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FAO Mr Tony Young  
Senior Case Officer  
Energy Consents Unit  
Scottish Government

10<sup>th</sup> October 2018

Dear Mr Young

## **THE ELECTRICITY ACT 1989 SECTION 36**

### **THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017**

#### **SCOPING OPINION REQUEST FOR PROPOSED APPLICATION UNDER SECTION 36 FOR THE CLOICHE WIND FARM, IN THE PLANNING AUTHORITY AREA OF THE HIGHLAND COUNCIL**

##### **Introduction**

We welcome the opportunity to comment on issues to be considered in the environmental impact assessment of the proposed Cloiche Wind Farm by SSE Generation Ltd (SSEG). Mountaineering Scotland assesses proposed developments in terms of their impact on Scotland's mountain assets and the mountaineering experience. For wind farms, this mainly means visual impact and this is the focus of our response. We also comment briefly on some other issues.

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.

##### **Context**

This scoping relates to two sites abutting directly onto the Stronelairg Wind Farm currently under development, one to the west and one to the east. It is submitted by the same developer as Stronelairg and on land partly in the same ownership (Garrogie Estate) and extending onto Glendoe Estate. It will share infrastructure with the existing wind farm.

The scoping is for up to 40 turbines of up to 175m blade-tip height. This compares with the present development of 66 turbines: 52 of 135m, 13 of 125m and 1 of 110m.

The eastern area being scoped covers an area included in the original Stronelairg application and in which a proposed nine turbines were not consented. Several turbines immediately adjacent to

the west were only consented for a reduced height of 125m (from the application's 135m). These exclusions and height reductions were explicitly to mitigate adverse impacts: "Ministers consider that the reduction in scale of the proposal has helped to mitigate the visual and landscape impacts of the development, and has satisfactorily addressed these impacts to help bring them to an acceptable level..." (Decision letter, 6 June 2014, Page 7)

Clearly the effect of the eastern site would be to reinstate turbines into the area removed by Ministers to make the development 'acceptable' when granting initial planning permission.

The western site covers a larger area. It includes an area where four turbines were excluded from the original Stronelairg consent, for the same reasons as given above for the eastern section.

### **Specific comments for the Scoping Opinion**

1. Mountaineering Scotland agrees with the proposed EIA process. In addition, we strongly suggest that the EIA should explicitly address what has changed since 2014 to make potentially larger turbines acceptable in areas where previously turbines were ruled not to be acceptable.
2. We concur that a Glenshero windfarm proposal, even if not currently submitted for planning consent, should be included in the cumulative impact assessment.
3. We have no view on whether the Wild Land assessment should be part of the LVIA or a stand-alone report, provided it is undertaken and presented with appropriate thoroughness.
4. We agree with (or have no view on) the majority of viewpoints but consider that Viewpoint 1 should be moved to an adjacent Munro, Tom a'Choinnich, for example; Viewpoint 11 may be located on a Glen Feshie Munro which is at least 10 km closer than the Cairngorm Funicular and within the same NSA and WLA designations; and rarely-visited Viewpoint 6 could be dropped to give scope to introduce an elevated well-trafficked viewpoint to the southwest, on Sron a'Choire Ghairbh or Ben Tee for example.
5. We disagree that tourism and recreation should be scoped out, and suggest that there be an assessment focussed on the specific sections of the tourism and recreation market that published evidence suggests is impacted by wind farm development rather than the unsophisticated and undifferentiated approach that characterises many Environmental Statements.

We hope that you find these comments helpful in your consideration of this proposal.

Yours sincerely



**Davie Black**  
**Access & Conservation Officer**  
**Mountaineering Scotland**