



THE MOUNTAINEERING COUNCIL OF SCOTLAND

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Consents Unit

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Dunmaglass Wind Farm (Supplementary Environmental Information) – RES Group (Highland Council)

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 and we aim to represent the interests of all mountaineers. As the only national representative body of the sport of mountaineering in Scotland, we have 10,000 members.

The bases of our interest in Dunmaglass are:

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

For ease of reference, the following section numbers refer to those used in the SEI.

2. Site Selection

The Dunmaglass site is not in Highland Renewable Energy Strategy (HRES) “preferred” or “possible” development areas, despite the claim of the SEI that it is a “highly favourable area.” The HRES does not discount smaller wind farm developments in such area, but a 100Mw development of 33 125 metre turbines is well within the category of “national scale schemes” which the HRES guides developers to consider are inappropriate in such areas. The proposed Dunmaglass location is neither in the “preferred” nor the “possible development areas.” The location is in the area with a “presumption against development for national and major scale projects.” The MCoFS argues that as there are a number of the preferred areas below capacity, that these should be prioritised as locations for proposals, and hence that the developers have not sufficiently achieved the requirement of “need to show that there is no scope for alternative development within preferred and possible development areas.” (E.6 HRES). “Preferred” has permitted grouping of wind farms, and “possible” is “less suitable for grouping of schemes.” The third category, in which this location lies, is even less suitable, and MCoFS believes in this instance not suitable, for grouping. This area is already affected by Farr, and potentially Corriegarh, hence a third would represent a high level of grouping which is not indicated as suitable by HRES.

The assessment of site suitability does not include cumulative impacts on views from the popular Munros and Corbetts. As many of these mountains potentially affected by the Dunmaglass proposal

are already affected by other wind farms, this needs to be, but has not been, taken into account in scoring for site suitability. Additionally, the MCofS would object to discounting either “remoteness” or “wild land” character. Although these have an association, they are different enough to justify retaining both in the calculation as an area can have wild land quality without being remote, and this “feel” is often the very attraction for the area. A popular illustration of this is Glencoe with a primary route to Fort William running through it.

The recalculation offered in the SEI does not reflect the HRES, and should be discounted. The site is not in a “preferred area” or “possible area” under HRES.

The SEI states in 2.5.1 that clustering “avoids the need for widespread protection elsewhere.” The MCofS argues that this site is part of the area requiring protection, and that this is not a suitable area for clustering, and that this is one of the “high quality landscapes” as quoted from SNH. The Monadhliaths have a very different quality than e.g. Lanarkshire and the character of the area is primarily based on the wild land qualities and remoteness and perceived naturalness which are all highly vulnerable to turbine encroachment above a small angle of view from upland locations, and at some distance. Hence, the argument of acceptability of clustering in areas such as Lanarkshire do not apply to the site under consideration.

The statement in 2.7 that the area has “low sensitivity to large wind turbines” is at odds with the tables associated with the ZTV. The very few figures that consider the views of the proposed wind farm from upland areas state that the “viewpoint was assessed as having high sensitivity to change” and that the “impact” was “substantial adverse.” (fig 5.13 and 5.14). The MCofS would agree with the statements of substantially adverse impacts associated with the ZTV figures.

4. Site Design

The statement that “tracks on the site have been routed to avoid sensitive areas” has flaws in that the between-turbine tracks between Carn Odhar and Carn Ghriogair suggests active peat and are M19. M19 is a European priority habitat. Although it is recognised that this is a Natura site, the presence of this NVC community highlights the importance of some of the areas. Drainage through track construction will contribute to drying out which will release stored CO₂, hence reducing the benefit of the renewable energy as an emission reducing measure. Additionally, it is difficult to justify that the track upgrade has avoided sensitive areas where it is adjacent to another watercourse. There is potential run off, inevitable noise, vibration and disturbance that will affect this sensitive site.

5. Landscape and Visual Assessment

This section only takes into account the Farr wind farm, which has already been constructed. There is no consideration of the Corriegarth wind farm. SPP6 in the Cumulative Impacts section 51 states that “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.” This definition includes Corriegarth, hence that lack of sufficient consideration of the cumulative impacts with this development fails to adhere to SPP6. This would require a measure of the impact in terms of percentage of view affected by a combination of the visible wind farms, including those at the application stage. The wild land character of the Monadhliaths is greatly dependent on the expanse of apparent wildness. From peaks in the Monadhliaths it is common to enjoy a 360 degree view of the landscape. There may be capacity to absorb a small percentage of the view having turbines at an acceptable distance, but it is not a small number of 45 degree views that realistically reflect the character of the area, or make sense in terms of an expansive landscape.

