Agenda Item	**7.1**
Report No	**PLS/05/26**

HIGHLAND COUNCIL

Committee: South Planning Applications Committee

Date: 5 February 2026

Report Title: 24/00933/S36: Dell Wind Farm Ltd
Land at Dell Estate
Whitebridge
Inverness

Report By: Area Planning Manager – South

Purpose/Executive Summary

Description: Dell 2 Wind Farm (Re-design) - Erection and operation of a wind farm for a period of 35 years, comprising of 9 wind turbines, 4 with a maximum blade tip height of 180m and 5 with a maximum blade tip height of 200m, access tracks, borrow pits, substation, control building, 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 Objection** to the proposal as set out in section 11 of the report.

1. INTRODUCTION AND 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) for the construction and operation of the Dell 2 (re-design) Wind Farm and associated infrastructure. The original Dell Wind Farm application (14/02879/FUL) was refused planning permission by the Council in 2017 in relation to the landscape and visual effects of the proposed access track. Planning permission was however subsequently granted on appeal (PPA-270-2183) in August 2019. If the proposed development currently presented in this application is consented, then it will be constructed as a replacement of the permitted 2019 proposal (hereafter referred to the consented Dell scheme).

1.2 Unlike the consented Dell scheme, the current application now falls under the provisions of the Electricity Act and is classed as National Development by National Planning Framework 4 (NPF4) due to the generating capacity being in excess of 50 MW.

1.3 Due to the consultation response date set by the ECU there was insufficient time to allow the case officer to report the application to the South Planning Applications Committee. In order for the Council to maintain its right to partake in a public local inquiry in the event of an objection not being withdrawn, the chair and vice chair of the South Planning Applications Committee agreed that the Council should raise objection to the proposal. This was sent to the ECU on 26 June 2025. The objection was made for the following reasons:

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 and 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), 57 (Natural, Cultural and Built Heritage) and 61 (Landscape).and the Onshore Wind Energy Supplementary Guidance, as the development would have significantly detrimental landscape and visual effects. This is by virtue of its scale and design of the proposed development which would undo previously secured design mitigation.

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, 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), Highland-wide Local Development Plan Policy 67 (Renewable Energy Developments), Policy 2 of The Inner Moray Firth Local Development Plan 2, 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, the

loss of which cannot be offset by restoration due to the sensitivity and value of this habitat.

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, preserving natural beauty and conserving physiographical features of special interest by virtue of failing to demonstrate compliance with NPF4 Policies 11 (Energy) and 22 (Flood risk and water management), Highland-wide Local Development Plan Policies 64 (Flood Risk), 67 (Renewable Energy Developments) and The Highland Council's Supplementary Guidance: Flood Risk and Drainage Impact Assessment, as the development has not satisfactorily demonstrated the effects of flood risk.

1.4 The ECU was further advised that the detailed assessment of the application would be presented within the Officers' Report on Handling which would be considered by the South Planning Applications Committee (SPAC) in due course. The ECU was also advised that this report may include more refined reasons for objection.

1.5 The application has since been allocated to the DPEA (ref: WIN-270-27) and a public local inquiry will be held later in 2026. This current report is the detailed Report on Handling and recommends that the Council continue to object on the grounds of detrimental impact on montane bog, a priority peatland habitat, and flood risk, being objection reason 2 and 3 as outlined above. However, having completed the landscape and visual appraisal, Officers recommend that SPAC removes objection 1, as outlined above. This report will be provided to the Scottish Ministers along with the decision of the Committee.

Proposed Development

1.6 The proposed development comprises the following key elements:

- Up to nine wind turbines: four turbines (T2, T3, T6, T7) having a maximum blade tip height of up to 180m, and five turbines (T1, T4, T5, T8, and T9) having a maximum blade tip height of up to 200m;
- Visible aviation warning lights on five turbines (T1, T2, T6, T8 and T9); the remaining turbines having infrared lights;
- Turbine foundation, transformers and associated crane hardstandings and adjacent laydown areas at each turbine;
- 16.1km of access track and spurs, comprising: 12.9km of newly constructed track, 2.5km of which would be floating track, and 2.5km of upgraded existing track, plus 0.7km of temporary access track required to access a proposed borrow pit (no 2).
- 11 watercourse crossings;
- A permanent anemometer mast, having a maximum height of 122.5m;
- A substation including a secure compound, measuring 175m x by 175m, 17km of underground cables to connect the turbines to the substation;
- A single storey control building including compound, measuring 20m by

8m, sited on ground of an existing agricultural building to be demolished;

- Two temporary borrow pits;
- Three temporary construction compounds – CC1 and CC2 each measuring 100m by 50m and CC3 measuring 150m by 75m. This includes a site office, welfare facilities and laydown areas; and
- 5.81ha of woodland removal, 67 hectares of compensatory planting and 231ha area of peatland restoration.

1.7 The grid connection from the on-site substation would be subject to a separate consenting process by the network operator. A Section 37 application (24/01732/S37) for a new transmission connection from Melgarve substation to serve both Cloiche and Dell Wind Farms is pending decision by Scottish Ministers. Due to peatland habitat concerns raised by NatureScot and the Council, the applicant Scottish Hydro Electric Transmission have however removed the underground Dell Wind Farm connection part of this application. That application has previously been reported to SPAC with the Council's no objection consultation response being predicated on the removal of associated permitted development rights for the Dell connection. The proposed development's intended grid connection design, form, or routing therefore remains unclear at the present time.

1.8 A new permanent access bellmouth arrangement leading to a new track to serve the proposed development from the B862 is required. In addition, two new bellmouth arrangements will be required where the access crosses the unclassified Killiechoilum / Ardochy road. The port of entry for Abnormal Indivisible Load (AIL) components is proposed to be Inverness Harbour, then subsequently via the A9(T), B851 and B862. through Whitebridge to the proposed site access junction (see – EIAR Figure 10.3).

1.9 The applicant had originally requested a micro-siting allowance of 100m for site infrastructure (tracks, turbine locations, underground cables and crane hard standing areas), the purpose of which is to avoid or minimise environmental, or engineering constraints identified during pre-construction ground investigation or construction phase excavation works. The applicant has however since agreed to reduce the requested allowance to 50m. The final design of the turbine (colour and finish), aviation lighting, ancillary electrical equipment, and landscaping would be agreed with the Planning Authority by condition at the time of project procurement.

1.10 The applicant anticipates that the wind farm construction will take 18 months. The wind farm has an expected operational life of 35 years. Following this, should a future re-powering proposal for the site not be forthcoming and consented, the wind farm would be decommissioned.

1.11 Whilst public consultation for Section 36 applications is not mandatory, the applicant has carried out the following pre-application consultation. Due to Covid-19 restrictions a Virtual Public Exhibition was held between 7 March and 8 April 2022. The event was publicised via a leaflet drop to 2,000 nearest properties. A dedicated project website was also established in March 2022. Further details are provided within the submitted Pre-Application Consultation Report.

1.12 The applicant sought formal pre-application advice from the Planning Authority in February 2022 (22/00534/PREMAJ). Based on the information submitted, at the pre-application stage, it was concluded that it was unlikely that the Council would be in a position to support a wind farm of the scale envisaged in this location. In summary:

- Although the principle of wind energy development is accepted and has been established through the previous appeal decision, the increased scale of this proposal necessities careful re-assessment with the benefits of additional energy generation being balanced against the heightened environmental impacts;
- The overall number of turbines has reduced; however, the site layout increases turbine spacing which makes it more challenging for this proposal to integrate well with the pattern of wind farm development, established by Stronelairg turbines of 135m in height, with the proposal's positioning being topographically different, occupying land more on the rim of the bowl in which Stronelairg sits.
- The site's key landscape and visual receptors are the Monadhliath mountains, recreational routes, the Cairngorm National Park, and the Loch Ness and Duntelchaig Special Landscape Area (SLA);
- Concerns were also raised in relation to the proposed enlarged northern access track and its effect upon the SLA and onsite habitats. The retention of the northern site access track should be reassessed, with scope for an alternative access through Stronelairg Wind Farm to be revisited. The EIA was advised to test the technical deliverability of two access options: 1) via a new access track to the north, as well as 2) through Stonelairg. Should a track access through to the parent wind farm not be achievable, this should as a minimum still be pursued for public recreational access connectivity; and
- Other potential effects to be assessed include peat and habitat interests, ornithology, biodiversity enhancement, aviation lighting, transport and access.

