



# THE MOUNTAINEERING COUNCIL OF SCOTLAND

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Dear Sir/Madam

## **Scoping Opinion Request for the Proposed Section 36 Application for the Proposed Stronelaig Wind Farm**

### **Response from the Mountaineering Council of Scotland [MCoS]**

The MCoS is the representative body for hillwalkers, climbers and ski-tourers and is the only national representative body of the sport of mountaineering in Scotland. We have 10,500 members and almost all Scottish climbing/mountaineering clubs are affiliated to us. We are recognised by the Scottish Government as representing the interests of all mountaineers who use the Scottish hills. Our interests in wind farms and hydro-electricity schemes lie in issues of public access and conservation. The latter includes landscape and visual amenity, biodiversity, and soils and peat sustainability. The MCoS recognises that a portfolio of various renewable energy schemes can contribute to reliable, sustainable, secure and independent sources of energy. However, we have concerns over the carbon cost of some schemes, and the various environmental impacts involved.

### **General Points and Observations**

We find the contents of this scoping report to be very minimal. In our opinion, there is insufficient detail to enable consultees to make a properly considered and full response on all relevant matters based on what is provided here. In the Executive Summary it states that “the installed capacity of the proposed development is currently unknown and would be dependent on further analysis of meteorological data”. In 1.1.2 it states that “full analysis of this data, which would form a key element in determining potential capacity of a wind farm in this location, has yet to be undertaken”. We should have thought that wind data should have been made available and analysed before preparing a scoping opinion that depicts a very large development, with an initial layout of 142 135m turbines, shown in Figure 2, [and before any Extension and/or Addendum is also proposed]. This would be an enormous wind farm. We find this surprising; we are accustomed to receiving precise, detailed, planned, carefully considered and assessed scoping reports from SSE. There seems to be an inordinate rush here – the scoping was only posted to us on 22<sup>nd</sup> March 2011, there was a public meeting also in March in Fort Augustus, in combination with an exhibition on SSE’s Balmacaan wind farm proposal [there is no mention of a public meeting in Newtonmore, whose tourist economy will probably be impacted adversely by this development]; and the anemometer data isn’t even fully available yet. The proposal seems to be very speculative, as SSE must be aware that there will be opposition to the construction of such a large development in a location noted for wildness and visible from so many iconic viewpoints and in such close proximity to the Cairngorm National Park.

In many places there is reference to the baseline data originally collected during the preparation for the Glendoe hydro proposals and the on-going ecological monitoring gathered since the HEP's construction. Since these are neither available nor referenced in this report, proper assessments by consultees of the environmental effects that this current proposal may give rise to are frustrated. In 1.2.2 it states that one of the aims of the Scoping Report is to "summarise existing baseline information in relation to the wind turbine search area and surrounding vicinity" – we don't have this summary of baseline data collected previously. This is unacceptable to consultees who are thus prevented from making a fully considered Response at this stage. If the Glendoe data sets are relevant, and at least some of them will be, then they should be reproduced here. We appreciate that frugality in re-using existing data, provided it is still up to date and relevant, is commendable, but it needs to be available.

In addition, we believe that the Glendoe HEP is not yet fully functioning while the tunnel repairs are on-going. Therefore, presumably, any ecological monitoring does not yet include assessment of the success or otherwise of mitigation measures used for the management of peat integrity in aquatic habitats and for burn bank species, such as water voles. In addition, the HEP would be expected to have some impact on the water table in the area with subsequent impacts on the peat hydrological regime, so this as yet cannot be taken into full consideration to adequately assess the impact of this proposed wind farm.

We consider that the content of 1.1.3 is inappropriate in a scoping opinion, which should merely contain factual proposals of the development in question. This paragraph may well be depicted in a poster display in a public exhibition, but it is out of context here.

