



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

By email to Stephen.McFadden@gov.scot; econsentsadmin@scotland.gsi.gov.uk

Stephen McFadden
Senior Case Officer
Local Energy and Consents
Scottish Government
4th Floor, 5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

2 February 2016

Dear Sir

ELECTRICITY ACT 1989 THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2000 (AS AMENDED)

SCOPING OPINION REQUEST FOR PROPOSED SECTION 36 APPLICATION FOR GLENDYE WIND FARM LOCATED ON THE FASQUE AND GLENDYE ESTATE NEAR STRACHAN IN ABERDEENSHIRE

1. Introduction

We welcome the opportunity to comment on issues to be considered in the environmental impact assessment of the proposed Glendye Wind Farm by Coriolis Energy. The Mountaineering Council of Scotland assesses proposed developments in terms of their impact on Scotland's mountain assets and the mountaineering experience. For wind farms, this mainly means visual impact and this is the focus of our response. We also comment briefly on some other issues.

2. The Mountaineering Council of Scotland (MCoS)

The Mountaineering Council of Scotland (MCoS) is an independent organisation with more than 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 in Scotland for the 75,000 members of the British Mountaineering Council (BMC), which whilst based in England and representing primarily the interest of English and Welsh mountaineers, fully supports our policy relating to wind farms and contributes direct financial support to our policy work, due to its members' interest in Scotland's mountains.

The MCoS 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 document [Respecting Scotland's Mountains](#).

3. Specific Comments

The development proposed is of around 40 turbines of up to 150m blade-tip height (BTH). The elevation of the turbine development area is stated as 400-540m OD, although Figure 2 indicatively shows turbines bases at c.360-500m. At a BTH of 150m, the blade-tips would potentially reach c.650m OD.

There is mountaineering interest across the Mounth and Grampian Highlands. The main summits relevant to this application are:

Clachnaben and Mount Battock, both very close to the site and both proposed as viewpoints. We note that Clachnaben is only 589m high, meaning that the proposed development, with turbines extending from c.400m OD (bases) to 650m OD (blade-tips), is likely to appear dominant in southwestern views.

Mount Keen and, more distantly in the same direction, **Lochnagar** and its neighbours. Both are included as viewpoints, the latter as wireline only.

Ben Tiran, just over 20km WSW. This is in line with Black Hill, proposed as a viewpoint.

Hill of Wirren, which is proposed as a viewpoint.

Black Hill is proposed as a viewpoint, representing the nearest approach of the Cairngorms National Park. The view of the wind farm from here may be partially obstructed by the adjacent West Knock. We suggest that West Knock is to be preferred as a viewpoint. It lies only just outside the National Park and is at the edge of the Wild Land Area.

We are content with the proposal that only viewpoints up to 20km distance should have photomontages prepared. The first paragraph of page 22 is, we assume, in error when it states this applies to viewpoints 1-17. In the table on the preceding page there is no viewpoint 17 and viewpoints 1-19 are within 20km of the proposed development.

The proposal (section 5.3) to focus visual assessment on areas within 10km of the proposed development is not appropriate for a development of this size. A more suitable focus distance would be within 20-25 km.

Impact on the 'Highland Edge' will be an important consideration. Visibility of the proposed wind farm from across Strathmore could be visually confusing and in contrast with the simple, predominantly horizontal skyline presently observed. This may be compounded by the proposed access route which will have to be engineered up an open and, in part, very steep slope with potential high visibility to the south.

Cumulative impact will be a consideration. Development until now has been either east of the Cairn o' Mount road in a lower, more subdued and forested landscape, or in low agricultural hills fringing Strathmore. The proposed development would represent a major move of development westward and the impact of this extension to the area characterised by scattered wind farms must be fully assessed.

On decommissioning we would expect to see the removal of all access roads (section 2.5).

We note the intention to draw on general population surveys of attitudes to wind farms (Section 14.1). Since major receptors of the proposed development would be hill-walkers, we suggest that their attitudes specifically should be included. Such evidence is available at [Wind Farms and Changing Mountaineering Behaviour in Scotland](#) (MCofS, March 2014).

To pre-empt a possible error repeatedly made in wind farm applications, we would point out that the much-cited, though out-dated, Glasgow Caledonian University report on tourism impacts was incorrect to claim that walking / hill-walking tourists held more favourable attitudes than average towards wind farms. A proper analysis of the GCU data, with confidence intervals, shows - as the detail of report itself states - that there was no significant difference between tourists who gave their main activity as walking / hill-walking and the rest of the sample.

For reasons known only to themselves the authors of the report ignored their own analysis and stated elsewhere in the report and in the summary that there was a difference.

Finally, the EIA should assess the proposed development's compatibility with the LDP and other relevant policy *as it exists* at the time of application, not as the applicant would prefer it to have been written.

It is clear from the Scoping Report that the applicant does not much care for some of the advice it has been receiving from Aberdeenshire Council and SNH.

4. Conclusion

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 Executive Officer