1.13 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: Development Description; Design Evolution and Alternatives; Landscape and Visual Impacts; Cultural Heritage; Ecology; Ornithology; Hydrology, Hydrogeology and Peat; Noise and Vibration; Access, Traffic and Transport; Aviation and Summary of Effects. The application is also accompanied by EIA technical appendices, figures and visualisations; a Pre-Application Consultation Report (PAC), an EIA Non-Technical Summary (NTS), a Design and Access Statement, and a Planning Statement.

1.14 Since the application was made a 'clarification' document was submitted to the ECU in March 2025; this included the applicant's feedback on consultee and third-party responses; updated visualisations and a reduced micro-siting allowance. During the course of the application, Officers sought more fundamental amendments, however, no variations have been made.

2. SITE DESCRIPTION

2.1 The application site covers 590ha; 332ha for the access corridor and 245ha for the wind turbine area. The site will be accessed from a new access junction from the B862 to the south of Whitebridge. Two new bellmouth arrangements will also be constructed where the access crosses the unclassified Killiechoilum/Ardochy road. The development is located within the Dell Estate with the turbines situated within an upland area on the western edge of the Monadhliath Mountains. It is composed of relatively flat or gently rolling plateau uplands, lying southward of Carn Dubh (762m Above Ordinance Datum (AOD)) in the north and extending to Cairn Easgann Bana (779m AOD) and Coire Odhar in the south. The plateau uplands, centred on the Glendoe Basin, are framed by the deeply incised Glen Brein to the west and Glen Markie to the east.

2.2 The site is located 6.5km from Whitebridge, 11km from Fort Augustus and 14km from Foyers. There are also several small settlements within the vicinity located along the route of the B862 through Stratherrick, including: Errogie (16km north), Lochgarthside (12km north), Knockcarrach (7km northwest), and Glendoebeg (8km northwest). Close to the edge of the Monadhliath massif, there are several groups of houses, such as Upper Knockhoilum (7km north), Moor of Knockhoilum and (8km north), Killiechoilum (7km north), Ardochy (6km north) and a number of large estate lodges at Glenbrein (6km north), Garrogie (5km north) and Killin (2.7km northeast). The nearest residential property is located 2.9km from the closest proposed turbine.

2.3 There are several vehicular and non-vehicular routes within 20km of the site (EIAR Figs. 4.2.1 – 4.2.9). Five routes have been taken forward to the full assessment: the B862 (6.2km to the southeast), A82 (10.6km to the southeast), A887 (13km to the southeast), A833 (23.56km to the south) and the Great Glen Way (which includes core path IN22.02: Abriachan to Drumnadrochit, 10.8km to the southeast). The area also includes tourism and recreational sites, including hill summits and the mountain areas of the Monadhliath, Ben Alder, Creag Meagaidh and the Cairngorms, Loch Ness and Urquhart Castle at Drumnadrochit.

Environmental Designations and Habitats

2.4 The site does not form part of any statutory or non-statutory designated site for nature conservation. The following designations are within 10km (EIAR Fig. 6.1):

Statutory Designation	Distance to Site Boundary	Qualifying Interests
Ness Woods SAC	3.2km north-west	• Tilio-Acerion forests of slopes, screes and ravines • Old sessile oak woods with Ilex and Blechnum in the British Isles • Otter
River Moriston SAC	5.8km north-west	• Freshwater pearl mussel

		• Atlantic salmon
Monadhliath SAC	7.0km south-east	• Blanket bogs (if active bog)
River Spey SAC	10.0km south-west	• Freshwater pearl mussel • Sea lamprey • Atlantic salmon • Otter
Easter Ness Forest SSSI	3.2km north-west	• Upland mixed woodland • Upland oak woodland
Loch Bran SSSI	5.7km north-east	• Dragonfly assemblage
Monadhliath SSSI	7.0km south-east	• Breeding Dotterel • Breeding bird assemblage • Blanket bog – Upland assemblage • Black mountain moth • Vascular plant assemblage
Glen Tarrif SSSI	8.0km south-west	• Upland mixed ash woodland • Beetle
Levishie Wood SSSI	8.6km north-west	• Upland birch woodland
River Spey SSSI	10.0km south-west	• Atlantic salmon • Sea lamprey • Otter • Freshwater pearl mussel
There are also 46 areas of ancient woodland within 2km of the site – see EIAR Fig. 6.1.		

2.5 Similarly, there are no statutory designations with ornithological features within the site. The following ornithological designations are located within 10km (EIAR Figure 7.1):

Statutory Designation	Distance to Site Boundary	Qualifying Interests
Loch Knockie and Nearby Lochs SPA	1km	Slavonian grebe (breeding)

Knockie Lochs SSSI	1km	Slavonian grebe (breeding)
Glendoe Lochans SSSI	4.5km	Slavonian grebe (breeding) Common scoter (breeding)
Monadhlaith SSSI	6.7km	Dotterel (breeding) Breeding bird assemblage including raptors, dotterel, golden plover, dunlin, ring ouzel, wheatear, stonechat, red grouse, meadow pipit and dipper.

2.6 The access corridor runs through areas of rough grazing, forestry, and moorland, partly along an existing estate access track. Wet dwarf-shrub heath is the main habitat within the access corridor. Most of the wind turbine area is characterised by peatland habitats, including extensive blanket bog. There are areas of semi-natural broadleaved woodland (0.89ha) located at the north of the site.

2.7 Site surveys for otter, water vole, pine marten, badger, Scottish wildcat, red squirrel and bats were undertaken. Some evidence for otter and water vole was noted near the access track. In addition, the site and surrounds have been surveyed for breeding and transient birds, of which effects upon golden eagles was taken forward and assessed further.

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 are located within the site. Class 5 peatland is also present. Peat depth surveys indicate that peat thickness varies from 0 up to 4.2m, with an average thickness of 1m.

2.9 The site is located within the River Foyers catchment area which is part of the wider River Ness catchment. The site contains two main watercourses, the Allt Breineag with two tributaries, one unnamed and Allt Dubh Cuil na Creige which flow north in Glen Brein. The second main watercourse is Allt Odhar and its tributaries which feed the River Killin and Loch Killin, located to the east of the Site. The site drains to the burns of Allt Breineag and Allt Odhar, both of which flow to Loch Ness via the River Foyers.

2.10 In terms of public water supply, the proposed development is located within the catchment of a Drinking Water Protection Area (DWPA). In addition, there are four properties which have a private water supply (PWS) which is sourced within the site or within 500m of the access track, following further analysis two PWS are considered further in the EIAR.

Landscape Designations, Wild Land and Landscape Character

2.11 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 (EIAR Figure 4.1.2).

2.12 The Cairngorms National Park is located 8.8km southeast. There are four National Scenic Areas (NSA) within the study area. EIAR Chapter 4 however details limited

areas of long-distance visibility (in excess of 32km), or no theoretical visibility of the proposed development. NSAs have therefore been scoped out of further assessment.

2.13 There are six Special Landscape Areas (SLA) located within the 45km study area, the closest being the Loch Ness and Duntelchaig SLA at a distance of 5.7km. Given the very limited and long-distance nature of visibility, or absence of visibility from all other SLAs these have been scoped out of further assessment.

2.14 There are six Wild Land Areas (WLA) in the study area. Again, the EIAR contends that owing to the very limited and long-distance nature of visibility, or absence of visibility, four of these WLAs have been scoped out of requiring further assessment. WLA 20: Monadhliath, and WLA 19: Braeroy – Glenshirra – Creag Meagaidh have been carried forward to the full assessment.

2.15 The application site is situated within the LCT 221: Rolling Uplands – Inverness LCT. Eighteen different Landscape Character Types (LCT) are identified within 20km; eight of which have been taken forward into the detailed assessment (EIAR Technical Appendix 4.2).

