



THE MOUNTAINEERING COUNCIL OF SCOTLAND

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22/4/11

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Dear Ms. Carse

Farr Point Wave Farms – MCoFS Scoping Response

The MCoFS is recognised as the Scottish Government as the representative body for hillwalkers, climbers and ski tourers. We have 10,500 members and almost all Scottish mountaineering clubs are affiliated to us. Our interests in developments lie in issues of public access and conservation. The latter includes landscape, visual amenity, and biodiversity. The MCoFS recognises that a variety renewable energy schemes can contribute to reliable, sustainable, secure and independent sources of energy.

This is a new technology, without general experience of the potential impacts, and as such the Environmental Statement (ES) will need to take account of this fact but taking a precautionary approach to inclusion of assessments in the EIA.

A general issue evident from the scoping report is a lack of appropriate consideration of natural heritage impacts other than on designated sites. Both the National Planning Framework (NPF2) and Scottish Planning Policy (SPP), in sections 99 and 128 respectively, note the importance of wildness and that this characteristic is not restricted to designated areas and is a continuum rather than a discrete feature. Wildness is not a feature on which any designated area is selected. The scoping report does not address these issues, the ES should do so. The elements of the wave farm that are on land must be considered, such as substation, associated tracks, and powerlines. Appropriate visualisations must be produced for illustration of the effects.

Decommissioning must include consideration of onshore infrastructure such as substation and associated access tracks and transmission infrastructure

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

Yours sincerely

Hebe Carus (Ms)
Access & Conservation Officer