



The Mountaineering Council of Scotland

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Dear Sir

Proposed Section 36 Application for the Clare Wind Farm Response to request for Environmental Scoping Opinion

1. Introduction

We welcome the opportunity to comment on issues to be considered in the environmental impact report regarding Partnerships for Renewables proposed wind farm of up to 21 turbines of up to 132m blade-tip height east of Ben Wyvis. We comment here only on those matters where we are not in agreement with the proposed assessment as set out in the Scoping Report.

2. The Mountaineering Council of Scotland (MCofS)

The MCofS is an independent organisation with over 12,500 members who are hill walkers, climbers and ski tourers. It was established in 1970 as the national representative body for the sport of mountaineering in Scotland. We are recognised by the Scottish Government as representing the interests of mountaineers living in Scotland.

We also act on behalf of the 75,000 members of the British Mountaineering Council (BMC) which contributes both financial and policy support to our work on landscape matters in Scotland.

The MCofS recognises the need to move to a low carbon economy but it does not believe that this transition need be at the expense of Scotland's marvellous mountain landscapes. It objects only to proposals that we regard as potentially most damaging to Scotland's widely-valued mountain assets, consistent with our policy as set out in our position statement [Respecting Scotland's Mountains](#). This reflects the views of our members and those organisations which support our policy, which include The Cairngorms Campaign, North East Mountain Trust and The Munro Society. To date we have objected only to around one in twenty applications.

3. Specific Comments

The site is adjacent to a previously refused application for 17 turbines of up to 126.5m blade-tip height (Clach Liath). The proposed Clare site is much further down the hill, with base elevations of around 180-360m on the two scoping layouts compared with 380-490m for the refused proposal. However, it is also relevant that a proposed small windfarm (Woodlands) lower still down the hill was withdrawn by the developer prior to determination in the face of significant negative signals from Highland Council and Scottish Natural Heritage. An application for the Clare site would need to show convincingly that the proposed scheme avoids the landscape and visual impacts, including cumulative impacts that led to both Clach Liath and Woodlands not being consented.

Viewpoints

The selection of viewpoints to represent walkers appears appropriate. We presume the odd location for viewpoint 6 on Figures 6a and 6b is unintentional and the viewpoint is intended to be in the vicinity of the summit of Ben Wyvis. Ideally we would like to see Little Wyvis also included as a viewpoint since it is a more significant hillwalking destination from a national perspective than Cioch Mhor (Viewpoint 3), however the latter may be locally important and we would not wish to over-ride that, if it is indeed the case.

Socio-economics

We do not understand the statement in para 13.2 that “a study area of 5km will be appropriate” when 13.1.2 lists locations up to 10km distant as included in the assessment for impact on hill-walkers. For some aspects of tourism and recreation a distance of 5km may be an appropriate threshold but for impact on hill-walkers 10-15km is more realistic. (This is not to suggest that significant impacts are not experienced beyond this distance.)

Assessment of impacts on recreation and tourism should use up-to-date information and consider trends in impacts, which are more illuminating of evolving tourist reaction to wind farm development than quoting individual surveys alone, especially surveys prior to 2010 which are largely irrelevant to the contemporary position. Relevant information is contained in a secondary analysis of general population surveys in our recent report: *Wind Farms and Changing Mountaineering Behaviour in Scotland*. (March 2014) http://www.mcofs.org.uk/assets/pdfs/mcofs-wind-farm-survey-report_2014.pdf The bulk of this report is an analysis of mountaineers' reactions to wind farms which is also relevant to assessment of the proposed development.

4. Conclusions

The MCofS is surprised at a further wind farm proposal coming forward for an area where the planning history is clearly not favourable. We have suggested some modest improvements to the proposed EIA which would enable the MCofS to make a proper assessment of the proposed development's potential impact upon the mountain landscape and mountaineering experience.

We hope that addressees consider these comments helpful and look forward to receiving an acknowledgement of safe receipt of this letter.

Yours sincerely

David Gibson
Chief Officer