragraphs in the case of each animal species considered to be at risk. In other words, it is anticipated (for the purposes of assessing disturbance to animals) that there will be absolutely **no** increased human or mechanical usage of the site, and by implication no increase in tourism or recreational use.

Similarly, in the 31 paragraphs devoted to impact on bird-life during the operational phase of the wind farm there is no description of anticipated disturbance by any tourists, walkers, cyclists, or horse riders on black grouse or on any other sensitive species.¹⁷ This is despite frequent mentions of the way in which Vantage point surveys and other studies had to be designed to minimise the well-known susceptibility of black grouse and other species to human disturbance in the form of professional ornithological surveyors.

¹⁵ para 13.7.77

¹⁶ para 7.10.15 and in numerous other locations in chapter 7.

¹⁷ paras 8.7.26 to 8.7.57

There is, therefore, a considerable lack of candour on the question of what exactly the proposed site will be good for, apart from energy generation.

The site cannot simultaneously be used for active outdoor tourism (a mini-Whitelee) and provide no increased disturbance for the many sensitive and endangered species of animal and bird which it contains.

Description of Tourist Routes incomplete

Description of Tourist routes (paragraph 13.6.29 and subsequently) is generally good, but there are some key omissions:

1. Although the Carrick Forest Drive is listed, there is no indication here of how close it goes to the proposed development, although other routes described in the same section are mentioned as being "17km east", "5km west" and "13km" west of the proposed development. To omit a similar measurement for the Carrick Forest Drive, which will be in the shadow of the wind farm, seems deceptive.
2. Carrick Forest Mountain Bike trails. A section is missing at the end of the paragraph: so the text does not mention that one of the trails goes directly from Loch Bradan and Loch Doon and would be severely impacted by the proposed wind farm (see below, item 5).
3. Paragraph 13.6.31 correctly states "There are several paths and trails in the Dalmellington, Loch Doon and Straiton area" in addition to the routes described by tourism agencies. These are not listed, nor is the effect of the wind farm on them assessed.
4. A picture of the Carrick Drive and Loch Doon is featured in an online report on the David Bell Memorial Race where it is captioned "The Most Scenic Race in the UK?"¹⁸ It should be noted that the South Carrick Davie Bell Memorial Race, and other important cycle races are omitted from paragraph 13.6.37, where cycle routes are discussed.
5. A key path, which runs from Loch Bradan to Loch Doon, along the lower slopes of Craiglee, is ignored by all aspects of the core paths analysis (Chapter 6, LVA, Chapter 13 - socio economics and tourism, and in figure 6.1.2b in the Appendices). The path is well used by cyclists and walkers, and is maintained and signed by the Forestry Commission as a cycle path. The exposure to the Glenmount wind farm would be extremely adverse on the whole length of this very scenic path.
6. The path to the summit of Craiglee from Loch Doon castle¹⁹ (also signed - photographs online) is also ignored by all the core path documentation mentioned above. Again, the adverse exposure to Glenmount would be very great indeed.

Existing Evidence on Tourism and Wind Farms misunderstood

Moffat report

Despite the statement in Appendix 13.1 that "Surveys of tourists do not measure the impact of a wind farm on tourism as an economic sector. Rather, they gather data on perceptions and opinions of wind farms and so are not of great value to an economic impact assessment", the RWE ES cites the Moffat report, and indeed puts great emphasis on it.²⁰

¹⁸ <http://southcarrickdaviebell.wordpress.com/2012/02/03/the-most-scenic-race-in-the-uk/>

¹⁹ <http://www.scottishhills.com/html/modules.php?name=Forums&file=viewtopic&t=12365>

²⁰ para 13.6.47 ff.

