



THE MOUNTAINEERING COUNCIL OF SCOTLAND

The Old Granary
West Mill Street
Perth PH1 5QP
01738 493 944
(messages only)
hebe@mcofs.org.uk
www.mcofs.org.uk

28/4/10

econsentsadmin@scotland.gsi.gov.uk
Energy Consents
The Scottish Government

Dear Mr McKay

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. 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. In the case of the Lochluichart Extension we consider the EIA must take care to comprehensively consider the landscape implications. We are gravely concerned that the area of turbines that were removed from the original application in order to achieve consent were in the same area as the proposed Extension turbines. We consider that little has changed in the situation in the intervening few years and the EIA for the extension will need to be able to illustrate what was not acceptable then is acceptable now while also taking into consideration the cumulative impacts with other consented / proposed developments that have been applied for in the interim.

1.6 This statement is grossly misleading in that it suggests that as a wind farm was consented in this area then the principle of wind farms at this location is established. It was the reduced number and location of those removed turbines that contributed to consent. Planning consent is about consenting a specific development, not a principle. In the case of Lochluichart this required the removal of turbines in the same location as the proposed extension. It would make a mockery of the consents process if the removed turbines were effectively consented just 2 years later. This area is relatively wild and each incremental increase has a disproportionate impact, especially in prominent turbine locations as are seen in the removed turbines in the original application, and hence the extension presented here.

1.7 & 3.1 Any assertion based on capacity must be supported by a widely supported, rigorous and reliable method of assessment. This must clearly be established and explained in the EIA.

3.4 A construction period of 9-12 months is stated for the extension. As the original Lochluichart wind farm is yet to be built, along with the adjacent Corriemoillie wind farm, the cumulative implications of sequential or parallel construction periods should be considered in the EIA.

3.5 The EIA must detail a decommissioning plan, along with decision criteria for selecting between the options of removal, refurbishment or replacement.

4.9 Assessment of the reversibility of impacts must be based on actual planned rather than theoretical reversal. The resulting impact on the development is due to what happens, rather than what is possible. The criteria of the “confidence in the impact prediction” must also be treated carefully. Measurements of impacts on landscapes, especially wild land qualities, are only at the development stage. The lack of an established measure (quantitative data) should not be confused with a lack of a definite and strong impact on a qualitative characteristic based on experience of receptors. The SPP refers to the Precautionary Principle. This must be applied in this circumstance.

4.14 Pre-application proposals may also be a material consideration and should also be included in the EIA. This is supported by the SNH Guidance on Cumulative Effect of Windfarms Version 2 revised 13.04.05.

4.22 The chapter on alternatives should also recognise that another alternative is that the extension is not built.

5.6 SNH Search Areas of Wild Land are not designed to be used as pseudo-designations. The areas mapped indicate the best examples of wild land, but areas beyond those boundaries may have strong wild land characteristics to which SPP statements about wildness are applicable. Additionally it is the landscape context of core areas of wild land that ensure they remain as wild land, so visual impact from core areas looking outward can have as much impact as looking into the area.

5.12 It is unclear what this paragraph means, but it must be acknowledged that mitigation cannot be both “avoid and minimise landscape and visual impacts.” The only way to avoid impacts in the quality environment where the development is proposed is not to build it.

5.14 The specific plan to achieve this reinstatement must be specified in the EIA. There must also be a clear statement as to how, where and when reinstatement will occur.

5.20 Viewpoints included in the EIA must include those listed in 5.4. Assessment must take into account the sensitivity of the receptors likely to frequent the viewpoint, not just rely on assessing level of impact based on number of receptors. It is inherently true that in wilder areas there will be much fewer receptors, but they will be much more sensitive to loss or reduction in wildness.

5.22 Glenmorrie wind farm should be added to this list. Photomontages are very useful to look at a static arc of view from any one point, however, depending how these are presented they do not give the impression received from that viewpoint, particularly a summit. This is particularly the case where any single arc of view has some turbines visible, but the impression formed by the 360 degree view when the receptor turns around can result in an experience of being surrounded if a number of those static arcs of view include turbines, even if only a few or at distance. This needs to be taken into consideration in the assessment.

5.25 Blanket mire, wet heath and bog pools, even if heavily grazed, all indicate the area is important as a carbon store. Disruption to the hydrology as well as land take and habitat change must be taken into consideration.

5.73 Avoiding turbines, and access tracks, on peat is very important, however, there would be no overall benefit in moving turbines to other areas where they have a greater visual impact. Measures

to mitigate impacts of one type should not have negative results through another type of impact. These interactions should be assessed with any mitigation measure proposed in the EIA.

5.136 Munros are not the only popular mountains for hill walkers and consideration of impact should not be restricted to these. Corbetts are also very popular i.e. mountains above 2500 feet. The development is within approximately 5km of the nearest Corbett and 15km from the nearest Munro. In a wild landscape, these distances are close due to the infrequency of other prominent modern man-made structures.

5.139 In an area with wild land characteristics, access along a vehicle-wide track cannot be considered a positive outcome. Access laws in Scotland mean the public have access to almost all land irrespective of the presence of a track. Tracks are never a positive addition to the landscape for either the landscape or public access in an area such as this.

5.141 Payments to local communities do not have a place in an EIA which is to consider planning-related impacts. It is not therefore appropriate to include such “sweeteners” in an EIA.

5.142 Interpretation of the development is not a mitigation measure in an area where visitors are primarily there to appreciate the wildness. It would be a development in itself.

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

Yours sincerely

Hebe Carus
Access & Conservation Officer

CC. Richard Frost, Savills