



THE MOUNTAINEERING COUNCIL OF SCOTLAND

The Old Granary
West Mill Street
Perth PH1 5QP
01738 493942
(messages only)
hebe@mcofs.org.uk
www.mcofs.org.uk

23/12/10

EconsentsAdmin@scotland.gsi.gov.uk

Dear Sir / Madam

Braemore Wind Farm S36 Application – MCoFS Comments

Please accept these comments from the Mountaineering Council of Scotland (MCoFS). 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.

There should be a presumption against permanent tracks. Other renewable developments have are using or have plans to use temporary. Where this is shown to not be possible, then track restoration must be a condition in the consent. Decommissioning is not complete without removal of the tracks created when they are no longer required for the purpose for which they were consented. In this case the nearly 10km of new tracks planned would have a significant negative impact on the landscape and visual amenity. The tracks remaining through claims of advantages for access are unlikely to be positive in reality as the pattern of windfarm tracks tend to be a network of dead-ends which are no use to access users, also there are already tracks existing on the site that offer better access opportunities and unless a specific demand can be shown, the access argument for these new tracks should be discounted.

A greater concern in terms of access is maintaining the access that already exists in the operational phase, but also as vitally during the lengthy construction phase. It is reasonable under the Land Reform (Scotland) Act 2003 to prohibit access to areas where engineering works are actually taking place and present a real health and safety concern. Restricting access along the track as far as the construction site however does not adhere to the Act or the accompanying Scottish Outdoor Access Code which specify that any disruption to access should be for the minimum area and minimum time possible. There are numerous examples of multiple use tracks that safely accommodate access users and construction traffic. This can be achieved in areas of concern through education of both access users through signs and contractors through training or guidance. Open access except through the actual construction site must be secured through consent conditions as there are a number of examples where unspecified assurances from development companies have not been adhered to because the requirements for continued access were not clearly enough stated, monitored or asserted.

The benefits of renewable developments are reliant on the greenhouse gas emission savings from replacing carbon-releasing energy production with renewable energy sources. This advantage can be greatly offset through development on wet soil and peat which releases greenhouse gases far beyond the development footprint through disruption of the hydrological movement in the soils. Tracks and turbines must be micro-sited where this can be minimised.

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

Yours sincerely

Hebe Carus (Ms)
Access & Conservation Officer