



THE MOUNTAINEERING COUNCIL OF SCOTLAND

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Scottish Government Energy Consents Unit

Dear Ms Flaherty

MCoFS Response to Scoping Request for Dalnessie Wind Farm, Sutherland

Please accept these comments from the Mountaineering Council of Scotland (MCoFS). The 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. Mountaineers contribute approximately £150 million to Scotland's rural economy each year and are attracted to Scotland mainly where there are mountains, crags and a relatively wild experience. The MCoFS interest in wind farms lie primarily in issues of public access and conservation. The latter includes biodiversity, soil and landscape.

3 The Proposed Development

3.8 Decommissioning

The outline description in this paragraph shows that after the site is "restored" it will not be returned to the condition prior to the development. We would expect that if the ES were to claim the process of decommissioning will "restore" the site that it will do just that. The ES must clearly explain what will be restored at decommissioning, and what will not. This must include whether or not the tracks are to be restored. Any planning consents for the tracks that maybe granted as part of the wind farm are for that purpose, and hence should that purpose no longer exist through termination of the wind farm operation, then this element must be restored and method detailed accordingly. The decommissioning details of the ES must also explain the provisions to ensure that the full decommissioning is conducted irrespective of any change in ownership or availability of funding for the works when the need arises.

5 Landscape and Visual

5.3 Visual Methodology & 5.5 Cumulative Assessment

A large proportion of categories of receptors directly experiencing the wind farm will be hill walkers. For this reason viewpoints used in visualisation, and cumulative analysis, must include (all in the 35km radius study area) Ben Klibreck, Ben Hope, Ben More Assynt, Ben Hee, Ben Loyal and Carn Cuinneag. These are all popular mountains; either Munros or Corbetts.

5.4 Design Iteration

This is not designated as a National Development (ND), and hence the need has not been proven. It is therefore incorrect to present turbine layout as the mechanism for minimising impact. The ES, and developers, must recognise that the ultimate way to minimise impact is for the development not

to go ahead. Turbine layout will therefore only ever reduce the impact and the development must not be presented as if it were an ND.

This section completely neglects to mention the wild land / wildness impacts and the necessity of assessing this. SPP states in section 128 that, “the most sensitive landscapes may have little or no capacity to accept new development. Areas of wild land character in some of Scotland's remoter upland, mountain and coastal areas are very sensitive to any form of development or intrusive human.” Note the use of the term “wild land character” not “wild land.” It must be remembered that SNH Search Areas for Wild Land (SAWL) are not a pseudo-designation and should not be treated as if it is purely impact upon these that is pertinent to impact on wild land. As the SPP says, it is the wildness characteristics across Scotland that must be conserved. They are a finite resource and recent research showed that, “the extent of Scotland unaffected by any form of visual influence declined from 41% to 31% between 2002 and 2008” (www.snh.gov.uk/publications-data-and-research/trends/scotlands-indicators/natural-heritage-indicators/). The present development is likely to further erode the diminishing resource.

6 Ecology & 7 Ornithology

Habitat enhancement opportunities equally apply to non-bird animals. In all cases, it needs taken into consideration that loss of habitat or direct impact on a nationally or internationally important habitat or species cannot be satisfactorily mitigated through enhancement of locally important LBAP habitats and species.

14 Tourism, Recreation & Socio-Economics

Any study, survey or analysis must take into consideration the proportion of residents, day visitors and tourist that undertake active outdoor recreation and therefore are the most likely to directly encounter the development. There must not be a disproportionate concentration on the impacts on car-based tourists, those that are likely to frequent the visitor attractions listed in this section. Hills such as Ben Klibreck are equally “visitor attractions,” although not directly commercial such attractions also sustain the local economy, and therefore communities. Study, survey and analysis methods must be used that capture the impacts on this important sector of visitors.

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

Yours sincerely

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Access & Conservation Officer

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