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Mr Stephen McFadden
Consents Manager
Energy Consents Unit
The Scottish Government

27th July 2018

Dear Sir

SCOPING OPINION REQUEST FOR PROPOSED SECTION 36 APPLICATION – LAIRG EXTENSION WIND FARM APPROXIMATELY 4KM SOUTHEAST OF LAIRG WITHIN THE LOCAL AUTHORITY AREA OF THE HIGHLAND COUNCIL

Mountaineering Scotland is the only organisation, recognised by the Scottish Government, which represents the interests of hill walkers, climbers and ski-tourers who live in Scotland or who enjoy Scotland's mountains. Together with our own membership of 13000 we also act for the 80000 members of the British Mountaineering Council (BMC) on landscape issues in Scotland

Energiekontor UK Ltd has submitted a scoping report for a proposed extension to the Lairg Wind Farm, by Lairg, Sutherland. Although presented as an 'extension' the proposed development is much larger than the existing development of 3 turbines of 100m blade-tip height (base altitudes c.250-270m AOD), with approximately 13 turbines of up to 179m blade-tip height proposed at base altitudes of c.160-250m AOD.

We comment here only on specific issues of potential concern to mountaineering interests where we are not in agreement with the Scoping Report.

Visual impact study area (para 7.124) (L&V Q1)

It is accepted that the proposed restriction of the detailed visual impact study area to 20km would encompass most residential and transient receptors but it is inadequate for mountaineering interests. Research from Australia, found to be consistent with empirical observation in Scotland, shows that current Scottish guidance – based on limited research on small turbines – substantially underestimates the actual visibility of turbines of current operational sizes. A detailed study radius of 25km would be more consistent with the evidence base on the distance within which turbines of the size proposed have the potential to be visually pre-eminent. A discussion paper on this evidence base is available on request.

Cumulative impact (L&V Q3)

The potential cumulative position in the Lairg area is complex. The operational and consented wind farms are as stated by the applicant (para 3.4, but Rosehall, not Rose Hall). However, there are proposals currently being advanced for up to four other developments of S.36 scale. As noted in the table below, it is not clear if all of these are still being pursued. (All websites accessed 17 July 2018.)

	Turbines N	BTH(m)	Scoping Response dated; other information
Garvary	36	175	11 Apr 2018 –this immediately abuts the Lairg Extension site to the south.
Braelangwell	21	145	23 Feb 2017
Meall Buidhe	21	120	14 Sep 2017 – marked ‘withdrawn’ on Energy Consents Unit website but developer website still states a planning application to be submitted in 2018
Dalchork	45	150	Unknown – Scoping report dated Feb 2013 Application was to be submitted ‘towards the end of 2017’ according to Eon website. (Also, Strath Tirry scoping for 4 x 135m within same area; Highland Council scoping response issued 1 Mar 2018.)

It is inevitable, given the developer-driven approach favoured by the Scottish Government, that wind farm planning applications in the wider Lairg area will be considered piecemeal. Nonetheless, the Garvary proposal - scoping opinion issued April 2018 - which abuts the proposed Lairg extension should be included in the LVIA. We would go further and hope that the two proposals will collaborate to ensure visual complementarity between the final schemes.

Again, we suggest 25km is a more appropriate distance threshold for the size of turbine proposed (cf para 130).

Landscape Baseline and Receptors

Q5 – We again suggest that 25km is a more appropriate threshold. (For the avoidance of doubt, we do not disagree with the proposed lower threshold for landscape character assessment (Q4) since it is the visual consequences of landscape change that have the further reach.)

Q6 – We concur with the inclusion of the listed Wild Land Areas in the assessment.

Q7 – The proposed viewpoints fail to allow a proper consideration of the potential impact upon mountaineering/hill-walking.

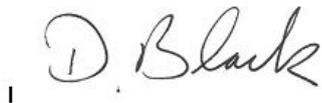
We do not disagree with the inclusion of Ben Klibreck (viewpoint 15), but there are other ‘listed’ hills in the area which should be represented.

In particular, there is no high level viewpoint to the south where the Graham of Carn Salachaidh lies within 20km and the Corbett Carn Chuinneag just over 20km. One or other of these has been referenced in the recent scoping submissions in this area. Either would also be an important cumulative viewpoint. The Graham Carn a’ choin Dearg is slightly more distant to the southwest. We strongly urge the inclusion of Carn Salachaidh as a viewpoint to represent middle-distance views from higher ground to the south.

One of the outstanding characteristics of east Sutherland is the extensive visibility across open moors from even modest elevations. It is not clear if the roadside viewpoints proposed will adequately represent this. For example, from the Trig Point on the hill of Meall a’ Chaise, NW of viewpoint 11, West Langwell, a tremendous full 360 degree panorama can be seen, with seven wind farms visible within 180 degrees of that, including the current Lairg turbines. West Langwell, although near, does not offer this with a topographically constrained 180 degree view and the potential for foreground clutter in baseline photography. Meall a’ Chaise offers a good middle-distance viewpoint for assessing cumulative impact on the experience of the upper moors, with easy access for the surveyor.

We hope that you find these comments useful in developing your Scoping Opinion for the proposed development.

Yours sincerely

A handwritten signature in black ink that reads "D. Black". The signature is written in a cursive style with a large, looped initial "D".

Davie Black
Access & Conservation Officer
Mountaineering Scotland