

By email to: [Econsents\\_admin@gov.scot](mailto:Econsents_admin@gov.scot)

Energy Consents Unit  
Directorate for Energy and Climate Change  
5 Atlantic Quay  
150 Broomielaw  
Glasgow  
G2 8LU

2 May 2022

Dear Sir/Madam

**Bunloinn Wind Farm - S36 application for 10 turbines above Loch Loyne, west of Invergarry.**

**ECU reference: ECU00003304**

### **Background and Context**

1. Energiekontor, has applied for consent to build a wind farm of 10 turbines of 200-230m BTH above Loch Loyne, west of Invergarry. Six turbines would be of 230m and four of 200m, with hub heights of 145m and 115m respectively.
2. Mountaineering Scotland **objects** to the proposed development on grounds of visual impact.

### **Mountaineering Scotland**

3. Mountaineering Scotland is a membership organisation with more than 15,000 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.
4. Mountaineering Scotland supports the move to a low carbon economy but does not believe that this need be at the expense of Scotland's marvellous mountain landscapes. It objects only to the small proportion of proposals that are potentially highly damaging to Scotland's valuable mountain assets, consistent with its policy set out in Respecting Scotland's Mountains. This approach has been strongly endorsed by its members and by kindred organisations such as The Cairngorms Campaign, North East Mountain Trust and The Munro Society.

## **Material considerations**

### **a) Introduction**

5. A few prefatory observations are made here.

a. The final column of the EIAR Table 3.1 (following para 3.15) is headed 'Tip Height (m)'. We have assumed it should read 'Hub Height (m)'.

b. In hill lists Beinn Loinne's summit (west top) (789m) is also known Druim nan Cnamh with Beinn Loinne being used for the slightly lower east top (775m). To avoid any confusion in this representation we follow the LVIA usage and refer to the hill as a whole as Beinn Loinne. Para 11.104 is confused since it refers to Beinn Loinne (775m) as the Corbett summit 'within the site'. The east top is in the site but not the Corbett summit.

c. Some of the baseline photography is poorer (cloudier/hazier) than would be ideal. As a consequence, the photomontaged turbines, faded to match the atmospheric conditions of the photography, understate how visible the proposed turbines would be in good conditions.

d. The ZTV maps use lighter colours to show greater visibility and darker colours to show lesser visibility. This is contrary to the guidance issued some time ago by NatureScot and which most applicants follow.

### **b) Policy**

6. Scottish planning and energy policies are in a state of change. The extant policies will have been superseded by NPF4 and a new Scottish Energy Strategy (SES) by the time a decision is made on this application. But NPF4 is currently only in consultation draft and the SES not even at that stage. Bunloinn, therefore, cannot sensibly be assessed against either current or future policy other than at a very general level.

7. The Scottish Government enthusiastically supports continued onshore wind deployment and we expect that to continue. However, policy (extant and in draft) is clear that expected economic and emissions benefits are to be balanced against potential harms in the determination of an individual planning application.

8. Each development needs to be judged on its own merits and in its geographical context. Decision-makers are not bound by national energy and planning policies to consent any particular scheme for electricity generation if its anticipated benefits are outweighed by its anticipated negative consequences. There are many possible locations suitable for low-carbon electricity generation. The adverse consequences of an individual scheme, however, are site-specific and should weigh more heavily in the balance because of this.

### **c) Landscape and visual impact (including cumulative impact)**

9. Landscape and visual impact assessment (LVIA) compiles data and presents results within an objective structure but ultimately applies subjective judgement, whether professional or consumer. In our experience, commissioned assessments consistently downplay the impact of proposed development. Mountaineering Scotland's assessment has been informed by the compilers and reviewers of this objection having extensive experience on Scottish and other hills, and 'fieldwork' in the hills around the development site over many years. We do not suggest that either professional or consumer judgement trumps the other; simply that each has a distinct place in informed decision-making.

10. As lay consumers of mountain landscapes, we find the professional distinction drawn between the various landscape and visual impacts often rather theoretical and the segmentation of landscapes for analysis to weaken the overall perspective. Hillwalkers experience landscape as a total experience, not separated into component parts. That is how we approach our assessment and we would hope that the decision-maker would take a similar holistic approach.

11. Paragraph 4.3 of the EIAR sets out the rationale for the site selection.

"Key reasons for the selection of this site was its topographical screening from Beinn Loinne, which limited visual impact predominately to the north and the north-east. The hill summit of Meall Odhar ... has also provided partial screening to the south. Effectively, the Site is located in a topographic 'bowl' which provides good wind conditions from a prevailing south-south-westerly direction. Wind speeds were also an important factor in the selection of the Site."