## **Specific Points**

**2.1.7 Access Tracks** – the MCoFS is concerned about the proliferation of construction tracks which are insensitively finished and conspicuous from appreciable distances from wind farm sites. Upland tracks cause concern due to such factors as visual impact, erosion of wildness, reduction in biodiversity, peat damage and peat slide risk, and drainage problems. We witness all of the physical phenomena in this list to a greater or lesser extent in visits to wind farms. There seem to be 2 access points to this proposed wind farm; one from the B862 and one from Garrogie Estate; there is no indication of why two routes, and therefore two landscape scars, are required. We would expect to see visualisations in the ES to include access tracks, not just wind farms as specified in the Highland Council Visualisation Standards for Wind Energy Developments: "4.3 In addition to turbines, significant borrow pits, control building(s), access tracks and significant land use change (e.g. forest removal) shall also be included."

2.1.8 We would not agree that there has been successful restoration of the Glendoe construction corridors as claimed here. It is rather early to confidently claim this level of success with the restoration methods used. It is some time since this writer has visited the area, so a visit to scrutinise the site will be made in the next few weeks. The track has been narrowed, but this does not ameliorate the fact that a permanent track now exists that was previously not a feature of the landscape.

2.3 Decommissioning – we anticipate that there will be a detailed section on this important inclusion in the ES, together with a carbon footprint study. In addition, there will need to be details of track restoration proposals at the time of decommissioning, as once the wind farm is removed then there will be no need for the tracks associated with it, including those feeding each turbine. All of these tracks will have significant impact on the landscape on this elevated site and they will be visible as scars from distant viewpoints.

## 4 ENVIRONMENTAL EFFECTS

### 4.2 Landscape Character and Visual Impact

4.2.1 states that the proposed scheme is not located within any areas covered by statutory designations. However, the proposed development would be sited in the middle of an SNH Search Area for Wild Land [figure 3]. There is no specific designation for wildness but this does not mean that it is less of a material consideration. Regarding wild land, NPF Section 99 states “As the European Landscape Convention recognises, their value extends beyond those protected by formal designations to all areas which reflect the interaction of natural processes with human activities” and “Some of Scotland’s remoter mountain and coastal areas possess an elemental quality from which many people derive psychological and spiritual benefits. Such areas are very sensitive to any form of development or intrusive human activity and great care should be taken to safeguard their wild land character”. Additionally SPP 128 states “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 and planning authorities should safeguard the character of these areas in the development plan” and in Section 131 states “However, there will be occasions where the sensitivity of the site or the nature or scale of the proposed development is such that the development should not be permitted”. We consider that the latter statement is very relevant in this context.

Additionally, the proposed site is in close proximity to two Areas of Great Landscape Value, a regional Scenic Area and of course the Cairngorm National Park, and is within an area covered by landscape character assessments. The visual amenity of visitors to these surrounding areas will be severely impacted by this development, should it be given planning permission. It should be noted that wildness is not only a feature of the landscape one is visiting or travelling through, but is also an important feature when looking into a wild land area, even at some distance from it. In 4.2.6 it is stated that the area is relatively remote – precisely. This paragraph also states, somewhat dismissively/disingenuously that receptors include “occasional hillwalkers” [in fact, this is a busy area for hillwalkers and there are well used wild through routes] and that there are a number of peaks in the wider area – these peaks are in fact highly frequented iconic summits. It should be noted that when traversing a landscape that the whole journey experience is relevant, not just the attainment of a summit and the views from it. As noted in 4.2.6 there are Scottish Hill Tracks in the area and these actually go right through the proposed site. Access legislation requirements will need to be taken account of. From a desk top study, the following important summits are among others within 15km of the development periphery and would require detailed scrutiny of impact:

Meall na h-Aisre	Corbett	NH515000
Geal Charn [Monadh Liath]	Munro	NH561987
Gairbeinn	Corbett	NN460985
Carn a' Chuilinn	Corbett	NH416033
Carn Liath [Loch Laggan]	Munro	NN472903
Carn Dearg [Monadhliath]	Munro	NH635023
Stob Poite Coire Ardair	Munro	NN429888
Creag Meagaidh	Munro	NN418875
A'Chailleach	Munro	NH681042
Carn Sgulain	Munro	NH684059
Carn na Saobhaidhe	Munro	NH599144
Carn Ban	Munro	NH631031

MCofS would be prepared to assist with selecting appropriate viewpoints from summits and ridges, which are also relevant to the landscape experience. It is obviously important that this exercise is carried out very thoroughly and that there are no important omissions.

