



# THE MOUNTAINEERING COUNCIL OF SCOTLAND

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Dear Sir

## **Proposed Sallachy Wind Farm, near Lairg, Highland Response to request for an Environmental Impact Scoping Opinion**

I am writing to your request for comments from the Mountaineering Council of Scotland [MCofS] on the above scoping opinion request.

The MCofS is recognised by the Scottish Government as the representative body for hillwalkers, climbers and ski-tourers. We have over 10,000 members and aim to represent the interests of all the estimated 400,000 mountaineers who regularly visit the hills in Scotland on issues relevant to the access to, and conservation of, Scotland's mountaineering environment.

The MCofS as an organisation is generally supportive of renewable energy technologies when we feel they are appropriately located and designed so that they do not adversely affect the natural environment. We recognise the role they may play in reducing harmful emissions, and their potential to contribute to the achievement of some anthropogenic climate change amelioration, and the opportunities they could offer to achieve security, independence and sustainability of supply. Scrutiny of our website at <http://www.mcofs.org.uk/access-and-conservation.asp> illustrates our position statements, the views of members and articles from previous issues of our quarterly journal. Very many mountaineers have concerns that there are undesirable costs:- the loss of visual amenity and the permanent detrimental effects on Scotland's renowned and globally important landscapes, in particular wildness. The MCofS responded in some detail to the Highland Renewable Energy Strategy 2006 and more recent planning documentation from this LA, consultation documents from SNH and SPP, so we are familiar with the issues involved in renewable developments both in the area and elsewhere in Scotland.

We should like the following to be taken into account in the preparation of the EIA and ES. We recognise that this proposal is at a very early stage. For example, we have not been provided with a turbine location map or a map depicting access tracks on site.

### **4.1.2. Potential Effects**

The benefits of renewable developments are reliant on the greenhouse gas emission savings from replacing carbon releasing energy production from unsustainable fossil fuel sources with

renewable energy sources. This advantage can be offset and negated to a greater or lesser extent through development on peaty substrates which disrupts the carbon sink attributes of the peat when it is disturbed. This disruption would be particularly damaging on this site, where the development footprint would be possibly exceeded by the consequent changes to the hydrological movement in the soils. The document recognises this and that these adverse effects are likely to be worse during the construction phase [Peat disturbance 4.1.2.1.1.]. Should this development be consented, there would need to be conditions set by the LA on restoration and the success of any mitigation measures would need to be monitored; however, it is likely that satisfactory mitigation would be difficult to achieve, resulting in unacceptable peat damage that would be extremely difficult and costly to rectify. We do not agree with the first sentence of the Summary at 4.1.2.1.4 – we consider that these effects will be much more than “minimal”. It could be anticipated that there would be considerable peat damage due to the heavy plant used in the construction phase. In particular track construction would cause damage. Tracks made for construction should preferably be of a temporary nature, but the necessary restoration would be challenging on this site.

#### **4.2.1.1. Designated Sites**

The very close proximity of both the Caithness and Sutherland Peatlands SPA, Ramsar site and SAC and the Strath an Loin SSSI is of great concern. We note that it is likely that an Appropriate Assessment will be required. We would anticipate significant impact on the River Oykel SAC.

#### **4.5 Landscape and Visual**

If consented, Sallachy Windfarm would have an appreciable impact on the landscape character and qualities and visual amenity in the area. We are particularly concerned that the proposed wind farm site lies WITHIN an SNH Wild Land Search Area [WLSA] and is also closely surrounded by other WLSAs, clearly indicated in Figure 4.5A. Not only is the site in a WLSA but it is also visible from and will impact on the aspect FROM nearby sites which are also regarded as wild land territory thereby reducing this landscape quality further. Wild Land qualities should be considered and included in the LVIA. It must be noted that the SPP and NPF2 both express wildness in terms of a characteristic of land and WLSA must not be treated as a pseudo-designation where impacts within the boundaries affect wild land and impacts outside do not. This whole general area has high wildness value.

The MCofS, along with various charities, NGOs and other organisations in Scotland, has concerns about the gradual erosion and reduction of Wild Land. We suggest referral to the SNH document “Public perceptions of wild places and landscapes in Scotland” in addition to the guidance papers listed on page 40.

It is noted that there are three National Scenic Areas, 4 Areas of Great Landscape Value and eight Remote Landscapes of Value for Recreation within the Study Area for the LVIA.

