



The Mountaineering Council of Scotland

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Dear Sirs

Upper Sonachan Wind Farm

Response to request for Environmental Scoping Opinion

1. Introduction

We welcome the opportunity to comment on issues to be considered in the environmental impact report regarding Skylark Energy's proposed wind farm of up to 20 turbines of up to 136.5m blade-tip height southeast of Portsonachan, Loch Awe. (Skylark Energy is a collaboration between Ecotricity and Skanska.)

We comment here only on those matters where we are not in agreement with the proposed assessment as set out in the Scoping Report.

2. The Mountaineering Council of Scotland (MCOFS)

The MCOFS is an independent organisation with over 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 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 position statement [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 only to around one in twenty applications.

3. Specific Comments

The site lies almost entirely outside the Area of Search defined by Argyll & Bute Council for large scale turbines (Proposed LDP Wind Farm Policy Map). Any application for this location will need to justify why (other than a pliant landowner) the scheme should be located here, north of the Area of Search, rather than a location further south being identified, which would be outside the Area of Panoramic Quality and less proximal to Wild Land Areas and the key national mountain assets of Ben Cruachan and Ben Lui, without being closer to the national mountain assets of the Arrochar Alps.

Viewpoints

The absence of any viewpoint on Ben Cruachan, the closest Munro to the proposed development at c.10km distance is remarkable. The 1126m summit should be included as a viewpoint.

It is odd that Ben Dorain (31 km distant) is proposed as a viewpoint but Ben Lui (20 km) has been discounted. The selection of Ben Dorain over Ben Lui appears biased and should be reversed. Our substantial experience of assessing environmental statements and viewing operational wind farms suggests that even the most technically perfect photomontages do not represent the real visual impact of wind farms at distances much beyond 20km. We are not suggesting there is no visual impact of wind farms beyond 20km, but photography cannot demonstrate it.

The selection of the minor Munro Ben Vane over its more frequently climbed neighbours appears also to be odd. We suggest that it be replaced by The Cobbler (a Corbett), probably the most popular hill in the Arrochar Alps.

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 largely 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 The bulk of this report is an analysis of mountaineers' reactions to wind farms which is also relevant to assessment of the proposed development.

4. Conclusions

We have suggested some modest improvements to the proposed EIA which would enable the MCoFS to make a proper assessment of the proposed development's potential impact upon the mountain landscape and mountaineering experience. On our initial assessment, it appears unlikely that a wind farm with turbines of the size proposed (cf Ben Ghlas, 60m BTH) can be developed in the location proposed without detriment to nationally-significant mountaineering assets. 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