



**The Granary
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Perth PH1 5QP
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By email to
eplanning@highland.gov.uk

FAO Ms Claire Farmer

5th July 2019

Dear Ms Farmer

Scoping opinion for proposed Bad Fearn Wind Farm - comprising of up to 10 turbines and associated infrastructure, with tip heights of up to 200m, and an installed capacity of up to 49.9mw, including associated electrical infrastructure, on land at Braemore Road, Dunbeath.

Reference Number: 19/02927/SCOP

Energiekontor UK Ltd has submitted an EIA Scoping Report for a potential wind farm at Dunbeath, Caithness. The proposal is for up to 10 turbines of up to 200m BTH generating 49.9 MW, just under the S.36 threshold. The proposed site is the northern part of a previous S.36 application by a different developer – Dunbeath Wind Farm, 17 turbines of 125m blade-tip height, generating capacity 51MW – which was refused by Scottish Ministers in 2015.

The area is not completely lacking in wind farm development. There is an operational wind farm at Buolfuich, c.5 km to the NE, comprising 15 turbines of 70m BTH. There is a consented cluster at Hill of Lychrobbie, <5km to the E, comprising 3 turbines of 50m BTH.

Mountaineering Scotland has reviewed the Scoping Report from the perspective of its members' interests and has the following observations.


1. The site is within 10km of Morven and even closer to other key hills of this distinctive range. It will affect views from and of the range. The interests of our members are therefore engaged.
2. Morven and East Scaraben are proposed as viewpoints. This is appropriate.
3. The ZTV shows substantial potential visibility of the development from the north with no proposed viewpoints. We suggest that Ben Alisky would provide a suitable elevated viewpoint, c.10km to the northwest. THC may wish to consider whether an additional viewpoint further north on the A9 may also be desirable to reflect impact upon views of the Morven range.
4. We note that Viewpoint 8 is mislabelled: it is on the A99 not the A9.
5. An unaware reader of the Scoping Report may form a misleading impression from paragraph 3.5's reference to "other sites currently within the planning system which are located close to the proposed development". We are unaware of any closer than 10km. There are a number within 20km, which sit in a very different context than the proposed development.
6. The detailed focus for cumulative assessment is proposed as 15km. This is too limited for a development of the scale proposed. A minimum of 25km is required to ensure relevant sites

are included, bearing in mind that blade rotation is easily visible in the field at 30km with rotors of 100m diameter and the proposed development envisages rotors 170m in diameter.

7. The site abuts the Causeymire - Knockfin Flows Wild Land Area but the Scoping Report makes no mention of a wild land assessment. One is required.
8. Paragraph 6.8 does not make any sense as written – “[the WLA] which extends 514km to the north, west and south-west of the site ...”. The longest axis of the WLA is c.35km.

We hope that you find these comments helpful in your consideration of this proposal.

Yours sincerely

A handwritten signature in black ink that reads "D. Black". The signature is written in a cursive style with a large, looped initial 'D'.

Davie Black
Access & Conservation Officer
Mountaineering Scotland