



The Mountaineering Council of Scotland

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Roslyn Keenan
Admin Officer
Local Energy and Consents
The Scottish Government

5 November 2015

Dear Sir

ELECTRICITY ACT 1989 - SECTION 36 WEST GARTY WIND FARM - FURTHER ENVIRONMENTAL INFORMATION

Please find below the Mountaineering Council of Scotland's response to the Addendum.

The MCofS now objects to the proposed development.

The addendum, insofar as it is relevant to our interests, consists of the deletion of one turbine, repositioning of another, minor alterations to other turbine positions and consequential minor changes to on-site roads.

Carry forward previous submission

When the Mountaineering Council of Scotland reviewed the original proposal it concluded that the proposal did not fully meet its criteria for an objection, mainly due to its distance from main areas of mountaineering interest. We noted that there was local mountaineering interest and specifically mentioned the mountains Beinn Dhorain and Morven. We concluded that, although there was detriment to mountaineering interests, it was insufficient at a national level to trigger an objection by the MCofS. Notwithstanding this, we raised a number of significant concerns about the proposed development in our submission of 6 January 2015.

These concerns are not diminished by the FEI and our previous submission remains wholly relevant to the consideration of this proposal.

Additional response to the new addendum

Having reviewed the additional information, it is now clear that no amount of redesign is likely to result in a commercially viable scheme with an acceptable environmental (visual) impact. This location does not have the capacity to accommodate a wind farm. We support The Highland Council's view that the proposed development would be detrimental to the landscape of the east Sutherland coastline, including but not limited to the Loch Fleet, Loch Brora and Glen Loth Special Landscape Area. The applicant seeks to give the impression that the development would only have a minor impact on one corner of a sizeable SLA. It would, in fact, be visible from all summits above 400m across the whole SLA, at a maximum distance of 20km.

We note that the FEI does not include a 35km radius ZTV, nor a comparative ZTV showing the visual reach of the original and revised layouts. This is unsatisfactory. Working from the wirelines and photomontages, we have concluded that a revised ZTV from high viewpoints would be essentially unaltered from the original. With this in mind, we have revisited our concerns regarding Beinn Dhorain and Morven, and have also assessed further the impact on Ben Horn. We have concluded that the impact on Beinn Dhorain and Morven remains unacceptable. We now add that the impact on Ben Horn is unacceptable, because the proposed development, if consented, would occupy the only northward rare angle of view from which wind farms (operational or consented) would not otherwise be visible.

Taken together with the concerns expressed in our previous submission, this reassessment leads us to consider that *our concern is now sufficiently strong as to lead to an objection to the proposed scheme.*

Conclusion

The FEI claims that at distances such as those from the hills we have assessed “the turbines would be viewed in the context of a wider landscape (including expansive upland views, large open spaces, undulating landform).” (Appx 7.1, p.21) We would submit that in the middle of these modestly-sized hills the proposed turbines would jar visually by their industrial and kinetic contrast with the wider landscape of expansive upland views and open undulating landform. This small area is a vital interruption between the turbine-characterised landscapes of Caithness and southeast Sutherland / Easter Ross. A single wind farm would destroy that distinctiveness.

Yours sincerely

David Gibson
Chief Executive Officer