

Energy Consents Unit

Ref: ECU00004592 Hill of Fare Windfarm

15 January 2024

I am writing on behalf of the North East Mountain Trust (NEMT). NEMT represents the interests of hill-goers and those who enjoy visiting remoter areas. Membership, consisting of eleven hillwalking and climbing clubs along with individual members, totals around 1000 people. It is a Scottish Charity SCIO 008783. NEMT is strongly in favour of increasing Scotland's renewable electricity generation capacity. However, we believe that this is the wrong location.

We object to the proposed wind farm for the following reasons

- The Hill of Fare is a prominent local land mark. Given that very large turbines have been selected for the development, it will have significant detrimental visual impact over a large area by effectively doubling the height of the hill. In addition to the very large turbines themselves, the access tracks needed for construction will be very visible, further adding to the landscape degradation. At night, the aircraft warning lights will add to the visual intrusion.
- We note that the Local Development Plan accepts wind farms but at a much lower tip height. The proposed development, thus, contravenes the agreed Local Development Plan.
- It will negatively affect the natural beauty of the area which is a Special Landscape Area and a "major gateway into Royal Deeside". We note that NFP4 states that impinging on a Special Landscape Area is sufficient reason to turn the proposal down if suitable mitigation cannot be found.
- It will have a negative effect on tourism, adversely impacting a significant part of the local economy. Tourism is the major employer in Royal Deeside and the many small businesses cannot afford to lose customers as people stop visiting the area due to the loss of its unique attractions.
- The provisions for transport of components to the site are inadequate and have not been thought through. Getting large industrial components out of the immediate Aberdeen South harbour area will cause major disruption as the access roads have yet to be constructed and on the final approach to the site, the roads are small, again [leading to](#) significant disruption.
- Construction of the wind farm will involve disturbing the peat, releasing carbon dioxide into the atmosphere and negatively affecting Scotland's GHG emissions. There is Class 1 peat on the site and mitigations for disturbing this are insufficient.
- The developer talks of contribution to the local economy. However, very little of the construction spend will enter the local economy as the construction will be undertaken by a national contractor with their own workforce, providing little direct local employment. During operation, maintenance will be carried out by skilled workers from out side the local area. The proposal talks of a direct contribution to community funds but this is small (and unspecified!), and needs to be seen in the context the likely loss of tourism input. The view of the local community is clear; all six community councils in the area of the hill are overwhelmingly against the proposal.

- Given the large amount of offshore wind development planned as a result of the Scotwind licencing round, the contribution of 106 MW is not needed to meet Government targets for Scotland. To put it into perspective, Scotwind is said to be developing 25GW and Hill of Fare is rated at 106 MW, i.e, 0.42% of Scotwind. As a whole, the country is well on track to meet official targets with currently consented onshore projects set to deliver 22.1 MW by 2030 versus a target of 20 MW and offshore wind set to deliver 11 MW compared with the target of 11 MW. This means that not every site now needs to be developed and that we can make more balanced decisions about where to locate wind farms both on and offshore.
- The proposed wind farm will be visible up to 25 km away. We acknowledge that Scottish Planning Policy contains a presumption in favour of sustainable development, but this is not sufficient to justify destruction of the local landscape over such a large area.
- We are concerned about the wisdom of building more wind farms when the grid is currently heavily constrained. This appears to us to be a waste of public money. The system is already making substantial payments to operators to shut-in and adding more wind farms will make matters worse, requiring further public money to be wasted.
- In addition to the climate emergency, there is widespread agreement that we are facing a similar emergency with the loss of biodiversity. This proposal does nothing to help biodiversity. Birds and other wildlife will be adversely affected. There are a number of protected species resident on the Hill of Fare. These need to be protected, not exterminated.

Regards

David Windle (Chair of North East Mountain Trust)