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FAO Mr Mark Ashton
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17th April 2019

Dear Mr Ashton

Clauchrie Windfarm: Submission of Request for an EIA Scoping Opinion
ECU Reference: ECU00001805

Introduction

We welcome the opportunity to comment on issues to be considered in the environmental impact assessment of the proposed Clauchrie Windfarm by ScottishPower Renewables Ltd. 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

Scottish Power Renewables (SPR) are scoping an Environmental Impact Assessment (EIA) for a wind farm on the South Ayrshire/Galloway border, within 5km of the Merrick Wild Land Area (WLA) and 6.7km from the summit of the Merrick itself. The scoping is considering 16 turbines of up to 200m blade-tip height.

The site itself is largely commercial conifer plantation with some unforested higher ground. The scoping layout largely avoids the open ground but the turbines sit just south of it and the blade-tip height would be above the summits. Mountaineering Scotland is concerned with the visual impact from The Merrick Range and the Curleywee- Lamachan group south of Glen Trool.

MS previously objected to a proposal at Balunton (9 turbines of 125m BTH) because of:

- visual impact on the hills of the Merrick area at distances of approximately 8-12 km, close enough for blade movement to very visible
- visible through the Glen Trool 'gap' well into the core of the WLA
- appearing as a substantial move (north)eastward from the established pattern of windfarm development. This latter point was particularly important. The western edge of the mountain core of Galloway currently looks out on an extensive fringe of plantation forestry beyond which, typically at distances of 20km and upwards, a wind farm landscape is being built. The core of our objection to Balunton was that it would break that pattern by placing a wind farm within the forestry fringe. The simple sequence of landscape transitions outwards from The Merrick hills - from open hill to forestry to wind farms - would be disrupted.

SNH also objected, based on the impact on the WLA. The Balunton application was withdrawn before being determined.

The proposed Clauchrie wind farm sits 2km NE of the existing SPR Mark Hill wind farm. This comprises 28 turbines, all except one being 110m BTH, with one 125m BTH. This was not objected to by MS. The turbines bases are typically around 200m OD, giving a blade-tip altitude of a little over 300m OD. By comparison, the base altitudes proposed for Clauchrie are 300+m, giving blade-tip altitudes of 500+m.

No other wind farms or applications are closer to the Merrick than c.17km.

Appraisal

As one would expect the proposed EIA is largely standard and requires no comment. I have two areas where comment on the Scoping Report may be useful. I set them out under the relevant questions as posed in the Scoping Report.

Q 5.2

Cairnsmore of Carsphairn is proposed as a viewpoint. This is 30km away and it can be confidently predicted that the LVIA will find no impact at this distance. It would be more useful to have a closer viewpoint representing angles of view from popular hills that the proposed viewpoints do not cover, specifically, the Lamachan/Curleywee group SE of Glen Trool. The northern end of the Merrick range at Shalloch on Minnoch is also not covered, though this might rather duplicate the assessment for the Merrick.

Q12.1

It is not clear how the effect on walkers on the Galloway hills will be assessed since paragraph 12.4.2.3 implies consideration of recreation effects only within 2km of the site (through para 12.4.4.3 states 5km). Perhaps hill routes and summits are to be treated as 'notable points of focus for visitor attraction' under paragraph 12.4.2.2.

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

Yours sincerely



Davie Black
Access & Conservation Officer
Mountaineering Scotland