Built Heritage

2.16 There are no designated heritage assets within the site boundary, but there are six non-designated heritage assets (EIAR Figure 5.1). Within 10km there are 10 Listed Buildings: one Category A listed Building (LB1874 – Whitebridge, old bridge over the River Foyers), as well as a further seven Category B, and two Category C listed buildings. There are also two Scheduled Monuments within 10km of the proposed turbine locations: SM128/129/140 – Corrieyairack Pass military road located 10km to the southwest, and SM4536 Dell Farm burial mounds located 10km to the north. Urquhart Castle (Scheduled Monument SM90309) is located 21.7km north of the closest proposed turbine and through consultation with Historic Environment Scotland, assessment of the impact upon this monument is included within the EIAR.

Cumulative Development

2.17 Appendix 1 of this report provides details of operational, consented / under construction, and in planning wind farm projects within 45km of the application site. The closest operational wind farm to the site is Stronelairg which is located 500m south, with the consented Cloiche Wind Farm located 2.6km southwest/southeast. Since the original EIAR was submitted in January 2024, the cumulative wind energy picture has changed. To reflect this, Officers have updated the cumulative list. The main changes are: Dunmaglass Wind Farm was consented is now operational; Bunloinn, Tom Nan Clach Extension, Corriegarth 2, Chrathaich, and Tomchrasky Wind Farms were in planning and have now been consented, and Balnespick Wind Farm and Beinneun 2 Wind Farm were at scoping and are now at application stage pending consideration by Officers. It is also noted that two further schemes are at scoping: Glenmarkie Wind Farm and a variation to Bhlaraidh extension. However, schemes that are currently at scoping stage have not been included in Officers assessment of this application. Given the undefined and uncertain nature of scoping applications, it would be premature to attribute material weight at this stage.

3. PLANNING HISTORY

3.1	23 June 2025	24/01732/S37 Melgarve cluster project - Section 37 application under the Electricity Act for the installation and operation of approximately 7 km of 132 kV overhead line on double circuit steel structure towers, and ancillary development comprising 2 no. cable sealing end compounds, approximately 9.9 km of underground cable (7.3 km from the Dell Wind Farm on site substation, 1.8 km from the Cloiche Wind Farm on site substation and 0.8 km on approach into Melgarve substation), upgrades to existing access tracks, new permanent and temporary access tracks, and temporary working areas (ECU Case Reference: ECU00004850)	Raised no objection (Scottish Government decision pending)
3.2	Received: 8 March 2024	24/00881/S42 Dell Wind Farm - Application under Section 42 to vary Conditions 2 (period of permission) and 5 (decommissioning) of planning permission PPA-270-2183	Pending consideration
3.3	25 April 2022	22/01097/SCOP Dell Wind Farm Re-Design - Erection and Operation of a Wind Farm comprising of up to 10 Wind Turbines with a maximum blade tip height 200m, access tracks, borrow pits, substation, control building, anemometer mast and ancillary infrastructure	Scoping opinion issued
3.4	20 Oct 2021	21/04400/SCOP Dell Wind Farm Variation - Construction and Operation of Dell Wind Farm comprising 12 Wind Turbines of up to 149.9m to blade tip height and associated infrastructure	Scoping opinion issued
3.5	22 Aug 2019	14/02879/FUL Dell Wind Farm - Erection of 14 turbine wind farm (approx. 42MW installed capacity) and associated infrastructure.	Planning permission granted on appeal
3.6	8 October 2012	12/04001/PAN Erection of about 16 wind turbines with a tip height of about 130 m and associated infrastructure, including underground cabling, access tracks, crane hardstandings, control buildings and substation	
3.7	30 Aug 2012	12/02857/SCOP Dell Wind Farm - Scoping Opinion	Scoping opinion issued

The Consented Dell Scheme

3.8 The consented Dell scheme comprises 14 turbines, 10 turbines at a height of 130.5m to blade tip and four turbines at 115.5m to blade tip. The consented Dell scheme is yet to be implemented and was due to expire in August 2024. Consequentially, the applicant submitted a timeous application under Section 42 of the Town and Country Planning Act (24/00881/S42). That application seeks to vary Conditions 2 (period of permission) and 5 (decommissioning) of the consented Dell Scheme. Following concerns raised by officers regarding the detail of that application, the applicant has requested that the Planning Authority does not progress with the determination of the Section 42 application until the re-design application has been advanced. If consented, the Section 42 application would constitute a new planning permission for the consented Dell scheme.

4. PUBLIC PARTICIPATION

4.1 Advertised: Section 36 Application and EIA Development

Date Advertised: The Herald (13 March 2024); The Edinburgh Gazette (12 March 2024); and The Inverness Courier (12 and 19 March 2024).

Representation deadline: 3 June 2025

Representations Received by The Highland Council: 0

Representations Received by The Energy Consents Unit: 1 objection

4.2 No material planning considerations have been raised in the objection, with this raising commercial concerns arising from the proposed proximity of certain Dell 2 turbines to the southern boundary, specifically for operational Stronelairg turbines T6, T7, and T8, turbine integrity and operational safety. Such operational concerns are deemed by Officers to be a civil matter between the potentially affected parties, albeit that any resultant material reduction in the life expectancy or yield of existing Stronelairg turbines would be material to the reported renewable energy benefits arising from the proposed development. The potentially affected Stronelairg turbines are however limited in number, and the Dell turbines are not in the prevailing wind direction and as such, the materiality of this is a moot point, with any weight to be attributed to this being a matter for Scottish Ministers as decision maker.

4.3 Representations received by the Scottish Government's Energy Consents Unit can be accessed via www.energyconsents.scot

5. CONSULTATIONS

Consultations undertaken by The Highland Council

5.1 **Stratherick and Foyers Community Council (Host) objects** to the application. Raises concerns in relation to the increased height of the turbines and the requirement for aviation lighting, poor public consultation, insufficient detail regarding compensatory planting, and a failure to consider the Stratherick and Foyers Local Place Plan. The traffic data and visual information should include the Loch Kemp Pump storage scheme. It also considers that a new access is

unnecessary, and that the development should utilise a shared arrangement with Stronelairg. The proposed planting to hide the access track will take many years to be effective and will have an impact upon the Loch Ness SLA. Omission of some recreational routes from the application, and the destruction of a footbridge on the South Loch Ness Trail has resulted in it being diverted onto the B862 for 1.5km past the entrance to the site. This directly exposes users of the Trail to the risk, danger and loss of amenity caused by the construction traffic. Cumulative impact of this with other planned / consented developments upon the local road network.

5.2 **Access Officer** no objection to the application, recommending that an Outdoor Access Plan is secured by a planning condition.

5.3 **Community Wealth Building Team** no objection to the application. Confirm that the team are aware of this application and will liaise with the applicant directly regarding the Highland Social Value Charter.

5.4 **Development Plans** does not object to the application and advises on the policy context of the development and developer contribution requirements.

5.5 **Environmental Health** does not object to the application, subject to planning conditions restricting operational noise limits, a construction noise mitigation scheme, a private water supply monitoring and mitigation plan and a scheme for dust suppression.

5.6 **Flood Risk Management Team (FRM) objects** to the application. The crossing of Allt Breineag will be major and encompass the whole width of the adjacent flood plain. Consequentially, flood risk due to the new crossing will occur without suitable design / mitigation. FRM states there is a requirement for the crossing to accommodate climate change, which in turn means that the causeway across the functional flood plain may require further raising and consequently further mitigation. An updated FRA and associated proposals are requested to demonstrate a suitable maintenance for the conveyance of water across the floodplain.

5.7 **Forestry Team** does not object to the application. Further information was requested in relation to compensatory woodland planting (including the offsetting for the commercial woodland) and measures to protect ancient woodland located near the proposed access track. Following the submission of further information relating to policy compliance, tree protection measures and the compensatory proposals, their initial objection has been removed. Planning conditions are recommended which secure a detailed Compensatory Planting Plan (including future maintenance) and tree protection measures.

5.8 **Historic Environment Team** does not object to the application. In relation to archaeology, the team are content with the EIAR, and the mitigation/ use of good practise measures outlined in the application. This will limit the direct impacts to within an acceptable range. Appropriate measures should be incorporated within the planning conditions requiring a CEMP, and a Written Scheme of Investigation. In relation to conservation, the team have no further comments to make as there are no listed buildings or other cultural heritage interests likely to be affected.

