



# THE MOUNTAINEERING COUNCIL OF SCOTLAND

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Business, Enterprise & Energy Directorate  
Renewable Energy Division  
Meridian Court  
5 Cadogan Street  
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Dear Ms. Deeney

## Section 36 Application for the proposed Viking Wind Farm in Shetland

Please accept these comments from the Mountaineering Council of Scotland (MCoS) on the Viking wind farm. We are recognised by the Scottish Government as the Representative Body for hill walkers, climbers and ski tourers. We have over 10,000 members and aim to represent the interests of all the 400,000 regular Scottish mountaineers on issues relevant to access to, and conservation of, Scotland's mountaineering environment.

All page references in these comments refer to the Non-technical Summary (NTS).

### The Proposals

The MCoS has concerns about access tracks across deep peat (p6/7). "Floating tracks" are a new method, and we have concerns whether it is satisfactorily proven to preserve the peat quality, especially considering the large amount of peat that is potentially at risk.

The anticipated construction period of 5 years is a significant length of time in terms of impact on quiet enjoyment of the central area of Shetland, and any impacts on access to this area for those wishing to exercise their access rights.

The "key views" referred to (p9) do not include any of the popular off-road high viewpoints where people enjoy quiet recreation. Particularly affected are the hills of Scalla Field (HU389572 in the middle of Kergord quadrant), Dalescord Hill (HU393684 in the middle of Delting quadrant) and Cunningill Hill (HU432675 approximately 2km north-west of Collafirth quadrant).

### Environmental Effects

The "panoramic views across Shetland," (p11) noted as present in the 2 southern quadrants recognises the importance of the first viewpoint referred to in the foregoing paragraph. However, despite this recognition in the ES, this area is not represented among the "key views" (p9) and neither are the other listed common goals amongst hill walkers visiting Shetland.

The predicted impact on views from 2 of the NSA areas have been underestimated. Both the Muckle Roe and the area that includes Weisdale Roe are within the 15km, where notionally significant impacts occur (p14).

The importance of taking into account the sensitivity of the receptor is referred to (p13), however some of the most sensitive receptors have not been taken into consideration. These receptors include those that wish to enjoy recreation away from man-made facilities, such as roads and constructed paths, and appreciate the

unique wild-feeling and barren landscape of Shetland. These sensitive receptors, including hill walkers, have not been taken into account as evidenced by the lack of relevant “key views” (p9). The Environmental Statement (ES) claims that 4 walking routes will receive significant visual impact during the construction phase, but not the operational phase. Based on this assessment, we can infer that the “walking routes” do not include those used to summit the significant hills in the area. These other walking routes must be taken into consideration when assessing the impact of the proposal. The prediction of impacts based on roads, ferries, cycle routes and waymarked and promoted walking routes is misleading. All Visit Shetland website promoted paths are coastal, hence using this criteria for consideration is skewed towards the less sensitive receptors who tend to appreciate the landscape from a constructed environment. A significant number of walkers will be independent of promoted routes, and as mentioned previously, will be looking for a wilder experience in Shetland with higher altitude panoramic locations to walk – the very locations where the wind farm is proposed. Unlike the coastal routes considered, walkers at more inland locations will not just experience the “proposals appearing in a smaller proportion of the view” (p15), but will find the majority of their view, and on some hill tops all of the view, dominated by the turbines.

The MCofS has serious concerns regarding the acknowledged “significant negative effects are likely to be caused to the blanket bog” (p18). Such a habitat requires decades to form, and a short time of hydrology disruption to be destroyed, hence “compensatory habitat enhancement” is not likely to be effective for bog habitat.. This will have implications for the habitat extent on Shetland and carbon storage.

The MCofS has concerns regarding the impact on breeding birds such as Merlin, Whimbrel, and Red-throated Divers, but we defer to the expert opinions of the RSPB on this matter.

The lack of use of hill top type receptor location impact assessment on recreation renders the assessment only partially useful, and concentrates assessment on visitors that are primarily focussed on using man-made facilities rather than those enjoying the landscape from a relatively natural setting. The recreation impact assessment is therefore not conclusive that there will only be a moderate impact. In terms of exercise of access rights, there will be significant disruption to access opportunities across much of inland Shetland for the 5 years of construction. An “access management plan to maximise the potential benefits through provision of public access and organised tours,” is not a like for like compensation as it replaces independently enjoyed appreciation of the wild upland landscape of Shetland with “tours” and facilities that are not the chosen method of appreciation of Shetland of the most disrupted proportion of Shetland visitors. The opportunity to appreciate the upland landscape will be significantly impacted upon throughout the operational life of the wind farm, as well as the construction phase.

Although in relation to the mainland, Shetland lacks high mountains and truly wild areas, it is still valued by visitors and those that walk the highest hills in the different areas of Scotland. The high points in any area attract visitors to enjoy them as viewpoints. For this reason, the MCofS has concerns based on the landscape implication of building wind farms in 4 of the highest points of mainland Shetland. This means that all high viewpoints on Shetland will be significantly impacted by foreground views of turbines. This may have implications for visitor enjoyment and therefore visitor number, an important contribution to the Shetland economy.

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

Yours sincerely

Hebe Carus  
Access & Conservation Officer