



THE MOUNTAINEERING COUNCIL OF SCOTLAND

The Old Granary
West Mill Street
Perth PH1 5QP
01738 493 944

hebe@mountaineering-scotland.org.uk
www.mcofs.org.uk

1/7/08

Consents Unit
Victoria.Wallace@scotland.gsi.gov.uk

Allt Duine Wind Farm (Scoping Report 0608) – npower renewables

Mountaineering Council of Scotland Response

Scope of Concern

The Mountaineering Council of Scotland (MCoFS) 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, and are recognised by the Scottish Government as representing the interests of all mountaineers.

The bases of our interest in Allt Duine are:

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

The comments below are on the sections of most concern to the MCoFS.

7 Landscape and Visual Assessments

Walking and mountaineering each year contributes to the HIE area economy a “net annual expenditure of £245.7m for 2002/2003 and the equivalent of 4,466 full time jobs. A further 1,737 indirect and induced jobs were supported by walking and mountaineering tourism” (*Economic Impact And Development Opportunities For Outdoor And Environment Related Recreation In The Highlands And Islands: Walking And Mountaineering - Research Report* by George Street Research And Jones Economics 2003/2004). This shows how important it is to consider the quality of the experience for those taking part in these activities. Landscape and visual assessment of popular hill walking views is essential. Additionally, any surveys to investigate impacts needs to be carefully designed to ensure it reflects a cross section of those who will be affected by the development, including hill walkers as well as more generalist tourists.

ZTVs, panoramas and wireframes also need to include the views from popular hill walking viewpoints to truly reflect the impact on hill access users. The points selected for analysis must include popular but less high profile locations, although including important locations such as around Cairngorm is also important., ESs for other renewable developments have failed to do this, and therefore did not reflect the true impacts as closer viewpoints are often those that are the most sensitive receptors through being away from existing infrastructure e.g. wild land areas. Impact assessment must include all consented, operational and proposed wind farms in 360 degree views from the points. Cumulative wireframes must include these popular hill viewpoints also to adequately follow the requirements of SPP6. This states that “in reaching decisions on individual applications, planning authorities should take account of those projects in the vicinity that have

been built, those which have permissions and those that are currently the subject of valid but undetermined applications“ (paragraph 51). In order to do this, cumulative wireframes must include all three categories of wind farm in the vicinity.

The potential visual receptors considered must include the most affected popular mountains in the area. These include Munros (>3000 feet / 914 metres: Carn Sgulain, A' Chailleach, Carn Dearg, Sgor Gaoith) and Corbetts (2500-3000 feet / 761-914 metres: Carn an Fhreicheadain, Geal Charn Mor, Carn na Saobhaidhe, Meall a' Buchaille, Meallach Mor, Carn Dearg Mor).

Loss of wild land character is a vitally important issue to consider. A finer analysis is required than consideration of whether the site lies within or outwith a boundary, and because there is no designation for wild land. Wild land can be lost through landscape and visual impact, but also increased ease of access. SNHs Search Areas of Wild Land (SAWL) is a useful guide to where these characteristics can be found, but should not be treated as geographical sites. Wild land characteristics also occur outside these areas. Relevant to this is the Appendix 1 statement that the area is primarily Rolling Upland LCT and that “views from the hilltops and plateau areas are expansive, creating a strong feeling of openness and exposure” (p77), “the general lack of artefacts and few signs of active management create a strong perception of remoteness,” and that “roads, tracks, power lines also all have an effect on the sense of remoteness within the landscape” (p78).

9 Ecology

The MCoFS has great concern about the loss of montane habitats. These are already threatened by climate change. Although renewables are designed to mitigate this, such developments have the potential to result in loss of the habitats that are the most vulnerable to the problem they are designed to solve. Such loss is near impossible to mitigate as montane habitat exists where it is due to the characteristics of that location. Often species dependent on the habitat cannot migrate or adapt enough to compete in other locations. Montane habitat is vulnerable to disturbance and, in the UK context, is sparsely distributed. Vegetation, and therefore habitat, at altitude is very slow to recover, and often needs active assistance above about 600 metres altitude. True mitigate of its loss cannot be achieved through equivalent habitat creation. Although the proposed site has no natural heritage designations, it is likely to contain European priority habitats. These have a high value even outside designated sites. Their location within the development site needs considered when planning the design and layout of developments.

The distribution of European habitats, Schedule 1 species, Annex I species and red data book species all need to be mapped for a full analysis of the impact.

13 Other Material Issues

13.5 Traffic Management

Access to popular hill walking locations in and adjacent to the proposed site requires cars to be parked, and this has been done for decades. The proposed development must not impede this. All the tracks likely to be used for machinery and vehicle access to the proposed site are commonly used approach routes to the hills, and car parking must not be diminished throughout construction, operational or decommissioning phases. This must be built into plans for alterations and usage of the public roads.

13.6 Public Access and Safety

Access points from the A9 direction into the area of the wind farm are popular routes for walkers and off-road cyclists. These are listed in numerous walking and cycling guides. There have been unnecessary difficulties with continued public access connected with the Glendoe hydro and Millennium wind farm developments. This must not be repeated at Allt Duine if it is consented.

There are tracks across Scotland where there is shared use by non-motorised access users with appropriate use of signs, awareness-raising, track design and driver training / safe driving. The hill walking public will not tolerate prevention of use of tracks into the areas hills that have been customarily used for decades. This includes the tracks that may be selected for use into the west side of the Monadhliaths including (but not exhaustively) Rights of Way HD45 and HB41, however all tracks and paths are well-used for accessing the east side of the Monadhliaths. Plans for track use must include provision for shared use by access users. The plans for forestry operation track in Glen Etive may offer a potential solution by use of “passing places” for pedestrians. At the time of writing this has not been constructed, but may be a contributory method through which shared access can be made safe alongside the provision suggested earlier in this paragraph. Continued access to area and up tracks during construction, operational and decommissioning periods must be planned for.

13.7 Socio-economic

This section claims that “no specific or well-defined walking route has been identified.” This is untrue. Preceding paragraphs have cited a number of popular routes; there need not be a constructed path for there to be commonly used walking routes. The sales of the Corbett book alone suggest the commitment of members of the public resident or visiting Scotland for whom ascent of these hills is a goal. Most, but not all will follow the recommended routes. Walkers should not be confined to using these routes, but they illustrate that there are “well-defined walking routes” affected by the development. This needs to be assessed properly.

The MCofS will object 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