The statement that “in the operational phases, the character and views of the landscape would be affected by the presence of 33 wind turbines and associated overhead power lines,” and that “surrounding land would be returned to its existing appearance,” suggests that all tracks will be

fully reinstated. MCoFS would therefore expect that all tracks are fully reinstated to pre-construction width and impact on the landscape. The MCoFS would object if this were not part of the conditions, and that the remoteness of the area is eroded by lengthening of existing tracks. During the operational phase there would need to be a contingency plan that did not require retaining these tracks for maintenance were it to be required, and that maintenance needs were not used as a reason for arguing that the new tracks are retained.

The statement that “rolling upland” areas “although important at the local level, are not particularly rare within the wider context of the study area,” does not reflect the importance of this type of landscape in the Scottish context. The Monadhliaths are one of the very few areas of continuous uplands outside the Cairngorms National Park. At a national level there is only a small proportion of this category, and this is the context in which the site should be assessed, rather than within the study area as the topography means that a large proportion of this area is affected when there is an increase in the “currently few examples of such manmade elements.”

The ZTV study shows that visual effects are mainly concentrated from high ground rather than communities and A9. Considering people on A9 are in cars on a main road, this is not necessarily the most important area to consider impacts on as the viewer is already in a manmade structural context. Views from the relatively natural high ground are treated somewhat dismissively. Viewpoints from where people “visit and congregate” include hill tops. This has not been taken into consideration in the SEI. There are about 44 Munros and Corbetts within the 40km radius study area, which are commonly walked hills. This illustrates how central this area is to mountaineering recreation, one of the most accessible and popular sports in Scotland (Surveys confirm that in any one month period around 6% of the Scottish population (equivalent to 305,000 based on ONS 2004 projections) go hill walking and climbing (sportscotland 2002, 2005)). Within approximately 20km (half the visual study area radius) in approximate ascending order of distance from wind farm are the following significant viewpoints.

Height / name	Category	Grid reference	Number of turbines visible	ZVT viewpoint
811m Carn na Saobhaidhe	Corbett	NH60011445	25-33	
920m Carn Sgulain	Munro	NH68380586	25-33	viewpoint 11 fig 5.13A
878m Carn na Fhreicheadain	Corbett	NH72590713	25-33	
930m A' Chailleach	Munro	NH68130417	25-33	
945m Carn Dearg	Munro	NH63550239	25-33	
926m Geal Charn	Munro	NH56159879	25-33	viewpoint 12
862m Meall na h-Aisre	Corbett	NH51570003	17-24	

The first in the table is only 4.5 km south west from the proposed wind farm site, and has not been included as a ZVT viewpoint although has 25-33 turbines visible. Additionally, no account taken has been taken of the cumulative impact on these important recreational areas of views of Farr wind farm and potentially also Corriegarth wind farm.

6. Ecology and Conservation Assessment

The SEI states that a “precautionary principle” will be followed with respect to Water Voles. The intended survey is for watercourse crossing points. The survey needs to be conducted not just where the track cross the burns, but where it runs alongside as this is so close to the watercourses and the noise, vibration and run off may affect adjacent areas utilised by the Water Voles.

Peat Bogs in “fair condition” may have the potential to attain “good condition.” Track construction will prevent the immediate area attaining that status, additionally the affect on the bog will not be restricted to the actual area of the track, but will affect the surrounding area through hydrological

disturbance. These factors need take into consideration, not just the destruction of good condition mire.

7. Bird Assessment

Golden plover and dunlin were observed to be nesting in the “potential impact zone.” This appears to be at odds with the statement that “no significant impacts are predicted on any of the site’s ornithological importance.” These species will lose out if the wind farm is constructed, and although the “habitat management plan and the bird monitoring programme will also be implemented and will deliver a net gain to the area’s bird populations,” golden plover and dunlin will be displaced. This is illustrated in Figure 07.01-07.14 which shows that a significant number of Golden Plover pairs would be displaced, some Dunlin and disruption to use of area by Golden Eagle, Hen Harrier, Merlin and Peregrine. There is no evidence there are excess breeding areas nearby for them to move into. This will mean a net reduction in these species breeding in the area.