5.9 **Landscape Advisor (Ironside Farrar)** does not object to the application. Broadly agrees with the conclusions of the LVIA, which identifies relatively localised significant adverse landscape and visual effects from the proposal. Highlights possible additional significant effects from a section of the Great Glen Way Upper Route south of Invermoriston and VP6. The access track from the B862 would initially be a locally intrusive feature, however it seems likely that its effects on views would be materially reduced over time assuming the implementation of proposed design and mitigation measures. Highlights limited intrusion to views from the western shores and lower slopes at Loch Ness and within Stratherrick, key issues therefore relate primarily to effects from VP11 Meall Fuar-mhonaidh. Identifies an adverse effect to views / visual amenity at this viewpoint but advises this would not be significant. There would be no significant effects to the Special Qualities of the Loch Ness and Duntelchaig SLA. Previous mitigation for other schemes concentrated on reducing effects to the east and south, which would not be undone by the proposed development.

5.10 **Transport Planning** does not object to the application. Request conditions securing road improvements / financial contribution towards the South Loch Ness Road Improvements Strategy and any significant change to the assumptions made in the EIAR about traffic generation to be reflected in the scale of mitigation required. Recommends that the following is secured by condition: a finalised Construction Traffic Management Plan; conclusion of the 'Wear and Tear' agreement; final details for the new access bellmouths; the prevention or construction or ongoing operational access being taken along the U1140 Whitebridge to Killin Road onto the U1209 Killiechoilum / Ardochy Road; and the establishment of a liaison group which will provide lines of communication between the developers and the local community.

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

5.11 **Aberdeen International Airport** do not object to the application.

5.12 **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.

5.13 **Cairngorms National Park Authority** do not object to the application. When considering the cumulative visual effects, there would be negligible visibility of the proposed wind farm on its own from within the National Park. The majority of where it would be seen from is already influenced by visibility of a number of other existing and consented wind farms. As the minimum distance between the National Park boundary and the nearest proposed lit turbines is approximately 8km, with the proposed lighting intensity reduction measures, this would substantially mitigate any significant effects on the park's Dark Skies SLQ. Adding the proposed Dell 2 wind farm to the baseline would not significantly add to the existing level of effects, either alone or in combination with other existing or consented wind farms.

5.14 **Highlands and Islands Airports Ltd (HIAL)** do not object to the application.

5.15 **Historic Environment Scotland (HES)** do not object to the application. Broadly content with the EIAR but point to some issues with the significance criteria used in

the assessment. In relation to its heritage interests, it is content that there would be negligible impact on the setting of Urquhart Castle (SM90309).

5.16 **Ironside Farrar (Peat Landslide)** do not object to the application but raise several queries in the Stage 1 Checking Report for the Peat Landslide Hazard and Risk Assessment. The initial comments have been included in a revised PLHRA which Ironside Farrar accept.

5.17 **Joint Radio Company** do not object to the application and does not foresee any potential problems based on known interference scenarios.

5.18 **National Air Traffic Services Safeguarding (NATS)** do not object to the application. It notes that the proposal does not conflict with its safeguarding criteria.

5.19 **NatureScot objects** to the application due to the significant adverse impacts on montane bog, which is a priority peatland habitat. Due to the sensitivity of this habitat, the significant effects of the proposal cannot be overcome by offsetting.

Raises no objection in relation to designated sites and protected species. Confirms that it is unlikely that the proposal will have any significant effect on the qualifying interests to the Loch Knockie and nearby Lochs SPA and Glendoe Lochans SSSI.

It recommends that pre-construction surveys and Species Protection Plans (SPP) are secured in relation to water vole, mountain hare, otter, bats and wildcat. A Construction Breeding Bird Protection Plan should include the mitigation proposed within the EIAR to avoid disturbance to breeding Schedule 1 birds and black grouse. In relation to golden eagles, NatureScot welcome the modelling and request confirmation if all application stage and consented wind farms have been included in the cumulative assessment of foraging habitat loss. If not, it recommends an updated cumulative assessment of habitat loss is undertaken.

5.20 **Ministry of Defence - Defence Infrastructure Organisation** does 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.

5.21 **Mountaineering Scotland** confirms it does not wish to make comments on this application.

5.22 **RSPB** confirms it does not wish to make comments on this application.

5.23 **Scottish Forestry** does not object to the application. It acknowledges the applicant's commitment to providing compensatory planting. In relation to the loss of woodland (5.18ha), it notes there is a potential impact on an area of native woodland and will require consideration and further mitigation in terms of the control of woodland removal policy / NPF4 Policy 6. Ancient woodland near the access route areas of woodland should be protected and monitored during the development. Further information on the compensatory planting scheme (location/Species/Method/monitoring). A planning condition requiring a detailed compensatory planting plan, including scheme location, detailed location within any

larger scheme, species, delivery methods, timing, supervision and monitoring is requested.

5.24 **SEPA objects** to the application on the basis of a lack of information in relation to flood risk. Originally, SEPA did not object subject to a number of conditions which included the design and details of the watercourse crossings and the finalisation of a flood risk assessment and updated hydrological and hydraulic modelling. However, following the submission of the applicant's 'clarification document' in March 2025, SEPA have submitted a holding objection due to a lack of information in relation to the proposed change in design of the access track approach to the Allt Breineag crossing. SEPA now request further information to demonstrate that the development will not increase flood risk elsewhere.

In relation to peat impacts, SEPA do not object, but it requests conditions to secure: a finalised Peat Management Plan; this should demonstrate how micro-siting has further minimised peat disturbance and impacts on near natural habitat; and recalculation of peat excavated and where is it will be used and site-specific measures to reduce impact on near natural habitat.

In relation to private water supplies, it has no objection but requests that water quality monitoring is secured by condition during any construction within 100m of the Ardochy and Glenbrein Lodge Spring water abstraction source. Finally, to ensure that construction works are carried out in line with the measures prescribed in the submission, a condition should be included requiring adherence to the Schedule of Mitigation, Good Practice, Enhancement and Monitoring (EIAR Appendix 1.2) and the Outline Construction Environmental Management Plan (EIAR Appendix 2.1).

6. DEVELOPMENT PLAN POLICY

6.1 Appendix 2 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. 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.

7.2 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

7.3 The key considerations in this case are:

a) Compliance with the Development Plan / Other Government Policy
b) Energy and Economic Benefits
c) Sighting, Layout and Design
d) Landscape and Visual Impacts
e) Construction
f) Roads, Transport and Access
g) Water, Flood Risk, Drainage and Peat
h) Natural Heritage (including ornithology)
i) Forestry
j) Built and Cultural Heritage
k) Noise and Shadow Flicker
l) Aviation
m) Telecommunications
n) Other Material Considerations

Compliance with the Development Plan / Other Government Policy

7.4 Appendix 3 of this report provides an assessment of compliance with the Development Plan / Other Material Policy Considerations. Since Dell was consented in 2019, the Development Plan has changed. In summary, the Development Plan now 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). The principle of wind farm development is established by the previous consent and national policy. 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.

7.5 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 maintain 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.

7.6 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 5 provides an assessment against Landscape and Visual Assessment Criteria contained within Section 4 of the Onshore Wind Energy Supplementary Guidance.

Energy and Economic Benefits

7.7 The Council continues to respond positively to the Government's renewable energy agenda. Installed onshore wind energy developments in Highland accounts for around 30% of the national installed onshore wind energy capacity, with a substantial number of onshore wind farm applications pending consideration at present. 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 60 MW (anticipated to be 6.6MW per turbine) and to power up to 36,460 homes per year. This is compared to 42MW for the consented Dell scheme.

7.8 Wind turbines provide an important mechanism for the reduction of carbon dioxide (CO2), 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 forestry or peat, are present and potentially impacted by the development, often termed "carbon balance". The applicant has submitted a Carbon Balance Assessment

(EIAR Technical Appendix 2.4). The net emissions of carbon dioxide from the proposed development have been calculated as approximately 130,604 tCO2. The scheme is estimated to produce annual carbon savings of approximately 60,374 tons of tCO2 per year, based on the displacement of grid electricity based on the current average grid mix. The scheme is estimated to have a payback period of 2.2 years based on the grid fuel mix of electricity generation.