"This study carried out a person-to-person survey and considered the views of 380 tourists in four case study areas (Caithness & Sutherland; Stirling, Perth & Kinross; Scottish Borders; Dumfries & Galloway) and was undertaken at locations that maximised the likelihood that respondents would have seen a wind farm during their visit."²¹

The RWE ES authors fail to mention that "This question was not asked to those respondents in Dumfries & Galloway as there is only a planned wind farm for that area," which reduced the sample size to 246.²²

The fact that at the time of the writing of the Moffat report, respondents in Dumfries were considered not likely to have seen a wind farm is an indication of how out-of-date the findings of the Moffat report now are.

The Moffat report's authors were fully aware that perceptions of wind farms change over time and depending on exposure and cumulative effect. The RWE ES also fails to mention the Moffat report's highly relevant finding in the same section that both the surveys conducted (Intercept and online) "confirm that a definite tipping point exists where Wind farm development becomes untenable for a significant number of visitors."²³

Final conclusions of the Moffat report invalid for the current proposal

The RWE ES assessment fails to recognise that the final conclusions of the Moffat report do not apply to the Glenmount scenario, as the Moffat report stresses the importance of continuing to adhere to local planning policies which have so far acted to prevent wind farms from being built in scenic areas: it is important to note too that the continuance of such protection is taken as a given by the report.²⁴ The Glenmount development is proposed in direct contravention of local planning guidance, as laid out in the East and South Ayrshire Landscape Wind Capacity Studies, and so presents a type of development which **was not studied** by the Moffat report, which considered only those wind farms which had been sensitively located away from scenic areas according to local planning policies.

The authors of the Moffat report did not anticipate anything resembling the siting of the Glenmount proposal, beside an SSSI, which happens also to be one of the most beautiful and highly valued lochs in Southern Scotland.

The Assessment should further note that the Moffat report specifically recommends the siting of wind farms away from major tourist routes. The A713 is the major tourist route between the

²¹ para 13.6.48.

²² Moffat report, para 4.5.2

²³ Moffat report, p. 127

²⁴ *Ibid.* p. 53: "In the UK the planning system, discussed in Chapter 13, has an important role. An environmental appraisal is required for all developments and where there is a significant negative impact on the environment the assumption is that the development will not be allowed. Given the assumed direct relationship between landscape and tourism, *ex post* findings of limited impact of wind farms on tourism could be taken as evidence of effective planning rather than evidence that wind farms in inappropriate locations or linked in a continuous band could not have serious negative effects on tourism."*contd./*

Ibid. p. 67: "There is often strong hostility to developments at the planning stage on the grounds of the scenic impact and the knock on effect on tourism. However the most sensitive of these do not appear to have been given approval so that where negative impacts on tourism might have been a real outcome there is, in practice, no evidence of a negative effect."*contd./*

Ibid. p. 68: "Even if there is a loss of value the effect on tourism in practice is extremely small. This possibly reflects the current limited nature of the exposure (e.g. 10 minutes in a 5 hour journey) and, as mentioned earlier, the effect of the planning system preventing seriously adverse developments." *contd./*

Ibid. p. 86: "We conclude that whilst there is evidence of a belief from local people prior to a development that it might be injurious to tourism there is virtually no evidence of significant change after development has taken place. However that is not to say that it could not have an effect, rather it reflects the undoubted fact that where outstanding scenery, with high potential tourist appeal, has been threatened, permission has been refused."

Central Belt and Dumfries and Galloway: when you drive south from the Central Belt towards the Galloway Hills, the glorious view of Loch Doon as you come over the hill out of the confined space of Glen Muck is one of the key moments of the whole drive - signalling as it does your arrival in the wild and open spaces. The A713 is how most Scottish visitors come to access the Galloway Forest Park, and as tourism providers, we cannot overstate our opposition to the cluttering of this principal tourist route with inappropriately large industrial turbines.

Similarly, paragraphs 13.6.49 to 51, which quote the Moffat report in relation to negative economic impact, drop in revenues, and the compatibility of tourism and wind farms are **inapplicable in the present instance**, because the Glenmount development represents a type of wind farm (located in a scenic tourist area) which the Moffat report did not analyse.

