

By email to: Econsents_Admin@gov.scot

Energy Consents Unit
Directorate for Energy and Climate Change
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22 January 2021

Dear Sir/Madam

Aberarder Wind Farm: Environmental Impact Assessment Scoping Report

ECU reference: ECU00002179

Background and Context

1. RES has submitted a scoping report for a wind farm of up to 12 turbines of up to 175m BTH on the Monadhliath east of Strathnairn, immediately north of and adjoining the operational Dunmaglass wind farm.
2. Mountaineering Scotland is a membership organisation with almost 14,500 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

3. The site already has planning permission for 12 turbines of 130m blade-tip height. Mountaineering Scotland did not object to the original application, which was designed to appear as a compatible extension to the operational Dunmaglass, taking access through that scheme. The key issue for Mountaineering Scotland in assessing an application for higher turbines would be whether this compatibility remained the case, mainly in relation to the highest altitude turbines.
4. We have only a small number of observations, relating to the questions in Para 5.7.1.
5. We think there may be errors in the viewpoints in either Table 5.2 or Figure 3. The numbered list of viewpoints in Table 5.2 is inconsistent with the numbered viewpoints in Figure 5.3. Often this is simply because the numbering is different. However, there are also viewpoints in Figure 3 that are not in Table 5.2. As a consequence, it is impossible to know which viewpoints are

actually being proposed in this Scoping Report. (We note in passing that Viewpoints 11 and 15 are misspelt in Table 5.2.)

6. In particular, Meall Fuar-mhonaidh and Carn na Saobhaidhe would be key hill viewpoints in the assessment of the proposed development and are in Figure 3 (as far as can be made out at the small scale used) but not Table 5.2. We want to emphasise that without these two viewpoints a proper assessment cannot be made of the potential visual impact.

7. In Paragraph 5.7.1 it is suggested that the previous baseline photography taken in 2014 could be used with changes montaged in. It is our view that outdated baseline photography should be replaced with new photography where the baseline has changed materially in the intervening 7 years. Dunmaglass, which would be key to any assessment, only became fully operational in 2017.

8. Turbines 1-3 have the potential to appear particularly discordant with Dunmaglass if increased to 175m height. We suggest that in designing the revised scheme consideration be given to retaining these turbines at their current consented height.

Yours sincerely



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