



The Mountaineering Council of Scotland

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Dear Sir

ELECTRICITY ACT 1989

THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2000

RESPONSE TO SCOPING OPINION REQUEST FOR PROPOSED SECTION 36 APPLICATION FOR THE OURACK WIND FARM, IN THE PLANNING AUTHORITY AREA OF THE HIGHLAND COUNCIL

1. Introduction

We welcome the opportunity to comment on issues to be considered in the environmental impact report regarding Vattenfall's proposed wind farm of up to 50 turbines of over 100m blade-tip height north of Grantown-on-Spey. Our comments reflect our members' interests and therefore primarily relate to visual impact and its consequences. 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.

We object 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 *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.

3. Specific Comments

We consider that the environmental impact assessment will need to address the following issues.

- a) The landscape of the proposed development is not exceptional but is of sufficient merit to justify being part of a Special Landscape Area, the qualities of which have already been compromised by consented developments in or near to its western and eastern arms. The proposed development would appear to risk inflicting terminal damage upon the visual amenity of the SLA.
- b) The proposed development abuts the Cairngorms National Park. Although distant from the core mountain areas, it has potential impacts upon distinctive and popular outlying hills such as Ben Rinnes.
- c) The proposed development would substantially intensify wind farm development in the area, extending the wind farm landscape of upland Moray further west. It is close to already operational or consented wind farms and will often appear in the same angle of view. The 'area of interest' mapped indicates that an opportunity is being lost to merge the proposed development with existing wind farms as a single consolidated design. Separation of wind farms by a few kilometres creates a situation where developments are neither sufficiently distanced to be distinctly separate nor close enough together to appear as a single (albeit spatially extensive) feature. How cumulative impact is handled will be the key feature for the EIA.
- d) We welcome the number of preliminary viewpoints that represent hillwalker or recreational walker receptors. However, there are two omissions. (1) The Knock of Braemoray is a distinctive small peak very close to the proposed development and should be included. Proposed Viewpoint 12 could be dropped to accommodate this since there are several other low ground viewpoints included in the same area. (2) There is no representation of hills listed by the Scottish Mountaineering Club (SMC) to the west of the proposed development. Carn nan Tri-tighearnan and Carn Ghlas Choire are both designated as Grahams in the SMC list and lie within 10-20km from the proposed development, close enough to see blade movement. Either could be included but we suggest the latter as it is closer. To compensate, Viewpoint 13 could be dropped. It is 32km distant and technology simply doesn't reproduce real-life impacts at that distance.
- e) It is regrettable that the assessment of tourism impacts will rely upon a document published in 2008 and not updated since despite a substantial and rapid change in context since its fieldwork was undertaken in 2007. In 2007 there was 1150MW of installed onshore wind capacity in Scotland; at October 2015 there was 4.4 times this level operational and in total 8.3 times this level consented (DECC Renewable Energy Planning Database). This is equivalent, in terms of the increase, to assessing road impacts in 2015 using 1951 vehicle numbers.

4. Conclusions

The key visual impact issue for the EIA will be how cumulative impact is handled. In general a pattern of high turbine density in a smaller number of areas would minimise total visual impact across the country compared with the dispersed pattern of small wind farms with extensive total visual impact that the Scottish planning system has encouraged.

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