

Agenda Item	<b>6.2</b>
Report No	<b>PLS-08-25</b>

## HIGHLAND COUNCIL

**Committee:** South Planning Applications Committee

**Date:** 06 February 2025

**Report Title:** 23/02462/S36: Loch Liath Wind Farm Limited  
Land 9000M SW Of Glenurquhart High School  
Balmacaan Road,Drumnadrochit

**Report By:** Area Planning Manager – South

### Purpose/Executive Summary

**Description:** Loch Liath Wind Farm - Erection and operation of a wind farm for a period of 35 years, comprising a total of 13 wind turbines with Turbines 2, 3, 4, 5, 8, 9, 10, 11, 12, and 13 having a maximum blade tip height of 200m, and Turbines 1, 6 and 7 having a maximum blade tip height of 180m, access tracks, borrow pit, substation, control building, anemometer mast, and ancillary infrastructure.

**Ward:** 12 – Aird and Loch Ness

**Development category:** National Development (Section 36 Application)

**Reason referred to Committee:** National Development (Section 36 Application)

All relevant matters have been taken into account when appraising this application. It is considered that the proposal does not accord with the principles and policies contained within the Development Plan and is unacceptable in terms of applicable material considerations.

### Recommendation

It is recommended that the Council **Raise an Objection** to the proposal as set out in section 11 of the report.

## 1. PROPOSED DEVELOPMENT

1.1 The Highland Council has been consulted by the Scottish Government's Energy Consents Unit (ECU) on an application made under Section 36 of the Electricity Act 1989 (as amended). The proposed development comprises:

- Up to 13 wind turbines, ten turbines (T2, T3, T4, T5, T8, T9, T10, T11, T12 and T13) will have a maximum blade tip height of up to 200m and three turbines (T1, T6 and T7) will have a maximum blade tip height of up to 180 metres;
- Visible aviation warning lights, anticipated to be fitted on six turbines (T1, T4, T7, T10, T12 and T13);
- Turbine foundation and associated crane hardstandings and adjacent laydown areas at each turbine location (50m x 20m);
- 9.3 kilometres (km) of new access track comprising 8.2km of standard/cut track and 1.1km of floating track, with access to be taken via the Bhlaraidh Wind Farm access from the A887, utilising around 17.3km of existing track;
- Nine new watercourse crossings and seven drain crossings (16 crossings in total);
- Onsite underground electrical cables and cable trenches connecting to a new onsite substation; these will be laid in trenches along the access tracks;
- Onsite substation and control building (typical form shown in EIAR Figure 4.12); substation compound measures 120m x 70m with a 2.1m high fence (typical layout shown in EIAR Figure 4.7); and
- A steel lattice anemometer mast, measuring up to 122.5m in height.

To support construction the following elements are proposed:

- A temporary construction compound (approx. 50m x 50m), this will be located to the south of the substation (see EIAR Figure 4.1);
- Creation of a temporary borrow pit for the extraction of stone (200m x 40m);
- An onsite concrete batching plant, likely to be located either in the borrow pit or construction compound; and
- Restoration of all temporary working areas.

1.2 The grid connection from the on-site substation to the National Grid would be subject to a separate consent application by the Network Operator. Details of the grid connection are currently undefined.

1.3 The proposed development will be accessed via the A887. The access will then follow the existing Bhlaraidh Wind Farm track, before accessing the turbine area. Some minor upgrades may be required to facilitate the delivery of the abnormal loads. The port of entry for turbine blades is expected to be Kyle of Lochalsh, with the blades being delivered to site via the A87(T) and A887(T). All other components arriving by sea are anticipated to be delivered to Corpach and routed to the site via the A830(T), A82(T) and onto the A887(T). A Construction Traffic Management Plan (CTMP) will be implemented to minimise disturbance on the local road

network.

- 1.4 The applicant has requested a micro-siting allowance of 50m for site infrastructure (tracks, turbine locations, underground cables and crane hard standing areas). This is to avoid or minimise environmental or engineering constraints identified during pre-construction ground investigation or construction phase excavation works. Any movement of infrastructure will be subject to advice from an Ecological Clerk of Works (ECoW). The final design of the turbine (colour and finish), aviation lighting, ancillary electrical equipment, landscaping and fencing etc. are also expected to be agreed with the Planning Authority by condition at the time of project procurement. Whilst indicative drawings for these elements are set out in the application, turbine manufacturers regularly update the designs that are available, thereby necessitating the need for some flexibility in the approved design details.
- 1.5 The applicant anticipates that the wind farm construction period will be 18 months. A Construction Environment Management Plan (CEMP) will be in place during the construction phase. The CEMP will also contain a Pollution Prevention Plan, Construction Method Statements, a Peat Management Plan (PMP) (see outline PMP at EIAR Appendix 7.3), a Site Waste Management Plan, a Construction Traffic Management Plan, an Access Management Plan (outline submitted - Appendix 13.1) and a Site Restoration Plan. Working hours for construction will be from 07:00 to 19:00 Monday to Friday and 07:00 to 13:00 on Saturday. No working is proposed on Sundays and public holidays unless otherwise agreed.
- 1.6 The wind farm has an expected operational life of 35 years. Following this a further planning application would be required to determine any future re-powering proposal the site, which may include retention of the development. If the decision is made to decommission the wind farm, the detailed method and extent of the decommissioning activities would need to be agreed via a decommissioning method statement. Decommissioning is expected to take approximately 12-18 months.
- 1.7 Whilst public consultation for Section 36 applications is not mandatory, the applicants carried out pre-application consultation. Due to Covid-19 restrictions the first public exhibition was held online between 21 May and 14 June 2021. This was advertised by a leaflet drop; press advert and social media and a project website was also established. A freepost reply card, and an 0800 phone number was also available for those who were unable to participate online. A second round of public exhibition comprised in-person events in addition to a virtual exhibition. These took place at Cannich Village Hall, Glen Urquhart Public Hall and Glenmoriston Millennium Hall during August and September 2022. This was also accompanied by a leaflet drop and a survey reply card. Details of this are provided within the submitted Pre-Application Consultation Report.
- 1.8 The applicant sought formal pre-application advice from the Planning Authority in 2019/2020 (19/05014/PREMAJ). The scheme presented at the pre-application stage was for between 15 and 30 turbines, and tip heights of 149.9m and 180m. The Planning Authority's pre-application response noted that the scheme was unlikely to be supported, siting landscape and visual impact concerns, particularly in relation to: the summit of Meall Fuar-mhonaidh and the need to preserve mitigation secured through other wind farm schemes; impact on views of Urquhart

Castle from the loch; impact on views from Loch Tarff and B862 at Suidhe. It was advised that a further increase in blade tip height and number of turbines would increase the visual impact of the proposal and potentially have an impact on with qualities of the wild land area, special landscape area and national scenic area. Concerns were also raised that the turbines would not be in keeping with the existing pattern and would require visible aviation lighting. Other matters advised to be addressed related to peat impacts, biodiversity enhancement, water environment, ornithology, cultural heritage, roads network and wider public access.

- 1.9 The application is supported by an Environmental Impact Assessment Report (EIAR), the contents of which has been informed through an EIA Scoping exercise. The EIAR includes chapters on the EIA Process and Methodology, Planning Policy; Site Selection Design and Alternatives; Carbon Balance; Landscape and Visual Impacts (including ZTVs, wireframes and visualisations); Geology, Hydrology, Hydrogeology and Peat; Ecology; Ornithology; Cultural Heritage; Noise and Vibration; Traffic and Transport; Socio-Economics, Tourism and Recreation; other matters including Aviation, Shadow Flicker and Telecommunication Infrastructure and a Schedule of Mitigation. The application is also accompanied by Technical Appendices, a Pre-Application Consultation Report (PAC), an EIA Non-Technical Summary (NTS), a Design and Access Statement, and a Planning Statement.
- 1.10 Variations: No variations have been made to the application during the course of the application. However, further information was submitted in October 2024. The information is contained within the applicant's Supplementary Environmental Information (SEI) Report and supporting figures and appendices and comprises the following:
- Further peatland restoration areas and information to address NatureScot's response;
  - Additional material and assessment of cumulative impacts of the Proposed Development; and
  - Supplementary information with respect to securing socio-economic benefits as part of the Proposed Development.

## **2. SITE DESCRIPTION**

- 2.1 The site is located approximately 7km from Invermoriston, 8.5km from Balnain and 14km from Drumnadrochit. The site is predominantly located within the Balmacaan Estate, with the access through Glenmoriston Estate. The site occupies an upland area to the west of the Great Glen and Loch Ness, with Glen Urquhart to the north and Glen Moriston to the south. The turbines are proposed to be sited within undulating upland moorland plateaus with rocky outcrops and upland lochans. There are numerous steep-sided rocky hills within the site including Carn an Tuairneir (574m AOD) and Carn Tarsuinn (616m AOD) and within the wider area including Meall Fuar-mhonaidh (699m AOD) to the east from which views of the Great Glen are afforded to the north-east, east and south-east.
- 2.2 There are numerous lochans within the site, including Loch nam Meur and Loch na Ruighe Duibhe, which are connected by a series of burns which feed the River Coiltie to the north-east of the Site and the Allt Saigh to the south of the site. Mixed

woodland and coniferous forestry are found adjacent to the northern and south-eastern boundaries of the site and extend onto the glen sides. Several small clusters of residential properties are found scattered along the glens to the north, east, south and north-west.

2.3 Key transportation routes include the A831, which passes through Glen Urquhart approximately 4km to the north of the nearest turbine, and the A887, which runs along the foot of Glen Moriston approximately 4.4km to the south. The A833 connects Drumnadrochit and Beaully, connecting to the A831 approximately 10km north-east of the Proposed Development. The A82 runs alongside the western shore of Loch Ness with the Great Glen approximately 6.1km to the east of the nearest turbine, and the B862 follows the eastern shore of Loch Ness, approximately 10.9km to the east.

2.4 There are several hill summits, recreational routes and core paths within the area (see EIAR Figures 6.2b and 13.1):

- The Great Glen Way is a long-distance path and follows the western shore of Loch Ness approximately 4.5km east of the nearest turbine.
- The South Loch Ness Trail passes from Fort Augustus to Inverness, broadly following the eastern shore of Loch Ness and is approximately 9.7km east of the nearest turbine.
- The Great Glen Way and South Loch Ness trail form the Loch Ness 360° Trail, a promoted circular route that circumnavigates Loch Ness.
- The Affric Kintail Way passes through Glen Urquhart, 3.6km north of the nearest turbine.
- The Caledonia Way cycle route runs from Campbeltown to Inverness and passes to the east of Loch Ness, approximately 9.8km east of the nearest turbine.
- The Great Glen Canoe Trail passes approximately 7km to the east of the nearest turbine on a south-west to north-east alignment through Loch Ness. Boat cruises and tours also bring recreational receptors and visitors to the waters of Loch Ness.

### **Environmental Designations and Habitats**

2.5 The site does not form part of any statutory or non-statutory designated site for nature conservation. The following designations are within 10km:

Statutory Designation	Distance to Site Boundary	Qualifying Interests
River Moriston Special Area of Conservation (SAC)	Adjacent to the Site, at the south end of the Bhlairaidh Wind Farm existing access track	Atlantic salmon, Freshwater pearl mussel
Levishie Wood SSSI	Adjacent to the Site, along the Bhlairaidh Wind	Upland birch wood

	Farm existing access track	
Ness Woods SAC (including Easter Ness Forest SSSI and Glen Tarff SSSI)	4.9km south-east	Mixed woodland on base-rich soils associated with rocky slopes, Western acidic oak and woodland Otter
Levishie Wood SSSI	Adjacent to the Site, along the Bhlaraidh Wind Farm existing access track	Upland birch wood
Strathglass Complex SAC	7.0km west	Alpine and subalpine heaths, Blanket bog, Bog woodland, Plants in crevices on base-rich rocks, Caledonian forest, Dry heaths, Tall herb communities, Wet heathland with cross-leaved heath, Clear-water lakes or lochs with aquatic vegetation and poor to moderate nutrient levels, Montane acid grasslands, Plants in crevices on acid rocks, Acidic scree, Mountain willow scrub and Otter
Glen Affric SSSI	7.1km west	Dragonfly assemblage, Lichen assemblage and Native pinewood
Balnagrach SSSI	9.6km north-east	Club sedge

2.6 There are no statutory designations with ornithological features within the site. Designations within 20km of the proposed development are tabled below.

Statutory Designation	Distance to Site Boundary	Qualifying Interests
North Inverness Lochs SPA	3.4km	Slavonian grebe; breeding
Dubh Lochs SSSI	3.4km	Slavonian grebe
Glen Affric to Strathconon SPA	6km	Golden eagle; breeding

Glen Affric SSSI	6km	Breeding bird assemblage
Loch Knockie and Nearby Lochs SPA	7km	Slavonian grebe; breeding
Knockie Lochs SSSI	7km	Slavonian grebe
Balnagrantach SSSI	7.9km	Slavonian grebe
Glendoe Lochans SSSI	16.3km	Slavonian grebe; common scoter
Loch Ruthven SPA	17.1km	Slavonian grebe; breeding
Loch Ruthven SSSI	17.1km	Slavonian grebe; Breeding bird assemblage

- 2.7 The development site and wider ecological study area is dominated by extensive areas of habitat mosaics, the principal components of which are blanket bog (including wet and dry modified bog), and wet and dry dwarf shrub heath. There is also a complex network of watercourses and lochans is present throughout this area. Site surveys for otter, Scottish wildcat; badger; red squirrel; pine marten; water vole; and bats were undertaken. Levels of bat activity across the site were generally low, and limited evidence of otter, badger and pine marten was also noted. Water vole were recorded in several locations. In addition, the site and surrounds have been surveyed for breeding and transient birds; of these two bird species were included in the full assessment, golden eagle and red-throated diver.
- 2.8 Class 1 and 2 peatlands which are defined as nationally important carbon rich soils, deep peat, and priority peatland habitat of high conservation value cover much of the site and wider area. Peat depth surveys indicate that peat (>0.5m depth) is present across 54.8% of the site, with peat >1.0m depth being present across 19.5% of the site.
- 2.9 There are no known public water supply sources within the site or within 2km of the proposed development.

### **Landscape Designations, Wild Land and Landscape Character**

- 2.10 The site itself is not covered by any statutory international, national, regional or local landscape-related designation, however there are several designations within the 45km Study Area.
- 2.11 The nearest National Scenic Area (NSA) is Glen Affric which is approx. 10.5km from the nearest proposed turbine. There are four other NSA's within 45km, however, due to limited theoretical visibility and the existing development in the area, these have been scoped out are not considered further. Similarly, the Cairngorms National Park is considered to have limited visibility and has been scoped out of further assessment.

- 2.12 In terms of local designations, there are nine Special Landscape Areas (SLA) located within the 45km study area, the closest is the Loch Ness and Duntelchaig SLA which is located approximately 4.7km from the nearest turbine and is considered further in the EIAR assessment. In relation to the Strathconon Monar and Mullardoch SLA, the applicant contends that the areas of theoretical visibility within the SLA are also located within the Central Highlands Wild Land Area 24 (located 9.3km to the west). Given the similarities between the Special Qualities of the SLA and the Wild Land Qualities of WLA 24, a separate assessment of effects on the SLA has not been undertaken but the applicant has undertaken an assessment of WLA 24. Due to distance and limited visibility, the other SLAs are not considered further in the EIAR.
- 2.13 The nearest Wild Land Area (WLA) is WLA 24: Central Highland. There are three other WLA's within 45km, but due to limited theoretical visibility and distance to the proposal these have not been considered further within the EIAR. There is no theoretical visibility from any Gardens and Designed Landscapes (GDL) within the study area.
- 2.14 Seven individual Landscape Character Types (LCT) are identified within 15km of the site, six of which are considered further in the EIAR. An additional LCT is considered in the assessment which is located within 15-45km of the site. The site itself is located within the NatureScot Landscape Character Type (LCT) 222 Rocky Moorland Plateau.
- 2.15 The site is also located within the boundary of the Loch Ness Landscape Sensitivity Appraisal Area. This appraisal forms part of the Councils Onshore Wind Energy Supplementary Guidance. The turbine envelope for this application falls within the Landscape Character Area (LCA) LN10 Separation of Glen Urquhart and Glen Moriston, Rocky Moorland Plateau. Further consideration of this LCA is contained within the Landscape and Visual section and Appendices 2 and 3 of this report.

### **Built Heritage**

- 2.16 Three Study Areas were identified: Primary Study Area comprising the footprint of the proposed development; An Inner Study Area consisting of the land lying outwith the Primary Study Area to 5km, and an Outer Study Area consisting of land between 5km and 10km from the Primary Study Area. There are no designated heritage assets within the site boundary (see Figure 10.1). Within the Inner Study Area the EIAR identifies one category C listed building (Loch Ashlaich, shooting box and bothy LB19486), one scheduled monument (Levishie Cottage, fort and earthwork SM4567) and 28 non-designated heritage assets. Within the outer study area, five scheduled monuments; 76 listed buildings; and one conservation area (Tomich) have been identified. However, none of the listed buildings nor the Tomich Conservation Area have theoretical intervisibility with the proposal and were scoped out of further assessment. An additional five scheduled monuments beyond the Outer Study Area were identified as being sensitive to setting change arising from the proposal and so have been included in the baseline assessment.

## **Cumulative Development**

- 2.17 Appendix 2 of this report provides details of operational, consented / under construction, and in planning wind farm projects within 40km of the application site. Since the original EIAR was written in May 2023, the cumulative wind energy picture has changed. To reflect this the applicant has provided an updated cumulative list part of the further environmental information submitted in October 2024. The main changes are that Chrathaich, Dell 2 (redesign), Culachy and Abhainn Dubh Wind Farms which were at scoping stage at the time of submission have now been submitted as formal applications and are now pending consideration. Cloiche, Corriegarth 2, Bunlòin, Kirkan and Lochluichart Wind Farms which were in planning pending consideration at the time of submission have since been consented.
- 2.18 The closest operational wind farm is Bhlaraidh, which lies immediately south of the site, and comprises 32 turbines and Corrimony which comprising 5 turbines and is located 3.2km to the west. A subsequent extension to Bhlaraidh has also been granted by Scottish Ministers consisting of 15 turbines. Chrathaich Wind Farm, comprising 14 turbines, would also constitute a north wester extension to the cluster. That application is pending consideration by Scottish Ministers with Highland Council having no objection to that application, subject to the deletion of one turbine. Loch Liath represents a further northern extension to the established and consented cluster of wind energy development.

## **3. PLANNING HISTORY**

- |     |              |   |                        |
|-----|--------------|---|------------------------|
| 3.1 | 24 Feb 2021  | 21/00123/SCOP: Loch Liath Wind Farm - Proposed erection and operation of wind farm, comprising 26 wind turbines with a maximum blade tip height of 200m and associated infrastructure.                          | Scoping opinion issued |
| 3.2 | 3 March 2020 | 19/05014/PREMAJ: Wind Farm comprising turbines, access tracks, substation, temporary construction compound. Estimated to be between 15 and 30 turbines, and tip heights of 149.9m and 180m are being considered | Advice Issued          |

## **4. PUBLIC PARTICIPATION**

- 4.1 Advertised: Section 36 Application and EIA Development  
Date Advertised: Unconfirmed  
Representation deadline: 9 December 2024  
Representations Received by The Highland Council: 25 objections.  
Representations Received by The Energy Consents Unit: 20 representations (18 objections, 2 support)

4.2 Material considerations raised in objections are summarised as follows:

- Adverse landscape and visual impacts (including cumulative) on Glen Affric NSA, Wild Land Area, Loch Ness, Affric Kintail Way, Meall Fuar-mhonaidh, Suidhe viewpoint, A831, and views from Munros. Turbines are out of scale.
- Landscape and visual impact assessment within the EIAR significantly underplays the effects and some of the visualisations are poor quality;
- Glen Affric NSA and Nature Reserve was in contention for National Park Status.
- Impacts on tourism;
- Aviation warning lights giving rise to light pollution;
- Impacts of noise;
- Safety concerns for local road users and pedestrians;
- Impacts upon nationally important carbon-rich soils, deep peat and priority peatland habitat;
- Heritage impacts;
- Impacts upon health;
- Particle run off causing diffuse pollution in all the watercourses and lochs ruining the spawning redds for native brown trout and stickleback;
- Ecological impacts and habitat loss for endangered and protected birds and mammals. Impacts on the Glen Affric to Strathconon SPA;
- Inadequate consultation – documents should have included schemes at the scoping stage;
- Decommissioning should be secured by way of Section 75 legal agreement; and
- Not in conformity with the Development Plan and does not meet the requirements of the Electricity Act.

4.3 Material considerations raised in support are summarised as follows:

- Good community engagement and made modifications to the scheme;
- Contribution towards renewable energy targets;
- Wind farms have no detrimental impact on tourism;
- Support subject to the measures to enhance and restore habitat; and
- Would like to see the incorporation of energy storage.

4.4 Non-Material considerations raised:

- Exploitation of foreign nations resources and people;
- Oversupply of renewable energy generation in highlands / Scotland;
- Constraint payments;
- Lack of grid capacity; and
- Risk of fire from the turbines.

4.5 All letters of representation are available for inspection via the Council's eplanning portal which can be accessed through the internet [www.wam.highland.gov.uk/wam](http://www.wam.highland.gov.uk/wam). Those representations received by the Scottish Government's Energy Consents Unit can be accessed via

[www.energyconsents.scot](http://www.energyconsents.scot) It should be noted that some representations may have been submitted to both The Highland Council and Energy Consents Unit.

## 5. CONSULTATIONS

### Consultations undertaken by The Highland Council

- 5.1 **Glen Urquhart Community Council object** to the application. It raises concerns regarding the impacts on peat and a misalignment between the Peat Management Plan and Carbon Balance Assessment. Landscape and visual impacts (including cumulative effects), particularly in relation to Meal Fuar-mhonaidh, Landscape Character Types (LCT), the Glen Affric NSA and key routes in the area including B862, Affric Kintail Way, The Caledonian Way and the South Loch Ness Trail. To fully assess the landscape and visual impacts of the proposal it requests that 3D modelling is carried out for this development which includes the adjacent existing and proposed wind farm schemes. Other issues raised relate to impacts upon ecology/habitat management, ornithology, cumulative noise and community benefits.
- 5.2 **Strathglass Community Council object** to the application and raise the following matters. Impacts upon the integrity of the Glen Affric NNR and Glen Affric NSA. In particular cumulative impacts and visibility of the turbines from the lowest main public footpath within the NSA and the ZTV's show this development will have a high adverse impact, with turbines being seen enroute to, and within the Glen Affric NNR/NSA. The development would also have an adverse impact upon the Affric Kintail Way which is a long distance route. It considers that the effects have been downplayed and that the integrity of the NSA is compromised; it refers to the extent of the views detailed on the ZTV and visibility are key points for visitor interpretation. It also considers that some of baseline photography is poor quality, making it difficult to accurately assess the visualisation.
- Consider that a number of properties in Cannich will be affected as demonstrated by the ZTV, but the assessment considers that Cannich will not be affected. It does not accept that vegetation is reliable mitigation, it cites the Cannich wild fire and the loss of vegetation.
- In terms of cumulative impacts, requested that planned wind farms were also included in the assessment, capturing projects at scoping. Raises concerns about the legend on the cumulative maps which states that those at scoping stage have been included which is incorrect. Considers that the reduction in turbine numbers from the scoping stage does not show mitigation has taken place, but more the challenges faced by the developer to facilitate the development.
- Raises concerns in relation to matters scoped out of the assessment, citing Badger Falls scheduled monument having been scoped out due to vegetation which is an unreliable form of mitigation.
- 5.3 **Access Officer** does not object to the application subject to a planning condition which requires the submission of a finalised Outdoor Access Management Plan. The outline Outdoor Access Management Plan is welcomed, but several amendments are required and should be reflected in the finalised plan. This

includes further details illustrating the baseline, access management measures during construction and the operational access situation that includes the location of gates, pass gates and signs. Further details are also required in relation to the proposed access improvements at Meall Fuar Mhonaigh.

- 5.4 **Development Plans Team** do not object to the application. It outlines the applicable Development Plan policies and wider policy to undertake assessment.
- 5.5 **Ecology Team** do not object to the application. Confirms that the ecological and ornithological surveys are acceptable. Considers that the revised Outline Restoration and Enhancement Plan which now details: the proposed restoration of 104ha of peatland habitats, the creation of woodland and riparian planting, commitment to providing three diver rafts for breeding divers, and the inclusion of a regional eagle conservation management plan, as part of the proposed enhancements for the development is acceptable and should be secured by condition. In addition, conditions should also secure a finalised Construction and Environmental Management Plan (CEMP), the employment of an Environmental Clerk of Works (EnvCoW), pre-construction surveys, breeding birds survey and the provision of GIS Shapefiles to allow the compensation and enhancement areas to be mapped and monitored.
- 5.6 **Environmental Health** do not object to the application. The submitted operational noise impact assessment demonstrates that predicted noise levels are very low at any noise sensitive receptors due to the separation distances involved. In relation to construction noise, due to the separation distances this again is unlikely to be an issue. The private water supplies risk assessment has identified that there are no private water supplies which are hydrologically connected to the proposed development.
- 5.7 **Flood Risk Management Team** do not object to the application and have no comments to make.
- 5.8 **Forestry Team** do not object to the application. The access track which passes through woodland is an existing track. The turbines and associated infrastructure are on open ground and will not adversely affect trees or woodland.
- 5.9 **Historic Environment Team** do not object to the application. In terms of archaeology, the team are content with the conclusions in the EIAR that the potential for unrecorded remains to survive is low to negligible. No specific mitigation is required, how the CEMP should outline the process by which unexpected discoveries are reported and recorded. In relation to listed buildings, there is one listing in the surrounding study area, Loch Ashlaich shooting box and bothy (approximately 2km from the nearest turbine). While the proposed wind farm will have a negative impact upon its setting, in this wild moorland context, the intervening distance should avoid any significant effects.
- 5.10 **Landscape Officer** objects to the application. Generally content with the EIAR in relation to the predicted effects on Landscape Character Types. Considers that the most significant effects on the proposed development in terms of landscape designations would be those experienced in relation to the Glen Affric National Scenic Area (NSA) and the Loch Ness and Duntelchaig Special Landscape Area

(SLA). The effects in the NSA would principally affect the perception of wilderness experienced in the NSA by the introduction of more prominent turbines into some views and the visibility of aviation lighting within the designated area. However, whilst the development would result in significant effects on certain of the Special Qualities of the NSA, particularly the scenic compositions within SQs 1, 6 and 8, it is accepted that the effects would not constitute a threat to the integrity of the NSA.

In terms of the Loch Ness and Duntelchaig SLA, the development would have significant detrimental effects on the Special Qualities of the SLA, in the form of encroachment on the landmark Meall-Fuar-mhonaidh and the increase in cumulative effects perceived from the summit with existing and consented developments, and over a limited area on the function of Urquhart Castle as a prominent focus along Loch Ness.

- 5.11 **Transport Planning Team** do not object to the application. It notes that the access point and all construction and abnormal load routing to and from this development will be via trunk roads; this is supported but advice should be sought from Transport Scotland. A final Construction Traffic Management Plan (CTMP) should be secured by condition and recommends a number of additional points that should be included, providing that this does not clash with any specific feedback received from Transport Scotland, as the impacted Roads Authority. This includes the avoidance of convoying of general construction vehicles along public roads, avoid routing during school opening and closing times, specific identification for vehicles relating to this project, engagement with the local community and the provision of a single point of contact in the event of an issue. Confirmed that it has no further comments to make in relation to the SEI.

#### **Consultations Undertaken by The Scottish Government's Energy Consents Unit (ECU)**

- 5.12 **Glen Urquhart Community Council** object to the application. It raises concerns regarding the impacts on peat and a misalignment between the Peat Management Plan and Carbon Balance Assessment. Landscape and visual impacts (including cumulative effects), particularly in relation to Meal Fuar-mhonaidh, the Glen Affric NSA and key routes in the area including B862, Affric Kintail Way, The Caledonian Way and the South Loch Ness Trail. To fully assess the landscape and visual impacts of the proposal it requests that 3D modelling is carried out for this development which includes the adjacent existing and proposed wind farm schemes. Other issues raised relate to impacts upon ecology/habitat management, ornithology and community benefits.

In relation to the SEIR, the following matters are raised. In addition to noise, vibration impacts are also referenced in relation to ecology and ornithology. A large natural corridor and buffer is required from Bhlairaidh Wind Farm to allow natural development of the area to the benefit of the public, Glen Urquhart Community, Ecology and Habitat. Maintains its concerns in relation to peat impacts. It also raises the matters of constraint payments and grid capacity.

- 5.13 **Strathglass Community Council** object to the application and raises the following matters. Impacts upon the integrity of the Glen Affric National Nature Reserve and Glen Affric NSA. In particular, cumulative impacts and visibility of the turbines from the lowest main public footpath within the NSA and the ZTV's show this

development will have a high adverse impact, with turbines being seen enroute to, and within the Glen Affric NNR/NSA. The development would also have an adverse impact upon the Affric Kintail Way which is a long distance route. Raise concerns in relation to matters scoped out of the assessment, citing the Badger Falls scheduled monument which has been scoped out due to vegetation, which it considers is an unreliable form of mitigation. Consider that several properties in Cannich will be affected as demonstrated by the ZTV, but the assessment considers that Cannich will not be affected. In terms of cumulative impacts, requested that planned wind farms were also included in the assessment, this would capture scoping applications, it also raises concerns about the legend on the cumulative maps which states that applications at the scoping stage have been included which is incorrect. Finally, it considers that the reduction in turbine numbers from the scoping stage does not show mitigation has taken place, but more the challenges faced by the developer to attempt to facilitate the development.

In relation to the SEIR, the following further comments are made. Reiterates its concerns in relation to Glen Affric and the chosen viewpoints have avoided the worse affected areas and are out of scale. The development will result in a loss of amenity, and associated wellbeing for residents and visitors. It also raises issues in relation to aviation lighting, impacts upon tourists, ornithology and peat.

- 5.14 **Aberdeen International Airport** do not object to the application.
- 5.15 **British Telecom** do not object to the application and do not foresee that the development will interfere with BTs current and presently planned radio network.
- 5.16 **Crown Estate Scotland** do not object to the application.
- 5.17 **Fisheries Management Scotland** do not object to the application. They have notified the local fisheries board which is the Ness District Salmon Board and reference should be made to their guidance.
- 5.18 **Historic Environment Scotland** do not object to the application. It is content that sufficient information has been supplied in the EIA Report and welcome the submission of visualisations. However, it disagrees with the applicant's assessment of impact for the Garbeg settlements and burial mounds scheduled monuments (SM4635, SM11438 and SM11437) and Urquhart Castle (SM90309). However, its own assessment does not identify any effects that would be significant in EIA terms. Nevertheless, it recommends that the applicant explore options to further reduce the number and extent of turbine hubs and towers that would be visible in views of Urquhart Castle and views from Garbeg. Confirmed that it has no further comments to make in relation to the SEI.
- 5.19 **Highlands and Islands Airport Limited** do not object to the application. Subsequently, confirmed that it has no further comments to make in relation to the SEI.
- 5.20 **Joint Radio Company** do not object to the application and does not foresee any potential problems based on known interference scenarios.

- 5.21 **Ironside Farrar** do not object to the application. It has confirmed that the Stage 2 Peat Landslide Hazard Risk Assessment (PLHRA) adequately addresses the queries raised in the Stage 1 Checking Report and the PLHRA is considered acceptable.
- 5.22 **Ministry of Defence - Defence Infrastructure Organisation** do not object to the application. It requests conditions to secure the submission of an aviation safety lighting scheme detailing how the development will be lit throughout its operational life to maintain civil military aviation safety along with aviation charting and safety management measures to be submitted to the MOD 14 days prior to commencement of works. Confirmed that it has no further comments to make in relation to the SEI.
- 5.23 **National Air Traffic Services Safeguarding (NATS)** do not object to the application. It notes that the proposal does not conflict with its safeguarding criteria. Confirmed that it has no further comments to make in relation to the SEI.
- 5.24 **NatureScot** object to the application. This is on grounds of the development's adverse impact upon priority peatland. It considers that the impacts on this habitat have not been fully assessed because an inappropriately small buffer has been used to calculate indirect loss of priority peatland habitat therefore, the calculation of habitat loss is a significant underestimate. The amount of restoration proposed is also significantly inadequate to offset the impacts on this high quality priority peatland habitat. NatureScot requested an updated assessment using a more appropriate buffer to calculate loss. In addition a more comprehensive and ambitious outline Restoration and Enhancement Plan which clearly demonstrates that the areas chosen for restoration are suitable and that the desired outcomes are likely to be delivered. In response the applicant has engaged further with NatureScot, and the SEI report provided an updated NVC survey and new areas identified for peatland restoration. An updated assessment of impacts within the infrastructure footprint plus the 10 m buffer is presented. At the time of writing this report of handling a further response from NatureScot is awaited.

In relation to Glen Affric NSA, the effects on the special landscape qualities are not of a severity or extent that would compromise the overall integrity of the NSA.

In terms of ornithology, it supports the proposal to include a Breeding Bird Protection Plan and should in conformity with NatureScot standing advice. It advises that the proposal will not have an adverse impact if the measures detailed in EIA Appendix 4.2 Schedule of Mitigation which includes a Breeding Bird Protection Plan and the provision of a nesting raft as an alternative site are implemented. In relation to golden eagles, it considers that due to the small area involved and the habitats present the loss of foraging range will not lead to displacement of the nearest breeding pair of golden eagles and the calculated collision risk mortality will not adversely affect the conservation status of golden eagle in NHZ 7. However, the applicant has proposed to adopt a Regional Eagle Conservation Management Plan, this should be secured by condition.

In relation to protected species, it advises that if the mitigation measures detailed in EIA Appendix 4.2 Schedule of Mitigation, Appendix 4.1 Outline Construction Environmental Management Plan and the Species Protection Plans are implemented then it is satisfied there will be no impacts to protected species in line

with NatureScot's standing advice.

- 5.25 **RSPB** have advised that it will not be submitting any comments in respect of this development. This was also confirmed in relation to the SEI.
- 5.26 **Scottish Forestry** do not object to the application. The application has stated that no trees are to be felled to accommodate the development.
- 5.27 **Scottish Water** do not object to the application. The proposed development is located within a drinking water catchment where a Scottish Water abstraction is located. However, it considers that this is a relatively large catchment, and the activity is sufficient distance from the intake that it is likely to be low risk. Water quality must still be protected during the construction activity and Scottish Water have produced guidance on these matters.
- 5.28 **Scotways** do not object to the application and welcome the submission of the outline Access Management Plan and confirm that a response should be sought from the Councils Access Team. Subsequently, confirmed that it has no further comments to make in relation to the SEI.
- 5.29 **SEPA** do not object to the application. It requests conditions to secure: a finalised Peat Management Plan; no micro-siting to place infrastructure on areas of deeper peat; the use of floating access tracks as per EIAR Figure 4.1; a finalised Restoration and Enhancement Plan; design specifications for the watercourse crossings; restoration of the borrow pit post construction; a finalised Decommissioning and Restoration Plan; and adherence to the Outline Construction and Environmental Management Plan and the Schedule of Good Practice and Mitigation Measures. In response to the SEI, SEPA have no additional comments to make but request a slightly updated wording of conditions, to reflect their developing approach to peat and peatlands.
- 5.30 **Transport Scotland** do not object to the application, subject to conditions to: secure the proposed route for any abnormal loads on the trunk road network; accommodation measures for abnormal loads including the removal of street furniture, junction widening and traffic management; any additional signing or temporary traffic control measures deemed necessary due to the size or length of any loads being transported must be undertaken by a recognised QA traffic management consultant and a Construction Traffic Management Plan (CTMP) must be submitted to and approved by Transport Scotland. Subsequently, confirmed that it has no further comments to make in relation to the SEI, but reiterated the need for the recommended conditions.

## **6. DEVELOPMENT PLAN POLICY**

- 6.1 Appendix 3 of this report provides details of the documents that comprise the adopted Development Plan, including details of pertinent planning policies as well as adopted supplementary guidance, and other material policy considerations which are relevant to the assessment of the application.

