

By email to: Econsents_Admin@gov.scot

Energy Consents Unit
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

10 January 2020

Dear Sir/Madam

Ourack Wind Farm: Environmental Impact Assessment Scoping Report

ECU reference ECU00001999

Vattenfall Wind Power Ltd has submitted an EIA Scoping Report for a potential wind farm at Ourack, north of Grantown-on-Spey. This was previously the subject of an EIA scoping in 2015-16 for up to 50 turbines of up to 125m blade-tip height. The new scoping is for up to 27 turbines of up to 180m BTH. This pattern of fewer, taller turbines is common on potential sites revisited by developers in recent years.

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.

Mountaineering Scotland responded to the previous scoping and this is acknowledged at relevant places in the new Scoping Report. In particular, several viewpoints proposed by Mountaineering Scotland have been adopted.

Assessment

1. The landscape of the proposed development is not exceptional but is of sufficient merit to justify being part of a Special Landscape Area, the qualities of which have already been compromised by consented developments in or near to its western and eastern arms. The proposed development would appear to risk inflicting significant damage upon the visual amenity of the SLA, but it might be considered that this is already inevitable given other current wind farm operational and development activity around the eastern end of the SLA. Cumulative impact is likely to be the key feature for the EIA in terms of assessing mountaineering impact.

2. The proposed development is close to the Cairngorms National Park. Although distant from the core mountain areas, it has potential impacts upon distinctive and popular outlying hills such as Ben Rinnes.

3. We welcome the number of viewpoints that represent hillwalker or recreational walker receptors. In particular we endorse proposed viewpoints 4-6, 9a, 14-16, 18 and 19.

4. The ZTV maps use misleading shading. As SNH Guidance notes: "Darker colours tend to read as portraying greater visibility than lighter colours ...". The Figures in the Scoping Report use the lightest shading for the greatest number of turbines visible. We suggest that for better public understanding the applicant revises this in line with SNH guidance.

Yours sincerely



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