

By email to: Econsents_Admin@gov.scot

Energy Consents Unit
Directorate for Energy and Climate Change
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150 Broomielaw
Glasgow
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30 June 2020

Dear Sir/Madam

Craiginmoddie Wind Farm: Environmental Impact Assessment Scoping Report

ECU reference 00002080

Background and Context

Energiekontor has submitted a scoping report for a wind farm of up to 16 turbines of up to 230m BTH in South Ayrshire. The proposed site lies east of the operational Hadyard Hill wind farm (52 turbines of 100-110m BTH), and between it and the scoping site of Carrick wind farm (scoping based on 17 turbines of 200m BTH). It is around 7km north of the application site of Clauchrie wind farm (18 turbines of 200m BTH).

Mountaineering Scotland is a membership organisation with over 14,000 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 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

Mountaineering Scotland is in general content with the proposed methodology in the Scoping Report. It has four observations which are set out below.

1. The principle of focussing on a 20km 'study area' is acceptable but that should not mean entirely ignoring visual impacts upon areas beyond 20km. Even the present assessment of the Scoping Report has been hindered by the restriction of the ZTV diagram to little more than the 20km radius from the site.
2. The Scoping Report states: "... there is little visibility beyond the 5-10km radius to the east and south because the bigger hills which sit behind the Foothills with Forest and Wind Farms LCT, would

screen visibility.”(Para 5.57) The Galloway Corbetts and most of the Donalds (hills >2000 feet) sit in the southeast quadrant from the proposed development site and summits at 11km to >27km distance are shown on the ZTV as having visibility of the site, mostly with 15-16 turbines in view. The LVIA supporting any future application should be more careful in its assertions.

3. Viewpoints on The Merrick, Shalloch on Minnoch, Cornish Hill and Cairnsmore of Carsphairn are appropriate. However, the absence of a viewpoint on the northern Rhinns of Kells – at the summit of Coran of Portmark, for example – is undesirable. If the number of viewpoints is an issue, we would regard Coran of Portmark (at c.19 km) as more important than Cairnsmore of Carsphairn (at 27km).

4. The visual relationship of the proposed development with the adjacent scoping site of Carrick wind farm and the application site of Clauchrie wind farm will be an important consideration in assessing the impact of any future Craiginmoddie planning application. Wirelines should clearly show these proposals unless they have been refused or withdrawn prior to an application for Craiginmoddie.

Yours sincerely



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