



THE MOUNTAINEERING COUNCIL OF SCOTLAND

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Dear Sir

THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2000 SECTION 36 APPLICATION FOR THE PROPOSED EXTENSION TO THE MILLENIUM WINDFARM IN THE HIGHLANDS OF SCOTLAND

The Mountaineering Council of Scotland 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 the estimated 400,000 Scottish mountaineers on issues relevant to the access to, and conservation of, Scotland's mountaineering environment.

The MCoS as an organisation is generally supportive of renewable energy technologies and recognises the role they play in reducing harmful emissions, and their potential to help combat climate change and the opportunities they offer to achieve security, independence and sustainability of supply. Scrutiny of our website at <http://www.mcofs.org.uk/access-and-conservation.asp> illustrates our position statements, the views of members and articles from previous issues of our quarterly journal. However, very many mountaineers have concerns that there are potentially undesirable costs:- the loss of visual amenity and the permanent detrimental effects on Scotland's renowned and globally important landscapes. The MCoS responded in some detail to the Highland Renewable Energy Strategy 2006 [mentioned in 6.4.30 of Volume 1 of the current papers] and is therefore familiar with the relevant issues for the Council.

In the deliberations on this Application we should like the following comments to be taken into account together with those made in our original Scoping Opinion submission of 11/03/08 which we feel are still valid. In our scoping opinion response we described our observation on visual impact, landscape deterioration, access, track construction and peat damage. In this response, however, we have confined ourselves to addressing the first 3 of these. We also have biodiversity observations but are aware that the RSPB is addressing these.

Consideration of this Application

It would be inappropriate to lodge an objection to the Millennium Wind Farm Extension Application, when this proposed addition to a consented built development would have a much less significant visual impact on the landscape than the impact of the original 20 turbines of the wind farm. Additionally, the 6 turbines of the Extension seem to be located at least to some extent to take advantage of the contours of the site and this has achieved some mitigation. Thus they should be less predominant from most viewpoints than the original turbines. This is broadly in agreement with PAN 45 Renewable Technologies and SNH's draft "Developing Wind Farms in the Landscape".

Application Processes

We are very concerned, however, about what appears to be emerging as almost standard practice by developers. The recent trend, seen for example at Whitelee wind farm on Eaglesham Moor and elsewhere, appears to be to achieve a successful wind farm application and then subsequently to follow an additional extension scoping and application process. There is a danger that these

extensions push planning criteria and boundaries that would not have been countenanced if they had been in the original applications. This could be considered to be a somewhat devious method of achieving a larger wind farm than would be the case if each application combined both the original proposal and the extension together as the original submission for consideration by planners, regulators and stakeholders. Once a wind farm has been consented, one would anticipate that an application for an extension would be relatively easy to obtain so that the outcome is that the developer is able to construct a much bigger wind farm. This compares with, for example, a sizeable ski resort that has a dozen serviced runs putting in an application for several additional uplift facilities.

Wild Land Considerations and Landscape Quality

The MCoS, along with various charities and NGO organisations in Scotland, has concerns about the gradual erosion of Wild Land. We note the comments in 6.4.37, which includes the NPPG14 attempt to define wild land. We agree that a precise definition is difficult because perception of characteristics varies with each individual. In 6.4.38 it is stated that the proposed wind farm is not located in “wild land” as defined by NPPG14; however, the site will be very visible and impact significantly on the aspect FROM nearby sites which are [or were] regarded as wild land territory, thereby reducing this landscape quality.

Not only is it difficult to identify wild land locations [and we do not accept the conclusions in section 6.4.39] but it is also extremely difficult to put a precise socio-economic value on them. We would however, suggest referral to the recent SNH document “Public Perceptions of wild places and landscapes in Scotland”. We note that during the scoping exercise that SNH also observed that although the site is not in a “search area for wild land” the area has wild qualities and there are a number of wild land search areas WITHIN a 45 kilometre radius of the site. SNH also recognised the proximity of NSAs within 45 km of the proposal, and 4 AGLVs close to it and at that stage recommended assessment of the impact on these. We do not feel that the application successfully demonstrates that this assessment has been done adequately. There is a need for consenting authorities to consider the implications for this area in these respects.

