

By email to: Econsents_Admin@gov.scot

Mr Kevin Ainslie
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Dear Mr Ainslie

Pollie Hill Wind Farm, near Brora, Environmental Impact Assessment Scoping Report

ECU reference: ECU00006082

Background and Context

1. Pollie Hill Wind Farm Ltd (a joint venture of Coriolis and ESB) has submitted a Scoping Report for a wind farm of 13 turbines of 200m blade-tip height east of the Ben Armine massif, northwest of Strath Brora.
2. Mountaineering Scotland is a membership organisation with 16,000 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. We represent, support and promote Scottish mountaineering, and provide training and information to mountain users for safety, self-reliance and the enjoyment of our mountain environment.
3. At middling distances there are operational wind farms at Gordonbush (7.5km E) and Kilbraur (8km SE) and the consented Chleansaid (12km W). These distances show the step forward into wilder country that Pollie Hill would represent. The site boundary very marginally sits within Wild Land Area 35 Ben Klibreck – Armine Forest. No turbine or other development would physically be in the WLA, but around 40% of the area, and most of the summits and higher ridges northwest of Pollie Hill, would have clear visibility of these proposed Pollie Hill turbines.

Assessment

4. Mountaineering Scotland's concern at this stage is ensuring that the proposed viewpoints will allow a comprehensive assessment of the proposed development from a mountaineering/hillwalking perspective should an application be made, specifically potential views of the proposed development from the summits of Munros, Corbetts and other upland locations popular with hillwalkers and wild campers.

5. We endorse twelve of the sixteen viewpoints that cover recreational receptors on hills or remote ground: 1-4, 7, 8, 11-16. However we question why the slightly lower and more distant Ben Armine has been preferred to Creag Mhor (NC 698240) as Viewpoint 8 and which to some extent may have visibility of the proposed site screened by Creag Mhor? Both hills are Grahams and will rarely be climbed singly given their remoteness.

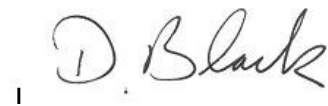
6. Viewpoint 4, Meall a Phiobaire, is a very obscure hill, although nearby is a Hundred Metre Prominence (HuMP), Meallan Liath Mhor (NC 659177), and more likely to be climbed, since it is listed as such in The Relative Hills of Britain website (<https://www.rhb.org.uk/>)

7. If not considered as a Viewpoint for LVIA then this HuMP would merit inclusion in the Wild Land Assessment, as would Strath na Seilge above Ben Armine Lodge, where the alignment of the glen will give views to the proposed development from well into the WLA, for example where the track passes below Green Face.

8. Paragraph 5.1.52 of the Scoping Report, in its third bullet, presupposes that significant effects on visual amenity will be restricted to within 10km of the site. We challenge this assertion until landscape and visual amenity visualisations have been assessed and indicate a more objective opinion.

7. In conclusion we question the inclusion of Ben Armine over Creag Mhor as Viewpoint 8; note that it would be beneficial to include Meallan Liath Mhor and Strath na Seilge above Ben Armine Lodge in the Wild Land Assessment; and challenge the Scoping Report wording in Paragraph 5.1.52 third bullet which presupposes that significant effects on visual amenity will be restricted to within 10km of the site.

Yours sincerely



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