



THE MOUNTAINEERING COUNCIL OF SCOTLAND

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Dear Brendan

Good Practice During Windfarm Construction – MCoFS comments on the guidance

(www.snh.org.uk/pdfs/strategy/renewables/Good%20practice%20during%20windfarm%20construction.pdf)

This document mostly looks useful and hopefully will do some good in raising the bar of standards. There are a few specific points MCoFS would like to make based on our area of expertise and experiences.

1. Regarding public access use, 7.1 states, "a windfarm's track network may enhance such use, so careful long-term planning is required." This would benefit from being balanced with the fact that benefit of this type is very site specific and does not apply to the locations of many (most?) wind farms where the location is remote from populations. The only example given is Whitelees where, yes definitely, there seems to have been a success with respect of access use. On the negative side, the statement plays into the hands of the "access-washing" of landscape and visual amenity impacting tracks. In wilder areas, they definitely detract, even from access as users in these areas often go to get away from tracks etc. The guidance just does not read as balanced in this specific matter.
2. This section also hints at what MCoFS is always trying to highlight, that there are plenty of examples where heavy vehicles share access tracks with access users, and with mutual respect and responsibility, this is safe. We definitely welcome the statement about suspension of access being where active construction is happening rather than the area under the developers control. Contractors (as opposed to developers) often seem to have a different understanding, and some have expressed to me that they still view access tracks as part of the active construction site. There needs to be something in the guidance about developer / contractor communication.
3. We are very concerned about 10.1 where it says, "Access Tracks constructed on a windfarm are required for four main phases of the works: ... 3. Long term access for the Operational & Maintenance needs of the windfarm, as well as providing amenity access for landowners and the public." The MCoFS objects to the assertion that access tracks are **REQUIRED** for **AMENITY ACCESS**. They definitely are not. Possibly this was a mistake in the wording, but wither way, this needs corrected.

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

Yours sincerely

Hebe Carus (Ms)
Access & Conservation Officer