## **7. PLANNING APPRAISAL**

- 7.1 This application has been submitted to the Scottish Government under Section 36 of the Electricity Act 1989 (as amended). Should Ministers approve the development, it will receive deemed planning permission under Section 57(2) of the Town and Country Planning (Scotland) Act 1997 (as amended). Although not a planning application, the Council processes S36 applications in a similar manner given that planning permission may be deemed to be granted.
- 7.2 Schedule 9 of The Electricity Act 1989 contains considerations in relation to the impact of proposals on amenity and fisheries. These considerations mean the developer requires to:
- have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and
  - reasonably mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.
- 7.3 It should be noted that for applications under the Electricity Act 1989 that the Development Plan is just one of several considerations, and therefore Section 25 of the Town and Country Planning (Scotland) Act 1997 which requires planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise, is not engaged. That said, the application still requires to be assessed against all policies of the Development Plan relevant to the application, all national and local policy guidance and all other material considerations relevant to the application.

### **Planning Considerations**

- 7.4 The key considerations in this case are:
- a) Compliance with the Development Plan / Other Government Policy
  - b) Energy and Economic Benefits
  - c) Design, Landscape and Visual Impacts
  - d) Construction
  - e) Roads, Transport and Access
  - f) Water, Flood Risk, Drainage and Peat
  - g) Natural Heritage (including ornithology)
  - h) Built and Cultural Heritage
  - i) Noise and Shadow Flicker
  - j) Telecommunications
  - k) Aviation
  - l) Other Material Considerations

## **Compliance with the Development Plan / Other Government Policy**

- 7.5 Appendix 4 of this report provides an assessment of compliance with the Development Plan / Other Material Policy Considerations. In summary, the Development Plan comprises National Planning Framework 4 (NPF4), the adopted Highland-wide Local Development Plan (HwLDP), the adopted Inner Moray Firth Local Development Plan 2 (IMFLDP2), and all statutorily adopted supplementary guidance, including the Onshore Wind Energy Supplementary Guidance (OWESG).
- 7.6 The principle of wind farm development is established in national policy, with the proposed development being of national importance for the delivery of the national Spatial Strategy. NPF4 considers that Strategic Renewable Electricity Generation and Transmission Infrastructure will assist in the delivery of the Spatial Strategy and Spatial Priorities for the north of Scotland, and that Highland can continue to make a strong contribution toward meeting Scotland's ambition for net zero. Alongside these ambitions, the strategy for Highland aims to protect environmental assets as well as to stimulate investment in natural and engineered solutions to address climate change. This aim is not new and will clearly require a balancing exercise to be undertaken, which is reflected throughout NPF4. This is also reflected within other material policy considerations, with Government policy giving significant weight to the importance of achieving net zero through the deployment of onshore wind at pace. Government legislation and policy maintains the commitment to attaining net zero by 2045, with the Onshore Wind Policy Statement requirement for 20 GW of onshore wind to be deployed by 2030, and the Climate Change Committee Report to UK Parliament (July 2024) explaining that onshore wind installations will need to double by 2030. The UK Government Clean Power Action Plan has also recently set a more ambitious target of 27-29 GW of onshore wind by 2030. When determining renewable energy proposals, the ability to meet these targets therefore demands substantial weight when undertaking the planning balance exercise.
- 7.7 At the regional level, HwLDP also offers support for renewable development proposals where they are located, sited and designed such as they will not be significantly detrimental overall, individually or cumulatively with other developments. To inform this assessment, the OWESG provides a methodology for a judgement to be made on the likely impact of a development on assessed "thresholds" listed in its 10 criterion, which are designed to assist the application of HwLDP policy in judging the final balance of benefits versus disbenefits of any given scheme. Appendix 6 provides an assessment against Landscape and Visual Assessment Criteria contained within Section 4 of the Onshore Wind Energy Supplementary Guidance. This concludes that the proposal fails to meet almost all of the OWESG criterion, with this being explained further within Design, Landscape and Visual Impacts section of this report.

## **Energy and Economic Benefits**

- 7.8 The Council continues to respond positively to the Government's renewable energy agenda. Installed onshore wind energy developments in Highland account for

around 30% of the national installed onshore wind energy capacity, with a substantial number of onshore wind farm applications pending consideration at present. While Highland has effectively met its target, as previously set out in the Highland Renewable Energy Strategy, it remains the case that there are areas of Highland capable of absorbing renewable developments without significant widespread effects.

- 7.9 Notwithstanding any impacts that this proposal may have upon the landscape resource, amenity and heritage of the area, the development could be seen to be compatible with Scottish Government policy and guidance and increase its overall contribution to the Government, UK and European energy targets, with the development having the potential to generate up to approximately 85.8MW, based on candidate 6.6MW turbines, and could power over 78,000 homes a year.
- 7.10 Wind turbines provide an important mechanism for the reduction of carbon dioxide (CO<sub>2</sub>), and other greenhouse gas (GHG) emissions into the atmosphere by reducing the consumption of fossil fuel generated mains electricity. However, during their manufacture, construction and decommissioning, wind farms can result in the emissions of GHGs, particularly where natural carbon stores, such as peat, are present and potentially impacted by the development, often termed “carbon balance”. The applicant has submitted an updated Carbon Balance Assessment (SEI Appendix 14.1) to take account of the additional peatland restoration areas now proposed. This assesses the GHG emissions and uses carbon dioxide equivalent (tCO<sub>2</sub>e) where equivalence means having the same warming effect as CO<sub>2</sub> over 100 years. It is estimated that the wind farm will produce annual carbon savings of around 42,000 tonnes of CO<sub>2</sub>e per year, through the displacement of grid electricity, based on the current average grid mix. It is calculated that the CO<sub>2</sub> emissions that will be emitted as part of the construction of the proposal will be paid back within approximately 0.8 years when compared to the fossil fuel mix of electricity generation and 1.7 years when compared to a grid mix of electricity generation.
- 7.11 The proposed development anticipates a construction period of approximately 18 months and an operational period of 35 years. There are likely to be some adverse effects caused by construction traffic and disruption, particularly during the construction phase when abnormal loads are being delivered to site. However, such projects can offer investment/opportunities to the local, Highland, and Scottish economy, including businesses ranging across the construction, haulage, electrical and service sectors.
- 7.12 The applicant has estimated that the construction cost of the development is approximately £85.8 million. It is anticipated that up to 10% of the overall value of contracts could be realised in the Council area (up to £8.58 million). EIAR chapter 13 and the EIAR Non-Technical Summary estimates that during the construction phase the proposal could generate up to 55 Person Years Employment (PYEs) which equates to £4.52 million in Gross Value Added (GVA). During each year of the operational phase, the Proposed Development would directly generate 1.6 Full-Time Equivalents, which equates to £2.4 million GVA.
- 7.13 Since the application has been submitted, the Council has published the Social Value Charter for Renewables Investment in June 2024. This has been brought to

the applicant's attention. Officers understand that the applicants have been liaising directly with the Council's Community Support and Engagement Officer and the Council's Economy and Regeneration Team. In response the applicant has submitted a Socio-Economic Statement. Within this, the applicant has reiterated the jobs and GVA benefits as described above, however in this document the applicant reports a revised operational job estimate; the Proposed Development is reported to directly generate 3 FTEs, which equates to £3.7 million GVA. Owing to the remainder of this document relating to community benefit, which is voluntary in nature, this is not documented within this Report of Handing as community benefit is not deemed a material planning consideration.

## **Design, Landscape and Visual Impacts**

- 7.14 The applicant has presented a number of submissions to illustrate the landscape and visual impacts of the development both singularly and cumulatively with existing and consented wind farm developments. The applicant's assessment is outlined in Chapter 6 of the EIAR and covered a 45km study area (EIAR Figure 6.1) The application is supported by a total of 20 viewpoints (VP) which are representative of a range of receptors including recreational users of the outdoors and road users and are at different distances, directions, and elevations from the site. The expected bare earth visibility of the development can be appreciated from the EIAR Volume 2 Chapter 6 Figure 6.2a Blade Tip ZTV and Figure 6.3a Hub Height ZTV. Figure 6.5b overlays the Tip Height ZTV with the Landscape Character types and Figure 6.6b with the Landscape Designations, this gives an overview of the visibility within the changing landform. Figures 6.2b and 6.3b details visual receptors and key routes within the surrounding landscape. However, it must be noted that this data does not reflect the screening effect of vegetation or built structures and so the visibility shown on the ZTVs is more extensive than would actually be experienced on the ground.
- 7.15 The 20 viewpoints, all within 30km from the development, are representative of a range of receptors including residents at settlements, recreational users of the outdoors and road users. In response to concerns raised by officers, the applicant has provided an amended visualisations in the SEIR for VP18: Toll Creagach (SEI Figure 6.31k-p). In addition, since the application was submitted there has been a significant change to the cumulative baseline near the site with the submission of Chrathaich Wind Farm, which is located approximately 0.6 km to the west of the nearest turbine. In response to officers requests the applicant has provided an updated landscape and visual cumulative assessment in SEIR Chapter 4. This is supported by updated cumulative wirelines for all of the VPs (SEI Figures 6.14k-6.33g) and an updated cumulative ZTV (SEI Figure 6.10) for operational and consented wind farms and Loch Liath, reflecting the additional consented wind farms. Sufficient information has now been provided to undertake an assessment of landscape and visual impact and the quality of the visual information provided is now considered sufficient.
- 7.16 The aim of the LVIA is to identify, predict and evaluate potential significant effects arising from the proposal. The methodology for the Landscape and Visual Impact Assessment generally follows that set out in Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3). As detailed in EIAR Chapter 6, assessing significance of the effect was classified by professional consideration

requires consideration of the nature of the receptors (referred to as sensitivity of the receptor) and the nature of the effect on those receptors (referred to as magnitude of effect). GLVIA3 states that sensitivity, should be assessed in terms of the susceptibility of the receptor to the type of change proposed, and the value attached to the receptor. The applicant has graded its assessment as high, medium, low or negligible and is informed by the elements outlined in EIAR Appendix 6.1 - Table A6.1.5. Judgements regarding the magnitude of landscape or visual change were recorded as high, medium, low or negligible and combine an assessment of the scale and geographical extent of the landscape or visual effect, its duration and reversibility – see EIAR Appendix 6.1 - Table A6.1.6.

- 7.17 The sensitivity of the receptor and the magnitude of the predicted effects is used as a guide, in addition to professional judgement, to predict the significance of the likely effects. Levels of effect were identified as negligible, minor, moderate or major. The applicant has not used a numerical or formal weighting system, instead relying on professional judgement to identify when the threshold of an effect is significant. As set out in para 3.32 of GLVIA 3 the “LVIA should always distinguish clearly between what are considered to be significant and non-significant effects”. The applicant has graded the levels of effect as negligible, minor, moderate or major, where moderate and major effects are considered significant. The Planning Authority agrees that moderate impact can be significant but this needs to be considered on a viewpoint by viewpoint basis using professional judgement.
- 7.18 The EIAR also provides a cumulative assessment, which includes two scenarios. Scenario 1 is Loch Liath in combination with operational, consented and projects under construction. Additions to this cumulative scenario since the original 2023 EIA Report include the consented Bunloinn, Corriegarth 2, Cloiche and Lochluichart Extension II Wind Farms. The SEIR reports that the cumulative magnitude of change and resulting landscape and visual cumulative effects under Scenario 1 will remain as identified in the EIAR. Scenario 2 also includes in planning schemes and any schemes at Public Inquiry. SEI Chapter 4 provides an updated cumulative assessment. Additions to this cumulative scenario since the 2023 EIA Report include the proposed Chrathaich, Dell 2, Culachy and Abhainn Dubh Wind Farms. The SEI reports that the cumulative magnitude of change and resulting landscape and visual cumulative effects under Scenario 2 will remain as identified in the EIAR.
- 7.19 In the assessment of each viewpoint, the applicant has come to a judgement as to whether the effect is significant or not. In assessing visual impacts in particular, it is important to consider that the viewpoint is representative of particular receptors, i.e. people who would be at that point and experiencing that view of the landscape not just in that single view but in taking in their entire surroundings.
- 7.20 A key consideration in the effects on receptors of wind energy development is the sequential effect when travelling through and area on the local road network both by individuals who live and work in the area and tourists. Those travelling scenic routes, whether designated as such or not, have a higher sensitivity to views. While a driver of a vehicle is likely to be concentrated on the view immediately in front, passengers have a greater scope for looking at their surroundings. In addition, the wider area is regularly frequented by cyclists. As such it is considered that road

users are usually high sensitivity receptors.

### **Siting, Design and Layout Evolution**

- 7.21 The site is not located within any landscape designations but is located relatively close to the Glen Affric NSA, the Loch Ness and Duntelchaig SLA and the Central Highlands WLA. As noted in the NatureScot Siting and Designing Wind Farms in the Landscape Guidance, it can be particularly challenging to accommodate multiple wind farms in an area. However, as detailed in EIAR Chapter 3 Site Selection and Design Strategy, one of the main drivers in the evolution of the scheme's layout and design was also minimising potential significant landscape and visual impacts, from Glen Urquhart, Glen Affric NSA, Meall Fuar-mhonaidh and the Central Highlands WLA. In addition, from the perspective of officers and as seen in nearby wind farm schemes it is also important for the design and layout to limit visual confusion, reinforce the appropriateness of each development for its location, present a balanced and rationale composition and avoid undermining mitigation secured by other developments.
- 7.22 In line with the EIA and the OWESG requirements, the applicant has illustrated and explained the steps, rationale, and influences for the evolution and design of the site. The applicant outlines that the overarching objectives of the design strategy were to develop a layout:
- Which maximises the potential energy yield of the Site whilst ensuring a cohesive and sensitive layout which will be legible from key views in the surrounding area where there is visibility of the turbines;
  - Which would minimise potential effects on Glen Urquhart and sensitive visual receptors located in the Glen;
  - Which when seen alongside the operational Bhlairaidh turbines minimises the spread of turbines across the horizon from key viewpoints, in particular Meall Fuar-mhonaidh and the B862 Suidhe scenic viewpoint;
  - Which minimises the horizontal extent and prominence of turbines in views from the Glen Affric NSA;
  - Which reflects the established pattern of wind farm development in the Study Area, and the immediately adjacent Bhlairaidh Wind Farm and consented Bhlairaidh Wind Farm Extension, as well as being coherent in its own right;
  - Which includes access tracks that utilise existing roads and tracks wherever possible, and which have been designed in such a way that they avoid steep terrain, and maximise screening through existing landform and vegetation to minimise visibility of these components; and
  - Which fulfils the above objectives whilst respecting other environmental and technical constraints including ecological, ornithological; hydrological and ground conditions (including peat) related constraints identified during the EIA process.
- 7.23 Furthermore, EIAR Chapter 3 Site Selection and Design Strategy describes the scheme's evolution through its several design and layout iterations. Wireframes (EIAR Chapter 3, images 3.7 – 3.11) from five VPs which were considered important in the design process has been submitted: VP1: Affric Kintail Way near Braefield; VP2: Meall Fuar-mhonaidh; VP3: Balbeg; VP5: Coire Loch Trail, Glen

Affric; and VP8: B862 Suidhe Viewpoint. These illustrate the effect of turbine deletions and layout changes in response to consultee/public feedback and a number of identified constraints such as ornithology, hydrology and peat. A key factor was also minimising potential significant landscape and visual impacts. The main stages of this process are summarised below.

- Layout 1: The initial layout was based on the maximum development scenario of 26 turbines at 200m blade tip which was presented at the scoping / pre-application stage in 2020. This was reduced down to 22 turbines following ornithological and peat data.
- Layout 3: consisted of 20 turbines (200m tip height). This reduction was informed by further ornithology surveys and a landscape review which resulted in the removal of the most northern turbines to reduce visibility and prominence from Glen Urquhart, Glen Affric NSA and the Central Highlands WLA. Also initial feedback a public exhibition.
- Layout 4: comprised 17 turbines (200m to tip), the reduction from the south-eastern corner was in response to GET modelling for golden eagles and to improve its composition from key views including the summit of Meall Fuar-mhonaidh. A further response was sought from officers and NatureScot.
- Layout 5/ 6: consisted of 14 turbines, with the removal of three turbines from the north and a reduction in height to 180m to tip for three turbines. This sought to reduce visibility and improve composition from key locations including from Glen Affric and to reduce the horizontal extent in the view from Meall Fuar-mhonaidh. This was further refined with the removal of T17 the most south-easterly turbine. This has left the final submitted layout of 13 turbines with a mix of tip heights of 180m and 200m.

7.24 Key considerations in coming to a judgement on the scheme are also derived from The Loch Ness Landscape Sensitivity study contained within the Onshore Wind Energy Supplementary Guidance (OWESG). This study identifies that any remaining capacity for larger scale development should be focused around existing clusters that are generally found in rolling uplands, rugged massif and rocky moorland Landscape Character Types. However, the development should be well designed, and the turbines should:

- Be set back from key routes (e.g The Great Glen Way, the A82 and the A887 around Dundreggan);
- Preserve mitigation established by current schemes;
- Maintain the landscape setting of each existing scheme;
- Respect spacing and scale of existing development pattern; and
- Minimise visual confusion from higher ground to the west and north and with Meall Fuar-mhonaidh and avoid a perception of the peak being encircled by development.

7.25 **Impact on Meall Fuar-mhonaidh:** A key consideration in the consented pattern and design of wind energy development in the area has been managing the impacts upon the popular and accessible summit of Meall Fuar-mhonaidh (VP2). Officers have continually sought to minimise and contain the lateral array/ visual envelope of wind energy development from this viewpoint. As noted by numerous

third parties and Community Councils, officers secured the deletion of three turbines from the Bhlaraidh Wind Farm extension scheme; this mitigation was considered necessary to resist the substantial encroachment towards and encirclement of the summit. The Council have raised no objection (subject to the deletion of turbine T14 to the adjacent scheme of Chrathaich Wind Farm, which is currently pending consideration by Scottish Ministers. Whilst acknowledging that Chrathaich Wind Farm would intensify the numbers of turbines visible from this summit it does not introduce turbines that would appear visually closer to the receptor than the consented Bhlaraidh Wind Farm extension. Importantly, whilst there would be some lateral extension of the turbine array, this would be relatively contained. All of which minimises the perceived encirclement of the summit. Although it is acknowledged that Loch Liath does not introduce turbines that would visually appear any further forward than Bhlaraidh Wind Farm extension and the lateral spread of the submitted scheme is reduced from that submitted at the scoping/preapplication stages, it is considered that the scheme presented does still substantially extend the horizontal spread and visual envelope of wind energy development, which intensifies the perceived encirclement of this important summit within the regional SLA.

- 7.26 **Impact on Loch Ness/ surrounding area:** Another established pattern of wind farm development in this area is for schemes to be set back and well contained from Loch Ness and routes along the Great Glen. For wind energy developments on both sides of Loch Ness, officers have continually sought to avoid/minimise visibility from the water and along the surrounding loch level routes and approaches. This has largely been achieved through the refusal of poorly sited wind farm proposals, and by securing appropriate mitigation by design, including turbine deletions and careful consideration of the scale of turbines. Currently visibility from operational schemes is restricted to a few blade tips. Indeed, Bhlaraidh Wind Farm extension was supported as visibility of the additional turbines is largely contained with the exception of a few blade tips which will be seen alongside a few existing blade tips of the operational turbines at Bhlaraidh. As detailed above, Chrathaich Wind Farm is currently pending consideration at present, no objection was raised as the proposed turbines, at 149.9m to tip, will again largely restrict visibility to a limited number of additional blade tips, which is commensurate with the existing and consented pattern of visibility.
- 7.27 In contrast, Loch Liath is far more visually intrusive, with larger scale turbines with results in hubs and towers now being visible on this skyline. It also results in a greater horizontal spread of turbines, resulting in turbines being introduced into views where there is no existing or consented wind farm development. As such this scheme has the potential to substantially undo design mitigation secured for other wind farm schemes to date, breaking the well-established pattern of wind farm development being set back and well screened from Loch Ness and routes along the Great Glen. Loch Liath would be an obvious new man-made feature in promoted views across and from on the water of Loch Ness, a world-renowned tourist attraction, with visibility occurring from a well-used part of the loch which is frequented daily by tourist travelling to and from Urquhart Castle.
- 7.28 Concerns have also been raised by Historic Environment Scotland (HES) relating to the development's impact upon the setting of Urquhart Castle. HES contend that

the skyline in this view is featureless save for a few blade tips from Bhlaraidh Wind Farm and its extension. The proposals would introduce several turbines into this view, with the hubs of eight turbines and the towers of six being visible. This represents a considerable change in the impact turbines have on this view, and therefore on the setting of Urquhart Castle. Whilst not objecting, HES recommended that the applicant looks at ways to reduce the impact of the scheme. Planning officers engaged further at the application stage requesting a reduction in the scale of the proposed development, however the applicant has not made any amendments.

- 7.29 **Impacts upon Glen Affric area/ Glen Affric National Scenic Area (NSA):** This location and designation has been an important design consideration for previous wind farm schemes. Officers and NatureScot have sought to minimise visibility and wider impacts upon this area. For instance, Bhlaraidh Wind Farm extension was supported as the proposal would not introduce new visibility of wind turbines to any part of the NSA and it would not be visible from the circular walk around Loch Affric. This was also an important consideration for Chrathaich Wind Farm, as mitigation through the deletion of Turbine 14 has been sought and agreed by the applicants to limit the impact upon this area. Whilst acknowledging that NatureScot have not objected to the impacts upon the Glen Affric National Scenic Area (NSA), they do raise substantial concerns about the scheme and recommend that mitigation options are explored. This is further detailed in the 'Designated Landscapes' section below.
- 7.30 **Aviation Lighting:** Finally, notwithstanding the smaller scheme of Corrimony Wind Farm, officers have sought to minimise impacts from visible aviation lighting, this was successful at Bhlaraidh Wind Farm extension with infra-red aviation lighting being accepted despite the 180m to tip height. Furthermore, the scale of the turbines proposed at Chrathaich Wind Farm are under 150m to blade tip so there is no requirement for visible aviation lighting so no impact during hours of darkness. This is considered to be important given the popularity of the wider area for overnight camping a point made by NatureScot in their consideration of the Glen Affric NSA. By contrast Loch Liath Wind Farm will require visible aviation lighting, the impacts of this are discussed in the 'Aviation lighting' section below.
- 7.31 The EIAR contends that the resulting layout which is presented in the current submission is the best viable option with respect to environmental constraints and civil engineering feasibility. In contrast officers have raised concerns about this development since the pre-application application stage and although the efforts made through the design iterations summarised above are acknowledged, substantial reservations still remain. Officers have sought further changes to the scheme in the form of turbine deletions and a reduction in the tip height, but these options have not been taken forward by the applicant.

### **Ancillary Infrastructure**

- 7.32 The applicant has identified that a grid connection will be required and has applied for a substation. The substation and control room (indicative design EIAR Figure 4.8) will be a single storey pitched roofed building. The final design and external material palette, together with the compounds and perimeter fencing can be secured by condition. Connection to the grid from the substation will be the subject

of a separate application and consent under Section 37 of the Electricity Act 1989 and will require its own assessment. That assessment must consider the cumulative effect of the grid connection with the wind farm development.

- 7.33 The final colour/finish of the turbines can be secured by a planning condition. The development will require high voltage electrical and fibre optic communications cabling. In order to minimise ground disturbance from this, the cabling trenches will follow the course of the access tracks from each turbine to the on-site substation. The turbine transformers will be located within the turbine towers and there would be no requirement for external buildings.
- 7.34 Once the wind farm has been commissioned, the site restoration will involve landscaping and replanting disturbed areas that are not required for the ongoing operational phase of the development. This will include the landscaping and re-profiling of the access track verges and reinstatement of disturbed areas adjacent to the substation, the temporary construction areas and around the crane hardstandings and turbine foundations. A programme of reinstatement monitoring will be implemented in the first few years of operation to document the success of revegetation of these areas. In relation to the proposed borrow pit a restoration scheme can be secured by condition.

### **Landscape Impact**

- 7.35 There are several aspects to consider in determining whether this development represents an acceptable degree of impact on landscape character, including:
- impacts on the Landscape Character Type (LCT) as a whole and on neighbouring LCTs; and
  - direct impacts on landscape designations; and
  - impacts on surrounding landscape designations.
- 7.36 Of the seven individual LCTs identified within 15km of the site, six are considered further in the EIAR. Effects on LCTs beyond 15km have been scoped out of the assessment, with the exception of LCT 230 - Interlocking Sweeping Peaks – Inverness. This has been included as the ZTV indicated visibility from elevated landform and hill summits throughout the LCT and within the Glen Affric NSA and Central Highlands WLA at distances of 17-32km.
- 7.37 Landscape character is the distinctive and identifiable pattern of elements that occur consistently in a particular type of landscape and the way that this pattern is perceived. Effects on landscape character can occur both on the site, where the pattern of elements that characterise the landscape would be directly altered by the addition of the proposed development, and outwith the site in the wider study area, where visibility of the proposed development may alter the way in which this pattern of elements is perceived.
- 7.38 The applicant's assessment on LCTs is reported in EIAR Chapter 6. The LCTs within 45km of the proposed development are illustrated on Figure 6.5a, with theoretical visibility from those within 20km indicated by the ZTV shown on Figure 6.5b. Of the seven LCTs considered, residual significant effects on landscape character were identified for localised extents of the host LCT 222 (Rocky Moorland

Plateau – Inverness), but minor, not significant for the LCT as a whole. The SEI reports no change to this conclusion.

7.39 The host Rocky Moorland Plateau – Inverness Landscape Character Type (LCT 222) is found in two locations in the detailed study area: to the north and south of Glen Urquhart. This LCT is characterised by open, gently rolling and undulating moorland plateaux with distinct edges, containing small hills formed by rocky outcrops and low areas of varying scale. The landform, has been created by weathering and glacial erosion, is divided by glens following the easterly direction of ice flows, and later rivers. Rocky heather moorland dominates the hilltops and upper slopes, and small lochans and areas of bog occupy depressions mainly on the extensive surface peat deposits in the southwest. Regenerating pine, birch and gorse is concentrated along glens with rivers, with sporadic patches occurring on hillsides. Much of this LCT is sparsely inhabited, with any settlements tending to be located along the edges or in adjacent LCTs, although there are a few isolated small farms and crofts in the east. There is an overall sense of scale, openness, exposure and degree of remoteness on the open plateau within this LCT, where there are extensive views of the surrounding landform. The pattern and ground texture of the majority of this landscape tends to appear random, which creates a landscape with no dominant visual movement or clear focal points. There is existing infrastructure within this LCT, including hydro infrastructure, the Beaully-Denny overhead line and Corrimony and Bhlaraidh Wind Farms. Part of this LCT falls within the Loch Ness and Duntelchaig SLA.

7.40 The landscape character of the LCT 222 Rocky Moorland Plateau is described further within the NatureScot 2019 Landscape Character Assessment. The key characteristics are:

- Open, gently rolling moorland plateau with distinct edges descending to adjoining straths and glens or rising to merge with Rugged Massif.
- Plateau with a patchy texture of small rocky outcrop hills, bogs and lochans in no clear hierarchy or discernible pattern.
- Hilltops and upper slopes dominated by rocky heather moorland, except in the northeast where extensive, contrasting conifer forests dominate.
- Regenerating trees and scrub in glens with rivers and sheltered lower hillsides.
- Strong contrast in landcover and settlement between the plateau and adjoining straths and glens.
- Sparsely inhabited and little evidence of active land use.
- A few historic sites indicating past settlement and land use.
- Orientation is difficult due to the lack of hierarchy, pattern and foci in the landform and landcover.
- Within the plateau distance and scale are generally difficult to perceive due to the lack of elements of known size.
- Distinct edges isolate the plateau from adjacent areas and give the sense of a vast, remote, upland moor.
- At the plateau edges, expansive views over inhabited straths and glens create surprise.
- Eastern areas have a semi-exposed character with occasional views of distant hills framed by the distinct edges of conifer forests.

Perception of remoteness on the open plateau, from the rugged patchy texture and absence of obvious human artefacts.

- 7.41 The ZTV shows that the proposed turbines will be visible from a large proportion of this host LCT, including elevated landform and the summit and the west facing slopes of Meall Fuar-mhonaidh (VP2) in the east. Resultant aviation lighting will also be evident within this LCT, as would the intensification of wind energy development; from parts of the LCT turbines would sit to the side of the Bhlaraidh scheme, thus increasing the horizontal spread and the extent of the view occupied by wind energy development.
- 7.42 The EIA reports moderate and significant local effects which reduces to minor and not significant for the LCT as a whole. In terms of cumulative effects, the proposal together with the Bhlaraidh Wind Farm extension will increase the extent of the LCT affected by wind turbines. The SEI reports that with Chrathaich Wind Farm under the Scenario 2 cumulative baseline, this will result in further intensification of wind farm development within this LCT and together, all of these schemes will have a strong characterising effect on the interior of this LCT. In addition, areas in the south-west of the LCT and along the transitional edges of the LCT would remain without direct influence of wind turbines.
- 7.43 Overall, the SEI reports no significant cumulative effects under either cumulative scenarios. These findings are contested. Given that the development would reduce the degree of remoteness of the plateau and introduces further visible aviation lighting, this would give rise to localised significant adverse cumulative effects on the host LCT.
- 7.44 As detailed previously, the site is also located within the area covered by the OWESG Loch Ness study, with the turbine envelope falling within the Landscape Character Area (LCA) LN10: Separation of Glen Urquhart and Glen Moriston, Rocky Moorland Plateau. In terms of landscape sensitivity, the appraisal notes that most of the Landscape Character Area lies outside the SLA designation; Meall Fuar-mhonaidh (VP2) itself is included and is an attraction in its own right, as it affords views of SLA and wider area. The experience of the landscape from the summit of Meall Fuar-Mhonaidh would be degraded if there were a perception of the peak being encircled by development. As detailed above, this has been a central consideration for nearby wind farm developments, and a key driver when securing mitigation. Nevertheless, the proposed development as currently presented, still substantially extends the horizontal spread and visual envelope of wind energy development in close proximity to this summit, which intensifies the perceived encirclement of this important summit within the regional SLA.
- 7.45 The Council's Landscape Officer is however generally content with the applicant's assessment; whilst it was agreed there would be significant adverse effects on the host LCT, the objection to the application is not on these specific grounds, rather, due to the scheme's resultant impacts on the special qualities of the wider SLA and other designated landscapes as described below.

## Designated Landscapes

- 7.46 Through consultation with Highland Council and NatureScot it was agreed that the assessment would focus on Glen Affric NSA, Loch Ness and Duntelchaig SLA and Wild Land Area (WLA) 24 - Central Highlands. In relation to the Strathconon Monar and Mullardoch SLA, the applicant contends that the areas of theoretical visibility within the SLA are also located within the Central Highlands Wild Land Area 24 (located 9.3km to the west). Given the similarities between the Special Qualities of the SLA and the Wild Land Qualities of WLA 24, a separate assessment of effects on the SLA has not therefore been undertaken. Other designations were also scoped out owing to the lack of visibility.

## National Scenic Areas

- 7.47 The proposal lies outside the Glen Affric NSA. The closest turbine is around 10km from its eastern boundary. This relatively compact NSA joins the Kintail NSA to the west and mainly lies within Central Highlands Wild Land Area (WLA 24) which extends to the north and south of the NSA. This is a nationally valued landscape, which is appreciated for its scenic qualities and natural heritage. It therefore has a high landscape value. As detailed above, limiting impacts upon the NSA (including from aviation lighting) is a key factor and constraint for wind energy development in the area. This is evident by the support given to the Bhlairidh Wind Farm extension and the Council's recommendation to delete T14 from the pending Chrathaich Wind Farm application.
- 7.48 Concerns regarding impacts upon the NSA were raised by officers and NatureScot at the pre-application stage. In response, the EIAR highlights that minimising impacts upon Glen Affric NSA was one of the design objectives which has driven the evolution of the site's layout. Reference is also made to the reduction in turbine numbers and setting turbines back from the site's western boundary to minimise the prominence of turbines in views from Glen Affric. Both Glen Urquhart and Strathglass Community Councils object to the application together with numerous third parties raising substantial concerns about the impacts upon Glen Affric.
- 7.49 There are nine Special Landscape Qualities (SLQ) associated with Glen Affric NSA. The applicant assessment of these is outlined in EIAR Vol 5a Appendix 6.3. Updated cumulative effects are also detailed in SEIR Chapter 4 and summarised in SEI Appendix E. Viewpoints 9, 10, 15, 18, WLA6, AESLQ 05 and AESLQ 06 are all located within the NSA boundary.
- 7.50 The Special Qualities of the NSA highlight the beauty of the glen and its importance as an area which provides a retreat from developed landscapes and into wildness. Similarly, the SQs highlight Loch Affric as the heart of the NSA as it nestles furthest from the transition to less wild and undeveloped landscapes. The SLQs are often experienced in combination such that there is an intensity of experience, which can be heightened by the journey to the NSA. Each of the overarching qualities are experienced across the NSA, whereas the 'Beautiful Loch Affric' SLQ8 is only experienced where Loch Affric can be appreciated.

- **SLQ1: One of the most beautiful glens in Scotland;**

- SLQ2: A glen of transition, from dense forest to exposed moorland;
- SLQ3: A journey into wildness;
- SLQ4: The prominence of water;
- SLQ5: A glen for all seasons;
- **SLQ6: A historic and popular route through the Highlands;**
- SLQ7: Venerable pine forest;
- **SLQ8: Beautiful Loch Affric;** and

SLQ9: The baronial Affric Lodge.

- 7.51 NatureScot advise that the SLQs highlighted in bold above (SLQs 1, 6 and 8) are the most likely to be significantly adversely affected by the proposal, and that there is a clear interaction between them and each a key component of the journey through the glen and the hills.
- 7.52 The applicant's assessment contends that there will be moderate (significant) adverse effects experienced by recreational receptors within localised extents for SLQ6 (A historic and popular route through the Highlands). However, it argues that the integrity of the NSA will not be significantly affected. NatureScot object to the scheme, although this is not on grounds of landscape impact. NatureScot still however raise substantial landscape impact concerns, noting that the applicant underrates the level of effects.
- 7.53 **SLQ 1: One of the most beautiful glens in Scotland and SLQ 8: Beautiful Loch Affric** are assessed together as they both relate to the scenic attributes of Glen Affric. NatureScot agree with the applicant in that SLQ1 and SLQ8 are most strongly expressed from the lower-lying extents of the glen and in proximity to Loch Affric which "is the key to the beauty of this glen." The SLQs are enhanced by the lack of development currently experienced in the lower glen and in relation to Loch Affric. While there is a low level of development on the containing hills (Corrimony Wind Farm), this is below the skyline, relatively small scale, visually contained and surrounded by completely undeveloped areas. As such it does not strongly affect the undeveloped perception of the area.
- 7.54 However, NatureScot argues that the scale and location of the turbines proposed, will adversely affect this balance and compromise the experience of these SLQs. From the limited areas where Loch Affric, the centrepiece of the designation, can be appreciated in views east, it will often coincide with visibility of the proposed turbines directly above Glen Affric / Loch Affric. NatureScot further argues that the proposal does not fit the landscape character, in terms of scale and positioning as represented by VP15 Core Path at Loch Affric.
- 7.55 Effects upon this location and route were important in the Council's decision not object to the Bhlairaidh Wind Farm extension and the pending Chrathaich Wind Farm, subject to the deletion of Turbine 14. As detailed in the SEI cumulative wireframes (SEI Figure 6.28a), Bhlairaidh Wind Farm extension is not evident within these views. The only visible turbine hub for the Chrathaich scheme is T14 which would sit amongst the proposed T1, T7 and T8 cluster for Loch Liath as detailed

on the wireframe. However, with the agreed deletion of T14, the proposed turbines at Chrathaich will be much more contained, situated behind the intervening landform, except for limited blade tips. Loch Liath in direct contrast, results in a scheme with significantly greater prominence and visual intrusion, creating a new focus in the immediate foreground to the NSA, competing with and detracting from the distinctive and largely undeveloped character of the glen, which is viewed in combination with the proposal. In addition, Loch Liath undermines mitigation secured through other successive schemes.

