



## The Mountaineering Council of Scotland

The Old Granary  
West Mill Street  
Perth PH1 5QP  
Tel: 01738 493 942

Please reply by email to [david@mcofs.org.uk](mailto:david@mcofs.org.uk)

By email to [EconsentsAdmin@gov.scot](mailto:EconsentsAdmin@gov.scot)

Joyce Melrose  
Scottish Government  
Local Energy and Consents  
5 Atlantic Quay  
150 Broomielaw  
Glasgow  
G2 8LU

3 November 2015

Dear Sir

### **ELECTRICITY ACT 1989: SECTION 36 ADDENDUM ON THE PROPOSED CAPLICH WIND FARM**

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

#### **We maintain our objection to the proposed development.**

The addendum, insofar as it is relevant to our interests, consists of trivial alterations to turbine positions, minor changes to on-site road layout, a proposed change in colour of the turbines, and attempted rebuttal of comments on possible tourism impacts made by ourselves and others in response to the planning application.

#### **Carry forward previously objection**

The Mountaineering Council of Scotland's submission of 23 February 2015 is unaltered by the addendum except in one minor aspect.

The proposed colour change to 'medium matte green / grey' instead of pale grey responds to section 5.b of our previous submission. We accept that such a change could be beneficial in making the turbines less prominent in back-clothed longer distance views. However, we doubt if it would achieve quite the level of invisibility portrayed in some of the developer's photomontages.

Nonetheless, if the scheme were to be consented we would support this colour change, but want it to be clear that the MCOFS does not regard this change as sufficient to make the scheme acceptable.

We do not believe that any commercial-scale scheme is acceptable in the location proposed.

/ continued

## **Additional response to the new addendum**

The main 'new' information in the Addendum of relevance to the MCofS objection is the applicant's attempt to demonstrate that any tourism impact will be minor and acceptable.

The MCofS cannot speak for tourism as a whole but only for the interests of our members and others who take to the Scottish hills. We accept that hillwalkers may be only a minority of tourists (though probably a larger minority in Assynt-Coigach than across Highland as a whole, to which the statistics quoted by the applicant in Section 1.3.2 apply).

We have up-to-date survey data showing that our members and other hill-walkers do not find turbines in mountaineering areas acceptable, with 40% avoiding such areas, and we prefer that data – cited in our previous submission – to general population data for Great Britain as a whole cited by the applicant (Section 1.3.2).

The MCofS has never suggested that windfarms will bring all tourism to an end. What we do suggest is that the loss of perhaps 10-20% of customers would be difficult for many local businesses and should not be countenanced lightly.

The applicant makes a general comment about all the submissions that raised issues to do with tourism studies and wind farms that "they are quoted out of context" (Section 1.5.2).

The MCofS rejects this slur, which we note is not supported by specific examples. By contrast our original submission gave specific examples of misuse of information in the application; points on which we note the Addendum is silent. Rather than consider the flaws in their original submission, the applicant would rather keep moving the argument onto new ground, such as the data from BRES.

The data presented by the applicant for Lairg and Rosehall is interesting but begs some questions. In particular the data are uninterpretable without knowing the relevant confidence intervals since the BRES is a sample survey (c. 4% of businesses are sampled each year) and since the ONS specifically warns that caution should be applied when comparing estimates at or below the local authority level especially when further disaggregating by industry.

Finally, we note that our specific points regarding the proposed Recreational Enhancement Fund are simply not addressed in the applicant's response, suggesting that they have no answer to our critique, (Section 1.6).

Yours sincerely

David Gibson  
Chief Executive Officer