

By email to: Econsents_Admin@gov.scot

Ms Nicola Kennedy
Energy Consents Unit
The Scottish Government
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19 July 2023

Dear Ms Kennedy

Carn Fearna Wind Farm, Little Wyvis, nr Garve: Environmental Impact Assessment Scoping Report
ECU reference: ECU00004851

Background and Context

1. Statkraft has applied for a scoping opinion for a wind farm on the southern shoulder of Little Wyvis, above Garve. The scoping proposal is for 14 turbines of 200m BTH.
2. Mountaineering Scotland is a membership organisation with more than 16,000 members and is the only recognised representative organisation for hill walkers, climbers, mountaineers and ski-tourers who live in Scotland or who enjoy Scotland's mountains. We represent, support and promote Scottish mountaineering, and provide training and information to mountain users for safety, self-reliance and the enjoyment of our mountain environment.
3. A windfarm proposal at this site under the name of Carn Gorm was previously refused in 2014 after a Public Local Inquiry, at which Mountaineering Scotland was represented. The Carn Fearna proposal covers essentially the same area as Carn Gorm, slightly expanded. The refused application was for 14 x 115m BTH.

Assessment

3. Mountaineering Scotland's concern at this stage is ensuring that the proposed viewpoints will allow a comprehensive assessment of the proposed development from a mountaineering/hillwalking perspective should an application be made.
4. The proposed site is a shelf of moorland and rough grazing on the south shoulder of Little Wyvis with an intricate topography of multiple small knolls and hollows and is very visible from surrounding hills and from low ground. The site is partly within the tip of a Wild Land Area and a Special Landscape Area.
5. There are operational wind farms within 10km to the west and to the south, and slightly further to the north-east, with another application in planning and two others in scoping.
6. There are five hill viewpoints proposed, and it is unfortunate that distances from the proposed windfarm are not given in the Scoping Report to allow for better judgement. We endorse the

viewpoints 10, 11, 12 and 20. We propose that Am Faochagach (NH303793) be used instead of Ben Dearg (viewpoint 19) since both are Munros but the former is closer to the proposed development. This list omits any viewpoint in the Fannichs, which are a very popular range of hills to the west. We suggest the Munro An Coileachan (NH241680) be included to assess cumulative impact with the Lochluichart/Corriemoille cluster.

7. Please note that comments regarding viewpoints are based on the ZTV in Figure 6.4 which has other shadings superimposed making it very difficult to read and impossible to zoom for detail without pixellation making it indecipherable.

8. We note that the Scoping Report refers several times to drawing on information gathered as part of the previous 2013 planning application for the same location (under the name Carn Gorm) but makes no reference to that application having been refused planning permission at PLI. We request that any new application show how it has addressed the specific reasons for refusal in 2014.

Yours sincerely



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