

The Granary | West Mill Street | Perth | PH1 5QP T: 01738 493 942 E: info@mountaineering.scot www.mountaineering.scot

By email to: Econsents Admin@gov.scot

Ms Carolanne Brown Energy Consents Unit Directorate for Energy and Climate Change 5 Atlantic Quay 150 Broomielaw Glasgow G2 8LU

15 May 2020

Dear Ms Brown

Carrick Wind Farm: Environmental Impact Assessment Scoping Report

ECU reference 00002063

Background and Context

Scottish Power Renewables has submitted a scoping report for a proposed wind farm in the northwest of Galloway Forest Park. The scoping layout is for 17 turbines of 200m blade-tip height. The turbines would be located at base altitudes of c.270-400m OD, giving blade-tip altitudes of up to 600m.

Mountaineering Scotland is a membership organisation with over 14,000 members and is the only recognised representative organisation for hill walkers, climbers, mountaineers and ski-tourers who live in Scotland or who enjoy Scotland's mountains, and acts to represent, support and promote Scottish mountaineering. Mountaineering Scotland also acts on behalf of the 85,000 members of the British Mountaineering Council (BMC) on matters related to landscape and access in Scotland, and provides training and information to mountain users to promote safety, self-reliance and the enjoyment of our mountain environment.

Assessment

Mountaineering Scotland has reviewed the Scoping Report from the perspective of its members' interests and has the following observations.

The site lies within the Galloway Forest Park, within the Galloway Dark Skies Park and partly within its core area, less than 1km from Wild Land Area 01 Merrick, and 5km from the Galloway Hills Regional Scenic area. From the nearest proposed turbine, Shalloch on Minnoch is 7km and The Merrick 12km. Both are Corbetts and popular hillwalking destinations.

The site is within 4km of: Clauchrie, the proposed application site to the south west, the operational Hadyard Hill to the west and the operational Dersalloch to the north east.



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Landscape and Visual Impact Assessment

Three mountain viewpoints are proposed. Other lower hill viewpoints are also proposed, of more local significance, and these seem appropriate. The mountain viewpoints are:

Viewpoint 5: Shalloch-on-Minnoch – agree with its inclusion as a photomontage viewpoint.

Viewpoint 15: The Merrick – agree with its inclusion. It should also have a photomontage as well as being a key cumulative viewpoint.

Viewpoint 22: Blackcraig Hill. While this may have some attraction as a key cumulative viewpoint, it much less popular for hill-walking than Cairnsmore of Carsphairn, which is 7km nearer to the proposed site, and with extensive forward visibility of the proposed development from the standard descent route. We suggest that Cairnsmore of Carsphairn as a viewpoint would be much more useful to assessors and the decision-maker than Blackcraig Hill.

There is no viewpoint proposed for the Rhinns of Kells, despite extensive visibility along its ridge, continuously from its northern half. At the least, a wireline should be provided for one of the summits on the northern half of the ridge, for example Coran of Portmark.

The nearest scoping layout turbine is 3km from the Merrick Wild Land Area. There is potentially widespread visibility of the proposed development across western summits and slopes of the WLA and scattered visibility from summits in the interior of the WLA. A full wild land assessment is required to assess the impact of this.

Socio-economic assessment

The tourism and recreation assessment proposes to draw upon a limited range of 'visitor attractions' without taking account of the recreational resource of the open hills, with all the Galloway Corbetts (four out of only seven in the whole of Southern Scotland) and something like 15 Donalds being within 20km of and having visibility of the proposed development. Only one of these – The Merrick – is mentioned in relation to the proposed recreation and tourism assessment. While some others are included as proposed viewpoints, it should be acknowledged that visual impact is not simply an impact in itself but depending on context can have behavioural consequences in terms of tourism and recreation.

Yours sincerely

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Davie Black Access & Conservation Officer Mountaineering Scotland

T: 07555 769325 E: <u>access@mountaineering.scot</u>