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Ms Carlyne Paton  
Senior Case Officer  
Energy Consents Unit  
The Scottish Government  
Energy Consents Unit planning reference: ECU00003304  
Sent by email: [Carolyne.Paton@gov.scot](mailto:Carolyne.Paton@gov.scot)

13 October 2022

Dear Ms Paton,

### **Objection: Bunloinn Wind Farm and battery storage proposal**

It is with regret that we note our objection to the application submitted by Energiekontor UK Ltd seeking approval and deemed planning permission for the construction and operation of the 10 turbine Bunloinn Wind Farm (Energy Consents Unit reference ECU00003304).

We are a conservation charity that supports the Scottish Government's net zero emissions target. We also support the continued protection of Scotland's wild land as a finite national asset that contributes to the health and wellbeing of present and future generations and has significant potential to naturally store millions of tonnes of carbon dioxide annually through peatland restoration and native woodland regeneration, as well as boosting biodiversity and reinvigorating rural communities. We are objecting to this application principally because of its adverse impact on nationally important wild land.

### **Specific points of objection**

#### **Adverse impact on wild land qualities**

1. We wish to note our support for the conclusion of NatureScot, in their response dated 29 July 2022, that the proposed development would have a significant adverse impact on the wild land qualities of the WLA.18 Kinlochhourn – Knoydart – Morar and WLA.24 Central Highlands ('WLAs') both during the day and at night as result of aviation lighting. The siting of the proposed development in the narrow area between the WLAs would compromise the prevailing '*sense of remoteness*' created by the connectivity between the WLAs and the absence of human artefacts visible from the mountain and ridge tops within the wild land areas (WLQ1. WLA.24 Central Highlands). This connectivity between the WLAs is a fundamental aspect of WLQ1 in both WLAs. It is for the applicant '*to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting,*

*design or other mitigation'* (SPP2, Table 1 and paragraph 215). In their guidance for assessing impacts on Wild Land Areas (published December 2020), NatureScot states '*[w]here effects are identified that result in a material change in the experience of any of the wild land qualities, this is considered to be significant.*' In our submission, the Applicant has not demonstrated that the significant effects on the wild qualities of both the WLAs can be substantially overcome.

2. The impacts of wind energy development on Scotland's wildest areas includes the night-time visual impacts from the steady red glow of wind development aviation lighting under formerly dark skies. The sensitivity of the site and surrounding upland area is acknowledged in the night-time aviation assessment report as '*high-medium given the partial overlap with the Central Highlands WLA and the locally designated Moidart, Morar and Glen Shiel SLA to the north and west of the LCT.*' We agree with NatureScot's conclusion that '*[t]he requirement for visible aviation lighting on six turbines would also result in significant night-time effects on the attribute of naturalness which underpins WLQ1*'.

### **Encroachment of industrialisation westward**

3. As clearly demonstrated by Viewpoint 17 Ben Nevis (Figure 6.35b) the proposed development would appear separate from existing nearby developments to the east of the site and would therefore represent a clear encroachment westward of the wind farm landscape. In this respect we support the response submitted by Mountaineering Scotland dated 2 May 2022; the proposed development would contribute to the attrition of the landscape's visual quality by increasing the spread west of wind developments in an area surrounded by the top 10% of wildest areas in Scotland.

### **Design iteration**

4. We recognise the design evolution of this scheme has led to a reduced number of proposed turbines and changes to individual turbine positions. We welcome that consideration has been given to impacts on golden eagle and that the position of turbines has been adjusted in the final layout to allow a foraging corridor for golden eagles. However, despite this mitigation, the fact remains that this wind farm is proposed as being sited in golden eagle foraging habitat with consequential loss to that habitat. The presence of golden eagles is an additional clear indication of the wild value of this site to an iconic native species.

In conclusion, on the basis that there is a need for protection of Scotland's wild land as a finite national asset that can support the country's net zero commitment, and for the reasons stated above, we believe that this development should be refused.

Yours sincerely,

The John Muir Trust