Survey results show significant minorities oppose wind farms

A number of recent surveys assessing reaction to wind farms have been conducted in the last few years.²⁵

For the purposes of assessing the likely damage to tourism of wind farms like Keirs Hill, the figures for those who “like” or “approve of” or “would not be deterred by” wind farms are irrelevant, even if they are in the majority. These majorities are the status quo, the people who will continue to visit. What tourist businesses need to know is the numbers of people who will **stop coming** if a wind farm is built in their area. The statistics for these significant minorities are revealing:

	Moffat	OnePoll ²⁶	ComRes ²⁷	YouGov ²⁸
% of opposition to wind farms by potential visitors	25% negative (including 10% strongly negative)	20% UK 18% Scottish	23%	26%

These figures are far too high for tourist businesses to be complacent about their prospects if wind farms are built nearby. The average for the figures in the table above is 22.4%

As we have seen, PBA Roger Tym’s own threshold (based on survey evidence) for assuming a high negative effect on business is 15%. BiGGAR Economics’ threshold (apparently lacking an evidential basis) is 20%. Using either measure, the results for business are bad: all four development surveys predict that visitors will decline in proportions from 18 to 26%. They are remarkably consistent. In all cases, the surveys predict that visitor drop-off may be enough to endanger business sustainability/survival.

Paragraph 13.7.56 of the RWE ES states that:

"The existing evidence finds only a very small group of people would change their behaviour to the extent that they would not visit an area due to the presence of wind farms. This existing evidence together with the few significant visual effects of the proposed development on baseline tourism routes leads to the assessment that the proposed development would, at worst, result in a negligible change in the propensity of tourists visiting the Local Area."

²⁵ conveniently cited in the RES socio-economic survey conducted for RES Keirs Hill wind farm by PBA Roger Tym.

²⁶ for VisitScotland, April 2012, as cited in the Keirs Hill Environmental Statement, chapter 16

²⁷ June 2012, as cited in the Keirs Hill Environmental Statement, chapter 16

²⁸ YouGov, for Scottish Renewables, , as cited in the Keirs Hill Environmental Statement, cap.16

We find that this statement completely misrepresents the size of the substantial minorities (over 20%) who **would** be deterred from re-visiting, on the basis of the general surveys cited above.

What the figures of people deterred from visiting would be in the case of Loch Doon, which is such a valued location environmentally and scenically is an open question: no surveys have been undertaken on such an insensitive proposal, and the RWE ES certainly does not add to the sum of our knowledge.

Inflated Figures, part 2 - operations and maintenance spend

Part of the means by which RWE attempts to demonstrate the positive economic impact of the Glenmount wind farm to the local community is by making estimates for the amount of money which will be spent either in the local or in the national economy during the lifetime of the development. For example, paragraph 13.7.12 of the RWE ES estimates £53,000 per MW annual operations and maintenance spend.

This figure is nearly four times higher than that quoted by RES for Keirs Hill

The Keirs Hill report for RES estimates instead that "The level of annual operational and maintenance expenditure for the proposed project is estimated to be some £0.8 million per annum - [calculated on a per MW basis]"²⁹

This works out at £13,840 per MW annually [based on Keirs Hill at 57.8 Mw], as opposed to the £53,000 per MW spend estimated by RWE for Glenmount. The reason for this seems to be that the Keirs Hill costs are worked out on the basis of actual projected costs, whereas the figures from Glenmount appear to be a weighted average of all wind farms.³⁰

The RWE ES contains an exhaustive analysis over 4 more paragraphs of how much benefit this hypothetical annual spend will mean to the local economy³¹: what confidence can we have in these projected benefits if the actual expenditure may be a quarter of what is stated?