- 7.56 Adverse effects are compounded by the way the view is experienced; in sequential channelled views along the glen from 5.6km of this route (LVIA, Appendix 6.3), disappearing and reappearing. The location and size of the turbines ensures that they will intrude upon the wider appreciation of both Loch Affric and Glen Affric and backdrop qualities in views which contribute to the experience of SLQs within the NSA. Consequentially, NatureScot consider that the LVIA may underrate the level of visual effect from the glen. Officers concur with NatureScot's assessment.
- 7.57 The Council's Landscape Officer considers that the development is most jarring in character when seen from and in the context of the more intimate interior landscapes of the strath floors and lower sides, where the contrast of the development with the enclosed space and focused views is most apparent.
- 7.58 Overall, NatureScot consider the proposed turbines would appear incongruous and distract and detract from the classic Highland scenery that can be enjoyed in this part of the NSA and is more strongly expressed in the glen. It will also adversely affect the experience of remoteness and wild character and advise that the proposal gives rise to a significant adverse effect on these 'scenic' SLQs impacting on the appreciation and enjoyment of this part of the NSA. The Council's Landscape Officer shares NatureScot's concern.
- 7.59 **SLQ 6: A historic and popular route through the Highlands.** This is experienced by visitors to the hills, glen and the shore/ waters of Loch Affric including recreational water users, walkers, cyclists and tourists. As summarised by NatureScot this SLQ is strongly experienced from the Core Path (VP15) and the Affric-Kintail Way. Both the glen routes and the northern mountains / Munros (represented by VP9 Meall Mor and VP18 Toll Creagach) are also important receptors due to the number of people likely to visit and their focus on the landscape. As such sensitivity to development is high.
- 7.60 NatureScot contend in views eastwards from the lower glen routes, the proposal would be experienced sequentially in classic views over Glen Affric, above Loch Affric where it would be the focal point in channelled views along the length of the glen. The turbines would intrude on views along the length of the Core Path along 5.6km of this route, (refer to LVIA Appendix 6.3), disappearing and reappearing, with visibility ranging from tips in the more distant views (e.g. Allt Beithe VP AESLQ05) to turbines when in proximity to Loch Affric (e.g. VP 15). Recreational users on both the lower glen / Core Path / shores and the waters of Loch Affric, currently enjoy a strong sense of naturalness and visual drama which enhances the enjoyment of this landscape for recreation. The introduction of this proposal will weaken these key characteristics and is likely to detract from the views and experience of people who make the effort to visit this area. People are drawn to the

walking routes and shores / waters of the loch to linger and enjoy the undeveloped scenic juxtaposition of landscape and loch. As such, the effects may be experienced for a prolonged period of time, increasing the magnitude of effects.

- 7.61 There would be visibility of the proposal over the south facing slopes and summits which form the northern extent of the NSA, as represented by VP9 (Meall Mor) and VP18 (Toll Creagach). Elevated views to the east of the NSA, include both the existing small scale Corrimony Wind farm (5 turbines up to 100m to tip) and Bhlaraidh Wind farm (32 turbines up to 135m to tip). NatureScot contend that there is also a clear interaction between SLQ3 'A journey into wildness' and SLQ6 'A historic and popular route through the Highlands' with both relating to a journey through the glen, and that the applicant may underrate the magnitude of change and thus the level of effect from the northern mountains. Officers concur with NatureScot's assessment.
- 7.62 The proposed turbines would appear as a substantial extension to these wind farms, and contrast in scale due to height and blade sweep. The turbines would appear as prominent, larger scale structures in panoramas from elevated views including the popular northern Munros / summits which offer the only opportunity to appreciate the scenic views across the full extent of the NSA. In these key elevated views, the extent of the NSA is currently unclear with no perceived edge. Loch Liath would visually link Corrimony and Bhlaraidh wind farms, creating a band of turbines and a perceived edge to the NSA in elevated views eastward across the NSA. This will adversely affect the views and experience from these hills, diminishing the recreational experience for walkers / climbers. Consequentially, NatureScot consider effects on SLQ6 would be significant.
- 7.63 NatureScot consider that effects on SLQs would be significant, however, these effects would not be to the degree that the objectives of the designation and the overall integrity of the Glen Affric NSA would be compromised. The Council's Landscape Officer concurs, in that the development would create significant effects on certain of the SLQs, particularly the scenic compositions within SLQs 1, 6 and 8, but accepts that such effects would not constitute a threat to the overall integrity of the NSA. Although recognising that the integrity of the NSA would be maintained, officers did request the applicant to explore options to reduce the impacts on the NSA further, through turbine deletions, and a reduction in turbine heights to tip. This has not been taken forward by the applicant.

#### **Wild Land Areas (WLA)**

- 7.64 The proposed development is not located within a Wild Land Area (WLA). It is located around 9.9km to the east of WLA24: Central Highland. As noted above, the Glen Affric NSA mainly lies within the Central Highlands WLA which extends to the north and south of the NSA. The ZTV indicates theoretical visibility from elevated landform and hill summits within the east, centre and south-west of the WLA out to around 30km. The applicant's assessment is contained within EIA Appendix 6.4 and is supported by a number of visualisations (VP 9, VP10, VP15, VP18, VP19, WLA1-7 and AESLQ 1-4). The assessment looked at three Wild Land Qualities (WLQ); WLQ 1 'An extensive and awe-inspiring range of large scale, high and rugged mountains', WLQ 2 'An extensive, remote mountain interior with strong qualities of sanctuary and solitude' and WLQ3 'Deep glens that have steep,

arresting side slopes as well as rivers and waterfalls, with some containing lochs and some revealing human land.

- 7.65 The applicant considers that whilst significant visual effects were identified; VP9: Meall Mor and VP10 Creag Dubh (both located along the eastern boundary of WLA 24), the existing presence of wind farm development in these views has already influenced the expression and strength of wild land qualities in these locations. Additional effects on the wild land qualities are judged to be very localised in their extent, and overall, the WLA will not be significantly adversely affected by the addition of the proposed development to the baseline conditions. Overall, the applicant concluded that there will be no significant effect on the assessed WLQs.
- 7.66 NatureScot has made no direct comment regarding wild land areas. It is noted in its response to the impact upon the Glen Affric NSA, that the area has a strong wild character from the Northern Mountain routes (such as VP 9 Meall Mor and VP18 Toll Creagach) which coincides with WLA 24 designation. As such, a number of the concerns raised in relation to the NSA are also relevant to the WLA. However, despite concerns with the scheme, NatureScot's objection is not based on landscape or wild land area impacts.

### **Special Landscape Areas (SLAs)**

- 7.67 The proposed development is not located within an SLA. Loch Ness and Duntelchaig SLA is located approximately 4.7km east the nearest proposed turbine. This SLA covers the part of the Great Glen which encloses Loch Ness. It includes the bounding hill slopes on the loch's western and eastern shores, the prominent hill Meall Fuar-mhonaidh on the loch's western side and the elevated interior moorland and agricultural plateau to the east of Loch Ness which contains Lochs Ashie, Duntelchaig, and Ruthven. Noted for its ever-changing compositions, this area is dominated by the vast linear feature of Loch Ness and its dramatic landform trench, flanked by steep, towering wooded slopes that lead to undulating moorland ridges and a contrasting remote interior plateau of upland lochs, small woods and rocky knolls.
- 7.68 There are three special qualities identified for this SLA; the dramatic Great Glen; the contrasting intimate plateau; and the historic landscape. The applicant's assessment concludes that there would be no significant effects on this SLA. This is contested. The Council's Landscape Officer finds that there will be significant and detrimental effects on the Special Qualities of this SLA.
- 7.69 The ZTV shows potential visibility within the south eastern portion of the SLA, from sections of the B862, represented by VP8 Suidhe Viewpoint, and the northern areas going up towards Dores, seen in VP13 B852 Erchite Wood, east of Loch Ness (picnic area) and VP16 B862 South of Dores, on the water on parts of Loch Ness, and at higher elevations such as VP2 the summit of Meall Fuar-mhonaidh. Whilst it is important to recognise that the proposed development sits outwith the SLA, many receptors that experience the special qualities of the SLA are those using the area for recreation, including tourists, particularly along the upland landscapes above both the east and west shore, including the South Loch Ness trail, Great Glen Way and Meall Fuar-mhonaidh.

- 7.70 This SLA is particularly sensitive to additional large features upon the side slopes or ridge lines of the glen. This is because these may:
- contrast with the distinct linear form of the glen;
  - the characteristic concentration of built elements along the shore or over flatter adjacent areas;
  - interrupt the sequential experience travelling along the glen;
  - affect the perception of its scale; and
  - change the open nature of views passing between the shore and the surrounding slopes.
- 7.71 Both sides of Loch Ness are sensitive to the introduction of built development which would intrude on views up and down the loch, and across the loch. Combinations of developments which would result in a series of linear or point features may distract from the sequential experience when travelling along the loch.
- 7.72 Given these sensitivities the Council has sought to create and preserve a pattern of wind energy development which is set back and well contained from Loch Ness. Mitigation to date has been through the refusal of poorly sited wind farm proposals, and by securing appropriate mitigation by design, including turbine deletions and careful consideration of the scale of turbines. The outcome to date is for consented and operational wind energy developments which has largely restricted visibility to a limited number of additional blade tips from Loch Ness. The scale and prominence of the Loch Liath turbines is therefore contrary to this prevailing pattern of development, as evidenced by for example VP13 B852 Erchite Wood, east of Loch Ness (picnic area).
- 7.73 The Special Qualities of the SLA include The Dramatic Great Glen of which the following elements would be affected by the proposed development:
- “Urquhart castle is a prominent focus along the loch, occupying a magnificent situation on an irregular headland of rock jutting out into the loch...”
- 7.74 The Council’s Landscape Officer considers that the introduction of the large turbines on the skyline close to the castle would detract from the castle’s prominence in locations on the Dores Road (B852), the minor road rising from Dores to Loch Duntelchaig and from locations on Loch Ness itself, such as would be experienced by the many leisure craft on the loch. It is noted that this effect is mitigated in some degree by the recessive nature of Urquhart Castle’s stone construction when viewed against the vegetated slopes of the glen, and by the offset to the left of the castle in views. The development would tend to be seen as a terminal focus of the glen which rises from Lewiston towards the development; the turbines would be seen to occupy a space beyond the confines of the Great Glen itself, and the blades would remain at a lower level on the skyline which rises to the left and right of the development in the composition.
- 7.75 The development is also considered to affect the following element associated with the Special Qualities of the Dramatic Great Glen:
- “Meall Fuar-mhonaid is a good vantage point from which to appreciate the massive scale and alignment of the Great Glen Fault within a backcloth of the Monadhliath massif to the south and the Balmacann and Affric mountains

interior to the northwest, both areas which possess wildness qualities.”

- 7.76 Meall Fuar-mhonaidh is also regarded as a “Key Location” in the Council’s OSWEG. As detailed above, the Council has continually sought to minimise effects from this landmark summit. However, the Council’s Landscape Officer considers that whilst the development would not significantly affect views towards Meall Fuar-mhonaidh, it would be extremely prominent in views from the landmark hill and would detract from its relationship to the setting described in the special quality. The development would extend the influence of large scale wind energy development around a greater horizontal extent than presently constructed or consented development and emphasise the size of the turbines due to their relative proximity to the hill itself, in contrast to other cumulative schemes.
- 7.77 The effect would also be contrary to the preferred design outcomes which The Highland Council seeks as laid out in the Criteria table within the OWESG. Specifically, Criterion 1 seeks to avoid development being visually prominent in the majority of views from settlements and Key Locations. This hill is regarded by the Council as a Key Location, being a well visited landmark hill which is relevant to the Special Qualities of this SLA.
- 7.78 The development would also fail to meet the thresholds set out for Criterion 3 due to its contribution to a disruption between the landmark hill and its setting. Similarly the contrast in the scale of the turbines to those within the cumulative context would not meet the expectations of Criterion 6 as its design could not be said to contribute positively to the existing pattern of wind development in the area, which would also tend to fail to meet the desired standard of Criterion 9, relating to the effect on the landscape setting of existing turbines and increase their perceived visual prominence.
- 7.79 Overall, the development would have significant detrimental effects on the Special Qualities of the SLA. Such effects would be in the form of encroachment on the landmark Meall-Fuar-mhonaidh and the increase in cumulative effects perceived from the summit with existing and consented developments, and over a limited area on the function of Urquhart Castle as a prominent focus along Loch Ness. Officers did request the applicant to explore options to reduce the impacts on the SLA further, through turbine deletions and the reduction in the scale of the proposed turbines. This has not been taken forward by the applicant.

### **Visual Impact**

- 7.80 Visual impact is considered with the aid of the criterion set out in Section 4 of the OWESG, with assessment against the criterion and a view taken as to whether the threshold set out in the guidance is met or not, contained in Appendix 6. The OWESG criterion is a useful tool to inform wind farm design and to generally guide development to appropriate places. The OWESG criterion are not however absolute policy requirements, with these reflecting the time of the OWESG’s publication which pre-dates NPF4.
- 7.81 The ZTV (EIAR Figures 6.2a-6.2c, 6.3a-6.3b) illustrates that the scheme will be visible from the elevated rolling moorland plateau and hill summits with 5km. It also points to supportive elements such as visibility being reduced by the existing

landform from lower lying areas such as from the northern slopes of Glen Moriston to the south, the southern slopes of Glen Urquhart to the north and the western slopes of the Great Glen. Within 10-15km visibility is more localised but extends across elevated land and summits. The EIAR refers to theoretical visibility which includes the northern slopes of Glen Urquhart, parts of the Affric Kintail Way (VP4), some lower parts and the northern slopes of Glen Affric to the west; and elevated landform and hill summits to the east of the Great Glen, including sections of the Caledonia Way cycle route, the South Loch Ness trail and the B862 near to Suidhe viewpoint (VP8) to the south-east. Beyond 15km theoretical visibility is mostly from elevated land and summits including elevated landform and hill summits within the Glen Affric NSA and the Central Highlands WLA and to the east of the Great Glen, including Carn na Saobhaidhe (VP17), Carn Dearg (VP20). To the north-east localised elevated extents of the B862 south of Dores (VP16) and hill summits to the south including Meall Dubh (VP14).

- 7.82 When considering the additional visibility of turbines beyond that experienced as a result of the operational and consented wind farm development, the ZTV indicates that the proposed development will be visible from similar locations as operational wind turbines. However, as summarised in the EIAR, within 5km, the proposal will introduce small areas of visibility within the site itself and to the north within Glen Urquhart near Balbeg, Braefield and near Shenval, though intervening woodland and forestry if maintained would limit this. Beyond 5km, the ZTV indicates introduced visibility from Loch Ness to the north-east of Drumnadrochit and approximately 1.6km of the eastern shore of Loch Ness near Erchite Wood. There would also be areas of new wind farm visibility to the south of Drumnadrochit, the western slopes of Strathglass to the west of Cannich, areas of Stratherrick and to the east of Fort Augustus near Borlum Hill, however intervening woodland and forestry if maintained would again limit visibility. To the west of the site, the ZTV also indicates visibility near Loch Affric, and a section of the Affric-Kintail Way near Alltbeithe.
- 7.83 The SEI also includes an updated cumulative ZTV (CZTV) (SEI Figure 6.37), which includes the pending application for Chrathaich Wind Farm. The CZTV generally shows a comparable pattern of theoretical visibility between Chrathaich Wind Farm with Loch Liath. The CZTV also illustrates localised areas of visibility of the proposed development in isolation, including localised areas within 5km, along the lower northern slopes of Glen Urquhart, and localised areas within the Glen Affric NSA. The SEI contends that these areas generally relate to areas of visibility of other operational, consented and proposed wind farms, as illustrated on SEI Figure 6.10. It must however be acknowledged that ZTVs show worse case bare earth modelling, and whilst potential visibility from cumulative schemes is likely to coincide from a particular point, the effects and actual visibility of each scheme can be very different in reality, due the scale and position with the landscape. For example, visibility from Loch Ness and the core path at Glen Affric (VP15).
- 7.84 Any large-scale wind energy scheme would be expected to result in significant visual effects. This is acknowledged through the OWESG, which explains that significant effects do not automatically translate to unacceptable effects. Following a review of the applicant's LVIA, there are however several differences in finding between the applicant and Council officers. Appendix 5 of this report provides a

summary of the applicant's visual assessment and the officer's appraisal of the assessment, which highlights any differences and any concerns with regard to visual impact.

7.85 Pertinent findings are:

- The EIAR includes a visual impact assessment of each of the 20 viewpoints. All the receptors at these viewpoints are considered by the applicant to have High sensitivity and susceptibility to wind energy development. This is agreed.
- The applicant has identified that the proposed development will give rise to significant visual effects at six viewpoints within a radius of 15.1km of the site. These are:
  - VP1 (Affric Kintail Way near Braefield),
  - VP2 (Meall Fuar-mhonaidh),
  - VP5 (Coire Loch Trail, Glen Affric),
  - VP8 (B862 Suidhe Viewpoint),
  - VP9 (Meall Mor, above Glen Affric) and
  - VP10 (Creag Dhubh)
- In addition, the EIAR identifies cumulative impacts at four of these viewpoints: VP2, VP5, VP9 and VP10.
- Additionally, officers have identified significant adverse visual effects at four further viewpoints:
  - VP13 (B852 Erchite Wood, east of Loch Ness (picnic area),
  - VP15 (Core Path at Loch Affric),
  - VP16 (B862 South of Dores), and
  - VP18 (Toll Creagach).
- In addition, officer have identified significant cumulative adverse visual effects at VP16 and VP18. These viewpoints are located within 22.3km of the site.
- Whilst not altering the overall level of significance, officers also came to different conclusions in relation to the predicted magnitude of change or the level of effect at VP2 (Meall Fuar-mhonaidh), VP9 (Meall Mor, above Glen Affric), VP10 (Creag Dhubh), VP11 (Carn na Leitire) and VP12 (Beinn a' Bha'ach Ard).

7.86 What follows is a summation of the visual impacts grouped by receptors. Consideration of each viewpoint based on the applicant's methodology (EIAR Appendix 6.1) is contained within Appendix 5 of this report.

### **Impact on Recreational Users of the Outdoors**

7.87 18 of the 20 selected assessed viewpoints are representative of locations where people undertake recreational activities in the outdoors, reflective of the character of the LVIA study area. These are: VP1 (Affric Kintail Way), VP2 (Meall Fuar-mhonaidh), VP4 (Affric Kintail Way) VP5 (Coire Loch Trail, Glen Affric), VP6 (B862 near Whitebridge), VP8 (B862 Suidhe Viewpoint), VP9 (Meall Mor), VP10 (Creag Dhubh), VP11 (Carn na Leitire), VP12 (Beinn a' Bha'ach Ard), VP13 (B852 Erchite Wood, picnic area), VP14 (Meall Dubh), VP15 (Core Path at Loch Affric), VP16 (B862 South of Dores), VP17 (Carn na Saobhaidhe), VP18 (Toll Creagach), VP19

(Sgurr nan Conbhairean), and VP20 (Carn Dearg).

- 7.88 The applicant and officers agree that this type of receptor has a high susceptibility to changes in views. All of the six viewpoints (VP1, VP2, VP5, VP8, VP9 and VP10) identified by the applicant as having a significant visual impact are representative of views experienced by different recreational receptors.
- 7.89 From the elevated areas and mountain summits the applicant identifies significant effects at VP2 (Meall Fuar-mhonaigh), VP9 (Meall Mor, above Glen Affric) and VP10 (Creag Dhubh), with significant cumulative effects predicted for VPs 9 and 10. The VPs range in distance from 7.1m to 15.1km from the nearest turbine and are geographically spread, with Meall Fuar-mhonaigh to the east and Meall Mor and Creag Dhubh to the west. In these views the proposal will substantially extend the horizontal spread and visual envelope of wind energy development. NatureScot note that the proposed turbines would appear as prominent, larger scale structures in panoramas from elevated views including the popular northern Munros / summits which offer the only opportunity to appreciate the scenic views across the full extent of the NSA. In turn this will adversely affect the views and experience from these hills, diminishing the recreational experience for users. NatureScot also consider that the LVIA underrates the magnitude of change and thus the level of visual effect from these locations.
- 7.90 Officers agree that there will be significant effects at the above VPs, however, consider that the applicant understates the predicted magnitude of change or level of effect. Officers also consider that these aspects are understated for the summits in VP11 (Carn na Leitire) and VP12 (Beinn a' Bha'ach Ard), although agree that the overall visual effect is not significant for these particular receptor summits.
- 7.91 In addition, officers have identified an additional significant effect from the Munro summit of Toll Creagach (VP18) which is located 18.6km to the nearest turbine. The effects would be significant and similar to those reported for VP9 (Meall Mor). The proposal would broadly double the horizontal spread of Bhlaraigh and introduce additional layering of wind farm development in the view between Corrimony in the foreground and Dumnaglass to the rear.
- 7.92 From lower elevations, the applicant has also identified significant but localised visual effects at VP1 on the Affric Kintail Way, which is a 44km promoted long distance trail from Drumnadrochit to Morvich. VP5 on the Coire Loch Trail in Glen Affric and at VP8 (B862 Suidhe Viewpoint) which is on The Caledonia Way cycle route. Cumulative visual effects are also predicted at VP1 and VP5. Officers agree that significant effects will occur at these VPs and on parts of the recreational routes identified. However, the applicant has under reported significant adverse cumulative effects identified by officers at VP15 (Core Path at Loch Affric) and VP13 (B852 Erchite Wood, east of Loch Ness).
- 7.93 VP15 is located on Core Path IN05.06 (17.5km in length), which is a circular route around Loch Affric and represents views experienced by recreational receptors within the Glen Affric NSA. From the Loch Affric circular walk, views over the loch are restricted due to screening by landform or woodland, intensifying the experience when views are revealed. As noted by NatureScot, due to the characteristics of this glen, especially in proximity to Loch Affric, renders the area

particularly sensitive to the development proposed. This sensitivity is also evident when considering the acceptability of nearby schemes. For instance, Bhlairidh Wind Farm extension was supported as it would not be visible from the circular walk around Loch Affric. This was also an important consideration for Chrathaich Wind Farm to limit the impact upon this area the deletion of Turbine 14 has been sought and agreed by the applicants.

- 7.94 NatureScot note that from the limited areas where Loch Affric, the centrepiece of the NSA designation can be appreciated in views east, it will often coincide with visibility of the proposed turbines directly above Glen Affric/ Loch Affric, as seen in VP15. The effect of the previously secured mitigation on the cumulative wireframe (SEI Figure 6.28a). The only visible turbine hub for the pending Chrathaich scheme is T14 which would sit amongst the proposed T1, T7 and T8 cluster for Loch Liath as detailed on the wireframe. However, with the agreed deletion of T14, the proposed turbines at Chrathaich will be much more contained behind the existing landform from this VP, except for a few blade tips.
- 7.95 In contrast, the hubs and blade tips of eight turbines and the blade tips of a further three turbines of the proposed development will be seen. The turbines will extend along the majority of the ridgeline and will sit to the rear and partially overlap the smaller Corrimony turbines which are back clothed from this VP. The proposed turbines will appear perceptibly larger in scale than those of Corrimony. The EIAR contends that given the distant nature of the view, the existing presence of the operational Corrimony turbines in the view, and the relatively small proportion of the view that the proposed wind turbines will occupy, the introduction of the proposed development will result in a small scale change to the view. Officers consider that the effects have been understated and owing to the framed nature of the view within the strath and contrasting nature and scale of the turbines with Corrimony, the effect would be visually significant. The EIAR reports, similar views will be experienced from relatively localised lower-lying extents of Glen Affric, within 19-25km to the west of the nearest proposed turbine, including approximately 2km of the core path which passes to the north of Loch Affric.
- 7.96 Officers have also identified significant effect from VP13 (B852 Erchite Wood, east of Loch Ness). The viewpoint represents views experienced by recreational receptors visiting the picnic areas within the Loch Ness and Duntelchaig SLA, and road users of the B852. However, as stated in the EIAR, similar views will be experienced from very localised extents of Loch Ness (2.7-4.7km to the northeast of Strone Point) and localised extents of the eastern loch shore. Officers agree that this view is also being representative of views obtained from leisure users on the water of Loch Ness such as canoeists on the Great Glen Canoe Trail, which is referred to as a 'Key Route' in the OSWEG and tourist boats. Views from the loch towards Urquhart Castle is also a 'Key View' identified in the OSWEG.
- 7.97 As detailed previously, in response to the popularity and sensitivity of the loch to development, officers have continually sought to avoid/minimise visibility from the water and along the surrounding loch level routes and approaches. Consequentially, the consented turbines at Bhlairidh and the pending scheme at Chrathaich will largely restrict visibility to a limited number of additional blade tips, which is commensurate with the pattern of visibility with the operational turbines at

Bhlaraidh.

- 7.98 In contrast, the proposed development will be far more visually intrusive, with larger scale turbines with results in hubs and towers now being visible on this skyline. It also results in a greater horizontal spread of turbines, resulting in turbines being introduced into views where there is exceptionally limited existing or consented wind farm development by virtue of careful siting and design. As such this scheme has the potential to substantially undo design mitigation secured for other wind farm schemes to date. Such an affect would be significant and detrimental to the visual amenity of receptors at the shoreside, as well as for those on the loch itself. These concerns are also observed in the responses of the Council's Landscape Officer and Historic Environment Scotland that noted it would have a considerable change in the impact turbines have on this view, and therefore on the setting of Urquhart Castle.

### **Impact on Road Users**

- 7.99 The OWESG identifies 'Key Routes' as the A82 (for LN10 this is specifically around Inver Coille to Invermoriston), B862 at Stratherrick, B851 Strathnairn and Loch Ness Side, A9, A833 Glen Convith, A831 Glen Urquhart, A887 Glen Moriston (for LN10 this is specifically around Dundreggan), A87 above Loch Garry, B851 Tombreck-Inverness, B852 South Loch Ness Shore, Dunain-Blackfold-Abriachan, Minor Road Caiplich (UC1072) and the minor road Bunloit. The views from these routes would be experienced transiently by road users (mainly drivers and passengers, and cyclists) who would experience the wind farm as part of the changing sequence of views experienced from the road.
- 7.100 The ZTV indicates and the assessment concludes that there would be no or very limited views of the proposed development from the following key routes identified in the OSWESG and have been scoped out of further assessment: A9, A82, A87, A831, B851 and A887.
- 7.101 The only road scoped in for further assessment is the B862. The ZTV indicates intermittent sequential visibility from approximately 6km of the road, this includes elevated parts of the route near Suidhe viewpoint (VP8), and the lower lying section around Whitebridge (VP6). There is also a VP from the slightly elevated and open section near Dores (VP16). The B862 also forms part of the Caledonia Way cycle route between Fort Augustus and Whitebridge and it also passes through the Loch Ness and Duntelchaig SLA. The EIA reports that the overall magnitude of change is medium for localised sections of the road near the Suidhe viewpoint, resulting in a moderate (adverse) and significant visual effect. However, it contends that magnitude of change is reduced to low for the road as a whole and taking account of the high sensitivity will result in a minor (adverse) and not significant visual effect.
- 7.102 Officers agree with the applicant's assessment regarding the section near the Suidhe viewpoint but contests the findings for VP16 and considers that the applicant under-reports the effects. This is from a slightly elevated position on the route and is open with views focused across Loch Ness and down The Great Glen. The hubs and blade tips of all thirteen turbines will be seen against the skyline in distant views south-west, turbine bases will be partially screened. Turbines will be to the north-east of the operational Bhlaraidh wind turbines; and it will increase the

prominence and horizontal extent of turbines in the view. The EIAR contends that the turbines will not overwhelm the scale of the containing landform to the west of the Great Glen and will appear relatively evenly spaced with a balanced composition across the cluster. The applicant considers that this will result in a low magnitude of change, the effects of which will be minor and not significant. However, officers find that the development will diminish the scale of the hills and will be much larger than the existing operational Bhlaraidh turbines, resulting in a substantially increased horizontal spread. The contrasting scale of turbines would also be apparent, particularly T3, T1 and T4 which appear to step down into the valley, forward of the horizon. This will result in major/moderate effects (adverse) and will be significant.

- 7.103 The EIA reports that the A833 road is not assessed further due to limited visibility apart from approximately 1.7km of the road (within 13km of the site), although actual visibility is further reduced by intervening woodland and vegetation. However, glimpsed views from the road are possible and the effect is considered within the assessment of VP7: A833 near Balnagrantach. The hubs and blade tips of two turbines and the partial blade tips of a further six turbines will be seen against the skyline in distant views south-west. The ridgeline formed by elevated rolling moorland along the north-eastern site boundary will partially screen turbines. Officers consider that whilst it will introduce turbines where there are currently none, these are oblique views experienced by road users in between occasional breaks in the vegetation which lines the road, with an overall effect that is minor and not significant.
- 7.104 The EIA reports that the B852 was not assessed further by the applicant as theoretical visibility is indicated from approximately 4km of the road to the south of Dores but contends that the actual visibility is further reduced by intervening woodland and vegetation. Although “glimpsed” views from this road are considered within the assessment of VP13: B852 Erchite Wood, east of Loch Ness (picnic area). As outlined above officers consider that visual effects from VP13 is significant. However, it is recognised that due to the existing roadside vegetation, these are not representative views from much of the road, instead it is more relevant to receptors on the loch.

### **Impact on Residential Receptors**

- 7.105 There are no settlements (as defined by the Development Plan) located within 5km of the outermost turbines of the Proposed Development. Representative viewpoints for residential receptors are from: VP1 (Affric Kintail Way, near Braefield), VP3 (Balbeg), VP6 (B862 near Whitebridge) and VP7 (A833 near Balnagrantach). The sensitivity of residential receptors is assessed as High in the EIAR. A Residential Visual Amenity Assessment (RVAA) is not required as there are no residential properties within 2km of the turbines.
- 7.106 Theoretical visibility of the proposed development from settlements within the 45km radius Study Area is illustrated by EIAR Figure 6.2b. According to the ZTV, most of the settlements located within 15km of the site have no theoretical visibility and have not been taken forward for further assessment. This includes Fort Augustus and Invermoriston. Theoretical visibility is possible from the northern edge of Drumnadrochit (14km to the north-east), Dores (over 20km to the north) and

Whitebridge (over 12km to the southeast). However, the applicant contends that actual visibility is limited by landform and vegetation and are not considered further in the EIAR. Individual and small clusters of residential properties are found scattered along the glens to the north, east, south and northwest, and along Glen Urquhart to the north.

- 7.107 The only settlement taken forward for further assessment is Balnain which is a small village in Glen Urquhart and comprises relatively dispersed properties along the A831. The ZTV indicates limited visibility from the settlement, with potential for visibility mostly focused along the elevated northern and western edges of the settlement. The assessment finds that when views are available from the northern edge of the settlement, the turbine blade tips of the proposed development will be glimpsed beyond intervening landform and against the skyline in the middle distance of views. This is represented by the views experienced in VP3 (Balbeg, Glen Urquhart). When available views from the settlements western edge will be the hub and blade tips of one turbine and the partial blade tips of a further five turbines as represented by VP1 (Affric Kintail Way, near Braefield). The EIA reports the overall magnitude of change is medium for a small number of properties located along the western edge of the settlement, reducing too low for the settlement as a whole. Taking account of the high sensitivity, this will result in a moderate (adverse) and significant visual effect locally, reducing to minor (adverse) and not significant visual effect for the settlement as a whole. This assessment is agreed.
- 7.108 There are scattered properties and smaller settlements located along the B862 at Stratherrick. However, as noted in the previous section theoretical visibility along the B862 road is not continuous, but when views are available it will be restricted to additional blade tips adjacent to Bhlairidh Wind Farm and at a distance of 12.8km. This effect is represented by the low lying VP6 from the north of Whitebridge. Although more turbines would be visible, it would not substantially affect the lateral scope or be viewed as dominant additions. As such there is agreement that effects from these scattered residential properties will not be significant. However, as detailed above, the applicant's assessment relating to VP16 (B862 south of Dores) is contested, which is also representative of views from nearby residential properties. For this reason, views (including cumulatively with other schemes) from this VP are significant.
- 7.109 The ZTV indicates that there is potential for some visibility along the A833, as represented by VP7 (A833 near Balnagrantsach), which is representative of views from scattered properties in the area. However, there is no visibility by the time the road reaches Milton. The hubs and blade tips of two turbines and the partial blade tips of a further six turbines will be seen against the skyline in distant views southwest. Although this will present wind energy development within a view that currently doesn't experience, the turbines will be partially screened set at a distance of over 13km. It is agreed that this will not result in significant effects, including cumulatively for this receptor.

### **Cumulative Landscape and Visual Impact**

- 7.110 In addition to the above, it is important to consider the context of the development in combination with other wind farm developments and assess the likely cumulative effects. Of particular importance is how wind energy developments relate to each

other in design and relationship to their surroundings, their frequency when moving through the landscape and their visual separation to allow experience of the character of the landscape in between.

- 7.111 GLVIA3 advises in relation to the baseline, taking the “proposed development” to mean the main proposal that is being assessed “it is considered that existing schemes and those which are under construction should be included in the baseline for both landscape and visual effects assessments (the LVIA baseline). The baseline for assessing cumulative landscape and visual effects should then include those schemes considered in the LVIA and in addition potential schemes that are not yet present in the landscape but are at various stages in the development and consenting process”. The applicant has split the assessment into two scenarios, consented projects and those currently pending consideration. The SEI updated the applicant’s assessment to take account of the evolving cumulative wind energy picture and in particular for this site the submission of Chrathaich Wind Farm.
- 7.112 The applicant has identified significant cumulative adverse visual effects on receptors at viewpoints: VP2 (Meall Fuar-mhonaigh), VP5 (Coire Loch Trail, Glen Affric), VP9 (Meall Mor, above Glen Affric), and VP10 (Creag Dhubh). The overall assessment findings are not contested, but for VP2, the applicant has reduced the magnitude of change from high to medium, and the effect from major to moderate when both cumulative scenarios are considered, albeit it still identifies a significant adverse effect. Officers consider that the magnitude of change should still remain high rather than medium. Similarly, it is found that the level of cumulative effect is higher than reported for VP 11 (Carn na Leitire) and VP12 (Beinn a’ Bha’ach Ard), although it is agreed that these will not be significant effects.
- 7.113 There would also be significant cumulative effects at VP16 (B862 South of Dores). At this VP, Loch Liath would be the most prominent when Bhlaraidh extension and Chrathaich are added into the cumulative picture. All other schemes are less dominant in the view and appear over rather than forward of the horizon. The in combination cumulative effects result in a substantially increased wind farm cluster which detracts from the landscape features within the view, with the intervening distance being foreshortened by the effect of being across a large body of open water in the view. In addition, significant effects are also predicted at VP18 (Toll Creagach). The addition of the consented Bhlaraidh extension would visually tie Loch Liath into the Bhlaraidh cluster. The addition of Chrathaich would increase the depth of the enlarged wind farm cluster, with Loch Liath reading as a linear western and somewhat uncontained sprawl of turbines across this mid portion of the view, and does not appear to round off the cluster, leading to moderate and significant adverse cumulative effect.
- 7.114 It is reported in the EIAR that the applicant has attempted, where possible, to reduce potential landscape and visual effects through the proposed design and layout of the turbines. In appraising the scheme, it is apparent that this has not gone far enough. It is apparent that this is not a well-designed scheme, as evidenced by the number and widespread resultant significant adverse landscape and visual effects identified by both the applicant, NatureScot, and Council officers. Such effects are not sufficiently mitigated, or localised, and arise due to the proposed wind farm being inappropriately sited in close proximity to a regionally

important landscape resource, as well as due to the scheme's poor relationship with the visual receptors and features of the area. It is also considered to undermine the design objectives and rationale for other schemes in the area. A further contributing factor is the scheme's resultant aviation lighting requirements which are assessed in further detail below.