7.9 The proposed development anticipates a construction phase of 18 months and an operational period of 35 years. There are likely to be some adverse effects caused by construction traffic and disruption, particularly 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.

7.10 The applicant has estimated the construction cost of the development to be approximately £72 million. Assuming up to 12% of construction costs are spent locally, the overall value of contracts that could be realised within the Council area could be up to £7.2 million. In terms of employment, EIAR Chapter 2 estimates approximately 90 full-time jobs during the construction period. Using a conversion factor of ten years of full-time employment to one permanent Full-Time Equivalent (FTE), the total employment generated through construction will be approximately nine permanent FTEs. Once operational, the proposed development will require a small team of personnel to service, maintain and operate it. It is predicted that one permanent site operator will be employed (one FTE) who will be responsible for overseeing the operation and maintenance of the development during its lifetime.

7.11 The Council published its Social Value Charter for Renewables Investment in June 2024. This has been brought to the applicant's attention. The Council's Community Wealth Building Team confirm that the team are aware of this application and will liaise with the applicant directly regarding the Highland Social Value Charter.

Siting, Layout and Design

7.12 In line with EIA and the OWESG requirements, the applicant has illustrated and explained the steps, rationale, and influences for the evolution and design of the site. It outlines that the aim of the current 'redesign' application is to benefit from major technological advancements in turbine design since the original scheme. Changes in technology will allow for a significantly more efficient and larger capacity scheme to be developed on the same site envelope as the original Dell Wind Farm. The applicant's strategy is to install fewer (9 rather than 14) but larger turbines at 180-200m to blade tip, rather than 115.5m to 130.5m originally consented.

7.13 EIAR Chapter 3 identifies that through the design process the applicant has sought to maximise the potential renewable energy generation within the technical and environmental constraints of the site. Whilst not materially increasing the significance of environmental effects that were considered likely for the consented Dell scheme. In particular, minimising land take and effects on peat and carbon rich soils and landscape and visual impacts. The new scheme has also sought to explore greater opportunities within the site to restore and enhance the landscape, soil habitats and biodiversity. Whilst respecting other environmental constraints

including archaeological, ecological and hydrological constraints.

7.14 Given that the principle of a wind farm on this site is supported by the consented scheme, the challenge from a landscape and visual perspective is to ensure that the new design achieves the most appropriate scheme for this location. In terms of scale, character, and fit within the cumulative context. With this in mind, the applicant outlines several design objectives:

- Present a layout which is legible and well composed in key views. Minimise visibility of the new scheme from the Great Glen (including the Great Glen Way), Urquhart Castle (SM90309), The Cairngorms National Park, Loch Ness and the A82.
- The layout should also respond to the upland plateau landform and takes advantage of topographical screening, where possible. The scheme should also seek to consolidate the established footprint of wind farm development within the wider Glendoe Basin.
- The turbine design should respond to the very large scale of the underlying landscape. Reduce the horizontal extent of the wind farm in key views, remove outlying turbines and reduce stacking. In wider views the turbine layout should overlap with and seen as part of the Stronelairg Wind Farm.
- Design of the access tracks should avoid steep terrain, maximise screening by existing landform and vegetation, and to utilise existing tracks wherever possible. Continue to mitigate the visual effects of the track including at receptors to the north such as travellers on the B862, the Great Glen Way and walkers on surrounding hills including Meall Fuar-mhonaidh.
- Reduce the effects of aviation lighting.

7.15 The EIAR Chapter 3 identifies that from the consented scheme, the layout has evolved through several design iterations (see EIAR Figures 3.1a-b). Key considerations were the aforementioned landscape / visual and cultural heritage receptors, as well as maintaining a 50m buffer from watercourses and avoiding deep peat. Technical considerations were also factored in, such as wake losses through individual turbine spacing, and also proximity of the southernmost turbines to Stronelairg Wind Farm. The applicant also considered it important to design a scheme which utilised the access track for the consented scheme, given it was considered acceptable to Scottish Ministers.

7.16 From Officers' perspective, a key consideration in coming to a judgement on the scheme is derived from The Loch Ness Landscape Sensitivity Study contained within the OWESG. This study identifies that any remaining capacity for larger scale turbine development should be focused on existing wind energy clusters. However, this should not undermine previously secured mitigation measures. The OWESG also states that schemes should not breach the skyline when viewed from the north side of Loch Ness, be set back from 'Key Routes', maintain the setting to existing schemes, avoid coalescence, and respect the spacing and scale of the existing development pattern. Relevant 'Key routes' and 'Key Views' to this landscape are identified as being from Loch Ness, Urquhart Castle, Meall Fuar-mhonaidh, and the Great Glen Way, A82, A887, and B862.

7.17 As a consequence, SPAC will be aware through recent wind farm schemes in the locality, such as Loch Liath, Culachy, Chrathaich and Bhlaraidh extension, that in line with policy and guidance Officers have continually strived to minimise (as far as practical) the effects of wind energy development in relation to a number of key areas. In particular, minimising the effects on NSAs, visibility from loch level of Loch Ness, the summit of Meall Fuar-mhonaidh and minimising/avoiding the introduction of aviation lighting. To date the Council has been largely successful in managing these effects whilst remaining positive and pragmatic towards wind farm developments including the use and recognition of the evolving natures and scale of turbines.

7.18 It is particularly important that siting, layout, and design principles consider the cumulative effects arising from a proposal's relationships with other wind energy developments. So, whilst the redesign is not an operational extension of another wind farm, in landscape and visual terms it will be seen as being closely related to Stronelairg / Cloiche Wind Farm cluster. Although this can be beneficial from the point of view of integrating a proposal into the established pattern of wind energy development, its proximity to Stronelairg is such that in this instance any successful design should read as continuous related development, and that the character and style of this needs to be respected and previous mitigation not substantively undermined.

7.19 The original 83 turbine scheme for Stronelairg was reduced to 66 (125m-135m to blade tip) with removed turbines being those to the south and northeast of the original scheme and its design ethos was one of landform containment within an upland 'bowl' plateau. Cloiche Wind Farm (29 turbines, 149.9m to blade tip) has since been consented (2023). Whilst this added to the visual envelope of wind turbines when viewed from elevated vantage points, the Council agreed to raise no objection following the deletion of 7 turbines. This was to improve visual containment and reduce effects towards the south and east including to the Cairngorms National Park.

7.20 Stronelairg is located within an upland plateau contained by hills, with the proposed development set amongst the more northerly of these hills, with turbines sitting at higher elevation than those of Stronelairg. Dell 2 does however benefit from some topographic containment to the northwest, where greater sensitivities lie, but is somewhat less contained than Stronelairg in this direction. The siting of the consented Dell scheme and the current re-design is to the north of Stronelairg Wind Farm, and so away from the areas subject to turbine deletions for Stronelairg and Cloiche Wind Farms. Whilst development in this northerly position, does arguably dilute the original ethos for Stronelairg to some extent, it is not considered in siting terms to unduly undermine the previously secured mitigation measures outlined above.

Additional Mitigation Sought by Officers

7.21 In terms of design and turbine scale, Officers have expressed concern since the pre-application stage. Particularly in relation to the potential effects of the increase in size of the turbines from that consented (consented 115m-130.5m to proposed 180-200m to blade tip), altered proportions relative to other built and consented

turbines nearby, and the effects of aviation lighting. The development could potentially contrast with the design of Stronelairg, adding prominence. To assist with the assessment the applicant submitted monochrome wireframes detailing the consented scheme of Dell with the current cumulative context (Technical Appendix 4.8).

7.22 Officers' concerns are best expressed from a number of VPs in which the scheme is read as a linear extension to Stronelairg Wind Farm, for example VP2 (above Glendoe Dam), VP6 (Summit of Carn a' Chuilinn), VP10 (Summit of Carn Ban) and VP11 ((Meall Fuar-mhonaidh). This is also evident where the proposed development is viewed to the rear of other wind farms, e.g. VP3 (Summit of Meall na h-Aisre), VP8 (Summit of Geal Charn) and VP12 (Summit of Carn Liath). In some of the VPs, the increase in turbine height results in greater skylinning effects e.g. VP1 (Summit of Carn Dubh), VP2, VP9 (Summit of Carn na Saobhaidhe), VP10 and VP12.

