



# THE MOUNTAINEERING COUNCIL OF SCOTLAND

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Section 36  
Scottish Government

## Proposed Kilgallioch Windfarm [Arecleoch Phase 2]

### Scoping Opinion Response from the Mountaineering Council of Scotland [MCofS]

Prepared by Beryl Leatherland  
Access and Conservation Committee of the MCofS  
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The MCofS is recognised by the Scottish Government as the representative body for hillwalkers, climbers and ski-tourers. We have 10,000 members and aim to represent the interests of all 400,000 British mountaineers on issues relevant to the access to and conservation of Scotland's mountaineering environment.

Thank you for giving us the opportunity to comment and to raise issues at this early outline stage of the Environment Impact Assessment [EIA] for this proposal.

The tract of land in question is not a core mountain area for us but we have some concerns which we should like to highlight. These principally concern the potential impact on the visual amenity of the upland landscape and recreational access.

The development as proposed is significantly large; up to 130 turbines and covering an area of 10 x 9 kms so it is to be expected that the local impact [during construction and visually] will be huge.

#### **Landscape and Visual Amenity**

We are concerned about the cumulative effects of this development together with others in the same area under construction, already established and at various proposal/planning stages. This area is quite important to the tourism economy of south west Scotland [the EIA rather underplays this] and this effect could be detrimental. The wider area is a popular destination for cycling, camping holidays, walking and riding, and the entire region is easily accessible from the Central Belt for a day trip.

This windfarm site is within 20 to 30 kilometres of various significant summits and ridges in the area so it would be expected that on a clear day the turbines will be visible from these vantage points. As you describe in 2.9, the developer has a duty to follow SPP6 and the relevant NPPGs and PANs. The most important in this context are the recently consulted on and revised PAN 45 Renewable Energy Technologies which you mention in 3.26 and, especially, SNH's draft publication "Designing Windfarms in the Landscape", mentioned in 4.30. The overall appearance of a collection of windfarms depends greatly on how their turbines are accommodated in the

natural lie of the land, taking advantage of the profiles of ridges, corries and valleys to reduce the visual impact from a variety of viewpoints as far as possible. In fact the design of the site may often have a greater impact than its proximity to a viewpoint as some level of mitigation can be achieved by sensitive layout. The SNH- devised guidelines on this are very clear and acceptable.

The moorland, forestry and upland plateau included in the site are relatively low-lying and the site is therefore visible from many nearby summits and ridges used for recreation; furthermore the outer fringes of the site may well be visible from coastal tourist locations and the long distance routes of the Carrick Way and Southern Uplands Way. While it would be most unrealistic to expect all tourist destinations to be exempt from visual windfarm development, there are definitely possible cumulative impact effects on the landscape resource in this instance. We recognise, however, that it is difficult to quantify these at this early stage for the reasons you give in 4.33 to 4.36 inclusive.

The following summits and ridges are within the Zone of Visual Influence [ZVI] and it would be extremely useful if the Assessment Methodologies you describe in A.6, a], b], c], and d] could be applied to them to determine potential impacts:

Shalloch on Minnoch 768 metres [grid ref 405907] which is a Corbett often combined into a high level ridge walk with Kirrieroch Hill 786 metres;

Merrick, 843 metres [grid ref 428855] also a Corbett and the highest summit in the Southern Uplands

Lamachan Hill 716 metres [grid ref 435770]

Other notable summits are more distant and/or the site may be obscured from them by higher hills. These include Cairnsmore of Fleet at 711 metres [502671] and Corserine at 814 metres [498871] and the Rhinns of Kells [the Kells Range] which may be out of the line of sight due to the Merrick except for the southern end of this high level 13 kilometre long ridge at Meikle Millyea 746 metres.

All the above routes are described in the Scottish Mountaineering Club [SMC] guide "The Corbetts and Other Scottish Hills" Vol2. It should be noted that these hills and long ridges, although smaller than their Munro counterparts, are visited particularly for the wide ranging views they offer throughout long high level walks.

### **Recreational Access**

It will be some time before the contractors, councils involved etc are in a position to consider the temporary impact during the 18 months of construction on access in the vicinity of the site but it is essential that any arrangements take full account of the Land Reform [Scotland] Act 2003 and the guidelines in the Scottish Outdoor Access Code, and that these are reflected in future planning applications and Environmental Statements. This would apply both during construction when public access should be maintained and after the windfarm is completed.

### **Scoping Questions**

- 6.14 We note that you are already consulting with the BHS. It could be suggested that Sustrans and the Ramblers' Association Scotland are included as consultees due to the long distance routes in the vicinity of the site
- 6.15 We have nothing to add to what you have already included in these areas, except for other key sources of environmental information. We could suggest that you look at "Impact of Windfarm developments on the soil carbon stocks held in peats" at ISBN 9780 75597 1473 [web only]. Potential environmental damage caused by peat disruption is of concern; you have already mentioned implications for hydrology and slide. We are also concerned about the quality of track construction, especially in relation to potentially excessive drainage,

having observed unsatisfactory construction and maintenance on visits to some windfarms in recent years.

We should be pleased to comment on your future Environmental Statement, particularly on aspects of Landscape and Visual Amenity, when it is available.

Beryl Leatherland