



The Mountaineering Council of Scotland

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Stephen McFadden
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27 January 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
WAUCHOPE NEWCASTLETON WIND FARM LOCATED AT WAUCHOPE AND
NEWCASTLETON FORESTS, SCOTTISH BORDERS**

Thank you for the opportunity to respond to the scoping request for the proposed Wauchope Newcastleton Wind Farm.

By way of introduction, the Mountaineering Council of Scotland (MCoFS) is an independent organisation with more than 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 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 document *Respecting Scotland's Mountains*.

Regarding the proposed development, this is a major proposal for up to 90 turbines of up to 132m blade-tip height, located at base altitudes between 300 and 400m OD, spread across three separate sites.

The MCoFS has only one comment on the methodology proposed, which appears standard, and that is to disagree with the intention to focus the LVIA on the area within 15km of the proposed scheme.

While the MCofS is only too aware of the limitations of photomontages and wirelines in portraying the visual impacts of operational turbines, to restrict visualisations and analysis as proposed is inappropriate for a scheme of this magnitude.

Both The Cheviot and Eildon Hills are within 30km of the proposed development yet could receive no consideration if a focus within 15km is agreed. (For different reasons we suspect that the visual impact at each of these locations would be not significant, but that is speculation and the purpose of the scoping is to ensure that the EIA will provide proper *evidence* on which to make such judgements.)

There are three quite separate sites contained within a single application. It would be informative in relation to the relative impact of each site if the EIA included a single map showing the separate and overlapping ZTVs of the three individual sites.

The MCofS is disappointed at the lack of specific consideration of hill-walking interests.

We suggest that two viewpoints are needed to represent these interests, in addition to the proposed Ruberslaw viewpoint. (1) Cauldcleugh Head is a Donald (a hill >2000' in the Southern Uplands) and the nearest hill listed in the Scottish Mountaineering Club's tables, lying within 10km of the nearest proposed turbine. (2) Although mention is made of the Pennine Way, no viewpoint is proposed on it. This is odd since a more distant viewpoint on the less well known St Cuthbert's Way *is* proposed for inclusion. A viewpoint on or between Brownhart Law and Scraesburgh Fell (neither of which is on the Pennine Way but both of which are ascended from it for their views) would be around 13km from the nearest proposed turbine.

It is difficult to make use of the list of cumulative developments (Appendix 2) since it does not include the names or grid references of consented/proposed developments and they are not shown on a map. It is not clear to us that the list is up to date. It also includes small local developments which should surely be scoped out.

We hope that these comments will be helpful.

Yours sincerely

David Gibson
Chief Executive Officer