7.23 With the above in mind, Officers considered that more could be done to improve the proposal and its cumulative fit. Consequentially, it was recommended that the applicant maintain the proposed layout but investigate a reduction in the scale of the turbines to a maximum blade tip height of 149.9m. Although this would be higher than the consented Dell turbines and those of Stronelairg, it would be comparable with the recent approval of Cloiche Wind Farm.

7.24 Following Officers' advice, the applicant reassessed the turbine heights and whilst acknowledging that it would reduce some of the visual contrast, the impact on the overall landscape and the surrounding views would be relatively minimal. The difference in visual effect between turbines at 149.9m and those proposed at 180m or 200m is not significant, as the visual perception remains largely unchanged in many key viewpoints. It is noted that some of the viewpoints raised by Officers are located to the south of the proposed development where the turbines would be seen in the context of the Stronelairg and Cloiche. The applicant contends that the additional contrast referred to by Officers would not therefore be apparent.

7.25 In addition, the applicant states that a reduction in tip height to 149.9m would lead to a notable decrease in energy output and exacerbate the array losses from Stronelairg. Whilst not a planning consideration, the applicant also states it renders the project more likely to be commercially unviable due to an increase in per-unit energy costs and reduced economic efficiency, making it more difficult to deliver the desired renewable energy benefits within financial constraints. Consequentially, the applicant has not amended the scheme in line with Officers' advice. Financial viability is not a material planning consideration, but Officers did highlight that other recent consents for schemes at 149.9m.

7.26 In support of the applicant's argument, comparative wireframes for VPs 2, 3, 6, 10, 11 and 12 were presented in Appendix F of the applicant's 'clarification' document submitted in March 2025. These wireframes highlight the visual differences between the proposed application height of 180m - 200m turbine and two alternative scenarios. Scenario 1) T1, 4, 5, 8 and 9 at 200m turbines and turbines 2, 3, 6 and 7 being reduced to 150m and scenario 2) T1, 4, 5, 8 and 9 at 180m high and turbines 2, 3, 6 and 7 being reduced to 150m. However, no wireframe was submitted which showed all 9 turbines at 149.9m as recommended by Officers,

which would have been of benefit. Despite this omission officers make the following observations:

- VP2 (Above Glen Doe Dam) seen as a linear addition to the operational Stronelairg turbine. The reduction in height has reduced visible hubs sky-lining. T1 is the nearest to the operational turbines, but this has not been reduced to 150m in the comparative wireframe, so the full effect of the reduction in height of all the turbines is not demonstrated. The turbines will still appear larger than Stronelairg, but the visual relationship is less jarring, although it is unlikely to reduce the overall level of significance in EIA terms.
- VP3 (Summit of Meall na h-Aisre) seen to the rear of the existing turbines – the recommended reduction in height brings all hubs below the horizon which helps with perception of scale.
- VP6 (Summit of Carn A' Chuilinn) like VP2, the proposed turbines are seen as lateral extension of Stronelairg. The recommended reduction in height brings all hubs below the horizon which helps with perception of scale and visual integration. Again, like VP2 the nearest proposed turbines (T1 and T9) are retained at 180m in the comparative wireframe, so the full effect of the reduction in height of all the turbines is not demonstrated.
- VP10 (Carn Ban) seen as a linear addition to the operational Stronelairg turbines. Would still appear larger, but more in line with Cloiche, which is located at the other side of the Stronelairg array, creating a book end effect.
- VP11 (Summit of Meall Fuar-mhonaidh) seen as a linear addition to the operational Stronelairg turbines and consented Cloiche turbines. The recommended reduction in height brings the hubs below or close to the horizon, this would be further improved if all the turbines were shown at 150m. Whilst the turbines still appear larger than those of Stronelairg, its integration is better with the Cloiche turbines.
- VP12 (Carn Liath) seen to the rear of the existing turbines – the recommended reduction in height brings the hubs below or close to the horizon which helps with perception of scale and depth.

7.27 Officers remained concerned about the increase in height of the proposed turbines and its ability to integrate with the adjacent development. It is also considered that a reduction in the height of all turbines to 149.9m would improve the schemes cumulative integration from a number of vantage points, however, that has not been tabled by the applicant.

7.28 Officers previously recommended that the Council raise an objection to the re-design on a number of grounds, including significant and detrimental landscape and visual effects. Since this point, Officers have undertaken further analysis and sought additional advice from an external landscape consultant.

7.29 Following receipt of further external landscape advice, it is considered on balance that the re-designed scheme does not undermine wider design objectives (outlined above and assessed in the next section) for the area or previous mitigation measures secured to such a degree that would warrant objection on these grounds. It is also acknowledged that a reduction in turbine height would not alter the

significance of any identified effects in EIA terms, with the possible exception of VP6 (Summit of Carn a' Chuilinn). Consequentially, in line with the following assessment, it is recommended that SPAC withdraws the Council's objection to the application in relation to landscape and visual impacts.

Aviation Lighting (Hours of Darkness)

7.30 Officers have constantly sought to avoid/minimise impacts from visible aviation lighting. The consented Dell scheme did not require visible lighting. However, with the larger scale of turbine now proposed, there is a safety requirement for visible aviation lighting. Officers have sought a reduction in the tip height, which would have again negated the need for aviation lighting, but this option has not been taken forward by the applicant.

7.31 The EIAR Technical Appendix 4.5 contains an assessment of night-time lighting Visualisations demonstrating nighttime visibility have also been submitted Night Time Viewpoint 1: (VP 11, 16km from the proposal) Summit of Meall Fuar-mhonaidh, Night Time Viewpoint 2: (VP 13, 19km distant) Great Glen Way, above Loch Ness (to the north of Bunloit) and Night Time Viewpoint 3: (VP 15, 23.2km distant) - B862 adjacent to Loch Ceo Glais. EIAR Figure 4.9.1 details the Aviation Lighting Zone of Theoretical Visibility for Lighting Intensity.

7.32 The assessment incorporates industry standard CAA mitigation which reduces effects of artificial lighting, such that: medium intensity steady red (2,000 candela) lights will be introduced on the nacelles of 5 turbines (Turbines 1, 2, 6, 8 and 9); the lights on these turbines to be capable of being dimmed to 10% of peak intensity when visibility exceeds 5km, as measured by sensors on turbine hubs. So, the effects of lighting on night-time views will be noticeable in closer views within 5km and where the sense of the lights appearing to flash will be apparent caused by rotating blades. When the visibility is sufficiently poor as to require 2000 cd lighting, then the visual impact of these beyond 5km distance will be less than that of the 200 cd lights. No significant effects are reported in the EIAR.

7.33 As the lighting will be on cardinal turbines, those closest to the Cairngorms National Park will be lit. However, the Cairngorm National Park Authority have no objection. It states that as the minimum distance between the National Park boundary and the nearest lit turbines is approximately 8km, it considers that the identified mitigation would substantially mitigate any significant effects on the Dark Skies SLQ. NatureScot and the Council's Landscape Advisor also do not raise concerns.

Ancillary Infrastructure

7.34 The applicant states that the ancillary infrastructure has been designed to avoid onsite constraints as far as possible. It has also been retained as far as practical in the same location as consented scheme (see EIAR Figure 3.1c for a comparison between consented and the now proposed layout). The control building remains unchanged from the consented project and makes use of an area where existing infrastructure in the form of an agricultural shed is located. The temporary construction compounds and borrow pits are also unchanged from the consented scheme. The met mast location has moved approximately 420m to the northeast, to avoid conflict with the new turbine locations (EIAR Figure 2.7). However, there

will be a reduction in the number of watercourse crossings (13 down to 11) due to the fewer number of turbines.

7.35 In terms of access tracks, the consented scheme required 18.3km of track, with the proposed scheme requiring 16.1km, due to the reduced number of turbines. The access tracks have been designed to avoid the deepest peat deposits and minimise water crossings. The main access track leading from the B862 up to the wind turbine area through Glen Brein remains largely unchanged from that which was consented (see EIAR Figure 3.1c). However, minor changes are proposed to the access bellmouth to accommodate the larger turbine components.

