



The Mountaineering Council of Scotland

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Dear Mr Cowie

Planning for Onshore Wind Energy in Highland: Consultation Paper

Further to your letter dated 19 March 2015, please find below the response from the Mountaineering Council of Scotland to the consultation:

Issue 1 Question	The MCofS agrees with the thresholds set out in the preferred option.
Para 2.8	The MCofS strongly supports the wording of this paragraph where it states "... unlikely to be acceptable ... a heavy burden of proof would lie with the developer ..."
Map 3	The MCofS accepts this as reflecting current Scottish Government policy. But it is clear that Group 3 as mapped includes areas where a wind farm would have a severely adverse impact because of proximity to areas of high landscape value (e.g. west of Glenbrittle NSA, east of Glen Affric NSA, SE of Strathnaver). This is recognised in paragraphs 3.2, 3.11 and 3.12, the wording of which is supported by MCofS.
Issue 2 Question	No response
Issue 3 Question	No response
Para 3.19	SNH published revised guidance on visual representation in December 2014.
Issue 4 Question 1	The MCofS regards 'pioneer' effects from the first development in an area mountainous or wild land as having a much greater impact than cumulative effects. Sequential effects are also important. Our preferred pattern would be distinct areas of concentration in 'wind farm landscapes' and areas with no wind farms rather than a dispersed pattern that creates an extensive 'landscape with wind farms' (e.g. as is developing from Fort Augustus to Elgin).
Issue 4 Question 2	The MCofS agrees with the preferred option. We would also like to see included major walking routes (.e.g. Corrieyairack), and Munros, Corbetts and Grahams where these are not already included in NSAs and WLAs.

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Issue 4 Question 3	We think the principle is right, although it needed to be applied at national level starting a decade ago. However, for the reasons given above (Issue 4, Q1) and having regard to the existing wide spread of consented wind farms, the MCofS places the highest value on avoiding pioneer impact in areas currently not or only lightly impacted by wind farms. We would be particularly concerned that the strategic spatial guidance does not encourage applications that seek to shoe-horn development into unprotected space between high value landscapes, where they can have an utterly disproportionate impact upon a wide area compared with the more modest impact of extensions and infilling where landscapes are already characterised visually by wind turbines.
Issue 5 Question	No response
Issue 6 Question	No response
Issue 7 Question	No response
Para 3.41	The MCofS strongly supports the last sentence regarding maintaining access rights during construction.
Issue 8 Question	No response
Issue 9 Question	The MCofS agrees with the preferred option. The SNH categorisation does not currently lend itself to a simple presumption against development, though we are attracted to the idea and the proposed national interest definition combining class 1 and 2 does promise some simplicity. However, we would be concerned that account should also be taken, in regard to individual planning applications, particularly for extensions and infilling proposals, of the extent to which the resource is already compromised by operational and consented developments.
Issue 10 Question	<p>It would seem common-sense that the existing use of an area as a wind farm would be a material consideration when considering an application for repowering. However, there are two additional considerations.</p> <p>First, repowering thus far has usually seen a substantial increase in the height of turbines. Given the strong ongoing trend of increasing turbine height in first-time applications, we can expect this to apply also to repowering applications. Sites acceptable, or at least tolerable, at a particular height might not be so at an increased height.</p> <p>Second, some existing consents are for unsatisfactory sites (e.g. Stronelairg) and at a future time, say in 10 years, once the full effect of the wide random spread of wind farms across Scotland can be better judged, it would be desirable to undertake a systematic review to enable a more planned and coherent approach to be taken to determining which sites would be suitable for repowering, at what height, and which would not.</p>
Issue 11 Question	No response

I would appreciate an acknowledgement of this response to the consultation.

Kind regards,

Yours sincerely

David Gibson
Chief Officer