### **Aviation Lighting (Hours of Darkness)**

- 7.115 There is a requirement to provide aviation lighting on turbines over 150m in height. Aviation lighting can disrupt the sense of remoteness experienced during hours of darkness from locations across the area. While during the day one's eye would be drawn to the moving blades of the turbines, in hours of darkness one's eye would be drawn toward the red aviation lighting, which can flatten a sense of distance in the darker landscape. Depending on the position of the receptor to the lighting, the lights may appear to flash as a result of the turning of the turbine blades, passing between the light and the viewer. This may be a visually confusing effect for the receptor unless aware of the reason for the lights, while in hours of darkness one does not have the benefit of being able to relate the lighting to a landform.
- 7.116 Given the environment of the area light pollution raises concerns, indeed as detailed previously, notwithstanding the smaller scaled scheme of Corrimony Wind Farm, officers have sought to minimise impacts from visible aviation lighting in this area. This was successful at Bhlraidh Wind Farm extension with infra-red aviation lighting being accepted despite the 180m to tip height. Furthermore, at the pending Chrathaich Wind Farm the scheme proposes turbines under 150m to blade tip so there is no requirement for visible aviation lighting so no impact during hours of darkness. The applicant's assessment for the proposed development is detailed in EIAR Chapter 6 and Appendices 6.5 and 14.2.
- 7.117 To reduce the impacts the applicant proposes to use a reduced lighting scheme in which six of the thirteen turbines will be lit with visible aviation lighting. The strategy will require two medium intensity 'steady' red (2,000 candela (cd)) lights on the nacelles of each of turbines T1, T4, T7, T10, T12 and T13, the secondary light on each turbine is fitted for use in the event of failure of the primary light and will not be lit concurrently. Mitigation will also be implemented through sensors which will measure the prevailing atmospheric conditions and visibility range. Where atmospheric conditions limit visibility to distances of less than 5km the lights are illuminated at the necessary intensity of 2,000cd. When clear atmospheric conditions result in visibility of 5km and over, the lights will operate in a lower intensity mode of 200cd, which is the equivalent of not less than 10% of the minimum peak intensity capable illumination. EIAR Appendix 14.2 suggests that, based on the extrapolation of Met Office records at Inverness Airport, the lights at Loch Liath will be set at 2,000cd for 4% of the time (visibility below 5km) and set at 200cd for 96% of the time (visibility above 5km). Owing to the different location of the baseline data, it is not agreed that these figures should be relied upon.
- 7.118 Discounting landcover, the hub height ZTV (EIAR Figures 6.3a and 6.3b) details the areas from which the turbine hubs may be seen. The assessment also illustrates the potential variability in candela levels emitted in relation to the vertical viewing angle of the observer (EIAR Appendix 6.5 Figure A6.5.1). The light is brightest when observed from a similar level or just above, but less bright as the

observer falls significantly below or above the light.

- 7.119 The EIA reports that aviation lighting will be theoretically perceptible from the Glen Affric NSA and Central Highlands WLA, with some theoretical visibility from localised lower-lying areas within the Glen Affric NSA, but this will be at a reduced intensity due to the viewing angle. Views will be focused within the elevated glen sides in the north and south of the NSA, with lights occasionally appearing at maximum intensity due to viewing angle. Aviation lighting will appear at maximum intensity from the most elevated locations including hill summits, although at an intervening distance of approximately 10-20km.
- 7.120 EIAR Figure A6.5.3 illustrates areas where lighting of the operational Corrimony Wind Farm and the proposal will be theoretically visible, as well as areas where only the nacelle lighting of the proposed scheme will be theoretically visible. This shows that the proposal will introduce lighting visibility across elevated areas of ground including hill summits, predominantly centrally and to the east of the site. The EIAR contends that to the west, including the Glen Affric NSA and Central Highlands WLA, new areas of lighting visibility would be limited due to the presence of the lit turbines of Corrimony. The EIAR reports that lighting effects will not result in any significant impacts on designated landscapes.
- 7.121 NatureScot note in its consultation response that the required turbine lighting will extend the adverse effects on the NSA after dusk and into the night-time. This is likely to exacerbate the effects of Corrimony aviation lighting. Given the area is popular for wild camping, sunset and sunrise (behind the proposal which will be in silhouette) will be experienced and sought out by recreational users. Walkers setting out early in the morning from Glen Affric or descending at dusk down into the glen from Toll Creagach (VP18) would be most susceptible. This would further weaken the appreciation of wildness and remoteness as experienced from these routes. NatureScot encourages the applicant to periodically review and consolidate implemented lighting schemes to explore ways to further reduce the minimum number of lights required in the interests of aviation safety. This is expected to be secured by condition.
- 7.122 In terms of visual impacts, the most likely effects would be on recreational receptors using the more elevated locations and hill summits. Such as Tom a Choinnich and Carn Eighe to the west, Beinn a'Bha'ach Ard (VP12) and Sgurr a' Choire Ghlais to the north, Meall Dubh (VP14) to the south-west and Carn na Saobhaidhe (VP17) to the south-east. However, the assessment contends that these areas are less likely to be regularly frequented during the hours of darkness, given the challenging terrain. The closest of the summits is VP2 Meall Fuar-mhonaidh 7.1km to the east in which all six lights would be visible. Maximum candela level of between 2,452 and 2,379cd and reduced (10% of Maximum) candela level of between 245 and 238cd under clear conditions. Given the intensity and distance and having regard to NatureScot's recent guidance on aviation lighting (2024), officers find that this would result in significant adverse effects.
- 7.123 The EIAR has not provided an individual assessment of significance for all of the 20 VPs, but it has for the three hours of darkness visualisations, VP1, VP10 and VP18. Both 2,000cd and 200cd intensity nacelle lights have been assessed. 200cd represents the maximum intensity that would be used when visibility extending from

the wind farm exceeds 5km. VP1 for is representative of users on the Affric Kintail Way and from nearby residential properties at Buntait, while VP10 Creag Dhubh and VP18 Toll Creagach are representative of recreational receptors.

- 7.124 As shown in EIAR Appendix 6.5 Figure A6.5.1, due to the viewing angle of the observer being below the horizontal plane, reduced light intensity is expected across lower lying straths and glens in which there are more settlements. Within 15km the only settlement taken forward in the LVIA assessment was Balnain, Glen Urquhart (7-10km to the north and north-east). However, the assessment has concluded that visibility of the aviation lighting is unlikely and significant effects are not envisaged. However, views of 1-2 hubs with visible lights are theoretically possible at scattered residential properties as noted in the assessment for VP1 Affric-Kintail Way near Braefield. Although not from this VP, views of Corrimony Wind Farm and its lights are available at scattered properties within 1.2km. At this VP, T12 will be potentially visible with T13 also possible in the vicinity of the site. The maximum light intensity will be 145cd and 14.5cd for the reduced scenario. When lit at the reduced intensity, lighting on the hub of one of the six lit turbines will be barely perceptible just above the dark horizon in views to the south, at a distance of 5.9km from the nearest lit turbine. The significance level is judged to be minor (adverse) not significant. These findings are agreed.
- 7.125 At VP10 (Creag Dhubh) the EIA reports that relatively dark skies are experienced in views from this location. The viewpoint overlooks the Glen Affric NSA and is located within the Central Highlands WLA. Views of all six of the lit turbines will be visible just above the dark horizon in views to the east, at a distance of 15.1km. The maximum candela level will be between 1,582-1,721cd with a reduced level of 158-172cd in clear skies. The lighting will be seen in a similar part of the view as the barely perceptible lit turbines of the operational Corrimony Wind Farm. However, it increases the horizontal extent of visible artificial lighting in otherwise dark night skies, albeit lighting will appear as a distant feature. The overall effect is judged to be minor (adverse) but not significant. These findings are agreed.
- 7.126 Similarly with the more distant Munro of Toll Creagach (VP18), lighting on the hubs of all six of the lit turbines will be visible in front of dark landform in views to the east at a distance of 18.6km from the nearest lit turbine. Lighting will appear slightly brighter than that of the operational Corrimony Wind Farm. The overall effect is judged to be minor (adverse) but not significant. Again, this is agreed.
- 7.127 It is also agreed that road users utilising the A82, A831 and A887 would not experience significant effects given that hubs are hidden from view from these routes (EIAR Figure 6.3a Hub Height ZTV). Along the A833 there will be limited visibility indicated from approximately 1.7km of the road (within 13km to the north-east of the site), however, in reality this is further reduced by intervening woodland and vegetation. VP7 (A833 near Balnagrants) is located along this road and provides the potential for three lit hubs to be seen at this location with visible lighting of 57.6cd under clear conditions. Visibility of the turbines with visible lighting will also be evident from short sections of the B862; VP6 (B862 near Whitebridge) will have no visibility of the hubs, whereas further along the road at VP8 (Suidhe Viewpoint), six hubs are potentially visible with lighting at between 108.7cd and 90.2cd under clear conditions and at a distance of 13.9km. Overall, it is however agreed that the impact on road users would not be significant owing to the

separation distance, the predicted light intensity, the direction of travel, and limited geographical extent where theoretical visibility would occur. The proposed lighting would however be an unwelcome noticeable feature in the landscape.

- 7.128 The presence of any visible aviation lighting is of concern, particularly when this is seen intermittently due to passing blades, with these additional visual impacts having been effectively designed out by the operational and consented Bhlaraidh wind farm schemes and the pending application of Chrathaich. However, it is noted that the lighting from Corrimony does have some effect, although Loch Liath will intensify the effect and extend the visual influence into a greater area. Planning conditions can however be applied to potentially limit the duration of these effects should Primary Surveillance Radar (PSR) or the use of aircraft installed Electronic Conspicuity (EC) equipment mitigation measures become widely available across the UK, and can be deployed at reasonable cost, as is now the case elsewhere in Europe. It is therefore proposed that the need for aviation lighting to be monitored throughout the lifetime of the development and switched off should this become redundant. The prospect of this however remains uncertain at the present time.

### **Construction**

- 7.129 There are likely to be some adverse impacts caused by construction traffic and disruption, particularly during the construction phase when abnormal loads are being delivered to site. The applicant anticipates that the wind farm construction period will be 18 months. A Construction Traffic Management Plan (CTMP) would be secured to manage the impacts upon the local road network throughout the construction period. It is considered that the CTMP should be reviewed throughout the works and informed by feedback from ongoing engagement with the community, through a Community Liaison Group. This will ensure that the community council and other stakeholders are kept up to date and consulted before and during the construction period.
- 7.130 A Construction Environment Management Plan (CEMP) would be in place during the construction phase, an outline CEMP has been provided (EIAR Appendix 4.1). and included with the Schedule of Good Practice and Mitigation Measures outlined in EIAR Appendix 4.2. The CEMP would control potentially polluting activities and prevent adverse impacts on river catchments, water supply catchments and the environment during construction. The CEMP will also be amended to incorporate information obtained during detailed ground investigations which will be undertaken post consent and prior to construction activities. The Principal Contractor would implement measures outlined within the CEMP as agreed with consultees including SEPA, NatureScot and THC. The CEMP will also contain a Pollution Prevention Plan, Construction Method Statements, a Peat Management Plan (Outline submitted – EIAR Appendix 7.3), a Construction Traffic Management Plan (CTMP) a Site Waste Management Plan, an Access Management Plan (outline submitted – EIAR Appendix 13.1) and a Site Restoration Plan. Compliance with the CEMP will be overseen by a suitably qualified and experienced Environmental/Ecological Clerk of Works (ECoW).
- 7.131 In general, working hours for construction will be from 07:00 to 19:00 Monday to Friday and 07:00 to 13:00 on Saturday. No working is proposed on Sundays and public holidays unless otherwise agreed. Developers must comply with reasonable

operational practices regarding construction noise so as not to cause nuisance. Section 60 of the Control of Pollution Act 1974 sets restrictions in terms of hours of operation, plant and equipment used and noise levels etc. and is enforceable via Environmental Health and not Planning. It is recommended that the applicant continues to keep noise to a minimum on the site and construction noise will be considered as part of the CEMP.

- 7.132 The new access tracks will be constructed using both cut and fill and floating designs to limit impacts on deep peat. SEPA are content and require tracks to be floated as shown on EIAR Figure 4.1 and for this to be secured by condition. SEPA also require the finalised Peat Management Plan to demonstrate how micro-siting and other measures have been used to further minimise peat disturbance. It also requests that there is a further investigation into opportunities to deliver greater peatland restoration. Revised peatland restoration areas and further information to address NatureScot's concerns has since been submitted. This is detailed further in the 'Natural Heritage' section of this report below.
- 7.133 Once the turbines have been installed, the access tracks, substation and hardstanding areas around the turbines would remain in place for the operational lifetime of the development. The construction compound areas and the site borrow pit will be restored and will form part of the CEMP and as requested by SEPA can be secured by condition. In addition, the Council will require the applicant to provide a financial bond regarding final site restoration (restoration bond) in the event of non-operation.
- 7.134 Where it is necessary to cross watercourses or flowing drains, appropriately designed crossings and culverts will be installed. SEPA are content with this approach and request that all watercourse crossings to follow the design specifications outlined in EIAR Appendix 7.5 Watercourse Crossing Inventory. Due to the scale of the development SEPA would control pollution prevention measures relating to surface water run-off via a Controlled Activities Regulations (CAR) Construction Site Licence. This will also be required in relation to any groundwater dewatering during excavations of the wind turbine foundations, excavated access tracks and underground cables.
- 7.135 The applicant has requested a micro-siting allowance of 50m for site infrastructure (tracks, turbine locations, underground cables and crane hard standing areas). Micro-siting is considered acceptable to address unforeseen onsite constraints. Any more than 50m may have a significant effect on the composition of a development. SEPA are content with this distance subject to any siting within this allowance not being located on peat deeper than presented in the application. Any movement from the consented locations should be subject to approval by the ECoW; this can be secured by a planning condition.
- 7.136 Should the development be granted consent, a Community Liaison Group (CLG) will be conditioned to ensure that the Community Council and other stakeholders are kept up to date and consulted before and during the construction period.

## **Roads, Transport and Access**

- 7.137 EIAR Chapter 12 assesses the expected impact of this development, particularly through the construction phase. This is supported by a Transport Assessment (TA) and as detailed above, the applicant is also committed to using a Construction Traffic Management Plan (CTMP) to manage the traffic impacts of the development. This will include measures to minimise traffic numbers, measures to minimise potential for dust/debris pollution, traffic management measures and working hours as well as speed limits. Additional information was submitted through the SEI report, this provided an appraisal of the potential cumulative traffic impacts upon the Trunk Road network. This updated cumulative assessment only included consented developments and schemes which have significant traffic flows within the same study area as the proposed development, this included Dell Wind Farm, Bhlaraidh Wind Farm Extension, Cloiche Wind Farm and Bunloinn Wind Farm. Third party representations have highlighted concerns regarding the level of traffic and safety implications of the proposed development for car users and pedestrians.
- 7.138 The site will be accessed from the A887 Trunk Road utilising the existing access currently serving the Bhlaraidh Wind Farm development. The EIAR states that whilst no widening of the existing Bhlaraidh Wind Farm access from the A887 is required, it may be necessary to scrape off the top layer of material to ensure the turbine blade tips do not strike the earthworks embankment and it may be necessary to improve the running surface prior to use.
- 7.139 The EIAR details that all construction and abnormal load will be routed via trunk roads (A830(T), A82(T), A87(T) and A887(T)). The Councils Transport Planning Team welcome this approach and consider that it makes best use of the established route hierarchy of roads in the area. In addition, Transport Planning also support the avoidance of the A831 local public road between Drumnadrochit and Cannich and then north to Beauly. However, as the affected routes are Trunk Roads, Transport Planning defer to Transport Scotland for its assessment of the suitability of the proposal.
- 7.140 The port of entry for turbine blades is expected to be Kyle of Lochalsh, with the blades being delivered to site via the A87(T) and A887(T). All other components arriving by sea are intended to be delivered to Corpach and routed to the site via the A830(T), A82(T) and onto the A887(T). Appendix 12.1 of the EIAR outlines the Route Survey Report, this identifies potential route constraints and mitigation measures to enable the component parts to be delivered. These include the need for load bearing surfaces and the removal of street furniture. Transport Scotland have no objection but state that any modifications to the trunk road network will require further discussion and approval by Transport Scotland. As such Transport Scotland conditions to secure the final abnormal load routes. This should include any accommodation measures required for the abnormal loads, including the removal of street furniture, junction widening, traffic management.
- 7.141 The EIA reports that the proposed development would lead to a temporary increase in traffic volumes on the road network during the construction phase. However, the effects are not constant, and traffic volumes would decrease considerably outside the peak period of construction. The maximum traffic impacts are predicted to occur

in month 8 of the construction programme, with 130 movements per day (52 car / light vans and 78 HGV journeys).

- 7.142 As outlined in EIAR Appendix 12.1, the total traffic movements are not predicted to increase by more than 10% at 14 of the 15 survey locations within the study network. The exception is the A887(T), east of the site access which will have an increase of 10.71%. These levels are well within the 30% threshold outlined in the IEMA Environmental Assessment of Traffic and Movement guidelines. In terms of just HGV traffic movements there will be a significant increase on the A887 (T) east of the site access, with an increase of 41.9%. However, the EIAR contends that whilst this is statistically significant, it is generally caused by the relatively low HGV flows on the A887. It represents approximately four additional inbound HGV journeys every hour during construction activities, which is not considered significant in operational terms. In addition, the theoretical road capacity has been estimated, this demonstrates that the A887(T) east of the site access has approximately 94% spare road capacity and can accommodate the development. The results also indicate there are no road capacity issues on any of the roads within the study area. Transport Scotland stated that it was content with the assessment subject to planning conditions.
- 7.143 As detailed above, the applicant included an updated cumulative traffic assessment in the SEI report. This assessment included an assumption that the peak of construction traffic will coincide with all cumulative assessment schemes. This is a worst-case scenario, as all projects have different construction programmes and connection dates. The baseline data and cumulative development traffic was combined and then a percentage impact assessment undertaken. As reported in the original EIA, the maximum impact associated with the Proposed Development traffic occurs on the A887, east of the proposed development site access junction. As the baseline of traffic will increase with the cumulative scheme, the maximum traffic level increase on the A887 will be 9.87%, which is less than the 10.71% previously assessed. The SEI reports that this potential level of additional traffic will not exceed the road capacity of the trunk roads that form the study area network, however there may be shared traffic management measures which can be provided for through subsequent CTMP for each project. Transport Scotland has no further comment to make on the SEIR and is content with the development, subject to the recommended conditions.
- 7.144 Overall, the assessment concludes that with the implementation of appropriate mitigation in the form of a finalised Construction Traffic Management Plan (CTMP), Abnormal Load Transport Management Plan; Access Management Plan; and A Staff Travel Plan no significant residual effects are anticipated in respect of traffic and transport. Transport Scotland are content with the original EIAR and have no objection to the development subject to a planning condition securing a finalised CTMP. Transport Scotland has no further comments to make on the SEIR and is content with the development, subject to the recommended conditions. Transport Planning also has no objection but recommend that a number of matters are referenced in the final CTMP; including the avoidance of convoying of general construction vehicles along public roads; traffic routing should avoid scheduled opening and closing times of schools; all construction vehicles should have unique identifiers to make it obvious that they relate to this wind farm development;

engagement with local community groups through the construction period of this development and provide a single point of contact for the community to raise any issues.

- 7.145 In terms of wider public access, a short section of the existing Bhlairaidh access route which will be used to access the Proposed Development overlaps with a route identified by ScotWays (H171). There are no other existing non-motorised public access footpaths, bridleways or cycle paths within the Site boundary. The application is supported by an outline Access Management Plan (AMP) (EIAR Appendix 13.1). The applicant does not intend on closing the H171 during construction of the proposed development, subject to the successful implementation of suitable mitigation measures, so long as the health and safety of the public is not compromised. The mitigation measures include (but not limited to) the installation of route crossing points (including signage); diversions; consideration of temporary management systems and speed limit on tracks.
- 7.146 There will be gates in situ along the newly constructed wind farm tracks, only allowing access to authorised vehicles, so access will not be enhanced to the public within the site as a result of the proposed development. However, the applicant does propose access enhancements to the path which provides access to the summit of Meall Fuar-mhonaidh. Enhancement works are expected to include the upgrade and improvement of the section of path from the deer stile to the summit which was identified during the survey work as being in a degraded state. The upgrade will include the construction of raised aggregate paths or stone pitched paths, as advised by survey work, with the installation of appropriate drainage including water bars and cross-drains to ensure hydrological connectivity of habitats and protect the integrity of the path. The applicant also proposes the provision of an ecological information board.
- 7.147 Whilst the Council's Access Officer has no objection to the application and welcomed the submission of the outline AMP, there are a number of revisions/clarifications which will need to be included in the final AMP to make the approach acceptable. This includes plans illustrating the baseline, access management measures during construction and the operational access situation that includes the location of gates, pass gates and signs. It is also recommended that diversions of the H171 during the construction period is avoided. During the operational phase, the Access Officer considers that the public should enjoy enhanced access granted via on foot, cycle and horseback along the newly constructed tracks through the site and any gates should be installed with gaps or pass gates beside them to accommodate walkers, cyclists and horse riders. Further information will also be required in relation to the proposed path which provides access to the summit of Meall Fuar-mhonaidh. However, the Access Officer is content that these details can be secured by a planning condition. Scotways has no objection to the application.

### **Water, Flood Risk, Drainage and Peat**

- 7.148 The results of the applicant's assessment are outlined in Chapter 7 of the EIAR. To address NatureScot's objection additional / revised information has been submitted in relation to the predicted impacts on the priority peatland habitat and is

outlined in SEI Chapter 3 and supporting appendices.

- 7.149 As detailed above a Construction Environmental Management Plan (CEMP) will be in place, which will ensure that potential sources of pollution on site can be effectively managed throughout construction and in turn during operation; albeit there will be fewer sources of pollution during operation. The CEMP needs to be secured by planning condition to ensure the agreement of construction methodologies with statutory agencies following appointment of the contractor and prior to the start of development or works.
- 7.150 The EIAR sets out that embedded mitigation by design has been used as far as practical to reduce potential adverse effects. For instance, no development buffers around watercourses, the use of existing tracks to minimise watercourse crossings, the avoidance of deeper peatland and the use of floating tracks. The developer is also committed to employing good practice techniques during construction and operation of the proposed development, those relating to peat hydrology, the water environment, sedimentation and the management of soil stockpiles, oils, fuels and chemicals are summarised in EIAR Appendix 7.1.
- 7.151 The only areas near the proposed development at risk of fluvial flooding are in the immediate vicinity of Loch na Ruighe Duibhe, particularly in the north and south. Further to the North the Loch Nam Meur and Allt Seanabhaile have associated localised flood zones. However, no infrastructure is located within these areas, with the exception of the 16 watercourse crossings (nine new watercourse crossings and seven drain crossings). The Council's Flood Risk Management Team and SEPA has not raised any concerns regarding flooding. SEPA has requested that all the watercourse crossings follow the design specifications outlined in EIAR Appendix 7.5 Watercourse Crossing Inventory, this can be controlled by condition. The watercourse crossings would be regulated under SEPA's Controlled Activities Regulations (CAR) regime. Post construction, the EIAR states that periodic inspection of the riverbeds and banks will be undertaken during the operational phase of the works. Streams and drains will be inspected to ensure they are operating correctly, and they will be cleaned of silt or vegetation if required.
- 7.152 As detailed above, the proposed development is located within a catchment area in which a Scottish Water drinking water abstraction is located. Scottish Water is content that as this is a relatively large catchment, and the development is sufficiently set back from the intake, there is a low risk that this will be adversely affected by the development. However, water quality must still be protected during the construction activity and Scottish Water has produced guidance on these matters. Compliance can be secured via the CEMP. The applicant has also undertaken a private water supplies (PWS) risk assessment which has identified that there are no PWS hydrologically connected to the proposed development. Environmental Health is content with this assessment.
- 7.153 The peat survey recorded depths of between 0m (no peat) and >5m across the survey area. The layout of the scheme has sought to avoid deeper pockets of peat. The EIAR indicates that the infrastructure has been designed to avoid peat where possible with peat >0.5m in depth present across 30.0% of the proposed development infrastructure and peat >1.0m in depth present at 5.8% of the proposed development infrastructure. The total volume of excavated peat

associated with the infrastructure footprint, side slopes and drains has been calculated at approximately 38,500m<sup>3</sup>. The EIAR identifies a minor to moderate (significant) level of effect in the relation to the disturbance of peat. The application is accompanied by an Outline Peat Management Plan (OPMP) (EIAR Appendix 7.3) and through the measures outlined a surplus of peat is not expected to be generated by this development. However, subject to the mitigation measures outlined in the OPMP and further restoration and enhancement measures then the residual effect is assessed as being minor (not significant).

- 7.154 SEPA has no objection but require a finalised Peat Management Plan to be secured by condition; an updated wording in relation to this has been submitted in its response to the SEI. This should demonstrate how micro-siting, and other measures have been used to further minimise peat disturbance. In addition, SEPA request that any micro-allowance does not move infrastructure onto peat any deeper than currently shown in EIAR Appendix 7.2.
- 7.155 A Peat Landslide Hazard and Risk Assessment (PLHRA) has been submitted with the application. The assessment concludes that the risks are calculated to be “Low” for the site. However, there are a number of mitigation measures which could reduce the risk levels further, such as a post consent site specific review of the ground conditions and the use of monitoring and good practice measures during pre-construction, construction and post-construction. Ironside Farrar, the Government’s advisor on the issue of peat risk, requested further information/clarification to which the applicant has responded and Ironside Farrar has confirmed that the Stage 2 PLHRA is acceptable.
- 7.156 This proposal will result in a loss of priority peatland habitat and has vegetation features which indicate this is high quality and in near natural condition. As detailed in the Natural Heritage section of this report, due to its impact upon peatland habitat, NatureScot object to the scheme. In particular raising concerns about the assessment under calculating indirect losses of peatland habitat and the inadequacy of the proposed scale of the reinstatement and restoration areas. In response, the applicant has carried out additional surveys and submitted a revised assessment of peatland lost and scheme for enhancement and restoration. SEPA and the Council’s Ecology Team has no objection subject to conditions securing a finalised Restoration and Enhancement Plan. A response to the revised information is awaited from NatureScot. It remains unclear if this objection can be overcome, and should it not be removed, Members are advised to raise an objection due to the loss of priority peatland habitat in near natural condition.
- 7.157 In terms of Groundwater Dependent Terrestrial Ecosystems (GWDTEs), EIAR Chapter 8 recorded three National Vegetation Classification (NVC) communities (M15, M25 and U6) which may indicate groundwater dependency. However, the hydrological survey found these not to be groundwater dependent. SEPA and NatureScot raised no concerns in relation to the original assessment.
- 7.158 In response to NatureScot’s concerns regarding priority peatland an updated NVC survey was carried out. This high resolution survey area (HRSA) included an increased buffer of 10m around the proposed infrastructure. The SEI reports another potential GWDTE habitat (M32 spring) just outwith the HRSA, however, again a hydrogeological assessment indicated that these area are unlikely to be

affected by the development (SEI Appendix C). In its response to the SEI, SEPA has made no additional comments in relation to GWDTEs.

- 7.159 In addition to the conditions identified above, SEPA also request conditions securing a borrow pit restoration and a Decommissioning and Restoration Plan and request a mechanism to secure mitigation identified in the Outline Construction and Environmental Management Plan (Appendix 4.1) and the Schedule of Good Practice and Mitigation Measures (Appendix 4.2). With the embedded design mitigation, adherence to good practice and the implementation of the outlined mitigation, no significant residual adverse effects and anticipated.

### **Natural Heritage (including ornithology)**

- 7.160 The applicant's assessment is outlined in EIAR Chapters 8 and 9. Additional/revised information was submitted in relation to impacts on priority peatland habitat. SEIR Chapter 3 provides an updated assessment using the additional survey work undertaken with the 10m buffer around the infrastructure (increased from 2.5m) (NVC survey - SEI Appendix C). Additional peatland habitat restoration areas (SEI Appendix D) have been identified and is supported by a revised Outline Restoration and Enhancement Plan (OREP) (SEI Appendix 8.5 and SEI Figure 8.9). Glen Urquhart Community Council and several third parties have raised concerns with regards to the ecological and ornithological impacts of the proposal.
- 7.161 Overall, the EIAR and SEIR conclude that subject to the recommended mitigation measures then there will be no significant residual effects during the construction, operation, and decommissioning, either individually or cumulatively from the development. The applicants are committed to ensuring that construction practices will be in line with best practise guidance. Environmental protection measures will be fully detailed in the final CEMP, Peat Management Plan (PMP), Species Protection Plans (SPPs), including pre-construction Protected Species Surveys for otter, water vole, badger and pine marten and further habitat enhancement measures will be detailed through the finalised Restoration and Enhancement Plan. Works will be overseen by an Environmental Clerk of Works (EnvCoW). The applicant is also committed to undertaking ongoing monitoring during the operational period of the wind farm, this will include the monitoring of red-throated diver and golden eagles and the progress of habitat restoration.

### **Designated Sites – Natural Heritage**

- 7.162 The site is not located within any statutory sites designated for its ecological interests, however, as detailed in section two of this report, there are several within 10km of the site. The closest is the River Moriston SAC, located adjacent to the site and across the A887, opposite the junction with the Bhlairidh Wind Farm existing access track. The qualifying interests include freshwater pearl mussel and Atlantic salmon. No works are anticipated in this location and the area of construction works is not hydrologically connected with the SAC. However, there is some potential for indirect effects in the form of increased dust within vicinity of the existing access. These potential effects are also predicted for the Levishe Wood SSSI which is designated for its birch woodland and located adjacent to the existing Bhlairidh wind farm access tracks. Pollution prevention measures

regarding dust will be implemented via the CEMP. Neither NatureScot nor Fisheries Management Scotland raised any concerns with this aspect of the proposal.

- 7.163 As detailed in section 2 above, the proposed development is not located within any statutory sites designated for its ornithological interest, but there are a number within 20km. The majority of the designations in the wider area are designated for Slavonian grebe. However as agreed in consultation with NatureScot, as the proposal is located within habitats intrinsically unsuitable for Slavonian grebe and have been scoped out of further assessment. In relation to the Glen Affric to Strathconon SPA, designated for breeding golden eagles, the EIAR contends that the distances between the wind farm and golden eagle breeding sites within the SPA are greater than the reported 6km range/connectivity distance for the qualifying species. Therefore, it is unlikely that golden eagles from the Glen Affric to Strathconon SPA utilise habitats within the site, so no effects are predicted. The findings of the EIAR are not contested by NatureScot or RSPB.

### **Species Protection**

- 7.164 Protected species surveys have identified the likely presence of water vole and bats within the study area. Limited evidence of otter, badger and pine marten was also found. NatureScot has no objection in relation to protected species subject to the mitigation measures detailed in Appendix 4.2 Schedule of Mitigation, Appendix 4.1 Outline Construction Environmental Management Plan and the Species Protection Plans being secured by condition.
- 7.165 During the construction phase, the EIAR identifies the potential for disturbance and/or displacement of a pair of red-throated divers. NatureScot do not object and advise that the development will not have an adverse impact on the Natural Heritage Zone (NHZ) 7 (Northern Highlands) population of red-throated divers. This is subject to the measures detailed in Appendix 4.2 Schedule of Mitigation which includes a Breeding Bird Protection Plan and the provision of a nesting raft as an alternative site being secured. In terms of the operational phase, the EIAR does not consider displacement to be likely and the calculated collision risk mortality rate is low. NatureScot consider that even if displacement was to occur then this together with the low mortality calculation would not adversely affect the conservation status of the NHZ population.
- 7.166 In relation to golden eagles, the EIAR identifies the potential displacement of feeding golden eagles from an area around the turbines during the operational phase. However, NatureScot consider that the combination of the small area involved, and the habitats present mean that this loss of foraging range will not lead to the displacement of the nearest breeding pair. The calculated collision risk mortality estimates that one golden eagle will be killed every 19 years during wind farm operations. NatureScot consider that this level of additional mortality will not adversely affect the conservation status of golden eagle in NHZ 7. Whilst the effects are not considered significant the applicant is proposing to adopt the Regional Eagle Conservation Management Plan (RECM) for NHZ 7. The RECM in NHZ 10 (Central Highlands) has been very successful in improving occupancy of golden eagle and therefore bringing the NHZ population back into favourable status. NatureScot and the Council Ecology Team support this approach and

recommend this is secured by a condition.

### **Habitat Loss**

- 7.167 The ecological survey area was found to comprise upland and mire habitats, predominantly blanket bog, which includes wet and dry modified bog and wet and dry dwarf shrub heath. This proposal will have an impact on priority peatland habitat, which NatureScot consider to be high quality and in near natural condition and issued a holding objection. NatureScot's concerns are twofold, firstly, the EIAR states approximately 8.9ha of blanket bog habitat will be lost to the proposal, with indirect losses being calculated using a 2.5m buffer around the infrastructure. This is considered to be an inadequate buffer for calculating the indirect impacts that are likely to be seen from changes in the hydrology. Secondly, the outline Restoration and Enhancement Plan proposed peatland restoration of 8.7ha for offsetting and potentially 2ha for enhancement. This level was substantially less than required to meet NatureScot's peatland guidance of 1:10 (loss:restoration) which was adopted after the application was originally submitted. Concerns about level of restoration and enhancement were also raised by Glen Urquhart Community Council and third parties.
- 7.168 In response the applicant has worked with NatureScot to overcome its objection. The SEI Report sets out how this discussion informed the updated NVC survey, and the new areas identified for peatland restoration. An updated assessment of impacts with an agreed 10m buffer has been used. The re-assessment calculates that 11.1 ha of Priority Peatland will be impacted by the development, 6.4 ha will be directly, and 4.7 ha will be indirectly impacted.
- 7.169 The updated Outline Restoration and Enhancement Plan (OREP) (SEI Appendix 8.5) now includes a total area of peatland restoration of some 104.8ha, representing a ratio of 1:9.4 (loss:restored). In addition, as set out in the SEI, extensive feasibility surveys (Appendix D, SEI Report) have been undertaken, so the applicant considers that there is a high degree of confidence that the peatland restoration areas are deliverable. SEPA and the Councils Ecology Team have no objection subject to conditions securing a finalised Restoration and Enhancement Plan. A response to the revised information is awaited from NatureScot.
- 7.170 The ecological (re)assessment considers that the effect on blanket bog as a result of habitat loss and fragmentation is assessed significant at a local level but Minor (not significant) in EIA terms. In addition to the above, approximately 1.6 ha of dry heath communities are predicted to be lost representing approximately 1.1% of the wider habitat resource within the Ecological Study Area. However, the SEIR considers that this habitat type is widespread throughout the uplands, and the effect due to loss as a result is not predicted to be significant. SEPA and the Councils Ecology Team have no objection subject to conditions securing a finalised Restoration and Enhancement Plan.
- 7.171 In relation to trees, the part of the access track which passes through woodland is an existing track currently serving Bhlairidh Wind Farm. The turbines and associated infrastructure are on open ground and will not adversely affect any existing trees or woodland. The Council's Forestry Officer and Scottish Forestry has no objection to the application. In addition to the peatland restoration, the

updated OREP proposes the creation of native broadleaved woodland (minimum of 30ha), riparian woodland (5ha), and montane scrub (low density in suitable habitat within the 200ha search area). This will enhance the diversity and connectivity of habitats within the Site, thereby benefitting a range of ecological features including bats, otter, pine marten and mountain hare.

### **Built and Cultural Heritage**

- 7.172 EIAR Chapter 10 considers the archaeological and historic environment value of the site and assesses the potential both for direct and setting effects on archaeological features and heritage assets. The assessment is supported by a walkover survey, wireframes and visualisations. The EIAR identifies no significant impacts on any designated or non-designated heritage assets. Strathglass Community Council raise concerns about some assets being scoped out of the assessment, citing the scheduled monument of Badger Falls, neither Historic Environment Scotland nor the Councils Historic Environment Team have raised concerns about the assets scoped out of the assessment.
- 7.173 **Direct effects:** No designated or non-designated heritage assets have been identified within the Primary Study Area. The EIAR contends that due to the limited evidence of past activity, in combination with the exposed, wet and unproductive environment, suggests there is a low to negligible potential for previously unrecorded buried archaeological remains. The Council's Historic Environment Team – Archaeology is content with the conclusions of the EIAR and although there may be peat across the site that could contain or preserve paleoenvironmental evidence, the areas of peat will be avoided by the site layout and impacts will be limited. As such no specific mitigation is considered necessary but recommends that a protocol in the event of the discovery of previously unrecorded assets is included within the CEMP. Historic Environment Scotland (HES) also has no objection to the proposed development and confirms that there will be no direct physical effects on any assets within its remit.
- 7.174 **Indirect effects** can occur when the development results in a change to the setting of a heritage feature. Within the 5km Inner Study Area, two designated heritage assets (LB19486 and SM4567) and twenty-eight non-designated heritage assets were identified. The EIA reported a minor, not significant effect on Loch Ashlaich shooting box and bothy (LB19486) and no effect on the Levishie Cottage, fort and earthwork schedule monument (SM4567) as there is no theoretical visibility. In terms of non-designated assets, only a minor (not significant) effect on its setting was reported for the Shooting Lodge on Loch Ma Stac (MHG55927).
- 7.175 The Loch Ashlaich shooting box and bothy (a category C listed building; LB19486) were constructed c.1855 and is located on the shore of the loch. EIAR Figure 10.4 details a wireframe of views from this heritage asset. The rotor and hubs of two turbines and the tips of the blades of a further four turbines will be visible in views to the west. The EIAR contends that the proposed development will slightly alter the way the asset is experienced within the wider upland landscape setting. However, its key setting relationships – between the shooting box and the loch, between the two buildings, and with the wider moorland basin in which the loch is situated will remain unaffected. The overall effect is reported as minor and not significant. The Council's Historic Environment Team – Conservation considers

that the proposed development will have a negative impact upon the setting of the listed buildings, however, in this wild moorland context, the distance should mitigate to avoid any significant effects and do not object to the application.