Due to the close proximity of the National Park, there should also be a detailed assessment of potential receptors within it. Again we would be prepared to be involved in the selection of viewpoints for ZTV, photomontage and wireframe purposes. The qualities of viewpoints within the National Park are obviously significantly important to tourism and we consider that at least the following should be included:

Carn Ban Mor 894972 to Sgoran Dubh Mor 905002

Einich Cairn 936992

Cairn Gorm summit area 005040

The extra and additional impact of the tracks used will be significant and these must be taken account of in all assessments.

### **4.3 Ecology and Nature Conservation; 4.4 Ornithology; 4.5 Hydrology and Ground Conditions**

Due to the fact that there is little detail in the Scoping Report and that SNH and others such as RSPB are being consulted, we will not comment on these sections at this stage but wait until the ES is available and comment then.

### **4.7 Land Use and Recreation**

The proposed scheme will have a wider impact than this section suggests. The wider area including Newtonmore, Kingussie, Aviemore and other smaller settlements should also be considered.

There is no mention of the Land Reform [Scotland] Act 2003 in this section. Our members frequently reported difficulties in achieving access to the hills for recreational purposes during the construction of the Glendoe Hydro plant. Despite the involvement of local access officers, the issues were never satisfactorily resolved. It may have been the case that there were problems caused on both sides, and perhaps the arrangements agreed by contractors were not put in place by the operators on site. However, should this proposal be granted planning permission, then these matters would need to be addressed at an early stage and alternative access arrangements should be made during the construction phase. The MCofS would be prepared to be involved in consultations on the arrangements for this.

### **4.14 Socio-Economic Impacts**

**Tourism** The construction of this wind farm would impact on the tourism economy of Fort Augustus, Newtonmore, Kingussie and Aviemore and their surrounding areas including the western National Park. If there is a decline in tourism in the area, contributed to by this wind farm and others in a cumulative way, then the few permanent long term jobs required in the operational phase must be balanced against those lost from the tourist industry. In these areas [Fort Augustus, Newtonmore, Kingussie, Aviemore, Cairngorm National Park vicinities] the main tourist activities are centred on outdoor pursuits. For this reason, the visual impact of this wind farm together with the cumulative impact must be assessed from the point of view of these visitors and not merely from accommodation locations, highways and through roads, and visitor attractions in the valleys.

In section 1.4 Consultations, the community councils to the west of the development have been included, and there was a public exhibition in Fort Augustus in March. There is also an indication of on-going community involvement via a community liaison officer and a community benefit fund.

However, the communities to the east of the proposed development do not seem to have been consulted. These communities will be affected at least as much, if not more so, as tourism is a major part of the economy to the bigger settlements to the east, and this development would be expected to be detrimental to this and with no direct advantage for them. It is essential to consult with these communities at this early stage. We refer SSE to SPP sections 31 and 32 on community engagement, PAN 81 and National Standards for Community Engagement.

## **6. CUMULATIVE IMPACTS**

We note the windfarms mentioned in 6.1.1 to 6.1.3. In addition, the following wind farms should be included in the cumulative impact assessment:

Kyllachy [at scoping stage]

Allt Duine [at scoping stage]

Druim Ba [at application stage]

Glenkirk [at application stage]

We note from 4.2.22 that the above will also be taken account of in the final cumulative assessment. In addition, the Glendoe Hydro development should be included in this exercise as it is adjacent to this proposed wind farm and is also an anthropogenic feature of this wilderness location. Refer to SPP 128 which indicates a threshold for development: “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 and planning authorities should safeguard the character of these areas in the development plan”.

Should you wish more detail or information on any of the points in this response and assistance in selecting viewpoints for visual impact assessment, please do not hesitate to contact me.

Yours sincerely

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MCofS Access and Conservation Advisory Group