7.36 As noted elsewhere in this report, the Council refused the original scheme entirely based on the visual impact of the access track from the north, including from The Great Glen and Loch Ness. Visual effects from the access track at locations of public interest / sensitivity are most apparent at VP4 (Carn and t-Suidhe), VP7 (B862), and more distantly at VP11 (Meall Fuar-mhonaidh). Whilst acknowledging that consent was subsequently granted on appeal in 2019, with that appeal process understood to have resulted in further mitigation in the form of landscaping / woodland screening, as part of the pre-application process Officers requested that the applicant revisit the access arrangements as part of the re-design proposal. In particular, that an alternative shared access through the existing Stronelairg Wind Farm should be proposed. This is a point also raised by Stratherick and Foyers Community Council and NatureScot who both object to this current application.

7.37 Disappointingly, this option has not been advanced by the applicant. Whilst acknowledging the potential benefits of a shared access track, the applicant states that “legal and operational constraints prevent this option”. Furthermore, “Stronelairg Wind Farm Ltd have raised concerns about potential operational impacts, making a commercial agreement unlikely within the timeframe of this application”. It is also highlighted that the proposed access route for Dell 2 Wind Farm has already been consented and deemed acceptable in terms of engineering and environmental impact.

7.38 The applicant is committed to minimising the visual effects of the access track, from receptors to the north, such as travellers on the VP7 (B862), the Great Glen Way and walkers on surrounding hills including VP11 (Meall Fuar-mhonaidh). This will be achieved through design, good practice construction techniques and use of appropriate construction materials. Proposals also include new native woodland planting within Upper Glen Brein; this will assist in integrating the track in wider views.

7.39 Whilst the track would initially be a locally intrusive feature, it is anticipated that its effects would materially reduce through the implementation of the mitigation measures. The effect of this is particularly evident at VP7 (B862), in which the woodland planting is likely to provide a substantial screening effect for much of the route. These measures could be secured by condition.

7.40 The applicant has identified that a grid connection will be required and has applied for a substation. The location of the substation and compound is shown on EIAR Figures 2.1a, 2.1e and 2.9a. The applicant highlights that the location of the substation has been chosen to take advantage of the screening afforded by the

landform to the north. The substation will be a single storey pitched roofed building, measuring approximately 20m x 10m. The EIAR indicates that the building will be constructed in keeping with the local built environment and it is anticipated that the design will aim to make the building appear less 'industrial'. Lighting will be down lit and linked to timers and movement sensors so that light pollution is kept to a minimum. The final design and external material palette, together with the compounds and perimeter fencing can be secured by condition.

7.41 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.

7.42 The final colour/finish of the turbines could be secured by a planning condition. The EIAR anticipates that any turbine transformers will be located within the turbine towers and there would be no requirement for external buildings. However, to present a worse-case scenario the EIAR assumes that external transformers will be installed (4m x 6m x 3m – indicative design EIAR Figure 2.5). The use of internal transformers could be secured by a planning condition.

7.43 Once the wind farm has been commissioned, site restoration will involve landscaping and replanting disturbed areas that are not required for the ongoing operational phase of the development. This can be secured by condition which includes the 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 can also be secured during 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 also be secured by condition.

Landscape and Visual Impacts

7.44 The site is located within the boundary of the Loch Ness Landscape Sensitivity Appraisal Area. This appraisal forms part of the Council's Onshore Wind Energy Supplementary Guidance. The turbine envelope lies within Landscape Character Area (LCA) LN6: Monadhliath ridge and tops, Rolling Uplands. The northernmost part (access track) of the site lies within LN15: Farmed Straths, Strath Errick and Strath Nairn.

7.45 The site is also located with the Council's Dava Moor, Nairn and Monadhliath Area Wind Energy Landscape Sensitivity Pilot Study (2021). It is not adopted but it provides useful context when assessing the landscape sensitivities in the area. The proposal is located within the Rolling Uplands (The Monadhliath) Landscape Assessment Unit (AU) as defined by this study. The study assesses a High-Medium sensitivity for turbines > 150m within this landscape and that turbines over 150m could fit within the scale of this landscape but this is subject to a number of constraints.

7.46 The applicant has presented a number of submissions to illustrate the landscape and visual impacts of the development, both singularly and cumulatively with other wind farm developments. The applicant's landscape and visual assessment (LVIA)

is outlined in EIAR Chapter 4 and covers a 45km study area. The expected bare earth visibility of the proposed development can be appreciated from the Zone of Theoretical Visibility (ZTV) maps, detailed in EIAR Volume 3 Chapter 4 Figure 4.2.1 Blade Tip ZTV and Figure 4.2.3 Hub Height ZTV. Figures 4.2.5 and 4.2.7 overlays the Tip Height ZTV with the Landscape Character types, designations and Wild Land Areas. Cumulative ZTV plans are also included (Figures 4.5.2 – 4.5.5). 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.

7.47 The application is also supported by visualisations from a total of 22 viewpoints (VP). These 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. 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.

7.48 Several of the photomontages were not considered to meet the Council's Visualisation Standards for Wind Energy Developments (July 2016). This included haze on the images; the baseline photography was taken in poor weather conditions (extensive snow), incorrect location or poor rendering of the existing turbines. In response the applicant submitted improved visualisations as part of a 'clarification' document submitted to the ECU in March 2025, for VP10, 11, 12 and 21. Clarification on the extent of visible aviation lighting from nighttime VPs 13: Great Glen Way and VP18: A'Mharconaich was also provided.

7.49 The methodology for the LVIA is outlined in EIAR Technical Appendix 4.1 and generally follows that set out in Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3). 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 significance of any identified landscape or visual effect has been classified by professional consideration and categorised as major, moderate, minor or no effect. These categories have been determined by consideration and the combination of judgements relating to sensitivity and predicted magnitude of change.

7.50 Sensitivity is a combined consideration of both the susceptibility of the landscape or visual receptor to the type of development proposed and the value attached to the landscape or visual resource and visual receptors relative to changes as a result of the proposal. An assessment of the magnitude of change, considers the scale and geographical extent of the landscape or visual effect, its duration and reversibility. The principles utilised by the applicant in establishing this is outlined in Technical Appendix 4.1, this also outlines the matrix used in correlating sensitivity and magnitude to determine significance of effects.

7.51 The level of any identified landscape or visual effect was judged to be major, moderate, minor or no effect, with intermediate categories (e.g. major/moderate) between these. 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. However, Table 4.2 in EIAR Chapter 4 identifies the matrix used as a guide to correlating sensitivity and magnitude to determine the level of predicted effects and their significance. A landscape or visual effect which is classified as major or major/moderate, is considered by the applicant to be a significant effect in terms of the EIA Regulations.

7.52 The applicant acknowledges "that in some other landscape and visual assessment methodologies a moderate level may be considered to be significant, but this is due to assessors calibrating their scale of effects differently, rather than because the threshold has been set high" in this assessment. The applicant further contends that "essentially in an assessment where moderate is considered significant, the level of effect will be broadly similar to that which is described as major/moderate here."

7.53 The EIAR also provides a cumulative assessment, again the applicant's methodology is outlined in Technical Appendix 4.1. The assessment considers the contribution that the proposed development will make to the 'cumulative baseline' (the operational and consented sites) and the effects resulting from the proposed development in combination with sites at application stage. Appendix 1 of this report provides details of operational, consented / under construction, and in planning wind farm projects within 45km of the application site.

Landscape Impacts

7.54 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, specific units of the LCT, that is Landscape Character Areas (LCAs), and on neighbouring LCT/LCAs;
- impacts on landscape composition; and,
- impacts on landscape designations.

7.55 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.

7.56 Eighteen different Landscape Character Types (LCT) are identified within 20km of the proposed development. Eight of which have been taken forward into the detailed assessment, which is detailed in EIAR Technical Appendix 4.2.

7.57 The application site is located within the LCT 221: Rolling Uplands – Inverness LCT. It "consists of rolling hills which lie to the southeast of the Great Glen and form an upland backdrop to much of the eastern part of Inverness district, extending far beyond the district boundary and into the Cairngorms National Park. The uplands act as a sheltering edge to the Farmed Strath landscape type, from which they rise.

