

By email to: Econsents_Admin@gov.scot

Stephen McFadden
Consents Manager
Energy Consents Unit
The Scottish Government

10 September 2019

Dear Sir

Kintradwell Windfarm, near Brora, Sutherland

Reference: ECU00001927

RES Ltd has submitted an EIA Scoping Report for a potential wind farm at Kintradwell, near Brora Sutherland. The indicative layout is 22 turbines of up to 149.9m BTH. Turbine bases would mostly be around 400-530m OD, occupying the highest ground within the proposed development site. The site is wholly within the Loch Fleet, Loch Brora and Glen Loth Special Landscape Area.

The proposed site is in close proximity to (c.2km east of) the operational 35-turbine Gordonbush wind farm, which has a consented 15-turbine extension. A revised planning application reducing the consented extension to 11 turbines but increasing their size from 130m to 149.9m BTH is awaiting decision. A little further away to the south (c.10km) is the operational 27-turbine Kilbraur wind farm and extension.

Kintradwell is also near to the West Garty wind farm site (c.6km NE) which was refused by Scottish Ministers in October 2018 because of its “significant detrimental landscape and visual impacts”. Further north (c.13km NE) is the proposed 5-turbine site of Navidale which is at appeal having been refused by Highland Council. Note that this last is omitted from Figure 5.3.

Mountaineering Scotland objected to the latter two applications on the basis of their impact on Morven and the wild hill experience thereabouts, and in the case of West Garty also its impact on Ben Dhorain, a Graham south of Glen Loth.

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

1. The ridge-top layout lessens topographic screening and gives visibility across a wide extent of hill and wild land, including Morven just under 20km away and the Graham, Ben Dhorain, 3.5km away. The interests of our members are therefore possibly potentially engaged.
2. Morven is not included in the proposed viewpoints. **Morven should be a viewpoint** and assessment of visual impact upon from a mountaineering perspective it will be pivotal to the position Mountaineering Scotland takes on any future application.

3. From many directions the proposed development will be seen in the same angle of view as Gordonbush. The visual relationship between the two developments will be a very important consideration, bearing in mind the potentially greater prominence of the higher-altitude Kintradwell site.
4. Para 5.3.15 proposes cumulative impact assessment be limited to within 20km of the site. This is inappropriately tight. It excludes the substantial level of activity around Lairg and the proposed spread southwards of the Caithness wind farms at Dunbeath. **A limit of 35km for cumulative assessment, aligning with the LVIA limit, should be used.**
5. The ZTV map (Figure 5.1) uses misleading shading. As SNH Guidance notes: “Darker colours tend to read as portraying greater visibility than lighter colours ...”.¹ Figure 5.1, however, uses its lightest shading for the greatest number of turbines visible and its most eye-catching colour for the lowest band of visibility. It would be more helpful to interpretation if this was not repeated in the EIA Report.

Yours sincerely



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

Davie Black
Access & Conservation Officer
Mountaineering Scotland

¹ SNH. Visual Representation of Wind Farms: Guidance. February 2017. Paragraph 60.