Cumulative Effects

The cumulative effect of the Millenium wind farm together with Dunmaglass, Corriegarth, Corrimollie, Lochluichart, Glenkirk, Farr and Fairburn will have significant adverse impact on the landscape experience for both the visitor and residents in this area of the Highlands. The various wind farms are outside any designated sites but they impact on, in particular, several of the Areas of Great Landscape Value listed in 6.4.43. In contrast to what is reported in volume 1, we feel that the visual impact on the Loch Lochy uplands [6.6.65] and the Quoich/Morar summits at only 10 kilometres distance [6.6.71] will be very high. It is very significant that the documents state in Volume 1 [6.4.57] in relation to this area that “the quality of the landscape is therefore to be considered high”. Furthermore, in 6.6.28, in a continuing discussion of the landscape type in this zone, this is reiterated with the addition of “with a high sensitivity to change”. While it would be most unrealistic generally to expect selected viewpoints to be exempt from any visual wind farm impact, there are definite cumulative effects on the landscape resource in this area. Thus we are very concerned about the cumulative effects in this area of this development together with others either under construction or already commissioned or at various proposal/planning stages.

Visual Impacts

In the scoping opinion response, at 8.3, I recommended doing visual impact assessments from 11 carefully selected viewpoints. I note that these have been done from only 4 of these. In 8.3 I also stated “However, the size of the wind farm would increase significantly and become more dominant and a major feature in the landscape”. We adhere to this observation.

The Existing Views taken from viewpoints 12,13,17 [especially 6.22b], 23 and 31 shown in the Environmental Statement Volume 3 figures really represent considerable spoiling of the visual environment. The view from Gairich [viewpoint 32, fig 6.37] is difficult to decipher due to the merging of the clouds and horizon in the wintry weather on the day it was taken; this is true of

some of the images in Volume 3 but we recognise that when so many impressions have to be photographed it is difficult to achieve comparability, which is a great disadvantage.

While the methods of assessment used have followed the guidelines used by the industry [and listed in 6.2.1] it must be recognised that the standard 50mm lens commonly used for the photos and equivalent view for the wireframes has the effect of making distant objects look smaller than they would to the naked eye in the real world: that is, there is a wide angle effect. This is always the case in the documentation produced by developers and has to be taken into account when considering their proposals.

It should also be noted that hillwalkers and mountaineers tend to ascend peaks in mainly fair weather conditions. Therefore the references in the submitted documents to “in very good conditions only” [6.6.1.89] and similar phrases are superfluous in our opinion. Poor visibility due to weather should not be relied upon for mitigation.

Recreational Access

Throughout both construction and operation the legislation of the Land Reform [Scotland] Act 2003 (LRA) will need to be complied with. Access rights apply to this site. One of our members has reported that when visiting the site early in 2009 they encountered a sign asking visitors to report to the site office. This is normal health and safety practice on construction sites. However, the office it was apparently unmanned and so they were not able to discuss access or receive guidance on the best route to take. Our member had limited time for their activity that day and they felt the signage was intimidating. It was a sunny day and they did not want it spoilt by any “hassle” so they decided to go elsewhere for their recreation on that occasion. This is precisely one of the scenarios the LRA was designed to prevent. On site, there should ideally be a regularly updated site plan showing alternative routes for walkers and others, to enable them to exercise their access rights and responsibilities safely and without hindering any work being undertaken. Of course, the member should have subsequently been in touch with the Access officers for Highland Council [the contacts are on our website and we advise members to do this]. I referred to access matters in my response to the scoping opinion request, in section 9.3.

Conclusion

The Mountaineering Council of Scotland feels it would be untenable to submit an objection to this Application, given that it will be less intrusive than the consented and built wind farm of which it is an additional component. However, we have continuing concerns about the development regarding access and amenity which you are asked to recognise and take into account in the proposed development. Additionally we trust that action on access that we have proposed will be taken. Please do not hesitate to contact me to discuss these issues further.

Yours sincerely

Beryl Leatherland
Access and Conservation Committee