



THE MOUNTAINEERING COUNCIL OF SCOTLAND

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16/8/11

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Dear Sir / Madam

Strathy Wood Scoping – MCofS Response

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 11,000 members, and are recognised by the Scottish Government as representing the interests of all mountaineers. The MCofS interest in wind farms lie primarily in issues of public access and conservation. The latter includes biodiversity, soil and landscape.

6 Landscape and Visual Impact Assessment

Method of Assessment

6.10 This assessment methodology must fully assess the impact on the wildness character of land affected in the study area. This consideration is not included in the list, but may be implied. It is Government policy that such a consideration is of national level importance as in National Planning Framework 2 (section 99) and Scottish Planning Policy (section 128).

6.12 Impacts do indeed decline with distance, however that is only one of a range of factors. Impacts increase at even distant locations of high wildness value. The relationship of significance of impact should not be represented as primarily a function of distance as is suggested in this paragraph.

Visual Receptors and Representative Viewpoints

We welcome the use of Ben Klibreck and Ben Loyal as viewpoints. It should be noted that Ben Hope is also a very popular mountain within the study area. It may not be necessary to conduct a full visualisation from this point, but the ZTV indicates that a significant number of turbines will be visible from this popular location and therefore the visual impact experienced by visiting or resident hill walkers will be underestimated with the existing viewpoints. Additionally Ben Hope and Ben Loyal are both in NSAs.

At all these locations there is an expectation of a wild experience in which a wind farm would not be expected to form part of the landscape. SNH Search Areas of Wild Land (SAWL) are indicative areas that illustrate the likely location of the very best wild areas in Scotland. Wildness cannot be assessed on a discreet scale but is a characteristic that can be experienced to a greater or lesser extent throughout the area. NPF2 and SPP both identify the consideration as wildness rather than whether or not the land is identified as “wild land.” For this reason the SAWLs are not designed,

nor should they be used as, reflecting whether land is wild or not and therefore whether this character should be taken into account at that location; they are not a pseudo-designation.

Cumulative Landscape and Visual Assessment

The popular hill walking summits in the study area, especially popular being Ben Hope, Ben Klibreck and Ben Loyal, will experience cumulative impact with the other Strathy wind farms. This particularly applies to Ben Hope and Ben Loyal as they are located to the west and therefore will be affected by an increased arc of view that will be affected by the Strathy wind farms collectively. It should also be noted that both these locations are within the National Scenic Area. For this reason we would recommend that a capacity study to be conducted to assess the level of impact the NSA has the capacity to absorb while retaining its wild character.

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

Yours sincerely

Hebe Carus (Ms)
Access & Conservation Officer