- 7.176 The Shooting Lodge on Loch Ma Stac (MHG55927) is a non-designated heritage asset. Turbines will be visible in views to the north-east, the nearest being approx. 3km away. The EIA reports that the views will not significantly alter how the remote upland and loch setting of this asset, or the way this element of its setting contributes to how the asset is experienced or how its functional relationship with the upland landscape as part of a shooting estate is understood. will slightly alter the way the asset is experienced within the wider upland landscape. Overall, there will be a minor (not significant) level of effect. Officers are content with this assessment.
- 7.177 Outer Study Area: As detailed in section 2, numerous heritage assets identified within this study area, with six scheduled monuments (outlined below) taken forward to a full assessment. The EIA reported either minor or no effects, so not significant in EIA terms.
- 7.178 Loch nam Faoileag, hut circles 730m NNW of Wester Balnagrach (SM11455). The ZTV suggests that there may be limited theoretical visibility in views to the south-west. However, the EIA contends that these are likely to be restricted by intervening vegetation on the higher ground running between Torr Buidhe to the north-west and Cnoc na Moine to the south-east. Overall, the assessment concludes that there will be no effect on this asset. HES has not made any comments in relation to the assessment or the likely effect on this Scheduled Monument. However, officers are content with the applicant's assessment.
- 7.179 Achratagan is a late prehistoric hut circle and cairnfield (SM11456). The proposal would be seen in views to the south-west from this asset and at approx. 9.5km, this is represented by the wireframe in Figure 10.7. The EIA reports that the development will not be dominant nor alter the contribution that this element of the setting of this heritage asset makes to the cultural significance, which is largely derived from the spatial and visual relationship between the building foundations and field clearance cairns. HES has not made any comments in relation to the assessment or the likely effect on this Scheduled Monument. However, officers consider that whilst not significant in EIA terms, the proposal would have an effect to some extent by virtue of it being visible.
- 7.180 The scheduled monuments at Garbeg (SM11437) and Garbeg Cottage (SM11438) comprise the remains of a late Iron Age or early historic houses. The Garbeg Cottage, burial mounds (SM4635) consist of a Pictish cemetery and an earlier roundhouse. HES consider that Figures 10.5, 10.6 and 10.12 are sufficient to demonstrate the likely impacts on their settings. The three monuments are broadly in the same location which suggests a relationship and it is likely that the settlements and the cemetery complex shared a visual relationship when in use. The EIA reports that while the proposed turbines will be visible in views to the south-west, this will be at approx. 14km, and the turbines will only just be discernible on the skyline and would be seen in combination with existing/consented turbines at Bhlairaidh. As such the EIAR considers that the presence of the proposal within the wider landscape and in these views will not

affect the historical and functional relationship of these assets, so no effects have been identified.

- 7.181 HES disputes that there will be no effect and considers that the proposal will have some effect by virtue of the turbines being visible. However, HES are content that the scheme will occupy a relatively small portion of the skyline in views out from the monuments at Garbeg, and the sense of their positioning in an expansive and mountainous landscape would only be negligibly affected. The setting of these monuments would, therefore, still be readily understood, appreciated, and experienced and it has no objection. However, it does recommend that the applicant explores options to further reduce the number and extent of turbine hubs and towers that would be visible in views from Garbeg.
- 7.182 Urquhart Castle (SM90309) sits on a promontory on the shore of Loch Ness halfway down the Great Glen, and at the entrance to Glen Urquhart. This position contributes to the understanding and appreciation of its chosen defensive location controlling access to Glen Urquhart and movement along and down Loch Ness and the Great Glen. Whilst the ZTV demonstrates there would be no theoretical visibility of the development from Urquhart Castle itself, the wirelines and visualisations (Figures 10.8- 10.11) show that the development would be visible on approaches to the castle from Loch Ness. In-combination views occur at a distance between approximately 1km and 4km from the castle and from some areas of the eastern shore over approximately 3km from the castle. The EIAR notes that while the castle is a dominant and striking feature in the landscape when approached by boat from Loch Ness, views of the castle are at their most arresting and informative when experienced in relatively proximity from the castle. In addition, the in-combination views are only available at limited locations and would not adversely affect the appreciation of the castle's picturesque setting (aesthetic value) or effect an observer's understanding or appreciation of the castle's strategic and defensive military siting. The EIAR concludes that overall, there would be no effect on the setting of this scheduled monument.
- 7.183 HES disagree that there will be no effect on this asset and contend that as the development will be visible in important views towards the castle then the proposals will have an effect on its setting. Whilst acknowledging that the castle may appear less prominent from the locations where the LVIA visualisations have been taken, the monument remains a very visible and conspicuous structure. This is also apparent due to the lack of built environment features in its surroundings. HES further consider that the lesser prominence of Urquhart Castle, when seen at a greater distance from the castle, only serves to make it more susceptible to having its dominance undermined in these views, not less. This aspect has not been acknowledged in the applicant's assessment. Indeed, when viewed from Loch Ness, the turbines would appear in a dip between the hills behind Drumnadrochit. Currently, the skyline in this view is featureless save for a few blade tips from Bhlairaidh Wind Farm and its extension. The proposals would introduce several turbines into this view, with the hubs of eight turbines and the towers of six being visible. This represents a considerable change in the impact turbines have on this view, and therefore on the setting of Urquhart Castle.
- 7.184 However, HES consider that, overall, the turbines are sufficiently distant from the monument, and occupy a sufficiently small part of its setting, to have only a minor

adverse impact on the setting of Urquhart Castle. The monument would still be readily visible in its surroundings as a prominent feature clearly situated to overlook Loch Ness. While the proposals would be visible in views towards the castle from across Loch Ness, they would not significantly, in EIA terms affect how the castle's setting is understood, appreciated, or experienced.

- 7.185 Whilst HES do not object it considers that the effects could be mitigated further by relocating turbines to reduce the extent of towers and hubs that would be visible. Similar to the scheduled monuments at Garbeg, HES recommends that the applicant explore options to further reduce the number and extent of turbine hubs and towers that would be visible in views of Urquhart Castle.

### **Noise and Shadow Flicker**

- 7.186 EIAR chapter 11 outlines the applicant's assessment in relation to the potential construction and operational noise and vibration effects on nearby residential receptors. Glen Urquhart Community Council and third parties have raised concerns regarding cumulative noise impacts.
- 7.187 In terms of operational noise, the noise assessment included the use of 16 noise survey locations (detailed on Figure 11.1). This concluded that due to the separation distances from residential properties the predicted noise levels at all of the survey locations will be low, with the highest predicted level only 20dB LA90, which is well below the simplified ETSU criteria of 35dB LA90. A cumulative operational noise impact assessment was not required as predicted operational noise levels from the Proposed Development acting alone are more than 10 dB below the ETSU-R-97 simplified noise limit of 35 dB LA90. Environmental Health has assessed the report and is content that operational noise will not be a significant issue. If required, operational noise limits could be secured by a planning condition.
- 7.188 In terms of construction noise, the applicant's assessment concludes that the construction of the proposed turbines will occur at distances that are highly unlikely to result in significant noise levels. Some intermittent construction effects related to access to the development from the south of the site may occur at dwellings neighbouring the access routes. However, this is not anticipated to result in breaches of noise limits, but good practise measures will be used and secured through the CEMP. The applicant states that residents will also be informed as to the details of the works including expected timings and any particularly intense periods of vehicle movements that may occur. Environmental Health is again content the construction noise will not be a significant issue.
- 7.189 Shadow flicker may occur under certain combinations of geographical position and time of day, when the sun passes behind the rotors of a wind turbine and casts a shadow over neighbouring properties. The Scottish Government's guidance is that shadow flicker is generally only experienced within 10 rotor diameters of a wind farm, however, the Council consider that it is appropriate to extend this limit to 11 rotor diameters, due to the area's northerly latitude. There are no residential properties within 11 rotor diameters, 1,705m or 1,755m if the requested 50m micro-siting allowance is included. Due to this shadow flicker was scoped out of the applicant's assessment and is not considered to be a constraint for this

development.

### **Aviation**

- 7.190 Chapter 14 of the EIAR assesses the possible effects of the proposal on existing communications infrastructure and aviation safeguarding facilities. There are no unresolved objections or outstanding concerns from aviation interests. The Ministry of Defence (MOD) requests a condition which secures the submission of an aviation safety lighting scheme which details how the development would be lit throughout its operational life to maintain aviation safety. In addition, aviation charting and safety management measures are requested to be submitted to the MOD 14 days prior to commencement of works.

### **Telecommunications**

- 7.191 There are no telecommunication links within, or in the vicinity of, the site which could experience interference from the proposed development. No concerns have been raised in relation to potential interference with radio/television networks. However, if consent was granted then a planning condition would nonetheless be sought to secure a scheme of mitigation should an issue arise.

### **Other Material Considerations**

- 7.192 The applicant has sought permission to operate the windfarm for 35 years. At the end of its operational life, usual decommissioning and restoration requirements should therefore be secured. If the decision is made to decommission the wind farm, all components, track access and associated infrastructure requires to be removed from the site. An exception is any residual concrete hardstanding areas, which would require removal to a depth of 1m below the ground level and be graded with soil and replanted. Cables also require to be cut away below ground level and sealed. It would be expected that any new tracks or areas used for constructing the wind farm would be reinstated to the approximate pre-development condition, unless otherwise agreed with the Planning Authority.
- 7.193 The requirements to decommission at its end of life is relatively standard and straight forward, with any request for re-powering to be considered with the submission of a relevant future application. It is important to ensure that any approval of this project secures by condition a requirement to deliver a draft A finalised Decommissioning and Restoration Plan (DRP) for approval prior to the commencement of any development and ensure an appropriate financial bond is put in place to secure these works.
- 7.194 The finalised DRP would be expected to be submitted to and approved in writing by the Planning Authority in consultation with SEPA no later than 12 months prior to the final decommissioning of the site. The detailed DRP would then be implemented within 18 months of the final decommissioning of the development unless otherwise agreed in writing with the Planning Authority.
- 7.195 Given the complexity of major developments, and to assist in discharge of conditions, the Planning Authority usually seeks that the developer employs a Planning Monitoring Officer (PMO). The role of the PMO, amongst other things,

would include the monitoring of, and enforcement of compliance with, all conditions, agreements and obligations related to this permission (or any superseding or related permissions) and shall include the provision of a bi-monthly compliance report to the Planning Authority.

### **Non-Material Considerations**

- 7.196 Non-material considerations raised in representations related to the lack of current grid capacity, and perceived oversupply of renewable energy generation in the north of Scotland. Such matters are not material to the determination of this application, with the Scottish Government having declared a climate and nature crisis, and current grid capacity not being a determining matter as set out within NPF4. Similarly, in relation to community benefit, whilst this can aid the just transition towards net zero, this is currently a voluntary arrangement as previously explained in the socio-economic section of this report.

### **8. Matters to be Secured by Section 75 Agreement**

- 8.1 A decommissioning and restoration financial guarantee can be secured by condition. No legal agreement is required should consent be granted.

### **9. CONCLUSION**

- 9.1 The Scottish Government gives considerable commitment to renewable energy and encourages planning authorities to support the development of wind farms where they can operate successfully and be situated in appropriate locations. The project has potential to contribute to addressing the climate emergency through additional renewable energy generation. In this regard it is anticipated to contribute an additional 85.8MW of installed capacity and make a meaningful contribution toward addressing climate change on the road to net zero. As with all applications, a balancing exercise must be undertaken. The benefits of the proposal must be weighed against potential drawbacks and then considered in the round, taking account of the relevant policies of the Development Plan, which includes NPF4, as well as all other material planning considerations.
- 9.2 The Council, at the time of writing, has received 25 objections, along with 18 objections and 2 support comments received by Energy Consents Unit. In addition, Glen Urquhart Community Council and Strathglass Community Council object to the application. NatureScot object on the grounds of peatland impacts. Additionally, NatureScot raises substantial concerns in relation to impacts upon the Glen Affric National Scenic Area, albeit it does not raise a formal objection on those grounds but recommends that the applicant explores ways to minimise impacts further. Historic Environment Scotland (HES) whilst not objecting, raise concerns with regards to the proposal impacts upon Urquhart Castle and the scheduled monuments at Garbeg, and recommends that the applicant explores ways to minimise impacts further. The Highland Council's Landscape Officer objects due to the landscape, visual and cumulative impacts of the proposal. Other statutory consultees did not raise any objection following submission of further environmental information, and subject to the application of planning conditions.

- 9.3 Given the scale of the turbines there is no doubt the proposed development would increase the visibility of wind energy development in the immediate and wider surrounding area. Significant landscape and visual impacts are expected from wind farm developments, however, in this case, these are considered to extend beyond a localised range. Certain findings in the applicants Landscape and Visual Impact Assessment are contested. Whilst it is agreed that there will be significant adverse visual effects on receptors at representative viewpoints: VP1 (Affric Kintail Way near Braefield), VP2 (Meall Fuar-mhonaidh), VP5 (Coire Loch Trail, Glen Affric), VP8 (B862 Suidhe Viewpoint), VP9 (Meall Mor, above Glen Affric) and VP10 (Creag Dhubh), further significant adverse effects have also been identified by officers on receptors at representative viewpoints: VP13 (B852 Erchite Wood, east of Loch Ness (picnic area)), VP15 (Core Path at Loch Affric), VP16 (B862 South of Dores) and VP18 (Toll Creagach).
- 9.4 The application site is set adjacent to existing and consented schemes and will result in the intensification and a significant lateral extension of this cluster. The Zone of Theoretical Visibility modelling demonstrates that the wind developments in the cumulative baseline scenarios already have relatively widespread visibility of wind turbines. Whilst this is acknowledged, the effects and actual visibility of each scheme can be very different in reality, due to the scale and position with the landscape. For example, visibility from Loch Ness (VP13) and the core path at Glen Affric (VP15).
- 9.5 Whilst not objecting, NatureScot raise significant concerns in relation to the scheme and its impact upon the Glen Affric National Scenic Area (NSA). It considers that the greater prominence and visual intrusion of these turbines significantly detracts from the views and experience of the NSA and its Special Landscape Qualities. The proposed turbines would require lighting on six of the turbines, thereby extending adverse effects into the night-time including dusk and dawn, and during periods of lower light. The Council's Landscape Officer objects to the scheme and considers that there will be significant detrimental effects on the Special Qualities of the Loch Ness and Duntelchaig Special Landscape Area (SLA); in particular impacts from Meall Fuar-mhonaidh and views down Loch Ness towards Urquhart Castle.
- 9.6 There would also be significant adverse landscape and visual effects on receptors on elevated areas and mountain summits with the applicant identifying effects up to 15.1km away. Officers contend that significant effects are however also likely from the Munro of Toll Creagach (VP), 18.6km from the scheme. From the summits to the west and northwest, NatureScot note that the proposed turbines would appear as prominent, larger scale structures in panoramas from elevated views including the popular northern Munros / summits which offer the only opportunity to appreciate the scenic views across the full extent of the NSA. In turn this would adversely affect the views and experience from these hills, diminishing the recreational experience for users. From the locally important summit of Meall Fuar-mhonaidh to the east, officers have sought to minimise impacts through previous schemes. However, Loch Liath will substantially extend the horizontal spread and visual envelope of wind energy development from this VP, which intensifies the perceived encirclement of this important summit within the regional SLA. This development would also require visible aviation lighting which causes concern and

further undermines previous mitigation, with significant adverse lighting effects also predicted for people on Meall Fuar-mhonaidh.

- 9.7 From lower elevations, the applicant has also identified significant but localised adverse visual effects at: VP1 on the Affric Kintail Way, which is a 44km promoted long distance trail from Drumnadrochit to Morvich; VP5 on the Coire Loch Trail in Glen Affric; and at VP8 (B862 Suidhe Viewpoint) which is on The Caledonia Way cycle route. Officers also find that significant effects would occur from VP15 which is located on Core Path IN05.06, a circular route around Loch Affric. NatureScot note that from the limited areas where Loch Affric, the centrepiece of the NSA designation can be appreciated in views east, it will often coincide with visibility of the proposed turbines directly above Glen Affric / Loch Affric, as seen in VP15. The extent of scale of Loch Liath in these views undermines the mitigation secured through Bhlaraidh extension and Chrathaich Wind Farms, including avoiding the requirement for visible aviation lighting.
- 9.8 Furthermore, significant adverse visual effects are considered to extend to recreational users of Loch Ness and on the users of the B862 as represented by VP13 and VP16. From these locations, the proposed development would be far more visually intrusive than any previously consented scheme, with larger scale turbines resulting in hubs and towers now being visible on this skyline. It also results in a greater horizontal spread of turbines, and turbines being introduced into views where there is exceptionally limited existing or consented wind farm development by virtue of careful siting and design. As such this scheme has the potential to substantially undo design mitigation secured for other wind farm schemes to date. These concerns are also observed in the responses from the Council's Landscape Officer and Historic Environment Scotland who noted that the proposal would have a considerable change in the impact turbines have on this view, and therefore on the setting of Urquhart Castle.
- 9.9 Additionally, the applicant considers that, the proposed development meets all of the relevant OWESG criterion. The case officer disagrees and considers that the proposed development scores poorly, with nine of the ten criteria not being met. Even allowing for subjective judgement it is considered the applicant has understated the detrimental impacts of the proposed development. Overall, the proposed development is in the wrong place and is of an incorrect scale, which would undo previously secured mitigation associated with the adjacent surrounding wind farms and have a significantly detrimental visual and cumulative impact.
- 9.10 The application has been assessed against the policies set out in NPF4 and the Development Plan, including Policy 67 of the Highland wide Local Development Plan with its 10 tests which are expanded upon with the Onshore Wind Energy Supplementary Guidance. This policy also reflects policy tests of other policies in the plan, for example Policies 28, 57 and 55. Whilst the proposal can be considered to benefit from an in principle support given the contribution the development would make to towards tackling climate change, this is outweighed by the significant landscape and visual effects both in isolation, and cumulatively with surrounding wind farms. This is not altered by any other material planning consideration, including national government policy support for onshore wind and the critical role it plays to achieve net zero. There is also an outstanding objection from NatureScot, advising that the development would have a detrimental impact on

priority peatland habitat, with the proposal also providing insufficient peatland habitat restoration to secure significant biodiversity enhancement. The applicant has sought to overcome this objection through the submission of SEI in November 2024, as the time of writing NatureScot have not commented further and as it currently stands, object to the scheme.

- 9.11 Schedule 9 of the Electricity Act sets out what an applicant shall do in relation of the preservation of amenity. It is considered that the proposal has not had regard to the desirability of preserving natural beauty and the significant detrimental effects cannot be mitigated. This is by virtue of the location, setting and design of the wind farm, resulting in landscape and visual impacts, in isolation and cumulatively, which cannot be accommodated. As outlined above there is also an outstanding objection from NatureScot in relation to impacts upon priority peatland habitat and the provision of insufficient peatland habitat restoration.
- 9.12 Given the above analysis, the application is considered to be contrary to the Development Plan, national policy and is unacceptable in terms of all other applicable material considerations.

## **10. IMPLICATIONS**

- 10.1 Resource: Significant staff and financial resources should the application proceed to Public Local Inquiry.
- 10.2 Legal: If an objection is raised to the proposal, the application may be subject to a Public Local Inquiry.
- 10.3 Community (Equality, Poverty and Rural): Not applicable
- 10.4 Climate Change/Carbon Clever: The proposal has the ability to make a meaningful contribution toward the production of renewable energy.
- 10.5 Risk: Not applicable
- 10.6 Gaelic: Not applicable

## **11. RECOMMENDATION**

**Action required before consultation response being issued to Scottish Ministers: N**

It is recommended to **RAISE AN OBJECTION** to the application subject to A. and B. and for the reasons set out in C. below:

- A. The Committee grants delegated authority to the Area Planning Manager – South to respond to the Scottish Government’s Energy Consents Unit / Scottish Ministers, regarding any future Further / Supplementary Environmental Information, where that information does not materially reduce the scale of the proposed development.
- B. The Committee grants delegated authority to the Area Planning Manager – South to respond to the Scottish Government’s Energy Consents Unit /

Scottish Ministers, to withdraw the Council's Objection in relation to the reason outlined in C.3. only, subject to a suite of recommended planning conditions, should the Supplementary Environmental Information (SEI) received 30th October 2024 or any further information / Supplementary Environmental Information be submitted which successfully removes NatureScot's objection in relation to impacts upon peatland habitat.

**C. Reasons for Objection:**

1. The application does not accord with the provisions of Section 36 of the Electricity Act 1989 by virtue of not demonstrating sufficient regard to the desirability of, and failing to reasonably mitigate effects detrimental to, conserving flora and physiographical features of special interest by virtue of failing to demonstrate compliance with NPF4 Policies 4 (Natural Places), 11 (Energy), and HwLDP Policies 67 (Renewable Energy Developments), 28 (Sustainable Design) and the Onshore Wind Energy Supplementary Guidance, as the development would have a significantly detrimental visual impact, particularly as viewed by recreational users of the outdoors in the wider vicinity of the site to the north-west, west, east, south-east and north-east of the proposed development as represented by viewpoints: VP1 (Affric Kintail Way near Braefield), VP2 (Meall Fuar-mhonaidh), VP5 (Coire Loch Trail, Glen Affric), VP8 (B862 Suidhe Viewpoint), VP9 (Meall Mor, above Glen Affric) and VP10 (Creag Dhubh). Additionally, it is considered the applicant has understated the significant adverse visual effects on receptors at representative viewpoints: VP13 (B852 Erchite Wood, east of Loch Ness (picnic area), VP15 (Core Path at Loch Affric), VP16 (B862 South of Dores) and VP18 (Toll Creagach). This is by virtue of the design and location of the proposed development which would undo previously secured design mitigation associated with the adjacent surrounding wind farms and have a significantly detrimental visual and cumulative impact, with significant adverse visual effects also extending into hours of darkness at VP2 (Meall Fuar-mhonaidh) due to the proposal's aviation lighting scheme.
2. The application does not accord with the provisions of Section 36 of the Electricity Act 1989 by virtue of not demonstrating sufficient regard to the desirability of, and failing to reasonably mitigate effects detrimental to, preserving natural beauty and conserving physiographical features of special interest because the proposal would result in significantly detrimental landscape effects on: LCT 222 Rocky Moorland Plateau and on the Loch Ness and Duntelchaig Special Landscape Area that is not clearly outweighed by social, environmental, or economic benefits. Consequently, the proposal does not accord with NPF4 Policy 11 (Energy) at d) and e), Policy 4 (Natural Places) at d) and engages the provisions of NPF4 Policy 4a) as well as HwLDP Policies 67 (Renewable Energy Developments) and Onshore Wind Energy Supplementary Guidance, 28 (Sustainable Design), 57 (Natural, Cultural and Built Heritage), and 61 (Landscape).
3. The application does not accord with the provisions of Section 36 of the Electricity Act 1989 by virtue of not demonstrating sufficient regard to the desirability of, and failing to reasonably mitigate effects detrimental to,

conserving flora and physiographical features of special interest by virtue of failing to demonstrate compliance with NPF4 Policies 1 (Tackling the Climate and Nature Crises), Policies 3 (Biodiversity), 4 (Natural Places) and 5 (Soils), HwLDP Policies 67 (Renewable Energy Developments), Policy 2 of The Inner Moray Firth Local Development Plan 2 (IMFLDP2), the Council's Biodiversity Enhancement Supplementary Guidance, and NatureScot's Peatland Guidance - Advising on peatland, carbon-rich soils and priority peatland habitats in development, as the development would have a detrimental impact on montane bog, a priority peatland habitat, which cannot be offset, with the proposal also providing insufficient peatland habitat restoration to secure significant biodiversity enhancement.

Signature: David Mudie  
Designation: Area Planning Manager – South  
Author: Peter Wheelan  
Background Papers: Documents referred to in report and in case file.  
Relevant Plans: Plan 1 – Figure 1.1 Site Location Plan  
Plan 2 - Figure 4.1a Site Layout Plan  
Plan 3 - Figure 4.1b Site Layout Plan  
Plan 4 - Figure 4.1c Site Layout Plan  
Plan 5 – Figure 4.2a Typical wind turbine – 200m tip height  
Plan 6 - Figure 4.2b Typical wind turbine – 180m tip height

Appendices: Appendix 1 – Letters of Representation  
Appendix 2 - Cumulative Wind Farm Developments  
Appendix 3 - Development Plan and Other Material Policy Considerations  
Appendix 4 - Compliance with the Development Plan / Other Material Policy Considerations  
Appendix 5 - Viewpoint Assessment Appraisal – Visual Impact  
Appendix 6 - Assessment against Landscape and Visual Assessment Criteria contained within Section 4 of the Onshore Wind Energy Supplementary Guidance

## Appendix 2 – Cumulative Wind Farm Developments (within 40km)

A2.1 This list has been updated by Officers to reflect the most recent position as of December 2024. This excludes all refused applications and those at EIA Scoping stage.

Wind Farm Site Name	No. of Turbines	Max Tip Height (m)	Distance from Proposed Development
<b>Operational Sites</b>			
Bhlaraidh	32	135m	0.5km
Corrimony	5	100m	3.2km
Millennium	26	115-125m	17km
Stronelaig	67	135m	20.9km
Beinneun and Extension	32	136m	22.5km and 20.9km
Corriegarth	19	120m	20.1km
Dunmaglass	33	117.5m	24km
Glen Kyllachy	20	110m	32.9km
Fairburn	20	100m	26.9km
Auchmore/ext	2	80m	25.4km
Farr	40	100m	33.1km
<b>Consented / under construction</b>			
Bhlaraidh Extension	15	180m	0.2km
Millennium South	10	132m	17.4km
Dell	14	115.5-130.5m	19.6km
Cloiche*	37	149.9m	20.4km
Corriegarth 2*	14	149.9m	19.9km
Bunloin*	10	200m	24.9km

Aberarder	12	130m	25.4km
<b>Application / Appeal Sites</b>			
Chrathaich**	14	149.9m	0.6km
Tomchrasky	14	185m	14.7km
Dell 2 (Redesign)**	9	200m	19.6km
Culachy**	8	200m	20.7km

\* sites that have since been consented.

\*\* sites that were at the scoping stage have since been submitted as formal applications.

## **Appendix 3: Development Plan and Other Material Policy Considerations**

### **DEVELOPMENT PLAN**

#### **National Planning Framework 4 (2023)**

A3.1 The NPF4 policies of most relevance to this proposal include:

National Development 3 (NAD3) - Strategic Renewable Electricity Generation and Transmission Infrastructure.

Policy 1 – Tackling the climate and nature crisis

Policy 2 – Climate mitigation and adaptation

Policy 3 – Biodiversity

Policy 4 – Natural places

Policy 5 – Soils

Policy 6 – Forestry, woodland and trees

Policy 7 – Historic assets and places

Policy 11 – Energy

Policy 13 – Sustainable transport

Policy 22 – Flood risk and water management

Policy 23 – Health and safety

Policy 25 – Community wealth benefits

Policy 33 – Minerals

#### **Highland Wide Local Development Plan 2012**

A3.2 28 - Sustainable Design

29 - Design Quality and Place-making

30 - Physical Constraints

31 - Developer Contributions

36 – Wider Countryside

51 – Trees and Development

52 – Principle of Development in Woodland

53 - Minerals

55 - Peat and Soils

56 - Travel

57 - Natural, Built and Cultural Heritage

58 - Protected Species

59 - Other important Species

60 - Other Importance Habitats

- 61 - Landscape
- 62 - Geodiversity
- 63 - Water Environment
- 64 - Flood Risk
- 66 - Surface Water Drainage
- 67 - Renewable Energy Developments
- 68 - Community Renewable Energy Developments
- 69 - Electricity Transmission Infrastructure
- 72 - Pollution
- 73 - Air Quality
- 74 - Green Networks
- 77 - Public Access
- 78 - Long Distance Routes

**Inner Moray Firth Local Development Plan 2 (IMFLDP2) (July 2024)**

- A3.3 Policy 2 - Nature Protection, Preservation and Enhancement. Developments proposals for national, major and EIA development will only be supported where it is demonstrated that the proposal will conserve and enhance biodiversity, including nature networks within and adjacent to the site, so that they are in a demonstrably better state than without intervention, including through future management.

**Onshore Wind Energy Supplementary Guidance (OWESG) (2016)**

- A3.4 The Onshore Wind Energy Supplementary Guidance (OWESG) provides additional guidance on the principles set out in HwLDP Policy 67 for renewable energy developments. The Guidance sets out the Council's agreed position on onshore wind energy matters, and, although reflective of Scottish Planning Policy at the time of its adoption prior to the adoption of NPF4, the document remains an extant part of the Development Plan and is therefore a material consideration in the determination of onshore wind energy planning applications. Nevertheless, the Spatial Framework included in the document is no longer relevant to the assessment of applications as in effect, the policies of NPF4 (specifically Policy 11, Energy) removes Group 2 Areas of significant protection from consideration by effectively making all land in Scotland either Group 1 Areas where wind farms will not be acceptable, or Group 3, Areas with potential for wind farm development.
- A3.5 However, the document also contains the Landscape Sensitivity Appraisals which identifies Key Views, Key Routes and Gateways as well as Landscape Character Area sensitivities and guidance. This appraisal forms part of the statutorily adopted Onshore Wind Energy Supplementary Guidance. The site falls within the area covered by the Loch Ness study, with the turbine envelope for this application falling within the Landscape Character Area (LCA) LN10 Separation of Glen Urquhart and Glen Moriston, Rocky Moorland Plateau.

### **Other Highland Council Supplementary Guidance**

- A3.6
  - Biodiversity Enhancement Planning Guidance (May 2024)
  - Developer Contributions (Mar 2018)
  - Flood Risk and Drainage Impact Assessment (Jan 2013)
  - Green Networks (Jan 2013)
  - Highland Historic Environment Strategy (Jan 2013)
  - Highland's Statutorily Protected Species (Mar 2013)
  - Highland Renewable Energy Strategy and Planning Guidelines (May 2006)
  - Physical Constraints (Mar 2013)
  - Roads and Transport Guidelines for New Developments (May 2013)
  - Special Landscape Area Citations (Jun 2011)
  - Sustainable Design Guide (Jan 2013)
  - Trees, woodland and development (Jan 2013)

### **OTHER MATERIAL POLICY CONSIDERATIONS**

#### **Emerging Highland Council Development Plan Documents and Planning Guidance**

- A3.7 The Highland-wide Local Development Plan is currently under review and is at Main Issues Report Stage. It is anticipated the Proposed Plan will be published following publication of secondary legislation post NPF4.
- A3.8 In addition, the Council has further advice on delivery of major developments in a number of documents. This includes Construction Environmental Management Process for Large Scale Projects (Aug 2010) and The Highland Council Visualisation Standards for Wind Energy Developments (Jul 2016).

#### **Other National Legislation, Policy and Guidance**

- A3.9
  - Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 – interim and annual targets replaced by Climate Change (Emissions Reduction Targets) (Scotland) Bill in November 2024
  - Climate Change Committee Report to UK Parliament (July 2024)
  - UK Government Clean Power Action Plan (Dec 2024)
  - Draft Energy Strategy and Just Transition Plan (2023)
  - Onshore Wind Energy Policy Statement (2022)
  - Draft Scottish Biodiversity strategy to 2045: tackling the nature emergency (2023)
  - Scottish Energy Strategy (2017)

- 2020 Routemap for Renewable Energy (2011)
- Energy Efficient Scotland Route Map, Scottish Government (2018)
- Siting and Designing Wind Farms in the Landscape, SNH (2017)
- Assessing Impacts on Wild Land Areas, Technical Guidance, NatureScot (2020)
- Wind Farm Developments on Peat Lands, Scottish Government (2011)
- Historic Environment Policy for Scotland, HES (2019)
- PAN 1/2011 - Planning and Noise (2011)
- PAN 60 – Planning for Natural Heritage (2008)
- Circular 1/2017: Environmental Impact Assessment Regulations (2017)
- NatureScot: Guidance on Aviation Lighting Impact Assessment (2024)

## **Appendix 4 - Compliance with the Development Plan / Other Material Policy Considerations**

### **National Policy**

- A4.1 National Planning Framework 4 (NPF4) forms part of the Development Plan and was adopted in February 2023. It comprises three parts:
- Part 1 – sets out an overarching spatial strategy for Scotland in the future. This includes spatial principles, national and regional spatial priorities, and action areas;
  - Part 2 – sets out policies for the development and use of land to be applied in the preparation of local development plans; local place plans; masterplans and briefs; and for determining the range of planning consents. This part of the document should be taken as a whole in that all relevant policies should be applied to each application; and
  - Part 3 – provides a series of annexes that give the rationale for the strategies and policies of NPF4, it outlines how the document should be used, and sets out how the Scottish Government will implement the strategies and policies.
- A4.2 **Part 1 - The Spatial Strategy** sets out that we are facing unprecedented challenges and that we need to reduce greenhouse gas emissions and adapt to future impacts of climate change. It sets out that that Scotland's environment is a national asset which supports our economy, identity, health and wellbeing. It sets out that choices need to be made about how we can make sustainable use of our natural assets in a way which benefits communities. The spatial strategy reflects legislation in setting out that decisions require to reflect the long term public interest. However, in doing so it is clear that we will need to make the right choices about where development should be located ensuring clarity is provided over the types of infrastructure that needs to be provided and the assets that should be protected to ensure they continue to benefit future generations. The Spatial Priorities support the planning and delivery of sustainable places, where we reduce emissions, restore and better connect biodiversity; liveable places, where we can all live better, healthier lives; and productive places, where we have a greener, fairer and more inclusive wellbeing economy.
- A4.3 At the national level, NPF4 considers that Strategic Renewable Electricity Generation and Transmission Infrastructure will assist in the delivery of the Spatial Strategy and Spatial Priorities for the north of Scotland, and that Highland can continue to make a strong contribution toward meeting Scotland's ambition for net zero. Alongside these ambitions, the strategy for Highland aims to protect environmental assets as well as to stimulate investment in natural and engineered solutions to address climate change. This aim is not new and will clearly require

a balancing exercise to be undertaken, which is reflected throughout NPF4.

A4.4 The proposed development is of national importance for the delivery of the national Spatial Strategy, whereby in principle support for the development is established. As the proposed development would be capable of generating over 50 MW, it is of a type and scale that constitutes NPF4 National Development 3 - Strategic Renewable Electricity Generation and Transmission Infrastructure.

A4.5 **Part 2 – Policies: NPF4 Policies 1, 2, and 3** now apply to all development proposals Scotland-wide, which means that significant weight must be given to the global climate and nature crises when considering all development proposals, as required by NPF4 Policy 1. To that end, development proposals are to be sited and designed to minimise lifecycle greenhouse gas emissions, as far as is practicably possible, in accordance with NPF4 Policy 2, while contributing to the enhancement of biodiversity, as required by NPF4 Policy 3.

As detailed in the 'Natural Heritage' section, to overcome NatureScots objection, the applicant has engaged with NatureScot. Further work has been undertaken in relation to priority peatland both in terms of the assessment and the scale of the restoration and enhancement plans. Comments are awaited from NatureScot as to the suitability of the revised information.