8. Hydrology

Efforts to prevent sediment run off are welcomed, and we trust SEPA will be rigorous in enforcing prevention requirements regarding sediment and spillages.

13. Socio Economic Assessment

“Public access during the approximate 18 month construction phase of the wind farm would be discouraged by RES by way of clearly marked signs warning of the danger of a construction site.” The extent of the construction site needs to be very clearly defined. The extent of the construction site must be very clearly defined. Based on experiences with Glen Doe hydro development, the developers were very negative about access outwith the minimum area of restriction required by the Land Reform (Scotland) Act 2003. This must not be repeated. Continued public access along the tracks must be ensured. There are many examples of tracks used regularly by heavy vehicles where they share access with many other users. This requires some vigilance from both the public and the vehicle drivers. A repeat of the attempted ban on track use by the Glen Doe construction company must be avoided, and both managers and plant operators must have a full understanding of responsible access rights. A woeful lack of this was illustrated on my first contact with Hochtief where their representative asserted that because they had upgraded the track they had the right to close it to public access on that basis. An illustration of the lack of driver concern for safety even on the roads around Fort Augustus was shown by complaints about inconsiderate driving. Safety awareness signs and training for drivers should be sufficient to ensure that the shared use of the track is safe. In particular there is interest in the mountaineering community in access up the track alongside the Allt Uisg an t-Sidhein as approach route for the popular Corbett Carn na Saobhaidhe. A plan for continued access should be drawn up, and the MCofS would be available for consultation. The local Access Officer should also be closely involved.

14. Tourism Assessment

“The great majority of tourism resources are not affected by the wind farm development; while for those that are, the impact is minimal.” This completely ignores the importance of the landscape and those that wish to interact directly with it by entering the remoter of higher level areas (mountaineers) where the “resource” is having the opportunity to escape and recharge through remoteness from obvious man made constructions. This “resource” was not included in the Glasgow Caledonian University study of impact of wind farms on tourism, hence ignores a not insignificant number of visitors that spend and contribute to the local economy. Conclusions based purely on this study are an inadequate assessment on the tourism experience.

Volume II – Maps & Figures

Fig 5.13A

Dunmaglass wind farm would be present in 10 degrees of the NW view with 30 turbines in view. It is also noted that 40 turbines of the Farr wind farm would be present to the north. The number of degrees of view affected are not quoted, but the orientation of the Farr site suggests that a similar number of degrees would be affected in this direction. Hence in one view from this location, it is likely that 20 degrees may be affected. Considering this one of the best directions to appreciate the surrounding wild land from this point, the negative impacts on the wild land characteristics is significant and adverse. Also visible would be Glenkirk, Glenmoriston and Farr (degrees of view unspecified) in a west north west direction, views of AGLV and SNH Search Areas for Wild Land. The effect of the panorama from this point will be significantly adversely affected.

Fig 5.14 (viewpoint 12 from Geal Charn)

The impacts are quoted as substantially adverse.

Fig 14.1

Many hill walkers enjoy their rights to responsible access in the way that the Land Reform (Scotland) Act 2003 intended, and that is not restricted to following “paths” as this map suggests are the routes that hill walkers follow. A typical example would be a circular route out from a car and returning to the same car, but avoiding following exactly the same route there and back. An often-used access point for Carn a na Saobhaidhe is to park at Coignafearn Old Lodge NH7117, follow the track south west as in the figure turning west at Dalbeg and to the summit, but to return along the high ridge linking, Beinn Bhreac Mhor NH6719 and via the track at NH6817. This would take the walker along the boundary line of the site around NH653188. Another obvious route to the same summit is south from Dunmaglass Lodge along the track, then again follow the ridge to Carn Odhar NH6317 and Carn Ghriogair NH6520 from where the natural descent is either down to the track via Allt na Doire Leathain (through proposed wind farm site) or Allt nan Adag (along edge of site). Similar attractive options exist away from the routes in the figure for many of the other hills. This means that the assessment based on effect on views and disruption to commonly used routes is false, and is based on overly simplifies and restrictive assumptions.

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

Yours sincerely

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Access & Conservation Officer