Mountaineering Scotland

**The Granary
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By email to brendan.turvey@nature.scot

16 August 2018

Dear Sir

Assessing the impact of repowered wind farms on nature - consultation

Mountaineering Scotland wishes to contribute to the consultation discussion. Our feedback on the guidance is based around your suggested consultation questions. We are happy for these comments to be made public.

Mountaineering Scotland is a membership organisation with over 13,000 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 80,000 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.

Consultation response from Mountaineering Scotland:

Q1   *We advise that the formal baseline for EIA should be the expected restored state of the site, excluding the existing turbines. We set out our reasoning at Annex A of this draft guidance. **Do you agree with this approach? If not, why not?***

Mountaineering Scotland strongly supports this advice. Repowering proposals may be radically different in character from the original projects, and could be in effect a completely new development, not just a modification to an existing scheme.

Proper consideration for protection of the landscape would require a new proposal to be assessed against a landscape in which the original proposal had been successfully removed and the habitats restored.

Q2   *We think it could also be helpful for decision-makers to see information comparing the full likely significant effects of the new proposal with the effects of the existing scheme. For example, we suggest that the application information should include a table comparing likely significant effects, a comparative ZTV, and comparative visualisations based on the 'baseline panorama and wireline' type format (see Section 2). **Do you agree with the proposed approach to comparing effects? Can you suggest a better alternative on how to present comparative visualisations?***

Mountaineering Scotland agrees with the suggestion to compare existing visual effects with proposed new ones. Visualisations are an indicative guide to what the eye will see. A comparison of the proposed layout against the baseline and also against an existing layout will help assessment of the visual effects against the landscape.

Q3   *Because of the existing wind farm, standard bird surveys will give a skewed picture of the restored site's likely bird activity and the related impacts of the new proposal. This is largely due to displacement effects. We therefore advise that there should normally only be a new desk-based assessment drawing upon a range of information (see Section 3).* **Do you agree with this approach? If not, why not?**

A recent survey of our member's views on conservation indicated that 72% think that mountain flora and fauna is important to their overall experience of a day in the hills. Protective measures for flora and fauna will be of benefit to our members' interests in the uplands.

Q4   *We advise that new terrestrial species and bat surveys should typically be undertaken. New habitat survey is also likely to be required and new peat survey may be necessary to comply with the latest peat survey guidance. Developers should review the success of any implemented restoration/ management associated with the original scheme, and look for opportunities to improve upon this.* **Do you agree with this approach? If not, why not?**

As the above response to Q3. Protective measures for flora and fauna will be of benefit to our members' interests in the uplands.

Yours sincerely

Davie Black
Access & Conservation Officer
Mountaineering Scotland