The much lower RES (Keirs Hill) estimate of operational expenditure is also part of an application by an energy company, (who are hardly likely to underplay these costs which are interpreted as bringing benefit to the local community). We hardly need to comment: if these estimates are so different, it is hard to place any reliance on them - let alone to assume that they represent any real benefit to the local community, unlike the threatened tourism businesses which are already located here and which attract visitor spend that goes directly and unequivocally into local businesses.

Specious arguments proposed suggesting improved access for active tourism

Paragraphs 13.7.64 to 13.7.68 are deeply misrepresentative of the real scenic destruction which Glenmount would bring.

It is stated, among other things, that "Overall there are few significant visual effects of the proposed development on baseline recreational activities" - we have already shown that the scenic effects on the A713, the Carrick Drive, and a number of key, signed local paths which are not even discussed, would be huge.

In paragraph 13.7.66. the ES attempts to counter the deeply felt anxieties expressed by the local BHS members during consultation. It states that "Wind farms can in fact sometimes pose a positive opportunity for horse riders by creating routes and improving access. Positive case study: Meadowhead Farm at East Kilbride and improved access courtesy of Whitelee

²⁹ para 16.105

³⁰ Para 13.7.12. See also *Onshore Wind: Direct and Wider Economic Impacts*: BiGGAR Economics, para 4.4, p. 26

³¹ 13.7.13 to 13.7.17

Wind Farm.” We have already shown above that the comparisons with Whitelee Wind farm are essentially nonsense and that any indication that the wind farm will improve access to otherwise untrodden land is in complete contradiction with the aims of the Outline Habitat Management plan, and the prevention of disturbance to rare species and habitats.

Cumulative effects underestimated

In discussion of cumulative effects, Knockskae wind farm (PNE wind: scoping) is completely omitted.

Historic attractions of Loch Doon not understood

Page 20 of the Non Technical Summary for RWE boasts the statement "The local area could not be described as a popular tourism location." To all who know the area, this is a statement which confirms what the rest of the RWE ES also suggests: that the developers who are proposing the Glenmount wind farm know little about the area and care less.

The briefest of searches on the internet would have revealed what those of us who are lucky enough to live nearby already know: that it is one of the most beautiful areas in Southern Scotland, a perfect foil both to the wildness of the Galloway Hills to the south and the wonderful designed landscape of Craigengillan to the north, - with a fabulous secret gorge walk down Ness Glen to connect the two. It is a place where you may see Osprey or Golden Eagle, walk, cycle or ride in perfect peace.

Not long ago, the attraction of Loch Doon's shores was so great that the visitors risked damaging the very environment that they came to enjoy: The photograph below has the original caption: "Loch Doon - caravan free for all: An enormous free caravan park! There are over a hundred caravans scattered all over the shores of Loch Doon."



from <http://www.geograph.org.uk/photo/468628> Richard Webb: June 2007: Location of photographer: NS 474 005

This popularity was evidently so great that the decision was taken to block off the areas which attracted free camping using large boulders. The photograph below, taken a few metres from the one above, was taken in February 2012.



from <http://www.geograph.org.uk/photo/2838154> original caption: Roadside boulders near Macnabstone: Leslie Barrie: February 2012. Location of photographer: NS 4759 0062

It appears the developers of Glenmount knew nothing about this example of the historic popularity of Loch Doon.

We respectfully request that the Scottish Government refuse permission for this insensitive proposal.

Philippa Baird
Glengill

John Elverson
Scienteuch

Peter and Dorothy Hadden
The Buck, Main St., Straiton

Bea Holden
Holly Tree Cottage
<http://www.straiton.org.uk/>

Kathleen Good
Craigview Cottage

Jonathan Meuli
Genoch Cottage
<http://www.genochcottage.com/>

Jennie and Roy Morrison
Fowler's Croft

Attachments:

1. VisitStraiton ornithology objection: VS-Glenmount-Ornithology-objection.pdf
2. VisitStraiton report: Wind Farm development and Tourism: VS-tourism-report_.pdf