



THE MOUNTAINEERING COUNCIL OF SCOTLAND

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Dear Sir / Madam

Draft Plan for Offshore Wind Energy in Scottish Territorial Waters – MCofS response

Please accept these comments from the Mountaineering Council of Scotland (MCofS). We are content for this response to be made public, shared with other departments and to be contacted in the future. The 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 offshore wind farms lie primarily in issues of the impact on the seascape / landscape from the land.

The MCofS welcomes the strategic planning approach to offshore wind developments. We accept the areas specified under the short term options, but we have significant concerns regarding the some of the areas specified in the medium term options and object to the NW 5 and 6 and the more inland / mainland areas of NW7 on the basis of the explanation in the following paragraphs.

Draft Plan for Offshore Wind Energy in Scottish Territorial Waters

3.3 Medium Term Options

3.3.3 This section does not describe impact in the north west beyond designated sites; "impacts on nationally designated landscapes are particularly concentrated in medium term options in the north west." There are likely to be significant impact of NW 5, 6 and 7 independently and cumulatively particularly between NW6 and 7. There is no designation or thoroughly researched strategic mapping of wild land / wildness quality, but the Scottish Planning Policy (SPP) makes it clear that wildness is a national-level concern. SPP paragraph 128 states as follows. "The most sensitive landscapes may have little or no capacity to accept new development. Areas of wild land character in some of Scotland's remoter upland, mountain and coastal areas are very sensitive to any form of development or intrusive human activity." SNH Search Areas of Wild Land do not fulfil the requirement as are purely indicative of core wild land and do not include "wild land character" as is specified in SPP.

3.4 Summary of the Regional Level Assessment of Environmental and Technical Issues

3.4.25 North West

"All options lie within medium-high or high sensitivity seascapes that are vulnerable to offshore wind development." This is particularly applicable to NW 5, 6 and the part of 7 nearest the land.

4.3 Draft Plan in the Medium Term

4.3.2 Proposed exclusions

Wild character mapping is required to define areas that maybe appropriate to exclude on this basis, but MCofS believes exclusion of all or part of NW 5, 6 and 7 maybe appropriate on this basis.

4.3.3 Regional prioritisation

This section notes that the **North West**, “area is important for tourism that is focused on the quality of the natural environment and it contains significant concentrations of wild land which have a close relationship with coastal and marine areas.” For this reason, wind developments in this region should not be planned until strategic wild land mapping exercise is produced for this area.

4.3.6 Options to be progressed in the medium term

Although NSAs have been taken into consideration when selecting options, this does not take into consideration the wild land character, and therefore is not a reflection of the landscape qualities.

Appendix A: Detailed Description of the Mapping to Identify Options

“Where data sets allowed, environmental sensitivities were mapped.” As noted above, there is no strategic researched wild land character map, hence the analysis is inadequate and until this is done, areas likely to have significant wild land character (see 4.3.3 text) should not be included in the options.

Strategic Environmental Assessment (SEA) of Draft Plan for Offshore Wind Energy in Scottish Territorial Waters: Volume 1: Environmental Report

3.6.2 Designated Sites

“Wild land has been identified as a diminishing characteristic that should be protected through the planning system. SNH has identified indicative wild land search areas, though these are not formally designated at present.” SAWL were never designed to be used as a pseudo-designation, they indicate the core wild land at a large scale, and therefore cannot be used to implement the SPP requirements of conserving wild land character.

5.6.3 Landscape Character of the Coast

“With less than 15% of the coastline developed, much of the coast has a natural character, with some areas providing a sense of wildness. SNH's policy statement 'Wildness in the Scottish Countryside' (SNH 2002) addresses the need to identify and protect areas of countryside valued for their qualities of remoteness and wildness. Much of the north and west of the country's coast has been identified by SNH as having high natural heritage sensitivity.” As mentioned above the Search Areas do not fulfil, nor were meant to, the baseline on which to base evaluation of remoteness and wildness.

5.6.4 Seascape Character

“The highest sensitivity seascapes lie on the north and west coasts of Scotland and thus are vulnerable or fragile seascapes with low ability to accommodate change within their landscape/seascape.” NW 5 and 6 and part of 7 lie in the category 5 highest level of sensitivity, hence are unlikely to be have the capacity to absorb wind developments without loss of wildness character, which to MCofS would be unacceptable.

5.7.4 Tourism and Recreation

The statistics quoted here are affected by the number of visitors that use the area, but do not fully take into account the quality of the experience as opposed to the quantity of people affected. There may be fewer visitors to the north-west coast than some of the other areas, but those that make the significant effort to visit this area are visiting because of the superb quality of the experience it

offers. Losing that high quality experience is likely to have a greater impact on visitors than an equivalent wind development in an area of lower sensitivity.

In summary, the MCoS view is that wildness has been insufficiently analysed to assess the medium term options, some of which are recognised as likely to have significant effect on this quality of national importance. As such, the MCoS believes until this is done, there should be no options advanced within NW 5,6 or &. Please do not hesitate to contact me to discuss these issues further.

Yours sincerely

Hebe Carus
Access & Conservation Officer