12. This rationale stretches the meaning of 'topographic bowl' well beyond breaking point. The site is located on the flanks of Beinn Loinne, which does provide screening to the north and northwest (not northeast (cf Viewpoints 4 & 8))<sup>1</sup>, though blades would be visible from most of the main summits in this direction and hubs from the highest summits (e.g. Vpt 5; cf Table 6.15). The minor ridge of Meall Odhar provides only limited screening of some turbines, with all hubs and the greater part of most towers visible from any elevated viewpoint, which here includes the high road between Glen Garry and Glen Moriston (cf Vpts 1 & 2 at only 2-3km distance).

13. It might be argued that visibility of only some blades and hubs is a minor impact. We disagree. Even a small number of moving blades in an otherwise uninterrupted view is a substantial visual distraction. This is especially so when they appear clearly separate from other wind farms, as they would here. This effect is probably at its worst at Sgurr nan Conbhairean (Vpt 5) because of its proximity.

14. From the west and south, Bunloinn would represent a further incremental westward step of the wind farm landscape west of Invergarry. It would appear nearer than existing development in the background from viewpoints to the west (e.g. Vpt 12, which also gives a general, though more distant, impression of the view from the east end of the Cluanie ridge and from the Glenquoich Munros). It would appear separate when viewed from the south (e.g Vpts 9 & 10). Viewpoint 9 also gives a general impression of the adverse impact on the view from the Loch Lochy Munros and the east Loch Arkaig Corbetts. At present there are long-distance views from north or south looking across Ben Loinne to the hills beyond from hills within 10-15km, uninterrupted by human intrusion, with existing wind farms sitting to the side of the view. This would be markedly and adversely changed if Bunloinn WF was consented.

15. A somewhat similar impact would be experienced at close range from Meall Dubh (Vpt 6), where the views west and north towards undeveloped hills are the main visual attraction and Bunloinn would occupy the foreground of views to the west, appearing quite separate from Beinneun WF. The visualisations from this Viewpoint fail to capture the primary view looking just north of west along Loch Cluanie framed by Beinn Loinne on one side and the Sgurr nan Conbhairean group on the other, with the eye drawn further west to the Cluanie and Kintail hills. Beinneun wind farm is a noisy distraction but sits slightly to the side of this prime view: Bunloinne would sit in it. The reverse effect would be seen from Vpt 3, at close quarters, from Beinn Loinne. This might be somewhat moderated by the Beinneun and Millennium turbines forming a backdrop but the proximity and size of Bunloinn's turbines would make them dominating, with the highest blade tips barely below the eye level of the viewer. Beinn Loinne summit is 789m AOD and the highest (and nearest) blade tip reaches 750m AOD (Turbine 10); the other turbines of the western group also appear high and prominent (Turbines 7-9 with blade-tip altitudes of 720-760m AOD).

16. With the exception of Meall Dubh, all the Viewpoints and hills referred to in the preceding paragraphs are in areas identified for their landscape and/or wild land quality.

17. Eight of the 12 Viewpoints within 20km are of relevance to hillwalkers and the LVIA assesses six of them as significantly visually affected by Bunloinn – experiencing both solus and cumulative impacts (Vpt 3, 4, 6, 8-10). It is our judgement that the other two 'walker' viewpoints within 20km

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<sup>1</sup> This screening to the north and northwest is correctly described at para 6.16 of the LVIA.

would also experience adverse visual impact. For Viewpoint 12 this is because of the scale of the turbines as they encroach further west than existing development, which would sit at the rear of the view with their turbines almost 100m shorter. For Viewpoint 5 it is because of the interruption of spectacular long distance views by flickering blades appearing above the Beinn Loinne horizon. The kinetic visual intrusion of even a few blades would have a disproportionate impact in this context.

18. The specific analysis for mountain summits (Table 6.15) is welcomed but it understates the potential impact of Bunloinn. Even so, it judges that seven of the 14 individual or groups of Munros and Corbetts, mainly those to the south and west, would experience a significant effect, both solus and cumulative. Figure 6.13 shows slivers of visibility of Bunloinn to the northwest where existing wind farms (more distant and smaller) are not visible. It might seem that such slivers and the visibility only of blades and an occasional hub are unimportant, but they represent a continuing salami-slicing attrition of the landscape's visual quality by the spread west of wind developments in this area.

