



The Mountaineering Council of Scotland

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By email to Stephen.McFadden@gov.scot

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Dear Sir

ELECTRICITY ACT 1989

THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2000

RESPONSE TO SCOPING OPINION REQUEST FOR PROPOSED SECTION 36 APPLICATION FOR THE BLARGHOUR WIND FARM LOCATED BETWEEN LOCH AWE AND LOCH FYNE IN ARGYLL & BUTE

1. Introduction

We welcome the opportunity to comment on issues to be considered in the environmental impact assessment of Coriolis Energy's proposed wind farm. Since the main change appears to be an increase from 19 to 20 turbines (as shown in Section 4) and an increase in maximum tip-height from 132 to 150m, the original scoping responses appear to remain relevant. We particularly note those of SNH, Argyll & Bute Council and RSPB which all question the appropriateness of this location for a large wind farm development.

2. The Mountaineering Council of Scotland (MCofS)

The MCofS is an independent organisation with over 12,700 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 in Scotland for the 75,000 members of the British Mountaineering Council (BMC), which fully supports our policy relating to wind farms and contributes direct financial support to our policy work.

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 policy document *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 to fewer than one in twenty applications.

3. Specific Comments

It will already be obvious to the developer that current planning documents will require to be used.

Likewise, the cumulative impact will require an up-to-date list of operation, consented and proposed developments. The precedent of the recent refusal of a proposed wind farm development at Ardchonnell, adjacent to Blarghour will also be a consideration.

In respect of landscape and visual impact (singly or cumulatively), which are the main issues considered by ourselves in this response, we note and concur with the comments made by SNH in their letter of 17 April 2014.

The original scoping document proposed that photomontages be prepared for viewpoints up to 15km distance and wirelines for those located further away. This is not acceptable. Photomontages should be prepared for locations up to 20km away. We accept that beyond 20-25km distance photography cannot satisfactorily replicate the experience of the human eye.

We concur with the originally proposed viewpoints numbered 9, 14, 17, 19 and 20. These are all popular hills, close enough in most cases to the proposed development for blade movement to be visible. We would be content to see viewpoint 18 dropped since it would view the development at a very similar angle and greater distance to viewpoint 14. We would also be content to see viewpoint 21 dropped since again the angle is similar and at a distance of 35km in a southward view it would be difficult to provide any representation of a meaningful visual impact.

4. Conclusions

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

Yours sincerely

David Gibson
Chief Executive Officer