



THE MOUNTAINEERING COUNCIL OF SCOTLAND

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29/4/10

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Carbon Free Moy Limited

Dear Mr Farrugia

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.

2.2 We are concerned about the assertion of "little or no visibility from important recreational, cultural heritage and national park viewpoints," despite the ZTV showing that 39-55 turbines could be visible from Cairngorm mountain (although at a distance) and a similar number visible from Geal Charn Mor on the boundary of the National Park at less than 25km distance.

2.8 For an operational life period assessment to have meaning, decommissioning should essentially return the ground to its original state. The EIA should include a full decommissioning plan, which should include planning for ground disturbed by any new tracks to be reinstated as they are an integral element of the development.

4.2 The visual impact analysis must take into account the sensitivity of receptors, not just their number. Inherent in any view from or of an area with wildness characteristics, the receptors are likely to be significantly more sensitive to modern man-made structures like turbines. Visual impact cannot be assessed purely by the number of receptors affected.

4.2.4 Another viewpoint that must be included is on the boundary of the national park, less than 25km distance and the ZTV suggests will be significantly affected. It is one of the popular Corbetts, Geal Charn Mor at NH836123.

4.2.5 Cumulative assessment must include developments consented, lodged and applications at the scoping stage. There are currently a number of wind farms in the public domain without formal applications that would have a strongly significant cumulative impact along with the Moy development. The MCofS welcomes the commitment in the scoping report to include examination of "successive views in different directions from one location." This is often lacking in EIAs, and we commend its inclusion here as necessary to achieve a realistic assessment of cumulative impact.

5.7 The EIA should include the process by which decommissioning will be decided upon, that is an indication of what the effective lifespan of the development is likely to be in reality.

5.8.4 Turbine removal from the proposal should be specified as a mitigation measure should other measures prove insufficient.

12 An access use assessment should be made of the site. MCoFS expects that the site is primarily a resource for local communities rather than visitors due to the lack of a specific goal on the site or a route through the site to reach one. The Land Reform (Scotland) Act 2003 and Scottish Outdoor Access Code both require that land is available for access on and off paths / tracks unless for specific reasons. Active engineering work would of course require stopping of access, but restrictions should be kept to a minimum area and period of time. The access tracks, except when being constructed themselves, should be available for access during construction and operational phases.

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

Yours sincerely

Hebe Carus
Access & Conservation Officer

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