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By email to Econsents Admin@gov.scot

Mr Lee Crosbie Case Officer Energy Consents Unit Scottish Government

17th March 2020

Dear Sir

Chleansaid wind farm: Environmental Impact Assessment Scoping Report: Mar. 2020

ECU Reference: ECU00002031

Context:

ESB, an Irish state-owned electricity company, has submitted an EIA Scoping Report for a potential wind farm called Chleansaid on the Dalnessie Estate, north of Lairg. The indicative scoping layout has 20 turbines of 200m BTH at base altitudes of up to c.360m OD.

A previous withdrawn application by SSE proposed 27 turbines of 121m BTH at base altitudes of up to c.450m OD for a site 6km northeast of that now proposed. Mountaineering Scotland objected to this previous application because of its visual impact on Ben Klibreck, Ben Armine, Creag Mhor and the Klibreck-Armine Wild Land Area (as it is now called), as well as its impact on more distant views. The development now proposed is at a lower altitude but with taller turbines such that the highest blade-tip altitudes OD are similar between the two proposals.

Mountaineering Scotland is an independent association of mountaineering clubs and individuals, with 14,000 members who are hill walkers, climbers and snowsport tourers. It was established in 1970 as the national representative body for the sport of mountaineering in Scotland. It is recognised by the Scotlish Government as representing the interests of mountaineers living in Scotland.

It also acts in Scotland for the 80,000 members of the British Mountaineering Council, which fully supports Mountaineering Scotland's policy relating to wind farms and contributes financially to its policy work.

Assessment:

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

- 1. We have no comment on the bulk of the Scoping Report.
- 2. We wish to point out that the Scoping Report contains references to the 2020 targets for greenhouse gas emissions and for energy demand, to which the proposed development cannot





possibly contribute. We assume that the planning assessment in any application will contain a more relevant policy context.

- 3. We concur with the proposed upland viewpoints, viz: 6, 7, 11, and 12.
- 4. We agree that a full wild land assessment is required for the Klibreck-Armine WLA, which the proposed development abuts. The impact on other WLAs is solely visual and can be adequately covered in the LVIA.
- 5. We note the intention to exclude tourism and recreational impacts from the EIA. We have no view on this since they are inevitably generalisations without any real engagement with issues specific to the location. However, we reserve our right to put forward arguments demonstrating adverse impact in similar landscapes should a planning application be made for this site and should Mountaineering Scotland decide to make representations on it.

Yours sincerely

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