19. The LVIA text several times makes the point that the existing Millennium and Beinneun wind farms are located at a higher elevation than Bunloinn would be. It is true that the bulk of the existing turbines are at a higher elevation but the elevation range of Bunloinn overlaps with the existing wind farms. Bunloinn's turbine bases would be at c.360-550m; Beinneun's are at c.420-630m; and Millennium's at c.460-700m AOD. Because of the greater height of the proposed Bunloinn turbines, the blade-tip altitudes would be very similar: Bunloinn c.560-760m; Beinneun c.560-770m; Millennium c.580-820m. They would certainly be perceived as similar by a viewer from many angles (cf Vpts 3, 5, 9, 10), though not all.

20. To sum up, notwithstanding the substantial number of significant adverse effects found in the LVIA, it still underplays the significance of the adverse visual and perceptual impacts upon the hills around the development area, including some to the north such as Sgurr nan Conbhairean (Vpt 5). It overplays the benefit of the topographical screening of the site, though we acknowledge that it is substantial to the northwest. It will be perceived as a significant step westward in wind farm development in this area, which is presently clustered around the relatively discrete Meall Dubh massif, crossing the Loch Loyne 'gap' onto the foothills of the larger hills to the west.

21. This will destroy the 'gateway' effect currently experienced as one rises out of the Glen Garry forests to see the enticing open mountain landscapes of the west. Instead, one will simply see yet another randomly placed windfarm.

#### **d) Socio-economics**

22. Mountaineering Scotland does not disagree with the general proposition that well-sited wind farms have no effect on tourism. But this is a broad generality. There are two major flaws to such a generalisation. First, there has been no study of the impact of wind farms in different types of landscape other than Mountaineering Scotland's reanalysis of Biggar Economics' data which showed a possible negative effect in locally designated landscapes<sup>2</sup>. Second, there has been no study of the impact of wind farms upon different segments of the tourism and recreation market other than Mountaineering Scotland's own survey of its members which suggested a significant minority of hillwalkers were choosing to avoid areas with wind farms<sup>3</sup>.

23. The tourism assessment in the EIAR simply follows the well-trodden path of using general statistics and an arbitrary selection of surveys and dated research to deny any possibility of an impact upon tourism. It addresses neither of the above points, which are highly relevant to a

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<sup>2</sup> Gordon, D. Wind Farms in Scenic Areas Damage Tourism. (Sep. 2020)

<sup>3</sup> Gordon, D. Wind Farms and Tourism in Scotland: A review with particular reference to mountaineering. Mountaineering Scotland. (Nov. 2017). See Table 1.

proposal for a wind farm such as Bunloinn which would impact upon wild and scenic mountains that attract those who might be particularly sensitive to such built development.

24. We are at a loss to follow the logic of the Tourism and Recreation assessment impact matrices that enable the conclusion to be reached that the many significant adverse visual impacts (solus and cumulative) on Munros and Corbetts shown in Table 6.17 translate into almost no significant adverse recreational impacts. The Tourism and Recreation author appears to be of the view that only visual effects reaching a very high threshold can translate into a significant recreational effect. We do not share this view and are not aware of any evidence to justify it. The LVIA assessment of Munros and Corbetts identifies multiple significant adverse visual impacts and appears to us much more likely to correctly anticipate the response of hillwalkers - highly sensitive receptors paying attention to the landscape - albeit we think the LVIA underplays some of the effects.

25. The decision-maker should ignore the Tourism and Recreation chapter's assessment of Munros and Corbetts (notably at paras 11.166, 11.172, 11.174 and 11.180). Even within itself the chapter is inconsistent since the overall conclusion at para 11.180 is inconsistent with paras 11.166 and 11.172. This is sadly typical of the superficial way in which all wind farm applicants 'assess', only to dismiss, impacts on mountaineering tourism and recreation.

### **Conclusion**

26. Mountaineering Scotland has carefully assessed the proposed development. It would have a substantial adverse visual impact upon hillwalkers in the the surrounding hills, albeit with the impact moderated across much of the northwestern quadrant where the development is often effectively screened.

27. This adverse impact is a direct effect of the location of the proposed development and cannot be mitigated.

28. Mountaineering Scotland **objects** to the proposed Bunloinn Wind Farm.

Yours sincerely



**Stuart Younie**  
CEO, Mountaineering Scotland