A4.6 Complementing those policies is NPF4 Policy 4 Natural Places, which sets out that development proposals by virtue of type, location, or scale that have an unacceptable impact on the natural environment will not be supported. The policy goes on to clarify what that means for different designations. It sets out that proposals with likely significant effects on European sites (SACs or SPAs) require appropriate assessment, and that development proposals that will affect a National Park, NSA or SSSI will only be supported where:

i) the objectives of designation and the overall integrity of the areas will not be compromised; or

ii) any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.

A4.7 Similarly, sites designated in Development Plans for local nature conservation or Special Landscape Areas (SLAs) are protected in NPF4 Policy 4 unless the development will not result in significantly adverse effects on its qualities or its integrity, or, these effects are clearly outweighed by social, environmental, or economic benefits of at least local importance. The site is not located within an SLA. There are nine Special Landscape Areas (SLA) located within the 45km study area, the closest is the Loch Ness and Duntelchaig SLA which is located approximately 4.7km from the nearest turbine and is considered further in the EIAR assessment. In relation to the Strathconon Monar and Mullardoch SLA, the applicant contends that the areas of theoretical visibility within the SLA are also

located within the Central Highlands Wild Land Area 24 (located 9.3km to the west). Given the similarities between the Special Qualities of the SLA and the Wild Land Qualities of WLA 24, a separate assessment of effects on the SLA has not been undertaken but the applicant has undertaken an assessment of WLA 24. Due to distance and limited visibility the other SLAs are not considered further in the EIAR. An assessment of the likely impacts upon these local designations is contained within this report.

- A4.8 The most significant policy change for Natural Places introduced by NPF4 Policy 4 is with regard to Wild Land Areas (WLA). This policy now states that renewable energy developments that support national targets will be supported in WLAs and that buffer zones around WLAs will not be applied, so that effects of development outwith WLAs will not be a significant consideration. The site itself is not located within any WLAs. The nearest is WLA 24: Central Highland, which is located 9.3km to the west of the nearest turbine. There are three others WLA's within 45km, but due to limited theoretical visibility, distance to the proposal and the existing development in the area, these have been scoped out / not been considered further within the EIAR.
- A4.9 Policy 11 intent is to “encourage, promote and facilitate all forms of renewable energy development onshore and offshore. This includes energy generation, storage, new and replacement transmission and distribution infrastructure and emerging low-carbon and zero emissions technologies including hydrogen and carbon capture utilisation and storage (CCUS)”. It specifies that the principle of all forms of renewable, low-carbon, and zero emission technologies is supported (with the exception of wind farm proposals located in National Parks or National Scenic Areas) including ‘enabling works, such as grid transmission and distribution infrastructure’ which encompasses this application.
- A4.10 It states that development proposals should only be supported where they maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities. The policy goes on to say that significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets, while identifying impacts, including cumulative impacts, that must be suitably addressed and mitigated against. Policy 11 e) i to xiii) sets out the criteria against which applications must be assessed.
- A4.11 This includes a broad range of matters similar those to be assessed under HwLDP Policy 67 including landscape and visual impacts. It advises that where impacts are localised and / or appropriate design mitigation has been applied such effects will generally be considered acceptable. While the adopted NPF4 reflects a stronger presumption in favour of all national scale energy developments, judgment is still required at the project level to ensure proposals do not have

unacceptable landscape and visual impacts even if the contribution to national renewable energy targets is considerable.

- A4.12 On that point it is noted that both legislation and planning law indicate that where there may be incompatibility between NPF4 and the Local Development Plan (LDP) (HwLDP, IMFLDP, and Highland Council Supplementary Guidance) published prior to NPF4, then the more recent document shall prevail. Notwithstanding however, in instances of incompatibility, this requirement may not eliminate the provisions of the LDP in their entirety whilst these documents remain an extant part of the adopted Development Plan. That means that the Council may wish to give more weight to the provisions of its LDP over national policies where there is strong justification for doing so, such as where it feels that LDP policy is better equipped to respond to local conditions for example. However, this matter is yet to be tested through the planning system
- A4.13 It is considered the proposal is not in overall conformity with NPF4 Policy 11, particularly with regards to 11 e) ii. which requires the proposed development project design and mitigation will demonstrate how the following impacts are addressed: Significant landscape and visual impacts, recognising that such impacts are to be expected for some forms of renewable energy. Where impacts are localised and/or appropriate design mitigation has been applied, they will generally be considered to be acceptable;
- A4.13 The current proposal will have significant adverse landscape and visual impacts on a range of features/receptors (including but not restricted to) Loch Ness and Duntelchaig SLA, locally important summits and Munro mountains, receptors on Loch Ness and users of the Affric Kintail Way and Coire Loch Trail.
- A4.14 Additionally, whilst the generality of HwLDP's topic policies are superseded by those in NPF4, HwLDP policies that offer greater detail than NPF4 or that are tailored to Highland circumstance (and are not wholly incompatible with NPF4) are still relevant and applicable. In particular, Policy 67 Renewable Energy and its related Onshore Wind Energy Supplementary Guidance is relevant, the latter classifying the application site as principally within an "Area of Significant Protection". Also, Policy 57 Natural, Built and Cultural Heritage in terms of protection of the Glen Affric NSA, Loch Ness and Duntelchaig SLA and the scheduled monuments of Urquhart Castle and Garbeg.
- A4.15 It is considered the proposal is not in overall conformity with Policy 57, Policy 61 and Policy 67 of HwLDP. Policy 57 requires all development proposals be assessed taking into account the level of importance and type of heritage features, the form and scale of the development, and any impact on the feature and its setting. The following criteria will also apply:
- For features of local/regional importance development will be allowed if it can be satisfactorily demonstrated that they will not have an unacceptable impact on the natural environment, amenity and heritage resource; and

- For features of national importance development will be allowed if it can be shown not to compromise the natural environment, amenity and heritage resource. Where there may be any significant adverse effects, these must be clearly outweighed by social or economic benefits of national importance. It must also be shown that the development will support communities in fragile areas who are having difficulties in keeping their population and services.

A4.16 In terms of HwLDP Policy 67, whilst the proposed development would contribute towards meeting renewable energy generation targets and generally have a positive effect on the local and national economy the Council has to be satisfied that it is located, sited and designed not to be significantly detrimental overall, either individually or cumulatively with other developments, having regard in particular to any significant effects on the following:

- Natural, built and cultural heritage features;
- Visual impact and impact on the landscape character of the surrounding area (the design and location of the proposal should reflect the scale and character of the landscape and seek to minimise landscape and visual impact, subject to any other considerations);
- Amenity at sensitive locations, including residential properties, work places and recognised visitor sites (in or outwith a settlement boundary); and
- The amenity of users of any Core Path or other established public access for walking, cycling or horse riding.

A4.17 **Part 3: Annex B – National Developments Statements of Need.** National developments are significant developments of national importance. Appendix B identifies 18 types of national development which will support the delivery of the spatial strategy. The statements of need set out in the Appendix are a requirement of the Town and Country Planning (Scotland) Act 1997). Any project identified as national development is required to be considered at a project level to ensure all statutory tests are met. This project is classified as National Development under Annex B Section 3 which states National Development for renewable energy includes “Strategic Renewable Electricity Generation and Transmission Infrastructure” including: a) On and off shore electricity generation, including electricity storage, from renewables exceeding 50 megawatts capacity;

A4.18 This brings the application under the tests set out under Policy 11. As noted earlier, it is considered the proposal is not in overall conformity with NPF4 Policy 11, particularly with regards to 11 e).

### **Highland wide Local Development Plan (HwLDP)**

A4.19 The HwLDP identifies the site as “wider countryside” under Policy 36. It sets out a range of parameters against which development will be assessed. It states that development proposals may be supported if they are judged to be not significantly detrimental under the terms of the policy noting “Renewable energy development proposals will be assessed against Renewable Energy Policies, the non-statutory

Highland Renewable Energy Strategy and where appropriate the Onshore Wind Energy Supplementary Guidance”.

- A4.20 HwLDP Policy 67 - Renewable Energy sets out that ‘renewable energy development should be well related to the source of the primary renewable resource needed for operation’. It states that ‘The Council will consider the contribution of the proposed development in meeting renewable energy targets and positive/negative effects on the local and national economy as well as all other relevant policies of the Development Plan and other relevant guidance.’ The Council will support proposals where it is satisfied they are located, sited and designed such as they will not be significantly detrimental overall, individually or cumulatively with other developments against eleven specified criteria (as listed in HwLDP Policy 67). Such an approach is consistent with the concept of Sustainable Design (HwLDP Policy 28) and the concept of supporting the right development in the right place at the right time.
- A4.21 Policy 69 – Electricity Transmission Infrastructure states that ‘proposals for overground, underground or sub-sea electricity transmission infrastructure (including lines and cables, pylons/ poles and vaults, transformers, switches and other plant) will be considered having regard to their level of strategic significance in transmitting electricity from areas of generation to areas of consumption’. Subject to balancing with this consideration, and taking into account any proposed mitigation measures, the Council will support proposals which are assessed as not having an unacceptable significant impact on the environment, including natural, built and cultural heritage features.
- A4.22 Although HwLDP Policy 67 and Policy 69 are considered compatible with NPF4 Policy 11, NPF4 expresses greater support for renewable energy projects outwith National Parks and NSAs and requires greater weight to be attributed to the twin climate and biodiversity crises in the decision making process, whilst still recognising that a balancing exercise must still be carried out.
- A4.23 As noted earlier, it is considered the proposal is not in overall conformity with HwLDP Policy 57 and 67.

**Area Local Development Plan: The Inner Moray Firth Local Development Plan 2 (IMFLDP2)**

- A4.24 Policy 2 Nature Protection, Restoration and Enhancement states that development proposals for national, major and EIA development will only be supported where it is demonstrated that the proposal will conserve and enhance biodiversity, including nature networks within and adjacent to the site, so that they are in a demonstrably better state than without intervention, including through future management. To inform this, proposals should:
- be based on an understanding of the existing characteristics of the site and

its local, regional and national ecological context prior to development, including the presence of any irreplaceable habitats or species;

- wherever feasible, integrate and make best use of nature-based solutions, demonstrating how this has been achieved;
- be supported by an assessment of potential negative effects which should be fully mitigated in line with the mitigation hierarchy prior to identifying enhancements;
- provide significant biodiversity enhancements, in addition to any proposed mitigation. take into account the community benefit of biodiversity and nature networks.

A4.25 Biodiversity enhancements proposed through development will require to be delivered within an agreed timescale and should include supporting nature networks, linking to and strengthening habitat connectivity within and beyond the development, where appropriate. Any submission should include management arrangements for long-term retention and monitoring of the approved biodiversity enhancements, wherever appropriate.

A4.26 This application is supported by an ecological assessments and an outline Habitat Management Plan which includes restoration and enhancement measures. It is considered that a more robust and ambitious scheme which aligns greater with this policy can be secured by condition.

### **Onshore Wind Energy Supplementary Guidance (OWESG)**

A4.27 The Council's OWESG is a material consideration in the determination of planning applications. The supplementary guidance does not provide additional tests in respect of the consideration of development proposals against Development Plan policy. However, it provides a clear indication of the approach the Council towards the assessment of proposals, and thereby aid consideration of applications for onshore wind energy proposals

A4.28 The OWESG approach and methodology to the assessment of proposals is applicable and is set out in the OWESG Para 4.16 - 4.17. It provides a methodology for a judgement to be made on the likely impact of a development on assessed "thresholds" in order to assist the application of HwLDP Policy 67. The 10 criteria are particularly useful in considering visual impacts, including cumulative impacts. An appraisal of how the proposal meets with the thresholds set out in the criteria is included in Appendix 6 of this report.

### **Landscape Sensitivity Study**

A4.29 The OWESG also provides strategic considerations that identify sensitivities and potential capacity for wind farm development. These are called the Landscape

Sensitivity Appraisals (LSA) and form part of the statutorily adopted Onshore Wind Energy Supplementary Guidance. The Appraisals identify Key Views, Key Routes and Gateways as well as Landscape Character Area sensitivities and guidance. The site is located within the area covered by the Loch Ness study, with the turbine envelope falling within the Landscape Character Area (LCA) LN10: Separation of Glen Urquhart and Glen Moriston, Rocky Moorland Plateau. The appraisal notes amongst other things that the assessment unit has 'no roads through it, that views are from distance or from within the assessment unit on foot, and that the landscape of this assessment unit provides middle ground foil to the Rugged Massif in views from Meall Fuar-mhonaidh, also that it adds a sense of vastness to perceptions of distance'.

A4.30 Visual receptors of highest sensitivity within LN10 are identified as people at Key Viewpoints, visitors/tourists including cyclists and walkers, whilst those of medium sensitivity include residents within the assessment unit and wider region and people using key routes. Key Routes identified are

- the Great Glen Way- around Bunloit and Grotaih the route has views into the assessment unit;
- the A82 around Inver Coille to Invermoriston; and
- the A887 around Dundreggan.

A4.31 In terms of sensitivity, the appraisal notes: "Most of the Landscape Character Area lies outside the SLA designation, Meall Fuar-mhonaidh itself is included and is an attraction in its own right and affords views of SLA and wider area. The experience of the landscape from the summit of Meall Fuar-Mhonaidh would be degraded if there were a perception of the peak being encircled by development." For LN10 the degree of landscape character sensitivity to large scale wind farms is scored on a scale of 1-4 as being 3, where 1 being most susceptible to change.

A4.32 The appraisal concludes the following on potential for wind energy development: "No scope for small or medium turbines Limited scope for:

- Micro turbines where closely associated with buildings
- Additional Large turbines within the existing pattern

Turbines should:

- Be set back from Key Routes
- Preserve mitigation established by current schemes
- Maintain the landscape setting of each existing scheme
- Respect spacing and scale of existing development pattern
- Minimise visual confusion from higher ground to the west and north and with Meall Fuar-mhonaidh."

## **Other Material Policy Considerations - Onshore Wind Energy Policy Statement (2022) and Draft Energy Strategy and Just Transition Plan (2023)**

- A4.33 The Onshore Wind Energy Policy Statement supersedes the previously adopted Onshore Wind Energy Policy Statement which was published in 2017. The document sets out a clear ambition for onshore wind in Scotland and for the first time sets a national target for a minimum level of installed capacity for onshore wind energy, being 20 GW. This is set against a currently installed capacity of 9.4 GW (June 2023). Therefore, a further 10.6 GW of onshore wind requires to be installed to meet the target. It is however acknowledged that targets are not caps. In delivering such a target Scotland would play a significant role in meeting the requirement of 25-30 GW of installed capacity across the UK identified by the Climate Change Committee.
- A4.34 Like the previous iteration of the Onshore Wind Energy Policy Statement, the document recognises that balance is required and that no one technology can allow Scotland to reach its net zero targets. The document is clear that in achieving a balance, environmental and socio-economic benefits to Scotland must be maximised. In taking this approach, this echoes Scotland's Third Land Use Strategy.
- A4.35 The document recognises that there may be a need to develop onshore wind energy development on peat. Priority peatland is present on the site, and it is considered that a Peat Management Plan and a more ambitious Habitat Management Plan can be secured by condition.
- A4.36 Additionally, the document acknowledges that in order for Scotland to achieve its climate targets and the ambition for the minimum installed capacity of 20 GW by 2030, the landscape will change. However, the OWEPS also sets out that the right development should happen in the right place. Echoing NPF4, the document sets out that significant landscape and visual impacts are to be expected and that where the impacts are localised and / or appropriate mitigation has been applied the effects will be considered acceptable.
- A4.37 The role of Landscape Sensitivity Appraisals in considering wind energy proposals is promoted through the document. This highlights the importance of applying those contained within the Council's OWESG when assessing applications.
- A4.38 Benefits to rural areas, such as provision of jobs and opportunities to restore and protect natural habitats, are also highlighted in the document. It considers some of the wider benefits and challenges faced by in delivery of ambition and vision for onshore wind energy in Scotland. These include shared ownership, community benefit, supply chain benefits, skills development and financial

mechanisms for delivery. The proposed development does lead to such benefits being delivered, however, in relation to maximising socio-economic benefits, there is no current guidance on what that should look like and evidence of a significant shift of requirements is yet to emerge, which Members may expect to see, from what was likely to be offered pre-adoption of NPF4.

- A4.39 Finally, the document also highlights technical considerations, those relevant to this application have been considered and mitigation, where required has been secured by condition.
- A4.40 The Draft Energy Strategy and Just Transition Plan has been published for consultation. Ministers will likely give consideration to this document in their decision on the application, however, limited weight can be applied to the document given its draft status. Unsurprisingly, the material on onshore wind in the document reflects in large part that contained in NPF4 and the Onshore Wind Energy Policy Statement 2022. A fundamental part of the Strategy is expanding the energy generation sector. Overall, the draft Energy Strategy forms part of the new policy approach alongside the OWEPS and NPF4 and confirms the Scottish Government's policy objectives and related targets reaffirming the crucial role that onshore wind and enabling transmission infrastructure will play in response to the climate crisis which is at the heart of all these policies.
- A4.41 To deliver the ambition for onshore wind, the Onshore Wind Sector Deal for Scotland was introduced in September 2023. The document focuses on necessary high-level actions by Government and the Sector to support onshore wind delivery. Jointly, Government and the Sector are committed to working together to ensure a balance is struck between onshore wind and the impacts on land use and the environment. The document looks to expediate decision making and consent implementation to achieve 20 GW of installation by 2030, meaning we should be seeing faster decisions on applications that are already in the system, with more consents being build out. Again, the sector deal does not detail what the socio-economic commitments should be.

## Appendix 5 – Visual Assessment Appraisal (Operational only)

			Proposed Development			Cumulative, with other developments (in combination). Applicant updated this – SEI Chapter 4. Scenario 1: Loch Liath + under construction + consented wind farms Scenario 2: also factors in undetermined valid applications (including those at appeal or public local inquiry)		
Viewpoint / distance to development	App / THC	Sensitivity of the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (MoC) (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (LoE) (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (MoCC) (Scale / Extent / Duration) High, Medium, Low, Negligible	Level of Cumulative Effect (LoCE) (Magnitude of Change / Sensitivity of Receptor)	Significance
VP1 Affric Kintail Way, near Braefield 5.8km	APP	High	Low	Moderate	Significant	No cumulative effects	No cumulative effects	N/A
	THC	High	Low	Moderate	Significant	No cumulative effects	No cumulative effects	N/A
<p>Existing view: The baseline is as described in EIAR Chapter 6 LVIA.</p> <p>Theoretical visibility: 1 hub and 6 blade tips. Aviation lighting: (T12 and potentially T13 in close proximity to the viewpoint) will be evident from this location as indicated by Appendix 6.5, Figure A6.5.2. Turbines T12 and T13 will have visible lighting at between 14.5 cd and 13.8cd under clear conditions. This VP is representative of views experienced by recreational receptors on the Affric Kintail Way which is a promoted long distance trail, and similar views experienced from residential properties at Buntait. It is agreed that the sensitivity of receptors is High.</p> <p>Turbines will be partially screened by the ridgeline formed by elevated rolling moorland in the north of the Site, with turbine T12 forming an evident feature against the skyline and is present within a dip in the elevated moorland. The EIAR states that similar views, in which the Proposed Development will be perceived to introduce wind turbines into the view, will be experienced from localised extents of the north-western slopes of Glen Urquhart near this viewpoint location, and from a relatively short section of the Affric Kintail Way as the route passes north of the A831 towards forestry to the north-east of Buntait. The applicant considers that the introduction of the proposed development will result in a medium scale change to the view, primarily resulting from the skyline feature formed by Turbine T12, however, it considers it to be a low overall magnitude of change – officers agree with this assessment.</p> <p>Cumulative effects: There are no views of existing / consented wind farms from this location. The nearby pending application of Chrathaich will also not be visible from this VP. However, as noted by the EIAR, the operational Corrimony Wind Farm will be seen in views from parts of the minor road and nearby residential properties approximately 600m to the north-west of this VP. From sections of the road in which Corrimony Wind Farm is visible, the applicant contends that visibility of the proposed turbines is limited to the partially screened blade tips of three or four turbines. In views from the lower-lying extents of</p>								

			<b>Proposed Development</b>			<b>Cumulative, with other developments</b> (in combination). Applicant updated this – SEI Chapter 4. Scenario 1: Loch Liath + under construction + consented wind farms Scenario 2: also factors in undetermined valid applications (including those at appeal or public local inquiry)		
Viewpoint / distance to development	App / THC	Sensitivity of the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (MoC) (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (LoE) (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (MoCC) (Scale / Extent / Duration) High, Medium, Low, Negligible	Level of Cumulative Effect (LoCE) (Magnitude of Change / Sensitivity of Receptor)	Significance
Glen Urquhart, the enclosing southern slopes of the glen, woodland and coniferous forestry screen and filter views towards the proposed development.								
<b>VP2 Meall Fuar-mhonaidh 7.1km</b>	APP	High	High	<b>Major</b>	<b>Significant</b>	Scenario 1 – medium Scenario 2 – medium	<b>Moderate</b>	<b>Significant</b>
	THC	High	High	<b>Major</b>	<b>Significant</b>	Scenario 1 – high Scenario 2 – high	<b>Major</b>	<b>Significant</b>
<p>The baseline is as described in EIAR Chapter 6 Landscape of Visual Impact Assessment. Theoretical visibility: 13 hubs and 13 blade tips. Aviation lighting: All six lit turbines will be seen - T1, T4, T7, T10, T12 and T13 will have visible lighting at between 245.2cd and 237.9cd under clear conditions.</p> <p>The viewpoint is popular with a mixture of walkers taking a detour from the Great Glen Way, visitors stopping to take in the scenic views and local residents utilising the easily accessed route from the nearby car park Grottaig. The summit of Meall Fuar-mhonaidh (699m AOD) is a relatively straightforward gradual climb from the car park. Receptors will be hill walkers, recreational walkers and visitors appreciating the view. It is agreed the sensitivity of receptors is High. The location is noted as a “Key Location” within the OSWESG. The summit is located within the Loch Ness and Duntlechaig SLA and overlooks key aspects of the SLA which increases its sensitivity.</p> <p>Mitigation secured through the operational and consented schemes at Bhlaraidh focused on this locally important summit. Part of the mitigation secured through the operational Bhlaraidh scheme was to delete turbines to limit the ‘spill of the turbines over the natural buffer of Carn Tarsuinn’..To respect this mitigation and to draw the turbines back from this VP, three turbines were also deleted from the Bhlaraidh extension scheme.</p> <p>It is also considered important that developments do not overwhelm the summit, which includes limiting the visual envelop and lateral spread of turbines developments. In relation to Chraithach Wind Farm, which is with Scottish Ministers for determination – Committee Members raised no objection to the scheme subject to the deletion of T14, to which the applicant has agreed. Whilst the reason was to primarily limit impacts upon Glen Affric and the NSA, the effect of the deletion from Meall Fuar-mhonaidh VP was to remove the most northerly turbine, which reduced its lateral spread. These three developments</p>								



<b>Proposed Development</b>	<b>Cumulative, with other developments</b> (in combination). Applicant updated this – SEI Chapter 4. Scenario 1: Loch Liath + under construction + consented wind farms Scenario 2: also factors in undetermined valid applications (including those at appeal or public local inquiry)
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Viewpoint / distance to development	App / THC	Sensitivity of the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (MoC) (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (LoE) (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (MoCC) (Scale / Extent / Duration) High, Medium, Low, Negligible	Level of Cumulative Effect (LoCE) (Magnitude of Change / Sensitivity of Receptor)	Significance
<b>VP3 Balbeg 8.9km</b>	APP	High	Low	Minor	Not significant	No cumulative effects	No cumulative effects	N/A
	THC	High	Low	Minor	Not significant	No cumulative effects	No cumulative effects	N/A
<p>Existing view: The baseline is as described in EIAR Chapter 6 LVIA. Theoretical visibility: 3 blade tips. Aviation lighting: no visibility.</p> <p>This viewpoint is located at a cluster of residential properties at Balbeg, on the lower northern slopes of Glen Urquhart. So represents views experienced by residential receptors within Glen Urquhart. Residential receptors are considered to be of high susceptibility to changes in the view – officers agree with this assessment.</p> <p>The partial blade tips of three turbines will be seen against the skyline in the middle distance of views looking south-west. Turbines will be mostly screened by the ridgeline formed by elevated rolling moorland in the north of the site. The blade tips of two of the three visible turbines will be barely perceptible beyond intervening landform. The proposal will introduce wind turbines into a view which doesn't currently experience any, however, the proposed turbines will occupy a relatively small proportion of views looking south-west. The applicant considers the magnitude of change to be low with minor (adverse) but not significant effects – officers agree with this assessment.</p> <p>Cumulative: There are no views of consented wind farms from this location and the pending application of Chrathaich will also not be visible from this VP. Officers accept this assessment.</p>								

			Proposed Development			Cumulative, with other developments (in combination). Applicant updated this – SEI Chapter 4. Scenario 1: Loch Liath + under construction + consented wind farms Scenario 2: also factors in undetermined valid applications (including those at appeal or public local inquiry)		
Viewpoint / distance to development	App / THC	Sensitivity of the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (MoC) (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (LoE) (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (MoCC) (Scale / Extent / Duration) High, Medium, Low, Negligible	Level of Cumulative Effect (LoCE) (Magnitude of Change / Sensitivity of Receptor)	Significance
<b>VP4 Affric Kintail Way, West of Cannich 9.4km</b>	APP	High	Low	Minor	Not significant	No cumulative effects	No cumulative effects	N/A
	THC	High	Low	Minor	Not significant	No cumulative effects	No cumulative effects	N/A
<p>Existing view: The baseline is as described in EIAR Chapter 6 LVIA. Theoretical visibility: 1 hub and 4 blade tips. Aviation lighting: Turbine T13 will have visible lighting 21.2cd under clear conditions. This VP represents views experienced by recreational receptors on the promoted long distance trail. Officers agree that the sensitivity of receptors is High.</p> <p>The hubs and blade tips of one turbine (T13) and the partial blade tips of a further three turbines will be seen against the skyline in views looking south-east. The ridgeline formed by elevated rolling moorland along the western Site boundary will partially screen turbines. The EIAR notes that similar views will be experienced from limited extents of the Affric Kintail Way as it passes to the west of Strathglass, given the presence of coniferous forestry which screens outwards views from much of this section of the route. The geographical extent of similar views is therefore considered to be small. The overall magnitude of change is judged to be low and taking account of the high sensitivity will result in a minor (adverse) and not significant visual effect. Officers agree that the overall effect will not be significant.</p> <p>Cumulative: There are no views of consented wind farms from this location and the pending application of Chrathaich will also not be visible from this VP. However, it is noted that in views further to the south-west there may be some perceptible tips of the operational Bhlairaidh wind farm and Chrathaich, but these are reduced due to existing vegetation.</p>								

<b>Proposed Development</b>	<b>Cumulative, with other developments</b> (in combination). Applicant updated this – SEI Chapter 4. Scenario 1: Loch Liath + under construction + consented wind farms Scenario 2: also factors in undetermined valid applications (including those at appeal or public local inquiry)
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Viewpoint / distance to development	App / THC	Sensitivity of the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (MoC) (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (LoE) (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (MoCC) (Scale / Extent / Duration) High, Medium, Low, Negligible	Level of Cumulative Effect (LoCE) (Magnitude of Change / Sensitivity of Receptor)	Significance
<b>VP5 Coire Loch Trail, Glen Affric 9.4km</b>	APP	High	Medium	Moderate	<b>Significant</b>	Scenarios 1 and 2- Medium	<b>Moderate</b>	<b>Significant</b>
	THC	High	Medium	Moderate	<b>Significant</b>	Scenarios 1 and 2- Medium	<b>Moderate</b>	<b>Significant</b>

Existing view: The baseline is as described in EIAR Chapter 6 LVIA.

Theoretical visibility: 5 hubs and 13 blade tips. Aviation lighting: Turbine T1, T7, T10 and T12 will have visible lighting at between 30.9cd and 23.9cd under clear conditions. This viewpoint is located on the Coire Loch Trail in the Glen Affric National Nature Reserve. Represents views experienced by recreational receptors within Glen Affric and Strathconon, Monar and Mullardoch SLA. Officers agree that the sensitivity of receptors is High.

The hubs and blade tips of five turbines and the partial blade tips of a further eight turbines will be seen against the skyline in views looking south-east. The ridgeline formed by elevated rolling moorland to the west of the site will partially screen turbines. The steel lattice towers and conductors of the Beaulieu-Denny 400kv overhead line sits in front of the development but at a much lower elevation. T3 and T6 would overlap with Corrimony but whilst the turbines are contained closer to the elevated forestry, Loch Liath will create a substantial lateral extension of visible and they will visually be read in a different landscape layer as the existing turbines.

The applicant considers that the proposed development will appear comparable in vertical scale as the turbines of the operational Corrimony Wind Farm. Officers suggest that whilst that maybe the case, there is a jarring effect as the two schemes overlap but sit within a different layer within the landform.

The applicant states that the presence of forestry and woodland limits outward views from the eastern extents of Glen Affric and the Coire Loch Trail. Similar views will be experienced from a relatively short, elevated section of the trail from which framed outward views south-east are available. The geographical extent of similar views is therefore considered to be small. Officers agree that this will result in moderate (adverse) and significant effects.

		<b>Proposed Development</b>				<b>Cumulative, with other developments</b> (in combination). Applicant updated this – SEI Chapter 4. Scenario 1: Loch Liath + under construction + consented wind farms Scenario 2: also factors in undetermined valid applications (including those at appeal or public local inquiry)		
Viewpoint / distance to development	App / THC	Sensitivity of the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (MoC) (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (LoE) (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (MoCC) (Scale / Extent / Duration) High, Medium, Low, Negligible	Level of Cumulative Effect (LoCE) (Magnitude of Change / Sensitivity of Receptor)	Significance
	Cumulative: Bhlaraidh extension are not visible from this VP. Chrathaich is largely screened by Forestry, but if seen it will be visually associated with the Corrimony development. Unlike Chrathaich it also increases the presence of aviation lighting in conjunction with Corrimony. Officers agree that there will be significant cumulative effects as a result of the development.							
<b>VP6 B862 near Whitebridge 12.8km</b>	App	High	Low	Minor	Not significant	Scenarios 1 and 2- low	Minor	Not significant
	THC	High	Low	Minor	Not significant	Scenarios 1 and 2 - low	Minor	Not significant
	<p>Existing view: The baseline is as described in EIAR Chapter 6 LVIA. Theoretical visibility: 0 hubs and 9 blade tips. Aviation lighting: No visibility of the turbines with visible lighting will be evident.</p> <p>Represents views experienced by road users, recreational receptors (NCN Route 1) and nearby residential receptors. Residential and recreational receptors are considered to be of high susceptibility to changes in the view – officers agree.</p> <p>The partial blade tips of nine turbines will appear against the skyline, though mostly screened by intervening landform in distant views north-west. The operational turbines at Bhlaraidh are visible as a series of blade tips.</p> <p>Similar views, in which the Proposed Development will be perceived to introduce wind turbines into the view, will be experienced from a very localised section of the B862 near the viewpoint. Outward views north-east from other parts of Stratherrick towards the site are limited by intervening landform and coniferous forestry. The geographical extent of similar views is therefore considered to be small. Officers agree that there will be a low magnitude of the change, resulting in minor (adverse) not significant effects.</p> <p>Cumulative: Loch Liath will overlap with part of Bhlaraidh extension and consequentially it will increase the visual envelope of turbines along this elevated line. The pending scheme of Chrathaich will not be visible. Although it will increase the spread and intensity, the development will only appear as blade tips</p>							

			Proposed Development			Cumulative, with other developments (in combination). Applicant updated this – SEI Chapter 4. Scenario 1: Loch Liath + under construction + consented wind farms Scenario 2: also factors in undetermined valid applications (including those at appeal or public local inquiry)		
Viewpoint / distance to development	App / THC	Sensitivity of the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (MoC) (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (LoE) (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (MoCC) (Scale / Extent / Duration) High, Medium, Low, Negligible	Level of Cumulative Effect (LoCE) (Magnitude of Change / Sensitivity of Receptor)	Significance
	and will appear commensurate in scale to the consented extension at Bhlraidh. Officers accept that this will not result in significant effects.							
<b>VP7 A833 near Balnagrach 13.7km</b>	App	Medium	Low	Minor	Not significant	No cumulative effects	No cumulative effects	N/A
	THC	Medium	Low	Minor	Not significant	No cumulative effects	No cumulative effects	N/A
<p>Existing view: The baseline is as described in EIAR Chapter 6 LVIA. Theoretical visibility: 2 hubs and 8 blade tips. Aviation lighting: Turbine T10, T12 and T13 will have visible lighting 57.6cd under clear conditions.</p> <p>This viewpoint is located on the A833, approximately 700m north of Balnagrach. The viewpoint represents views experienced by road users and nearby residential receptors. The applicant considers residential receptors to be of high susceptibility, but road users are considered to be of low susceptibility to changes in the view. The viewpoint is not located within a designated landscape or a recognised stopping point or promoted view. The value of the view is considered to be medium. On balance, taking account of the judgements of susceptibility and value, overall sensitivity of receptors at this viewpoint is judged to be medium.</p> <p>The hubs and blade tips of two turbines and the partial blade tips of a further six turbines will be seen against the skyline in distant views south-west. The ridgeline formed by elevated rolling moorland along the north-eastern site boundary will partially screen turbines. Officers consider that whilst it will introduce turbines where there are currently none, these are oblique views experienced by road users in between occasional breaks in the vegetation which lines the road. Officers agree that the overall effect is minor and not significant.</p> <p>Cumulative: The consented Bhlraidh extension are not visible from this VP and the turbines at the pending application of Chrathaich are also not visible from this VP.</p>								

		<b>Proposed Development</b>				<b>Cumulative, with other developments</b> (in combination). Applicant updated this – SEI Chapter 4. Scenario 1: Loch Liath + under construction + consented wind farms Scenario 2: also factors in undetermined valid applications (including those at appeal or public local inquiry)		
Viewpoint / distance to development	App / THC	Sensitivity of the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (MoC) (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (LoE) (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (MoCC) (Scale / Extent / Duration) High, Medium, Low, Negligible	Level of Cumulative Effect (LoCE) (Magnitude of Change / Sensitivity of Receptor)	Significance
<b>VP8 B862 Suidhe Viewpoint 13.9km</b>	App	High	Medium	<b>Moderate</b>	<b>Significant</b>	Scenario 1- low Scenario 2- low	Minor Minor	Not significant
	THC	High	Medium	<b>Moderate</b>	<b>Significant</b>	Scenario 1- low Scenario 2- low	Minor Minor	Not significant
<p>Existing view: The baseline is as described in EIAR Chapter 6 LVIA. Theoretical visibility: 12 hubs and 13 blade tips. Aviation lighting: Turbine T1, T4, T7, T10, T12 and T13 will have visible lighting at between 108.7cd and 90.2cd under clear conditions.</p> <p>This VP is a popular roadside vantage point located on the B862 on the south-eastern side of Loch Ness and provides open, elevated and panoramic views. The main views are towards the north-east over Loch Ness, forested wide glens and the B862 continuing into the distance. This north-easterly view is also the visual focus on an information board at this viewpoint, that labels key features within the view, including Meall Fuar-mhonaidh, the Great Glen and Loch Ness, Inverness and the Moray Firth, Loch Knockie, Tom na Crioich, Loch Mhor and Beinn Sgurrach. This viewpoint is on the promoted Loch Ness Trail and is on the Caledonia Way cycle route. Represents views experienced by road users and recreational receptors at popular promoted viewpoint within the Loch Ness and Duntelchaig SLA. EIAR considers receptors to be at high susceptibility to changes in the view – officers agree.</p> <p>The hubs and blade tips of twelve turbines and the blade tips of one further turbine will be seen against the skyline in distant views north-west, with the bases of turbine towers partially screened by intervening landform. The proposed turbines would appear adjacent (north) to the operational Bhlaraidh turbines and will increase the number and horizontal extent of turbines in the view but will appear larger than the operational turbines. Similar views will be afforded from a relatively short, elevated section of the B862 near and to the north-east of the promoted viewpoint before the road descends into Stratherrick. Intervening landform and vegetation foreshorten views from lower-lying sections of the road. The geographical extent of similar views is therefore considered small. Officers agree that the effect will be moderate (adverse) and significant.</p> <p>In terms of cumulative effects, in scenario 1 the proposed development would appear behind the consented Bhlaraidh extension turbines. The turbines at</p>								

