



# THE MOUNTAINEERING COUNCIL OF SCOTLAND

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Dear Sir / Madam

## **Balmacaan Wind Farm Scoping Request – MCofS Response**

Please accept these comments from the Mountaineering Council of Scotland (MCofS). The Mountaineering Council of Scotland (MCofS) is the representative body for hill walkers, climbers and ski tourers, and is the only national representative body of the sport of mountaineering in Scotland. We have 10,500 members, and are recognised by the Scottish Government as representing the interests of all mountaineers. The MCofS interest in wind farms lie primarily in issues of public access and conservation. The latter includes biodiversity, soil and landscape.

### **4.3 Supporting Documents**

The MCofS is very concerned about the growing practice of presenting a Planning Statement as part of the document bundle of an ES. These are an interpretation of planning policy in support of the development. The ES is supposed to be a factual statement about the development on which decision makers can make an objective decision. We consider it inappropriate for developers to be permitted to present such a promotional document through the same process as a factual one.

## **5 Environmental Parameters**

The potential cumulative effects should be considered with all developments in the planning system, even if they are at scoping. The overwhelming majority of s36 scoping go to application and the majority of smaller wind farms also. Their inclusion will also likely increase the efficiency of the decision as the timescales often mean that other developments at the scoping stage will also be at application stage when the ES of this development is being considered for decision. This applies to sections 5.1 and 5.6.

### **5.2 Geology, Soils and Hydrogeology**

Tracks have a significant additional impact when added to that resulting from turbines. Tracks should therefore be assessed in the ES as the mitigation offered by restoration of the tracks on decommissioning.

### **5.6 Landscape and Visual**

The presence of the NSA so close, 10km, is of great concern. Scenery in such an area, as with any viewpoint, is not restricted to a particular direction. Experience of the scenery while in the NSA can be equally impacted by views to beyond the boundary as views within the NSA boundary.

Recognition of the significant extra impact of tracks on top of that of the turbines themselves must be acknowledged and properly assessed in the ES. This is required when considering visualisations and landscape impacts, else the real impacts will be significantly greater than presented in the ES.

Full consideration needs to be taken of impact on wildness, at the level of importance given in the SPP (section 128) and NPF2 (section 99). The ES must not repeat the inappropriate use of SNH Search Areas for Wild Land (SAWL) often seen on other ESs. It should be noted that the purpose of SNHs SAWL were not intended as a pseudo-designation defining the location of wild land. They were mapped roughly as a starting point for discussions about characteristics of wild land, which may lie both inside and outwith SAWL. Both SPP and NPF2 require consideration of wildness character, which is not restricted to SAWL. Both policies have a concept of threshold which must be also taken into consideration. Wildness should be considered in this context.

#### **5.6.4 Assessment Methodology**

Viewpoints important for hill walkers, and therefore for visualisation locations, are also appropriate for the cumulative impact study. The particularly popular hills in the area are: Corbetts - Meall Dubh NH245078, Beinn Loinne NH152177, Carn na Saobhaidhe NH599144, Aonach Shasuinn NH173180 and Munros - Toll Creagach NH19442828 and Sgurr nan Conbhairean NH13001388. These are selective as the cluster pattern of popular hills is frequent in this area, particularly the Munros. This is a minimal list for this reason, and other Munro viewpoints, particularly in the NSA are likely to be appropriate. It should be noted that the visual impact is not merely appreciated on reaching a summit or some other destination. The whole journey to reach these points is an integral part of the experience of reaching a summit, so this should also be considered.

Receptors are of variable levels of sensitivity. Walkers are likely to be highly sensitive as they seek out experiences away from roads and buildings. The magnitude of effect cannot therefore be based purely on number of those experiencing views, but also the expectations and quality of those views based on the expectations.

Defining the 'detailed study area' as 10km radius is not justifiable. Significant visual impacts can be experienced well beyond that limit, depending upon topography dictating inter-visibility. An appropriate visual assessment must be made throughout the 35km study area rather than use of an arbitrary restricting assumptions about likely impacts. Coincidentally, the 10km limit avoids assessment of impact on the NSA. A full study of impact should be done.

#### **5.6.5 Cumulative Effects**

As noted for reasons stated previously, an up to date cumulative list must be used. This needs to include all proposals in the planning system, including scoping as the overwhelming majority go on to application. Cumulative effect should also be considered with other types of development, including if still current, proposals for the pumped storage hydro scheme in this area.

#### **5.8 Land Use, Socio-economic and Recreation**

The MCofS contests the assumption that the development will attract tourists. There is no evidence of people being attracted to accessing wind farm sites beyond possibly those local to population centres such as Whitelee near Glasgow. There is a tendency for visitors to the Highlands to emphasise a reason for the visit as being to appreciate the natural landscape

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

Yours sincerely

Hebe Carus  
Access & Conservation Officer