Figure 4.5B: Landscape Designations is insufficiently clear. The key gives 5 colours; green, taupe, orange, blue and purple. The map itself shows 4 turquoise areas which are not indexed [and no taupe areas]. It is not explained what the turquoise areas represent.

#### **4.5.2.2 Visual Amenity**

The visual amenity baseline study should include not only Ben More Assynt, Ben Klibreck, Quinag, Arkle and Ben Hope as stated but also other hills such as Ben Hee, Breabag, Glas Bheinn, Beinn Leoid, Beinn Uidhe, Canisp, Cul Mor, Seana Bhraigh, and Carn Ban. Seana Bhraigh is considered to be the most remote summit in Scotland. The proposed development site is in the hub of a whole range of iconic and popular summits in all directions from it except due east.

Due not only to the number of summits concentrated in the area but also to the local geology there is great variety in the scenic qualities of this part of Scotland and the visual amenity is

high, and the main attraction for the tourism economy in the area. These facts contribute to the popularity of the area and the tourist and visitor footprint. Any diminution in the scenic quality and sense of wildness will detract from the experience and contribute to a reduction in numbers of visitors. The sensitivity of these receptors is of High Magnitude. In particular repeat visits and recommendations on which the tourism industry depends would be expected to decline. It should be emphasised that appreciation of a landscape occurs throughout a journey, whether it is a walk, ascent, cycle ride or a canoe outing into the hills and valleys; not only on reaching a summit. Indeed, there are occasions when summiteers reckon they are lucky to get a view from the actual summit of the hill they are climbing, although they may have experienced magnificent views during the ascent. We would point out that there is no discourse in the text to support Table 4.7 on how this table might be used, as you have in the case of other tables in this section. This needs to be explained.

We note that the final viewpoint list will also take potential cumulative impacts into account – it is essential that this is done rigorously. MCoS would be readily prepared to assist in identifying viewpoints [summits and ridges] which would be appropriate for this exercise.

#### **4.5.4. Cumulative Landscape and Visual Impact**

While it would be most unrealistic generally to expect selected viewpoints to be exempt from any visual wind farm impact, there are definite cumulative effects on the landscape resource in this area. Already there is considerable intrusion into the landscape from the under construction/consented developments listed in 4.5.4.6. where three are listed already in the 30KM zone of study and all of which impact on wild land. There is already high level degradation of the landscape amenity in the vicinity of this proposal.

#### **4.7.2. Potential Effects**

We note the contents of the final paragraph in 4.7.2, and while there may be no reliable quantitative data showing negative impact on the tourist economy of any wind farm development, similarly there is no reliable quantitative data showing positive impact either! In this case it could be considered that there will be considerable and adverse impact on the local tourism economy throughout construction but also during the operational phase. In fact, on my recent visit to the area [early autumn 2010] this was a constantly voiced opinion on the wind farms in the area by accommodation providers, local shops and particularly many visiting fishermen. The latter frequently reckoned they would in future be exploring alternative venues. As far as we are aware there has never been a comprehensive peer reviewed appropriately scaled piece of research or even survey done on the impacts of wind farms on tourism on Scotland although there is anecdotal evidence and reports based on certain types of tourists. Any assertions based on information gathered must be supported by a widely respected, rigorous and reliable method of assessment – as yet to be devised. This must be clearly explained in the EIA. The piece of research mentioned in PAN 45 carried out by Glasgow Caledonian University in 2008 does not include a wide ranging appropriately scaled quantitative assessment of tourism impact, although it raises some obvious considerations as listed in 4.7.3.

### **5. Consultation**

#### **5.3. Proposed Methodology**

In Table 5.1 regarding consulting local interest groups; rambling is mentioned but, given the national significance of this landscape, a wider consultation is necessary. We acknowledge that we are included in the consultation process but it might also be appropriate to consult with Ramblers Association Scotland, Scottish Rights of Way Society and the Cyclists' Touring Club Scotland.

#### **Recreational Access**

Throughout both construction and operation the legislation of the Land Reform [Scotland] Act 2003 (LRA) will need to be complied with. Access rights apply to this area, as with most areas of land and inland water in Scotland. Unobstructed access along tracks must be maintained

throughout the construction and operational phases. This must be explicitly recognised and provision must be made for this where there is no active construction works.

Please do not hesitate to contact me to discuss any of the above issues further. The MCoS will be pleased to comment on any further documentation relating to this proposal.

Yours sincerely

Beryl Leatherland  
Access and Conservation Advisory Group