		<b>Proposed Development</b>				<b>Cumulative, with other developments</b> (in combination). Applicant updated this – SEI Chapter 4. Scenario 1: Loch Liath + under construction + consented wind farms Scenario 2: also factors in undetermined valid applications (including those at appeal or public local inquiry)		
Viewpoint / distance to development	App / THC	Sensitivity of the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (MoC) (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (LoE) (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (MoCC) (Scale / Extent / Duration) High, Medium, Low, Negligible	Level of Cumulative Effect (LoCE) (Magnitude of Change / Sensitivity of Receptor)	Significance
	Bhlaraidh extension would be visually closer to the receptor than the proposed turbines. In terms of scenario 1, the turbines of the pending scheme at Chrathaich will also be visible from this VP and would appear behind the Bhlaraidh extension turbines and amongst the operational Bhlaraidh turbines. The addition of Loch Liath will intensify the numbers of turbines visible.							
<b>VP9 Meall Mor, above Glen Affric 13.3km</b>	App	High	Medium	<b>Moderate</b>	<b>Significant</b>	Scenario 1- medium Scenario 2- medium	<b>Moderate</b> <b>Moderate</b>	<b>Significant</b> <b>Significant</b>
	THC	High	High/Medium	<b>Major/Moderate</b>	<b>Significant</b>	Scenario 1- High/Medium Scenario 2- High/Medium	<b>Major/Moderate</b> <b>Major/Moderate</b>	<b>Significant</b> <b>Significant</b>
<p>Existing view: The baseline is as described in EIAR Chapter 6 LVIA. Theoretical visibility: 13 hubs and 13 blade tips. Aviation lighting: Turbine T1, T4, T7, T10, T12 and T13 will have visible lighting at between 233cd and 225.8cd under clear conditions. Corrimony aviation lighting is also evident at this VP.</p> <p>Illustrative of elevated views from local high point within Central Highlands WLA, on northern boundary of the Glen Affric NSA and southern boundary of the Monar and Mullardoch SLA. The viewpoint is located with the Glen Affric National Nature Reserve. Represents views experienced by recreational receptors. EIAR considers receptors to be at high susceptibility to changes in the view – officers agree.</p> <p>NatureScot also consider that for impacts upon Glen Affric the northern mountains (e.g. VP9 and VP18) are important, due to the number of people likely to visit, their focus on the landscape and desire to experience the view from this location, as well as the status these hills/ routes have in the hillwalking/ walking community.</p> <p>The hubs and blade tips of all thirteen turbines will be seen in distant views east, mostly backclothed by more distant landform. The bases of turbine towers will be partially screened by intervening landform. The EIAR reports similar views will be experienced from the elevated sides of the north-east of Glen Affric within 13- 17km of the proposed development (including VP18). The proposed turbines will appear to the rear of the operational Corrimony wind farm and will extend between the more distant Dunmaglass and Corriegarth wind farms. The operational Bhlaraidh Wind Farm will appear further south (right of the view),</p>								

			Proposed Development			Cumulative, with other developments (in combination). Applicant updated this – SEI Chapter 4. Scenario 1: Loch Liath + under construction + consented wind farms Scenario 2: also factors in undetermined valid applications (including those at appeal or public local inquiry)		
Viewpoint / distance to development	App / THC	Sensitivity of the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (MoC) (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (LoE) (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (MoCC) (Scale / Extent / Duration) High, Medium, Low, Negligible	Level of Cumulative Effect (LoCE) (Magnitude of Change / Sensitivity of Receptor)	Significance
	<p>with a slight gap between the two schemes; however, there will be a significant horizontal spread of turbines across the view. The proposed turbines will appear larger in scale than the operational Corrimony and Bhlaraidh turbines. Other more distant operational wind farms will be seen in successive panoramic views, including Stronelairg, Millennium, Beinneun, Farr and Kyllachy. The EIAR considers that the magnitude of effect will be medium, with a moderate (adverse) level of effect and significant. NatureScot also consider that the LVIA may understate the magnitude of change and thus the level of visual effect from the northern mountains/ Munros. Officers agree that this will be a significant effect, and that the magnitude of change has been marginally understated.</p> <p>Cumulative: In terms of scenario 1, the development will overlap the end of the consented Bhlaraidh wind turbines (now consented Corriegarth 2 will sit further behind Bhlaraidh extension) and intensify the number of turbines in view and significantly extend the horizontal spread of turbines. The pending scheme of Chrathaich will also be visible from this VP, which will sit forward of the operational and consented schemes at Bhlaraidh and within the gap towards Corrimony. Loch Liath will overlap with the end turbines of Chrathaich and intensify the view and horizontal spread.</p>							
<b>VP10 Creag Dhubh 15.1km</b>	App	High	Medium	<b>Moderate</b>	<b>Significant</b>	Scenario 1- medium Scenario 2- medium	<b>Moderate Moderate</b>	<b>Significant Significant</b>
	THC	High	High/Medium	<b>Major/Moderate</b>	<b>Significant</b>	Scenario 1- medium Scenario 2- high/medium	<b>Moderate Major/Moderate</b>	<b>Significant Significant</b>
<p>Existing view: The baseline is as described in EIAR Chapter 6 LVIA. Theoretical visibility: 13 hubs and 13 blade tips. Aviation lighting: Turbine T1, T4, T7, T10, T12 and T13 will have visible lighting at between 172.1cd and 158.2cd under clear conditions.</p> <p>This viewpoint is located on the local hill summit of Creag Dubh (539m AOD) on the southern boundary of the Glen Affric NSA and within the Central Highlands WLA 24. The viewpoint is also located with the Glen Affric National Nature Reserve. The viewpoint represents views experienced by recreational receptors. EIAR considers receptors to be at high susceptibility to changes in the view – officers agree.</p>								

			Proposed Development			Cumulative, with other developments (in combination). Applicant updated this – SEI Chapter 4. Scenario 1: Loch Liath + under construction + consented wind farms Scenario 2: also factors in undetermined valid applications (including those at appeal or public local inquiry)		
Viewpoint / distance to development	App / THC	Sensitivity of the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (MoC) (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (LoE) (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (MoCC) (Scale / Extent / Duration) High, Medium, Low, Negligible	Level of Cumulative Effect (LoCE) (Magnitude of Change / Sensitivity of Receptor)	Significance
<p>The hubs and blade tips of all thirteen turbines will be seen against the skyline in distant views east. The ridgeline formed by elevated rolling moorland along the western site boundary will partially screen the bases of turbine towers. The turbines will be located in the gap between the operational turbines at Bhlaraidh and Corrimony and will appear larger in scale than the existing turbines. The proposed development will increase the number and horizontal extent of turbines in this view, appearing as features against the skyline across a medium proportion of the view. The EIAR reports that similar views will be experienced from elevated landform and hill summits to the south-east of Glen Affric (along the boundary of the Glen Affric NSA) within 10-19km to the west and south-west of the nearest proposed turbine. The EIAR reports a medium scale change to the view with moderate, so significant effects. Officers agree that this will be a significant effect, and that the magnitude of change has been marginally understated, with the skylining character of the turbines, their spacing and scale contrasting to Corrimony.</p> <p>Cumulative: The applicant's assessment for scenario is broadly accepted. For Scenario 2, the pending scheme of Chrathaich will be visible and sit in front of and overlap parts of Loch Liath and Bhlaraidh extension. However, Loch Liath would fill in the gap between Bhlaraidh extension/ Chrathaich and Corrimony, resulting in an elevated significant adverse cumulative effect should all planned projects proceed.</p>								
<b>VP11 Carn na Leitire 18.9km</b>	App	High	Low	Minor	Not significant	Scenario 1- Low Scenario 2- Low	Minor	Not significant
	THC	High	Medium	Moderate	Not Significant	Scenario 1- Moderate Scenario 2- Moderate	Moderate	Not Significant
<p>Existing view: The baseline is as described in EIAR Chapter 6 LVIA. Theoretical visibility: 13 hubs and 13 blade tips. Aviation lighting: Turbine T1, T4, T7, T10, T12 and T13 will have visible lighting at between 144.3cd and 131.8cd under clear conditions.</p> <p>Represents views experienced by recreational receptors from popular local hill summit. EIAR considers receptors to be at high susceptibility to changes in the view – officers agree.</p>								

			Proposed Development			Cumulative, with other developments (in combination). Applicant updated this – SEI Chapter 4. Scenario 1: Loch Liath + under construction + consented wind farms Scenario 2: also factors in undetermined valid applications (including those at appeal or public local inquiry)		
Viewpoint / distance to development	App / THC	Sensitivity of the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (MoC) (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (LoE) (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (MoCC) (Scale / Extent / Duration) High, Medium, Low, Negligible	Level of Cumulative Effect (LoCE) (Magnitude of Change / Sensitivity of Receptor)	Significance
			<p>The EIAR contends that similar views will be experienced from elevated south-facing slopes and hill summits between the A833 and A82, within 14-25km to the north-east of the nearest turbine. Similar views are afforded from a relatively short, elevated section of the Great Glen Way to the north of the site near Carn na Leitire. However, visibility will be limited to localised sections of the route due to screening of outward views by intervening forestry in this area.</p> <p>The hubs and blade tips of all thirteen turbines will be seen against the skyline in distant views south-west. The bases of turbines in the south of the Site will be partially screened by intervening landform. The proposed turbines will appear to the north of the operational Bhlaraidh wind farm, and turbines in the south of the site will appear in front of and will be more prominent than the operational Bhlaraidh turbines. It will also increase the horizontal spread of turbines in this view. Officers contend that the magnitude of effect has been understated in the LVIA, and that moderate, but not significant effects would occur, owing to the extent of additional horizontal spread, but also due to the increased visibility and apparent scale of T9, T12, T10 and T13, with these turbines having little intervening topographical screening.</p> <p>Cumulative: Bhlaraidh extension increases the horizontal envelope further, but that scheme is more recessive in the view. The pending scheme at Chraithach would site behind Loch Liath, and again is more recessive in the view.</p>					

			Proposed Development			Cumulative, with other developments (in combination). Applicant updated this – SEI Chapter 4. Scenario 1: Loch Liath + under construction + consented wind farms Scenario 2: also factors in undetermined valid applications (including those at appeal or public local inquiry)		
Viewpoint / distance to development	App / THC	Sensitivity of the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (MoC) (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (LoE) (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (MoCC) (Scale / Extent / Duration) High, Medium, Low, Negligible	Level of Cumulative Effect (LoCE) (Magnitude of Change / Sensitivity of Receptor)	Significance
<b>VP12 Beinn a' Bha'ach Ard 18.6km</b>	App	High	Low	Minor	Not significant	Scenario 1- Low Scenario 2- Low	Minor	Not significant
	THC	High	Medium	Moderate	Not Significant	Scenario 1- Moderate Scenario 2- Moderate	Moderate	Not Significant
<p>Existing view: The baseline is as described in EIAR Chapter 6 LVIA. Theoretical visibility: 13 hubs and 13 blade tips. Aviation lighting: Turbine T1, T4, T7, T10, T12 and T13 will have visible lighting at between 245.2cd and 242.9cd under clear conditions.</p> <p>Represents views experienced by recreational receptors within the Glen Strathfarrar NSA and Central Highlands WLA. EIAR considers receptors to be at high susceptibility to changes in the view – officers agree.</p> <p>The hubs and blade tips of all thirteen turbines will be seen backclothed by more distant landform in views south. The bases of turbine towers will be screened by intervening landform. The proposed turbines in the west of the site will appear in front of the operational Bhlaraidh turbines, with proposed turbines in the centre and east of the site increasing the horizontal extent of turbines, some stacking is apparent which is jarring, but it is relatively tightly clustered in the view. The magnitude of change would be higher than reported in the LVIA but remains not significant owing to compact nature of the turbine from this receptor.</p> <p>Cumulative: The consented Bhlaraidh scheme will partially sit to the rear of the proposed turbines at Loch Liath, with Bhlaraidh extension increasing the horizontal envelope further. The pending scheme at Chraithach will sit in front of the existing Bhlaraidh turbines, but will not increase the horizontal spread, whilst the other pending scheme of Culachy is also visible to the rear of the operational turbines at Bhlaraidh. Loch Liath interrupts the rhythm of Bhlaraidh Extension, but with the addition of Chrathaich the wider cluster appears more balanced with the Loch Liath turbines not appearing overly out of place. The addition of Culachy increased the overall perceived depth of wind farm development.</p>								

		<b>Proposed Development</b>				<b>Cumulative, with other developments</b> (in combination). Applicant updated this – SEI Chapter 4. Scenario 1: Loch Liath + under construction + consented wind farms Scenario 2: also factors in undetermined valid applications (including those at appeal or public local inquiry)		
Viewpoint / distance to development	App / THC	Sensitivity of the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (MoC) (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (LoE) (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (MoCC) (Scale / Extent / Duration) High, Medium, Low, Negligible	Level of Cumulative Effect (LoCE) (Magnitude of Change / Sensitivity of Receptor)	Significance
<b>VP13 B852 Erchite Wood, east of Loch Ness (picnic area) 20.4km</b>	App	High	Low	Minor	Not significant	Scenario 1- Low Scenario 2- Low	Minor	Not significant
	THC	High	Moderate	<b>Moderate</b>	<b>Significant</b>	Scenario 1- Low Scenario 2- Low	Minor	Not significant
<p>Existing view: The baseline is as described in EIAR Chapter 6 LVIA. Theoretical visibility: 8 hubs and 12 blade tips. Aviation lighting: Turbine T1, T4, T7 and T12 will have visible lighting at between 57.6cd and 48.4cd under clear conditions.</p> <p>Representative of low level views from shores of Loch Ness, on B-road, within Loch Ness and Duntelchaig SLA. This viewpoint is located on the eastern shore of Loch Ness at one of the promoted picnic areas along the B852, approximately 3.7km south-west of Dores. EIAR considers receptors to be at high susceptibility to changes in the view – officers agree, with this view also being representative of views obtained from leisure users on the water of Loch Ness such as canoeists, with further visualisations having been provided for leisure craft operating to and from Urquhart Castle, along the middle of Loch Ness.</p> <p>The hubs and blade tips of eight turbines and the blade tips of a further four turbines will be seen against the skyline.</p> <p>The EIAR states that the proposed development will increase the prominence and horizontal extent of the barely perceptible blade tips of Bhlaraidh wind farm. The proposed turbines will form a new skyline feature in focused views looking into the site along Glen Coiltie, however, the proposed turbines will not overwhelm the scale of the containing landform to the east of the Great Glen and will be seen across a relatively small proportion of the view. It also reports that similar views will be experienced from very localised extents of Loch Ness (2.7-4.7km to the northeast of Strone Point) and localised extents of the eastern loch shore, within the Loch Ness and Duntelchaig SLA.</p> <p>For wind energy developments on both sides of Loch Ness, officers have continually sought to avoid/minimise visibility from the water and along the surrounding loch level routes and approaches. This has largely been achieved through the refusal of poorly sited wind farm proposals, and by securing</p>								

			Proposed Development			Cumulative, with other developments (in combination). Applicant updated this – SEI Chapter 4. Scenario 1: Loch Liath + under construction + consented wind farms Scenario 2: also factors in undetermined valid applications (including those at appeal or public local inquiry)		
Viewpoint / distance to development	App / THC	Sensitivity of the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (MoC) (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (LoE) (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (MoCC) (Scale / Extent / Duration) High, Medium, Low, Negligible	Level of Cumulative Effect (LoCE) (Magnitude of Change / Sensitivity of Receptor)	Significance
	<p>appropriate mitigation by design, including turbine deletions and careful consideration of the scale of turbines. As noted in the EIAR, the blade tip of the consented Bhlaraidh Extension will be barely perceptible beyond intervening landform. No objection was raised to Chrathaich Wind Farm is currently pending consideration at present, will again largely restrict visibility to a limited number of additional blade tips.</p> <p>In contrast, Loch Liath is far more visually intrusive, with larger scale turbines with results in hubs and towers now being visible on this skyline. It also results in a greater horizontal spread of turbines, resulting in turbines being introduced into views where there is exceptionally limited existing or consented wind farm development by virtue of careful siting and design. As such this scheme has the potential to substantially undo design mitigation secured for other wind farm schemes to date. Such an affect would be significant and detrimental to the visual amenity of receptors at the shoreside, as well as for those on the loch itself.</p> <p>Cumulative: Effects would be minor owing to other consented and plan developments avoiding such significant impacts.</p>							
<b>VP14 Meall Dubh 19.7km</b>	App	High	Low	Minor	Not significant	Scenario 1- Low Scenario 2- Low	Minor	Not significant
	THC	High	Low	Minor	Not significant	Scenario 1- Low Scenario 2- Low	Minor	Not significant
<p>Existing view: The baseline is as described in EIAR Chapter 6 LVIA. Theoretical visibility: 13 hubs and 13 blade tips. Aviation lighting: Turbine T1, T4, T7, T10, T12 and T13 will have visible lighting at between 242.9cd and 237.9cd under clear conditions.</p> <p>Represents views experienced by recreational receptors from Corbett summit. EIAR considers receptors to be at high susceptibility to changes in the view – officers agree.</p> <p>The hubs and blade tips of all thirteen turbines will be seen against the skyline in distant views northeast, to the rear of the operational Bhlaraidh wind farm. Proposed turbines will appear slightly larger in scale than the operational Bhlaraidh turbines and it will intensify the cluster. Some to the turbines sit to the rear</p>								

		<b>Proposed Development</b>				<b>Cumulative, with other developments</b> (in combination). Applicant updated this – SEI Chapter 4. Scenario 1: Loch Liath + under construction + consented wind farms Scenario 2: also factors in undetermined valid applications (including those at appeal or public local inquiry)		
Viewpoint / distance to development	App / THC	Sensitivity of the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (MoC) (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (LoE) (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (MoCC) (Scale / Extent / Duration) High, Medium, Low, Negligible	Level of Cumulative Effect (LoCE) (Magnitude of Change / Sensitivity of Receptor)	Significance
	<p>of the landform, whilst the operational turbines at Bhlaraidh sit forward of this. However, it doesn't extend the visual envelope of turbines from this VP. The effects are not considered by officers to be significant.</p> <p>Cumulative: The consented Bhlaraidh turbines will extend the horizontal spread of turbines, this is also the case for the pending Chrathaich scheme. From this VP. This VP is close to the existing cluster of turbines of Millennium. Views of Tomchrasky and Culachy would be available, but these cumulative schemes are set out of the view towards the development. Officers agree that the overall level is not significant.</p>							
<b>VP15 Core Path at Loch Affric 20.4km</b>	App	High	Low	Minor	Not significant	Scenario 1 - N/A Scenario 2 - Low	N/A Minor	N/A Not significant
	THC	High	Medium	<b>Moderate</b>	<b>Significant</b>	Scenario 1 - N/A Scenario 2 - Low	N/A Minor	N/A Not significant
<p>Existing view: The baseline is as described in EIAR Chapter 6 LVIA.</p> <p>Theoretical visibility: 8 hubs and 11 blade tips. Aviation lighting: Turbine T7, T10, T12 and T13 will have visible lighting at between 98.2cd and 90.2cd under clear conditions. The existing visible turbine lighting on Corrimony Wind Farm is evident from this viewpoint.</p> <p>This viewpoint is located on THC Core Path (IN05.06), which is a circular route that circumnavigates Loch Affric within the Glen Affric NSA and Central Highlands WLA. It represents views experienced by recreational receptors within the Glen Affric NSA. EIAR considers receptors to be at high susceptibility to changes in the view – officers agree.</p> <p>This area is particularly sensitive, as such the Council and NatureScot have both sought to minimise impacts (including aviation lighting) in previous schemes. In particular, no objection was raised to the Bhlaraidh extension due to its limited visibility. The Council have also raised no objection to Chrathaich Wind Farm subject to the deletion of T14, which was considered to create disproportionate effect upon Glen Affric. The applicant has agreed to this deletion but is</p>								



			<b>Proposed Development</b>			<b>Cumulative, with other developments</b> (in combination). Applicant updated this – SEI Chapter 4. Scenario 1: Loch Liath + under construction + consented wind farms Scenario 2: also factors in undetermined valid applications (including those at appeal or public local inquiry)		
Viewpoint / distance to development	App / THC	Sensitivity of the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (MoC) (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (LoE) (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (MoCC) (Scale / Extent / Duration) High, Medium, Low, Negligible	Level of Cumulative Effect (LoCE) (Magnitude of Change / Sensitivity of Receptor)	Significance
<b>VP16 B862 South of Dores 22.3km</b>	App	High	Low	Minor	Not significant	Scenario 1- Low Scenario 2 - Low	Minor	Not significant
	THC	High	Medium	<b>Major/Moderate</b>	<b>Significant</b>	Scenario 1- Low Scenario 2 - Low	<b>Moderate</b>	<b>Significant</b>
<p>Existing view: The baseline is as described in EIAR Chapter 6 LVIA. Theoretical visibility: 13 hubs and 13 blade tips. Aviation lighting: Turbine T1, T4, T7, T10, T12 and T13 will have visible lighting at between 90.2cd and 82.2cd under clear conditions.</p> <p>Represents views experienced by road users, including tourists within the Loch Ness and Duntelchaig Special Landscape Area (SLA). EIAR considers receptors to be at high susceptibility to changes in the view – officers agree. OWESG identifies this road as a key route local residents, recreational users from wider highland area tourists.</p> <p>The hubs and blade tips of all thirteen turbines will be seen against the skyline in distant views south-west, turbine bases will be partially screened. Turbines will be to the north-east of the operational Bhlaraidh wind turbines; it will increase the prominence and horizontal extent of turbines in the view. The EIAR contends that the turbines will not overwhelm the scale of the containing landform to the west of the Great Glen and will appear relatively evenly spaced with a balanced composition across the cluster. Applicant considers that this will result in a low magnitude of change, the effects of which will be minor and not significant. Officers consider that the development will diminish the scale of the hills and will be much larger than the existing operational Bhlaraidh turbines, resulting in a substantially increased horizontal spread. The contrasting scale of turbines would also be apparent, particularly T3, T1 and T4 which appear to step down into the valley, forward of the horizon.</p> <p>Cumulative: Loch Liath would be the most prominent when Bhlaraidh extension and Chrathaich are added into the cumulative picture. All other schemes are less dominant in the view and appear over rather than forward of the horizon. The in combination cumulative effects result in a substantially increased wind farm cluster which detracts from the landscape features within the view, resulting in a moderate Significant cumulative effect, with the intervening distance</p>								

			Proposed Development			Cumulative, with other developments (in combination). Applicant updated this – SEI Chapter 4. Scenario 1: Loch Liath + under construction + consented wind farms Scenario 2: also factors in undetermined valid applications (including those at appeal or public local inquiry)		
Viewpoint / distance to development	App / THC	Sensitivity of the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (MoC) (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (LoE) (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (MoCC) (Scale / Extent / Duration) High, Medium, Low, Negligible	Level of Cumulative Effect (LoCE) (Magnitude of Change / Sensitivity of Receptor)	Significance
	being foreshortened by the effect of being across a large body of open water in the view.							
<b>VP17 Carn na Saobhaidhe 23.0km</b>	App	High	Low	Minor	Not significant	Scenarios 1 and 2 - Low	Minor	Not significant
	THC	High	Low	Minor	Not significant	Scenarios 1 and 2 - Low	Minor	Not significant
<p>Existing view: The baseline is as described in EIAR Chapter 6 LVIA. Theoretical visibility: 13 hubs and 13 blade tips. Aviation lighting: Turbine T1, T4, T7, T10, T12 and T13 will have visible lighting at between 242.9cd and 237.9cd under clear conditions.</p> <p>Represents views experienced by recreational receptors from this Corbett summit. EIAR considers receptors to be at high susceptibility to changes in the view – officers agree.</p> <p>The hubs and blade tips of all thirteen turbines will be seen backclothed by landform in distant views north-west. The bases of turbines in the south of the site will be partially screened by intervening landform. The proposed turbines will appear as an extension to the north of the operational Bhlaraidh wind farm. The EIAR contends that the proposed development will increase the horizontal extent of turbines in views looking north-west, the proposed turbines will occupy a small proportion of the long distance views. Officers agree that the effects will not be significant from this VP.</p> <p>Cumulative effects outlined in the EIAR and SEI are also not contested by officers.</p>								

<b>Proposed Development</b>	<b>Cumulative, with other developments</b> (in combination). Applicant updated this – SEI Chapter 4. Scenario 1: Loch Liath + under construction + consented wind farms Scenario 2: also factors in undetermined valid applications (including those at appeal or public local inquiry)
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Viewpoint / distance to development	App / THC	Sensitivity of the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (MoC) (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (LoE) (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (MoCC) (Scale / Extent / Duration) High, Medium, Low, Negligible	Level of Cumulative Effect (LoCE) (Magnitude of Change / Sensitivity of Receptor)	Significance
<b>VP18 Toll Creagach 18.6km</b>	App	High	Low	Minor	Not significant	Scenarios 1 and 2 - Low	Minor	Not significant
	THC	High	Medium	<b>Moderate</b>	<b>Significant</b>	Scenarios 1 and 2 – Medium	<b>Moderate</b>	<b>Significant</b>

Existing view: The baseline is as described in EIAR Chapter 6 LVIA. Theoretical visibility: 13 hubs and 13 blade tips. Aviation lighting: Turbine T1, T4, T7, T10, T12 and T13 will have visible lighting at between 247.1cd and 243.9cd under clear conditions.

Represents views experienced by recreational receptors from Munro summit within Glen Affric NSA, Central Highlands WLA and Strathconan, Monar and Mullardoch SLA. EIAR considers receptors to be at high susceptibility to changes in the view – officers agree.

The hubs and blade tips of all thirteen turbines will be seen backclothed by landform in distant views east. The bases of some turbines in the north and west of the Site will be partially screened by intervening landform.

Similar effects to the closer VP of 9 would occur. The applicant has rated those VPs as significant, although Officer's consider the magnitude of change has been under assessed. The applicant considers this VP not to be significant. However, NatureScot consider that the LVIA may underrate the magnitude of change and thus the level of visual effect from the northern and Munro mountains. Officers contend that effects would be significant with the proposal broadly doubling the horizontal spread of Bhlaraidh and introducing additional layering of wind farm development in the view between Corrimony in the foreground and Dunmaglass to the rear.

Cumulative: The addition of the consented Bhlaraidh extension would visually tie Loch Liath into the Bhlaraidh cluster. The addition of Chrathaich would increase the depth of the enlarged wind farm cluster, with Loch Liath reading as a linier western and somewhat uncontained sprawl of turbines across this mid portion of the view, and does not appear to round off the cluster, leading to moderate and significant cumulative effects. As part of the LVIA for Chrathaich officers also noted that the applicants under-reported the significant effects at this VP.

		<b>Proposed Development</b>				<b>Cumulative, with other developments</b> (in combination). Applicant updated this – SEI Chapter 4. Scenario 1: Loch Liath + under construction + consented wind farms Scenario 2: also factors in undetermined valid applications (including those at appeal or public local inquiry)		
Viewpoint / distance to development	App / THC	Sensitivity of the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (MoC) (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (LoE) (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (MoCC) (Scale / Extent / Duration) High, Medium, Low, Negligible	Level of Cumulative Effect (LoCE) (Magnitude of Change / Sensitivity of Receptor)	Significance
<b>VP19 Sgurr nan Conbhairean 26.1km</b>	App	High	Low	Minor	Not significant	Scenarios 1 and 2 - Low	Minor	Not significant
	THC	High	Low	Minor	Not significant	Scenarios 1 and 2 - Low	Minor	Not significant
<p>Existing view: The baseline is as described in EIA Chapter 6 LVIA. Theoretical visibility: 13 hubs and 13 blade tips. Aviation lighting: Turbine T4, T7, T10, T12 and T13 will have visible lighting at between 251.4cd and 250.9cd under clear conditions.</p> <p>Represents views experienced by recreational receptors from Munro summit within Glen Affric NSA, Central Highlands WLA and Moidart Morar and Glen Shiel SLA. EIA considers receptors to be at high susceptibility to changes in the view – officers agree.</p> <p>The hubs and blade tips of all thirteen turbines will be seen backclothed by landform in distant views east. The bases of some turbines in the north and south the Site will be partially screened by intervening landform. The proposed turbines are located to the north of the operational Bhlairaidh wind farm, increasing the number and horizontal extent of turbines within this cluster. Officers agree that the effects will not be significant from this VP. Cumulative effects outlined in the EIA and SEI are also not contested by officers, with Loch Liath integrating will with Chrathaich in this particular view.</p>								
<b>VP20 Carn Dearg 32.5km</b>	App	High	Low	Minor	Not significant	Scenarios 1 and 2 - Low	Minor	Not significant
	THC	High	Low	Minor	Not significant	Scenarios 1 and 2 - Low	Minor	Not significant
<p>Existing view: The baseline is as described in EIA Chapter 6 LVIA. Theoretical visibility: 13 hubs and 13 blade tips. Aviation lighting: Turbines T1, T4, T7, T10, T12 and T13 will have visible lighting at 242.9cd under clear conditions.</p> <p>Represents views experienced by recreational receptors from Munro summit within the Cairngorms National Park and Monadhliath WLA –EIA considers receptors to be at high susceptibility to changes in the view – officers agree.</p> <p>The hubs and blade tips of all thirteen turbines will be seen backclothed by landform in relatively distant views north-west. It will increase the number and horizontal spread of turbines visible from this VP. Similar views will be experienced from elevated summits within relatively limited extents in the west of the</p>								

			<b>Proposed Development</b>			<b>Cumulative, with other developments</b> (in combination). Applicant updated this – SEI Chapter 4. Scenario 1: Loch Liath + under construction + consented wind farms Scenario 2: also factors in undetermined valid applications (including those at appeal or public local inquiry)		
Viewpoint / distance to development	App / THC	Sensitivity of the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (MoC) (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (LoE) (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (MoCC) (Scale / Extent / Duration) High, Medium, Low, Negligible	Level of Cumulative Effect (LoCE) (Magnitude of Change / Sensitivity of Receptor)	Significance
		WLA and along the Cairngorms National Park boundary, within 25-35km to the south-east of the proposed development. The distance from the receptor is a mitigating factor as it occupies a small proportion of the long distance views. Officers agree that the effects will not be significant from this VP. Cumulative effects outlined in the EIAR and SEI are also not contested by officers.						

**Appendix 6 - Assessment against Landscape and Visual Assessment Criteria contained within Section 4 of the Onshore Wind Energy Supplementary Guidance**

1	<p><b>Relationship between Settlements/ Key locations and wider landscape respected</b></p>	<p><b>Turbines are not visually prominent in the majority of views within or from settlements/Key Locations or from the majority of its access routes.</b></p>
		<p>There are no settlements located within 5km of the proposed turbines. The ZTV and the visual assessment demonstrates that the proposal would have limited or no visibility from the vast majority of main settlements, including Invermoriston and Fort Augustus. The development will be visible from elevated properties on the northern slopes of Glen Urquhart, near the settlement of Balnain (VP1: Affric Kintail Way, near Braefield and VP3: Balbeg). When views are afforded part of the scheme will be screened by landform and will not lead to the perception of encirclement by wind energy development. The EIA reports the overall magnitude of change is medium for a small number of properties located along the western edge of the settlement, reducing too low for the settlement as a whole. Taking account of the high sensitivity this will result in a moderate (adverse) and significant visual effect locally, reducing to minor (adverse) and not significant visual effect for the settlement as a whole.</p> <p>Meall Fuar-mhonaigh is regarded as a “Key Location” relevant to the proposed development. As detailed above the Council has continually sought to minimise effects from this landmark summit. The proposal would be extremely prominent in views from the landmark hill and would detract from its relationship to the setting described in the Special Qualities for the SLA. The development would extend the influence of large scale wind energy and intensify the perceived encirclement of this summit, and introduce further visible aviation lighting. The effect would be contrary to the Councils preferred design outcomes and undermine mitigation previously secured.</p> <p>The ZTV shows that there would be no visibility from Urquhart Castle. Views from Loch Ness towards Urquhart Castle are also noted in the OSWEG and as a Special Quality of the Loch Ness and Duntelchaig SLA. The introduction of the large turbines on the skyline close to the castle would detract from the castle’s prominence in locations on the Dores Road (B852), the minor road rising from Dores to Loch Duntelchaig and from locations on Loch Ness itself, such as would be experienced by the many leisure craft on the loch. The proposed development will be visually intrusive, with larger scale turbines with hubs and towers now being visible on this skyline. It also introduces turbines into views where there is exceptionally limited existing or consented wind farm development by virtue of careful siting and design. These concerns are also observed by Historic Environment Scotland who noted that it would have a considerable change in the impact turbines have on this view, and therefore on the setting of Urquhart Castle.</p> <p>Overall, the proposed development <b>does not</b> meet the threshold of this criterion.</p>

2	Key Gateway locations and routes are respected	<p><b>Wind Turbines or other infrastructure do not overwhelm or otherwise detract from landscape characteristics which contribute the distinctive transitional experience found at key gateway locations and routes.</b></p>
		<p>There is no key gateway locations specifically identified within the LN10: Separation of Glen Urquhart and Glen Moriston, Rocky Moorland Plateau landscape character assessment.</p> <p>In relation to key routes for LN10 these are identified as the Great Glen Way- around Bunloit and Grottaig. The route has views into the LCA, A82 around Inver Coille to Invermoriston and A887 around Dundreggan. The ZTV indicates that there will be no or limited visibility from these locations.</p> <p>In relation to B862, the ZTV indicates intermittent sequential visibility from approximately 6km of the road. The EIA reports significant effects for localised sections of the road near the Suidhe viewpoint (VP6) with no significant effects from the lower lying section of the road near Whitebridge. Officers agree but consider that significant effects are also experienced from the more open section of road near VP16, in views are focused across Loch Ness and down The Great Glen.</p> <p>For Great Glen Canoe Trail, and the routes of leisure craft visiting Urquhart Castle, officers have also identified significant effect from representative VP13 (B852 Erchite Wood, east of Loch Ness). As detailed in Criterion 1, officers have sought to minimise impacts from Loch Ness. The proposed development will be far more visually intrusive, with larger scale turbines resulting in hubs and towers visible on this skyline. It also results in a greater horizontal spread of turbines, resulting in turbines being introduced into views where there is exceptionally limited existing or consented wind farm development by virtue of careful siting and design. As such this scheme has the potential to substantially undo design mitigation secured for other wind farm schemes to date.</p> <p>Overall, the proposed development <b>does not</b> meet the threshold of this criterion.</p>

3	Valued natural and cultural landmarks are respected	<p><b>The development does not, by its presence, diminish the prominence of the landmark or disrupt its relationship to its setting.</b></p>
		<p>This is considered to include the Great Glen, Meall Fuar-mhonaidh, Loch Ness and cultural landmarks such as Urquhart Castle. The ZTV shows that there would be no view of the Proposed Development from Urquhart Castle. However, as detailed in Criterion 1 and 2 above, the proposed development by virtue of its siting and scale is considered to have an adverse effect of views down the loch towards Urquhart Castle. Contrary to the applicant, officers find effects from Loch Ness to be significant, and the proposal undermines mitigation secured through previous schemes. Although Historic Environment Scotland do not object, it raises concern about the setting of the Urquhart Castle and recommended that the applicants looked to reduce the impacts.</p> <p>As detailed in Criterion 1 and 2, the effects from Meall Fuar-mhonaidh (VP2) are significant and again, mitigation secured through previous schemes would be undermined. The proposal causes disruption between the landmark hill and it's setting.</p> <p>One of the key considerations, as with previous schemes in this area, is to limit impacts on Glen Affric and the lower-level routes within this NSA. There will be significant effects from here (VP15). NatureScot note that from the limited areas where Loch Affric, the centrepiece of the NSA designation can be appreciated in views east, it will often coincide with visibility of the proposed turbines directly above Glen Affric / Loch Affric, as seen in VP15. The extent and scale of Loch Liath in these views undermines the mitigation secured through Bhlaraidh extension and Chrathaich Wind Farms, including avoidance of visible aviation lighting.</p> <p>No significant impacts on any designated or non-designated heritage assets were identified. Historic Environment Scotland however disagree with the applicant's assessment of impact for the Garbeg settlements and burial mounds scheduled monuments (SM4635, SM11438 and SM11437) and Urquhart Castle (SM90309). However, its own assessment does not identify any effects that would be significant in EIA terms. Nevertheless, it recommends that the applicant explore options to further reduce the number and extent of turbine hubs and towers that would be visible in views of Urquhart Castle and views from Garbeg.</p> <p>Overall, the proposed development <b>does not</b> meet the threshold of this criterion.</p>

