



THE MOUNTAINEERING COUNCIL OF SCOTLAND

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30/8/11

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Dear Sir / Madam

Mid Hill Wind Farm Extension – MCoFS Response

Please accept these comments from the Mountaineering Council of Scotland (MCoFS) on the proposed extension to the Mid Hill Wind Farm.

The MCoFS does not intend to make a comprehensive response to this proposal as we prioritise cases based on closeness to a “core mountaineering area,” however we are gravely concerned that this is not an appropriate time to submit an extension application due to the fact that the original development has yet to be built. The MCoFS objects to the practice of applying for an extension before construction of the original consent. This practice effectively renders the whole development as one, and as such should be applied for as one development and considered as a whole. An environmental impact assessment is an extrapolation and an estimate of expected impact. Many local communities, and indeed land owners, near wind farm development sites have reported that the development once built had far greater impact than was envisaged from the Environmental Statement. By attempting to assess the potential impact of a development based on the context that does not currently exist is an extremely imprecise science. The MCoFS strongly believes that for an assessment to reasonably confidently project impact of an extension the original application proposal must be built already, giving an opportunity for assessment of an extension to be assessed based on the actual context rather than adding an estimate on top of another estimate. On this basis we object to the extension proposal and believe it should be required to be re-submitted after the original wind farm is operational, else it is a larger original proposal by the back door.

In the event this development proposal progresses past the scoping stage, we would expect to see Mount Keen (the closest Munro and in the likely study area) as one of the viewpoints from which a visualisation and ZTV would be recommended.

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

Yours sincerely

Hebe Carus (Ms)
Access & Conservation Officer