



## The Mountaineering Council of Scotland

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Duarte da Costa  
Project Manager  
West Coast Energy Ltd

17 July 2015

Dear Sirs

### **Knocknalling Wind Farm**

#### **Response to Scoping Report for Environmental Impact Assessment (July 2015)**

##### **1. Introduction**

We welcome the opportunity to comment on issues to be considered in the environmental impact report regarding West Coast Energy's proposed wind farm of 14 turbines of up to 150m blade-tip height on the west side of the Glenkens. We comment here only on those matters pertinent to the Mountaineering Council of Scotland's interests regarding the possible development.

##### **2. The Mountaineering Council of Scotland (MCofS)**

The MCofS is an independent organisation with over 12,000 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 policy document [Protecting Our 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

#### ***Policy and Need***

Consideration of policy and need should take into account recent UK government statements regarding a sufficiency of onshore wind electricity generation capacity having already been consented and its intention not to encourage further onshore wind development beyond that already consented. While this may not preclude some further development, it would be for the developer to justify why *this* development in *this* location should be advanced in preference to alternative possibilities, such as extending development in landscapes already primarily defined by wind turbines.

#### ***LVIA***

The proposed site lies in a Regional Scenic Area defined by a broad shallow valley and given significant character by the dramatic rise of the Rhinns of Kells on its west and Cairnsmore of Carsphairn to the north. The north and east of the area have attracted considerable interest from wind farm developers, with several consented wind farms. Recently Loch Hill Wind Farm, about 7km from the proposed development, was refused consent on the grounds of cumulative impact on visual amenity. The LVIA in the ES will need to demonstrate why the same reasoning should not apply to Knocknalling.

The Glenkens plays a key part in the attractiveness of views between the Rhinns of Kells and Cairnsmore of Carsphairn, particularly from the latter looking south and southwest (away from operational and consented wind farms to its north and west). The surprisingly stark appearance of the two Torrs Hill turbines (100m BTH), generally backdropped in views from the hills, gives a hint of the potential visual impact of Knocknalling and the MCofS is likely to regard this as significantly adverse to the enjoyment of the hills. It will be for the developer to seek to demonstrate otherwise in the ES.

The viewpoints proposed appear reasonable to capture the visual impact upon hillwalkers. Specifically we endorse the following viewpoints.

Representing hillwalkers: viewpoints 12, 13, 14, 16. Some of these summits are rounded and it is important to note that walkers will often pause at the break of slope rather than the summit to gain the best views – Meikle Millyea is a good example of this.

Viewpoint 16 is located on a rarely climbed hill. Fell Hill (272 584) around 3km further south is much more frequently climbed and would better represent the impact on hillwalkers on high ground east of Knocknalling.

Consideration should be given to a viewpoint on Benniginea (256 576), which has been described as a giving a ‘splendid panorama’ and is accessible by a surfaced track with waymarking, therefore appealing to less capable walkers.

Representing Southern Upland Way walkers: viewpoints 7, 17.

Viewpoint 18 better reflects road users’ experience than Southern Upland Way walkers.

#### ***Socio-economics***

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 increasingly 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](http://www.mcofs.org.uk/assets/pdfs/mcofs-wind-farm-survey-report_2014.pdf)

#### **4. Conclusions**

The visibility of the proposed development, on the western side of the Glenkens, creates both novel and cumulative impacts that unlikely that a wind farm can be located within this landscape without an unacceptable level of harm to landscape, recreational and tourist interests. Unless the ES can show robustly and persuasively that this would not be the case, the MCofS would be minded to object should the proposal proceed to the formal application stage.

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