4	<p><b>The amenity of key recreational routes and ways is respected</b></p>	<p><b>Wind Turbines or other infrastructure do not overwhelm or otherwise significantly detract from the visual appeal of key routes and ways.</b></p>
		<p>There are no predicted effects on the Caledonian Canal. Localised significant effects were identified for the Affric Kintail Way (near VP1: Affric Kintail Way near Braefield), and localised significant effects have also been identified for The Caledonia Way/South Loch Ness Trail (near VP8: B862 Suidhe Viewpoint).</p> <p>In relation to the Great Glen Canoe Trail, as identified in criteria 1-3, officers have also identified significant effects from VP13 (B852 Erchite Wood, east of Loch Ness).</p> <p>The ZTV indicates mountain summits would be the subject of extensive visibility and there are a number of Munro and smaller local hill summits which form key recreational locations within the EIA study area. The applicant identifies significant effects at VP2 (Meall Fuar-mhonaidh), VP9 (Meall Mor, above Glen Affric) and VP10 (Creag Dhubh), with significant cumulative effects predicted for VPs 9 and 10. Additionally, officers find that significant adverse effects from the Munro summit of Toll Creagach (VP18) which is located 18.6km to the nearest turbine would also occur. NatureScot note that from the popular northern Munros / summits which offer the only opportunity to appreciate the scenic views across the full extent of the Glen Affric NSA, the turbines would appear as prominent, larger scale structures in panoramas. From these views the extent of the NSA is currently unclear with no perceived edge, Loch Liath would visually link Corrimony and Bhlaraidh wind farms creating a band of turbines and a perceived edge to the NSA in elevated views eastward across the NSA. Overall, it would adversely affect the views and experience from these hills. As detailed in Criterion 3, officers consider that there will also be significant effects on the core path (VP15) that forms the circular route around Loch Affric. The applicant has under-represented the effects from this location and the scheme undermines the mitigation secured through other schemes.</p> <p>Overall, the proposed development <b>does not</b> meet the threshold of this criterion.</p>

5	The amenity of transport routes is respected	<p><b>Wind Turbines or other infrastructure do not overwhelm or otherwise significantly detract from the visual appeal of transport routes.</b></p>
		<p>Many of the main transport routes are located within the lower lying glens, with the intervening landform helping to reduce or avoid visibility. The ZTV indicates that there would be no or very limited views of the proposed development from the following key routes; A9, A82, A87, A831, B851 and A887. Officers agree that no significant effects are predicted for the B852 and A833.</p> <p>However, significant localised effects are predicted on parts of the B862. The ZTV indicates intermittent sequential visibility from approximately 6km of the road. The EIA reports significant visual effects for localised sections of the road near the Suidhe viewpoint (VP8). As the road drops in elevation around the Whitebridge area the effects are considered to reduce in significance due to the moorland ridge providing a greater level of screening. Equally the applicant considers that VP16 is also not significant. However, officers consider that this slightly elevated and open section near Dores provides views across Loch Ness and The Great Glen. From this point the hubs and blade tips of all thirteen turbines will be seen against the skyline in distant views south-west, turbine bases will be partially screened. Turbines will be to the north-east of the operational Bhlaraidh wind turbines; and it will increase the prominence and horizontal extent of turbines in the view. The EIAR contends that the turbines will not overwhelm the scale of the containing landform to the west of the Great Glen and will appear relatively evenly spaced with a balanced composition across the cluster. However, officers consider that the development will diminish the scale of the hills and will be much larger than the existing operational Bhlaraidh turbines, resulting in a substantially increased horizontal spread. The contrasting scale of turbines would also be apparent, particularly T3, T1 and T4 which appear to step down into the valley, forward of the horizon.</p> <p>Overall, the proposed development is considered to meet the threshold of this criterion.</p>

6	<p><b>The existing pattern of Wind Energy Development is respected</b></p>	<p><b>The degree to which the proposal fits with the existing pattern of nearby wind energy development.</b></p>
		<p>In relation to this criterion, there would be a contrast in the scale of the turbines to other consented and proposed developments in the locality, and as such the scheme's design could not be said to contribute positively to the existing pattern of wind development in the area. Managing the impacts upon the popular and accessible summit of Meall Fuar-mhonaigh (VP2) has been key to the design of other schemes, with Loch Liath having a major adverse significant visual effect on this summit. Although it is acknowledged that Loch Liath does not introduce turbines that would visually appear any further forward than Bhlairaidh Wind Farm extension, and the lateral spread of the submitted scheme is reduced from that submitted at the initial scoping/preapplication stages, it is considered that the scheme presented does still substantially extend the horizontal spread and visual envelope of wind energy development, which intensifies the perceived encirclement of this important summit within the regional SLA. This development will also require visible aviation lighting which causes a significant adverse effect at this summit.</p> <p>Another established pattern of wind farm development in this area is for schemes to be set back and well contained from Loch Ness and routes along the Great Glen. For schemes on both sides of Loch Ness, officers have sought to avoid/minimise visibility both on the water and along the surrounding loch level routes and approaches. In contrast to the adjacent operational, consented and pending schemes, Loch Liath is far more visually intrusive, evident in VP13 and VP16. As such this scheme has the potential to substantially undo design mitigation secured for other wind farm schemes, breaking the well-established pattern of wind farm development. Loch Liath would be an obvious new man-made feature in promoted views across and from on the water of Loch Ness, a world-renowned tourist attraction, with visibility occurring from a well-used part of the loch which is frequented daily by tourist travelling to and from Urquhart.</p> <p>Another main consideration has been to limit impacts upon Glen Affric and the NSA. Bhlairaidh extension was supported as it would not introduce new visibility of wind turbines to any part of the NSA and avoided visibility from the circular walk around Loch Affric. As detailed above, of particular concern is the impacts from VP15, the Core path round Loch Affric. In contrast to the Chrathaich scheme which would be well contained, the proposed development would present hubs and blade tips of eight turbines and the blade tips of a further three turbines. This extends along the majority of the ridgeline and will partially overlap the Corrimony turbines and be of a contrasting scale and character, with the existing turbines being back clothed.</p> <p>The proposed development <b>does not</b> meet the threshold of this criterion.</p>

7	<p><b>The need for separation between developments and/or clusters is respected</b></p>	<p><b>The proposal maintains appropriate and effective separation between developments and/ or clusters.</b></p> <p>The SG notes that within LN10 there “is no clear pattern, beyond presence within the Plateau area”.</p> <p>The proposed turbines will be located within the interior of the plateau area of LN10 and will be set within an existing cluster of energy development. However, the proposed development would result in prominent turbines which spread further across this upland landscape and causing significant effects across an area which is not considered to be local. Consequentially, the scheme does not relate well to the existing cluster in many views; it does not relate well to the landscape setting, and would increase the visual prominence of surrounding wind turbines.</p> <p>Overall, the proposed development <b>does not</b> meet the threshold of this criterion.</p>
8	<p><b>The perception of landscape scale and distance is respected</b></p>	<p><b>The perception of landscape scale and distance is respected.</b></p> <p>It is considered that the proposed development would adversely affect the receptors’ existing perception of landscape scale and distance from several vantage points. For example, VP15 on the Core Path around Loch Affric. Another example is VP16 when receptors are looking across Loch Ness and The Great towards the proposed development. In contrast to consented and operational schemes, the scale of the proposal is considered to diminish the scale of the hills and will be much larger than the existing operational Bhlaraidh turbines, resulting in a substantially increased horizontal spread. The contrasting scale of turbines would also be apparent, particularly T3, T1 and T4 which appear to step down into the valley, forward of the horizon.</p> <p>The proposed development <b>does not</b> meet the threshold of this criterion.</p>
9	<p><b>Landscape setting of nearby wind energy developments is respected</b></p>	<p><b>Proposal relates well to the existing landscape setting and does not increase the perceived visual prominence of surrounding wind turbines.</b></p> <p>For LN10, the OSWEG states that proposed wind farms should “minimise visual confusion from higher ground to the west and north and with Meall Fuar-mhonaidh”. It is noted that a design strategy for the applicant was to reduce the horizontal extent of the turbines when seen from this summit.</p> <p>The Council has continually sought to minimise effects from this landmark summit. Whilst the development would not significantly affect views towards Meall Fuar-mhonaidh, it would be extremely prominent in views from the landmark hill and would detract from its relationship to the setting described in the Special Qualities for the Loch Ness and Duntelchaig SLA. The development would extend the influence of large scale wind energy development around a</p>

		<p>greater horizontal extent than presently constructed or consented developments and emphasise the size of the turbines due to their relative proximity to the hill itself in contrast to other cumulative schemes. As such it fails to meet the desired standard of Criterion 9 relating to the effect on the landscape setting of existing turbines and increase their perceived visual prominence.</p> <p>The proposed development <b>does not</b> meet the threshold of this criterion.</p>
10	<p><b>Distinctiveness of Landscape character is respected</b></p>	<p><b>Integrity and variety of Landscape Character Areas are maintained.</b></p> <p>The greatest effects would be on LCT222 Rocky Moorland Plateau which is the host LCT.</p> <p>The ZTV shows that the proposed turbines will be visible from a large proportion of this host LCT, including elevated landform and the summit and the west facing slopes of Meall Fuar-mhonaigh (VP2) in the east. Aviation lighting will also be evident within this LCT. Significant but localised effects are reported for this LCT, but not significant in terms of cumulative effects.</p> <p>The development would result in the intensification of wind energy development and from parts of the LCT. It would sit to the side of the Bhlairaidh scheme, thus increasing the horizontal spread and the extent of the view occupied by wind energy development. Officers find that the development reduces the degree of remoteness of the plateau and introduces further visible aviation lighting. It also has the potential to result in localised significant cumulative effects.</p> <p>Overall, the proposed development <b>does not</b> meet the threshold of this criterion.</p>



Figure 1.1: Site Location

 Site boundary

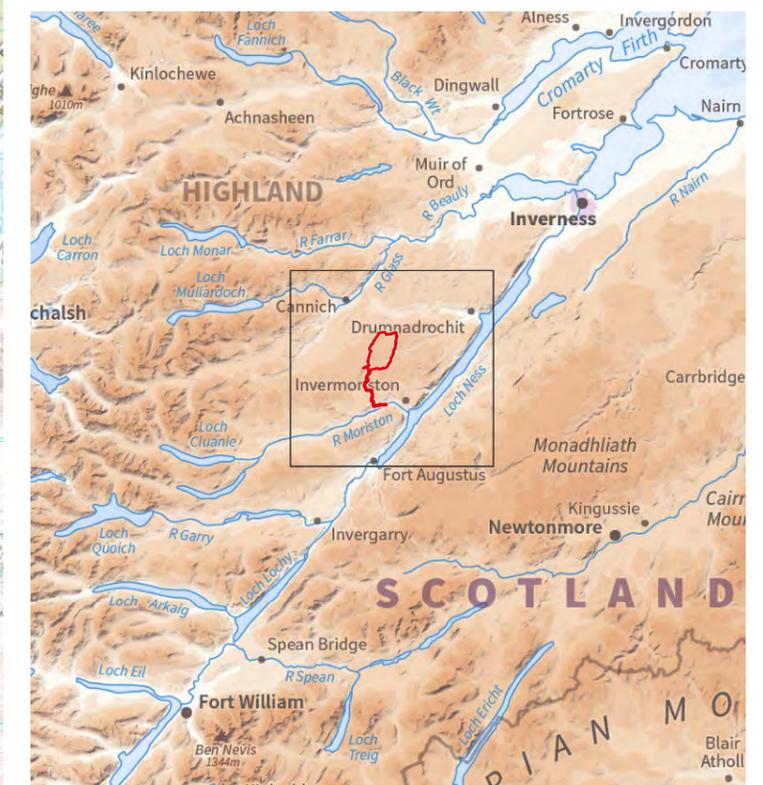
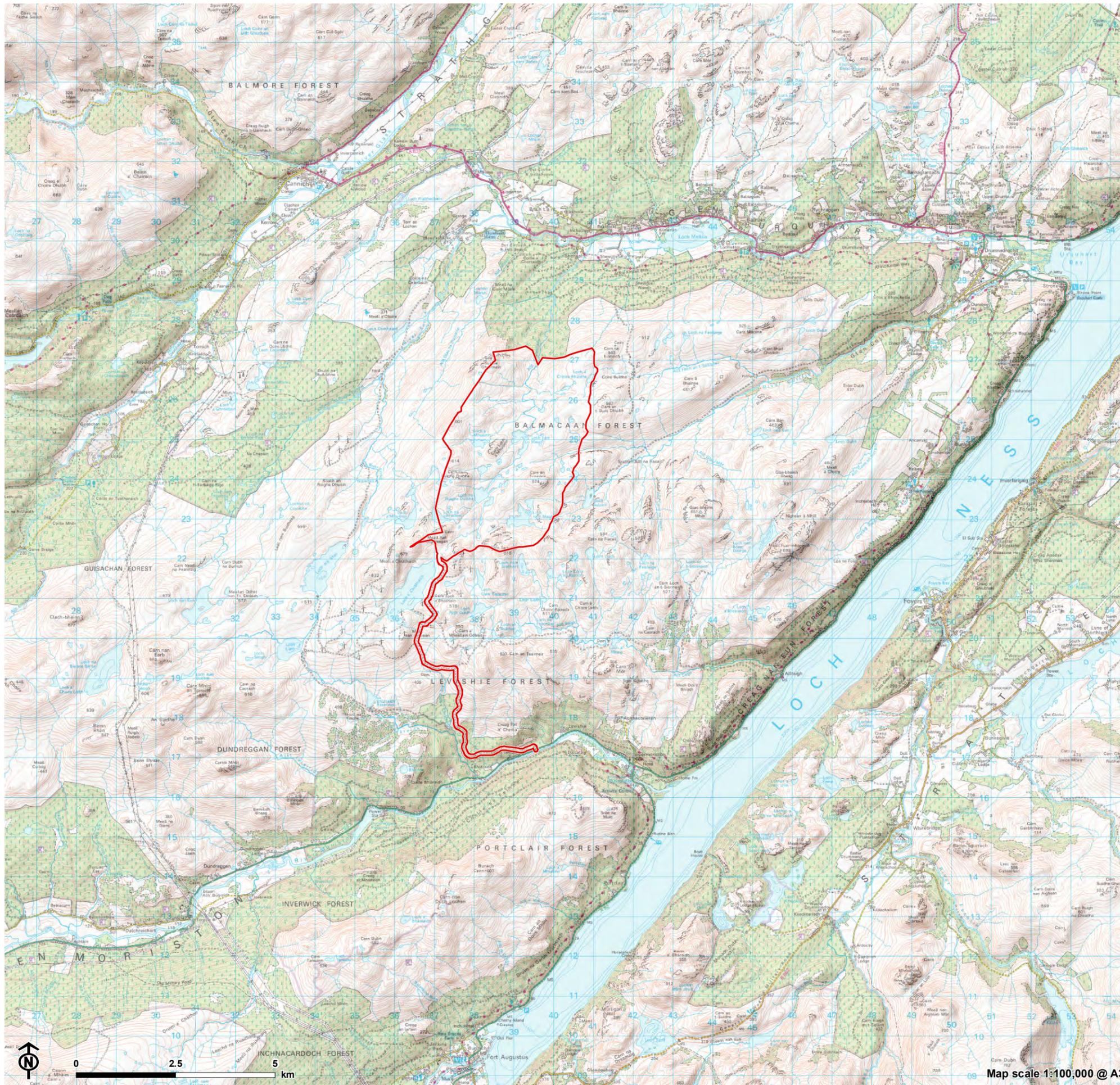
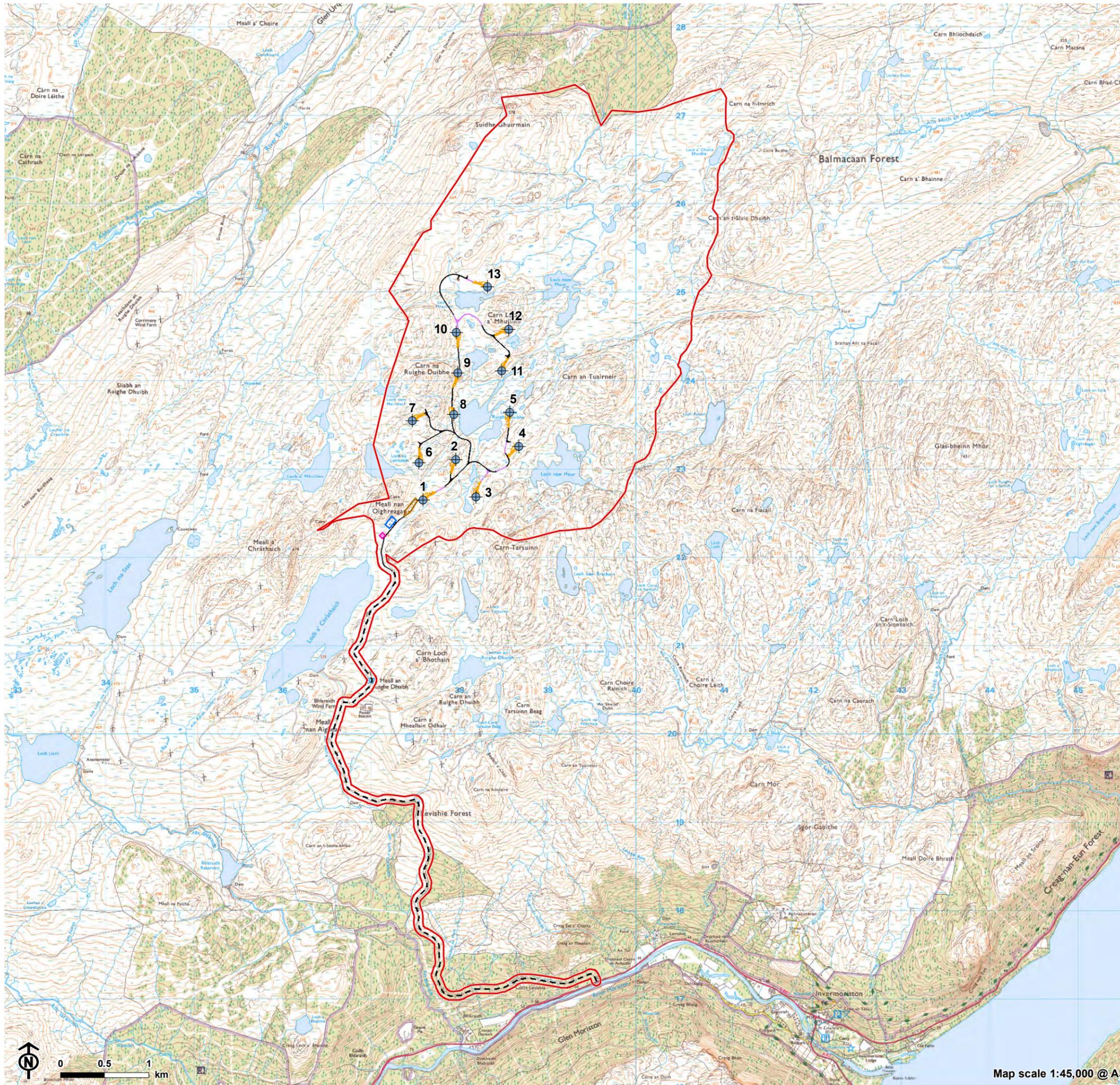


Figure 4.1a: Site Layout



- Site boundary
- Turbine
- Construction compound
- Substation
- Borrow pit
- Temporary hardstanding
- Permanent hardstanding
- Met mast
- New access track
- New access track (floating)
- Existing access track

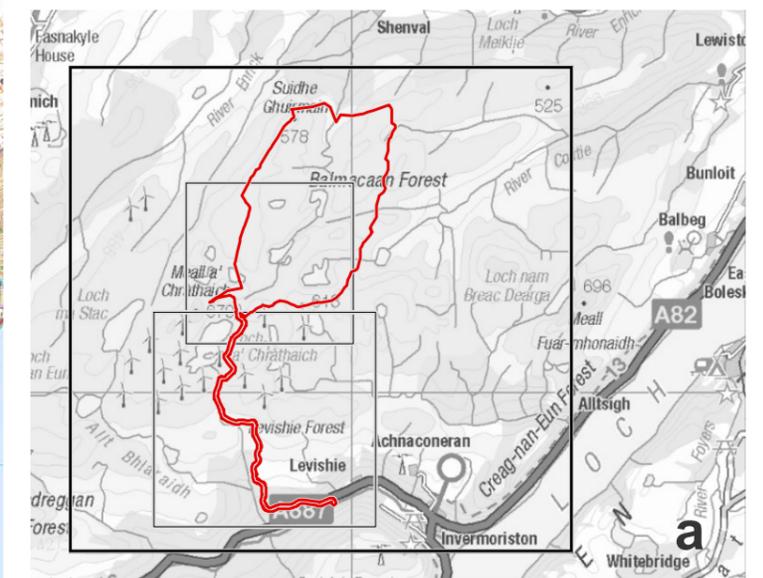
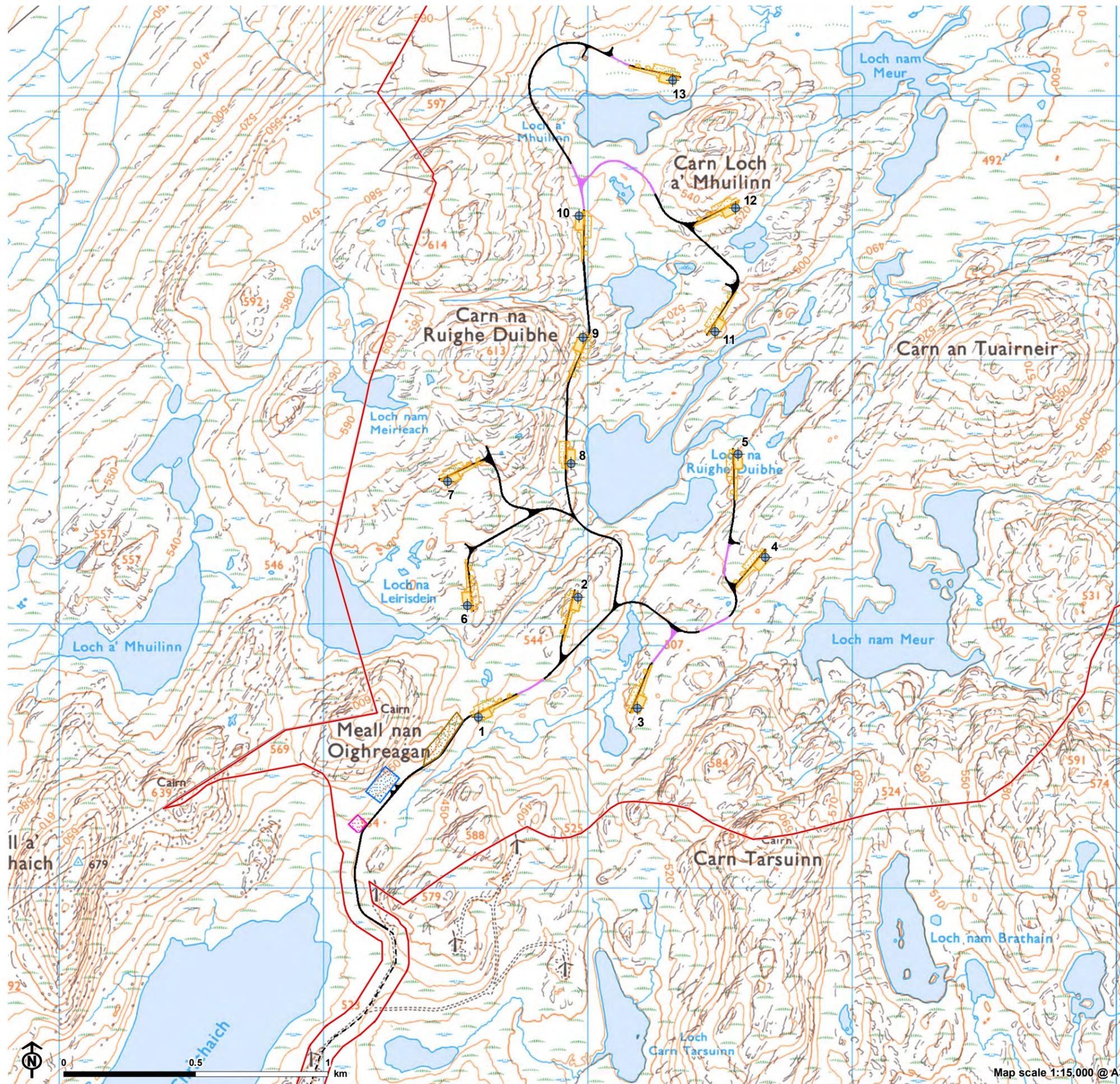
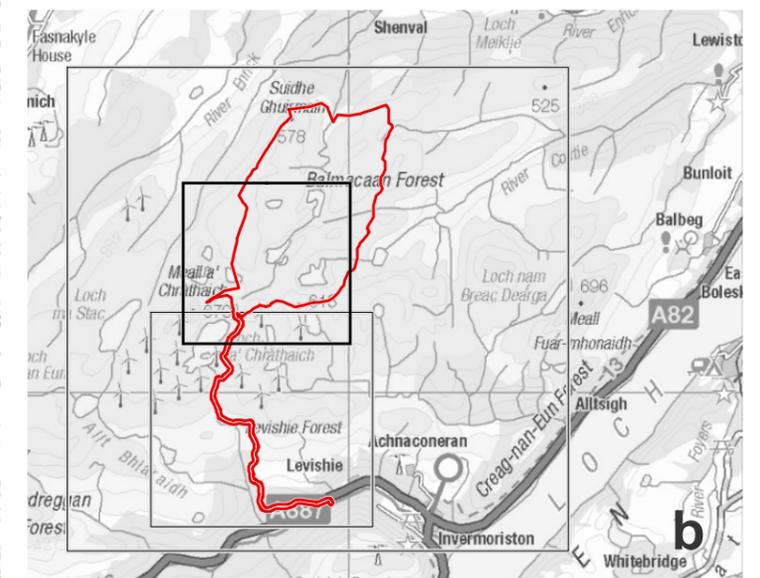


Figure 4.1b: Site Layout



- Site boundary
- Turbine
- Construction compound
- Substation
- Borrow pit
- Temporary hardstanding
- Permanent hardstanding
- Met mast
- New access track
- New access track (floating)
- Existing access track



Map scale 1:15,000 @ A3



Figure 4.1c: Site Layout



- Site boundary
- New access track
- Existing access track

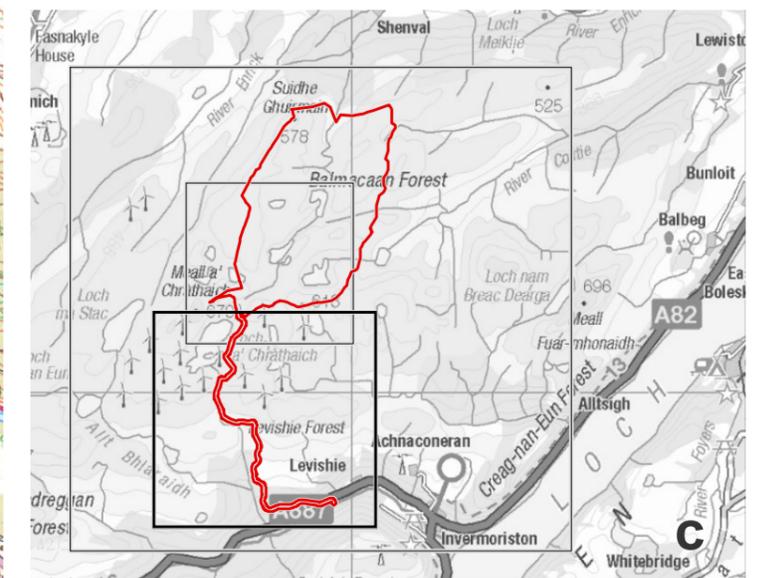
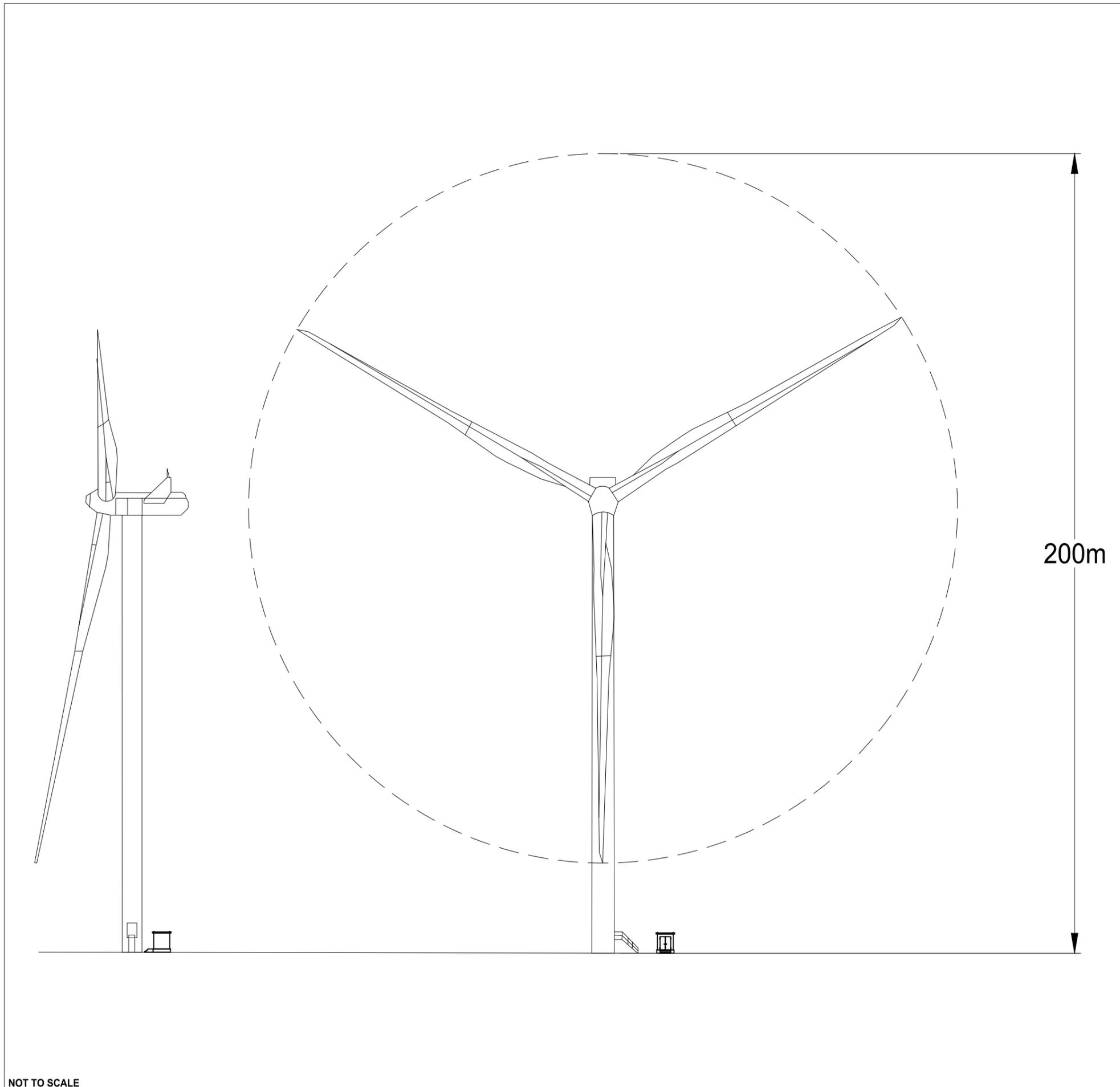


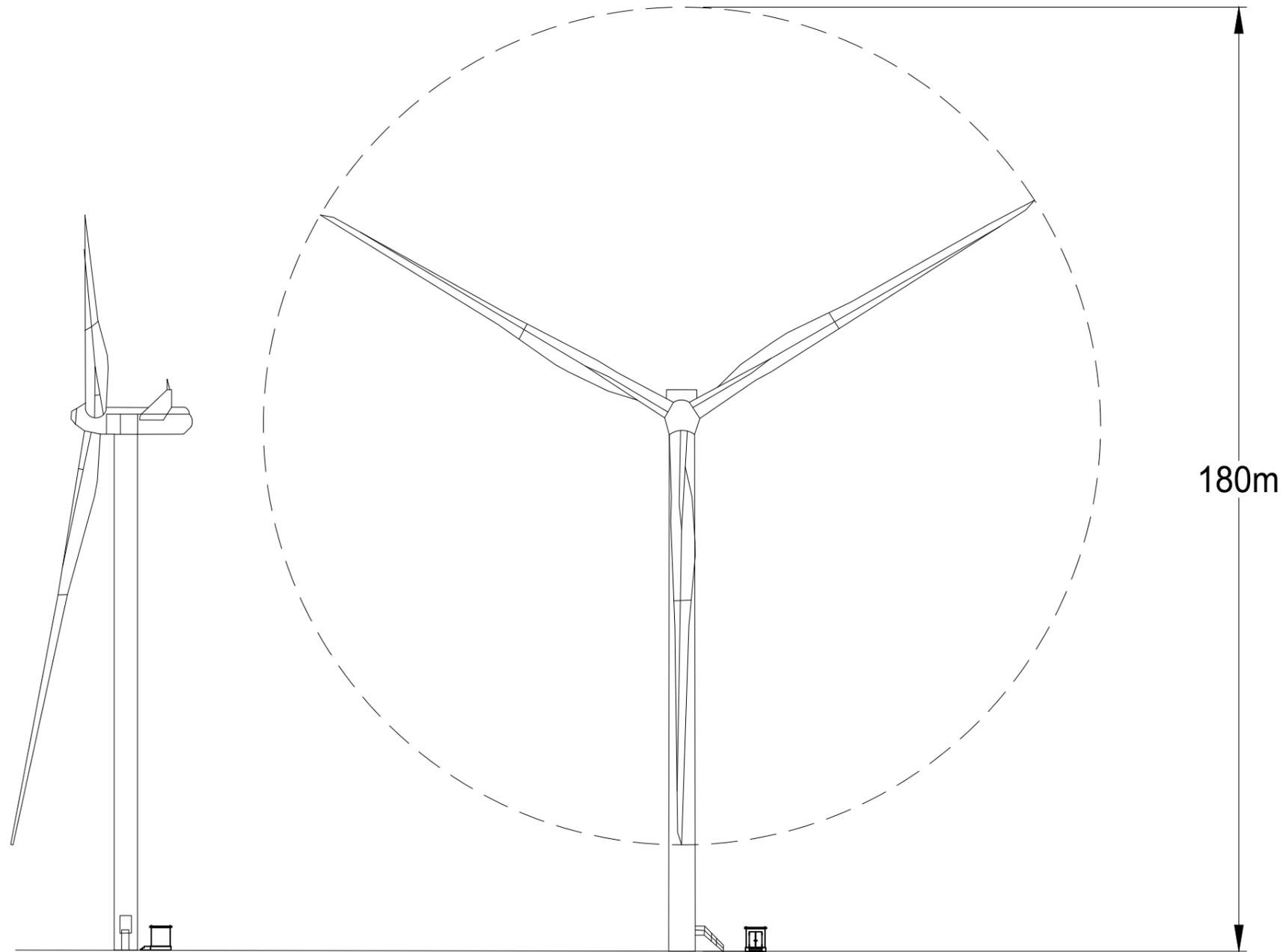
Figure 4.2a: Typical Wind Turbine - 200m Tip Height



NOT TO SCALE

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Figure 4.2b: Typical Wind Turbine - 180m Tip Height



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