

By email to: Econsents_Admin@gov.scot

Energy Consents Unit
Directorate for Energy and Climate Change
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

15 July 2020

Dear Sir/Madam

Quantans Wind Farm: Environmental Impact Assessment Scoping Report

Reference: ECU00002097

Background and Context

1. Vattenfall has submitted a scoping report for a wind farm of up to 21 turbines of up to 250m BTH on the southwestern slopes of Cairnsmore of Carsphairn. It is largely the same location as a previous application for 19 turbines of 130m BTH made by EON in 2014 and withdrawn in 2016 prior to determination.
2. 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.
3. The impact of concern to mountaineering interests is on the reciprocal views between Cairnsmore of Carsphairn and the Rhinns of Kells. Any wind farm immediately south of Cairnsmore of Carsphairn would interrupt these views and visually separate Cairnsmore of Carsphairn from the main part of the Galloway highlands. Protecting these views has been the approach taken consistently by Mountaineering Scotland when considering applications in this area.

Assessment

4. Mountaineering Scotland is in general content with the proposed methodology in the Scoping Report. It has two observations which are set out below.
5. We have no adverse comments on the viewpoints proposed. We particularly support viewpoints 3, 4, and 20 representing the Cairnsmore of Carsphairn massif; viewpoints 11, 12 and 25 representing

the Rhinns of Kells; 6, 7 and 21 representing the Southern Upland Way rising to Benbrack (viewpoint 16 feels redundant); and viewpoint 5 representing the Donalds (hills >610m) northeast of Cairnsmore of Carsphairn. We would note that on flat summits walkers will often sit immediately above a break of slope rather than at the summit itself since this offers a better view. Precise siting of the viewpoints on the Cairnsmore of Carsphairn massif should take this into account.

6. The Report proposes to scope out any consideration of tourism (para 11.6.1). This is unacceptable since reanalysis of Biggar Economics data shows wind farms located in local scenic designations have had an adverse effect on tourism-related employment. We recommend specific analysis of the effect of wind turbines on outdoor recreational interests as the proposed site is located within the Galloway Hills Regional Scenic Area.

Yours sincerely



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