They also form a backdrop to more distant areas to the south, east and west where they seem to merge into an undulating skyline without any clearly identifiable features".

7.58 Key characteristics are described as:

- "A series of large scale, smooth, rounded hills with summits of similar height forming broad, undulating upland plateaux containing occasional steep-sided straths.
- Open heather moorland dominates, the uniform colour and texture accentuating the landform.
- Strath floors contain inbye pastures, trees and small patches of woodland.
- Conifer forests limited to the lower edges of uplands and strath sides.
- Settlement limited to a few isolated farms in remote straths.
- A few mainly single track roads, integrated within the landform.
- Uninhabited interior, largely inaccessible to vehicles.
- Archaeological evidence of settlement and farming from prehistoric times to the 19th century.
- Striking colour and textural contrast between strath floors and moorland vegetation above.
- Expansive views from the hill tops and plateaux create a strong sense of openness and exposure.
- Scale and distance difficult to judge.
- Few signs of active management in the interiors, creating a strong perception of remoteness, although this is affected by a number of large wind farm developments."

7.59 The EIAR identifies significant and adverse effects which are relatively localised to the Rolling Uplands LCT within which turbines would be located but not extending to other character areas or types.

7.60 Beyond the immediate site surrounds, visibility to the proposed development is principally towards the north and west, available from the higher ground separating Loch Ness from Stratherrick (Farmed and Wooded Foothills LCT), from the western slopes of the Broad Steep Sided Glen LCT at Loch Ness and its enclosing hills including Meall Fuar-mhonaidh, and then from upland areas west of the Great Glen. Visibility further east, including within the Cairngorms National Park is very limited. Landscape character areas most susceptible to the proposal are the Farmed Strath of Stratherrick, and the Broad Steep Sided Glen of Loch Ness. From the Farmed Strath of Stratherrick there would be occasional blade tip visibility, which would be insufficient to have any material effect on its landscape character.

7.61 Views from the lower part of the Loch Ness Broad Steep Sided Glen are restricted to blade tips from the western side of the loch, as illustrated by viewpoints at Drumnadrochit (VPs 14, 19, 20). VPs 13 and 21 illustrate effects on views from the western slopes of Loch Ness from the Great Glen Way, with turbine hubs becoming

visible. While having some material effects to views and becoming the most prominent of existing / consented wind turbines visible east of Loch Ness, we concur with the conclusions of the LVIA that there would be no significant effects to the character of the Loch Ness Broad Steep Sided Glen LCT.

7.62 Overall, Officers and the Council's Landscape Advisor agree with the LVIA that effects to landscape character would occur relatively locally (within~5km of the turbines) affecting the Rolling Uplands LCT only. There would be some locally significant changes with the upgraded/ new track access, including tree planting, but which would not significantly change key landscape characteristics on a wider scale.

Designated Landscapes

7.63 The site is not covered by any statutory international, national, regional or local landscape-related designation, so no direct impacts on any designated landscape would therefore occur.

The Cairngorms National Park (CNP)

7.64 At the national level, the CNP boundary is 8.8km to the northwest of the closest part of the Park's boundary. Theoretical visibility, including cumulative visibility from within the National Park is shown on EIAR Figures 4.2.3 and 4.5.1. In addition, visualisations demonstrate the predicted level of visibility at the edge of the National Park; VP8 (summit of Geal Charn, 11km from the closest turbine; VP10 (summit of Carn Ban, 12.85km from the closest turbine) and VP18 (summit of A' Mharconaich, 30km southeast).

7.65 The Cairngorms National Park Authority (CNPA) do not object to the scheme. It considers the submission to demonstrate that there would be negligible visibility of the proposed wind farm on its own from within the National Park. The CNPA further note that the majority of where the proposal would be seen from is already influenced by visibility of a number of other existing and consented wind farms. Adding the proposed Dell 2 wind farm to the baseline would not significantly add to the existing level of effects, either alone or in combination with other existing or consented wind farms.

7.66 Whilst there is some increase in the horizontal extent of turbines from some viewpoints and in the visual density of turbines, this is all set within the context of views to existing wind energy development. When considering the localised and limited nature and significance of the effects, in an area already affected by other wind farm developments, the CNPA are content that the proposal would not compromise the integrity or objectives of the National Park. NatureScot also advise that the proposal will not have an adverse effect on the integrity of the CNP or the objectives of the designation.

Wild Land Areas (WLA)

7.67 The proposed development is not located within a Wild Land Aea (WLA). The nearest is WLA 20: Monadhliath, which is located approximately 5km from the closest turbine. The applicant's assessment of WLA is contained within EIAR

Technical Appendix 4.4. VP8, from the summit of Geal Charn and VP10, Càrn Bàn illustrate the typical views that will be experienced from the summit areas of the WLA.

7.68 As summarised in the EIAR, the ZTV indicates that the proposed development will have an indirect influence on the west facing flank at the western edge of the WLA / Monadliath plateau to the north and south of Glen Markie, the summit areas at Carn Ban and the edge of the Cairngorms National Park and small areas of distant visibility from the high parts of the plateau including: Carn Icean Duibhe, Carn na h–Easgainn and Carn Dubh.

7.69 The applicant's WLA assessment focusses on one of the four key attributes and Wild Land Qualities (WLQ) associated with WLA 20, which had the potential to be significantly affected by the proposal.

> "A range of massive, rounded hills and plateaux that are awe-inspiring in their simplicity, openness and immense scale, and offer panoramic views to distant mountain ranges".

The applicant highlights that the physical attributes of this WLA is remoteness and physically challenging, and awe-inspiring and arresting in perceptual terms. It is also highlighted that "views pass over an arresting succession of sweeping, elevated hill horizons that seem to extend far into the distance".

7.70 The applicant's assessment considers that the proposal will not alter the "simplicity, openness and immense scale" within the WLA or substantially affect the majority of views across the surrounding landscape and moorland beyond the WLA. The wind farm will be viewed locally as a noticeable addition to the landscape and seen in the context of the existing Stronelairg Wind Farm in wider views. Visibility of the turbines will extend into the night-time with distant visibility of the turbine lighting. The applicant contends that there will be a slight local reduction in the sense of scale of the WLA from the landscape beyond. However, the influence of the proposal on the perceptual aspects of the "awe inspiring" and the "arresting" qualities of views is locally reduced in local views from the WLA. Overall, the applicant reports a locally Moderate/Minor and Not Significant effect from the elevated west facing flanks of the WLA beyond c.6 km of the proposal.

7.71 In relation to WLA 19: Braeroy – Glenshirra - Creag, the closest turbine is located 9.5km to the north-east of this WLA. The EIA reports that there will be no significant adverse effects on the wild land qualities, with no material change to the experience of wild land qualities.

7.72 NatureScot has made no direct comment regarding wild land areas, but in relation to wider landscape and visual impacts, it considers that the proposed development would not raise issues of national interest. Given the response from NatureScot, and the position set out in NPF4 that impacts on a wild land area from development outwith a wild land area will not be afforded significant weight in the decision-making process, the applicant's assessment is accepted.

Special Landscape Areas (SLA)

7.73 The Loch Ness and Duntelchaig SLA, is located 5.7km from the proposal. Effects

are represented by VPs 7, 11, 13, 14, 15, 19, 20, 21, and 22.

7.74 As summarised in the EIAR, the ZTV highlights that theoretical visibility is available from the eastern side of the Great Glen through Stratherrick, intermittent visibility is indicated of between 4-6 turbines from the mixed forestry and agricultural landscape, with a localised area of visibility of up to nine turbines at the summit of Beinn a Bhacaidh. Dense forestry cover on the western steep side slopes of the Great Glen will also limit visibility to the proposed development; however, the number of turbines visible rises with altitude, with visibility of up to nine turbines from mid-elevations to higher moorland locations. From the higher glen sides and from hill summits such as VP11 (Meall Fuar-mhonaidh), there will be direct visibility of the turbines, seen within the expansive panoramas across the Great Glen and the Monadhliath to the east. Visibility of the turbines will extend into the night-time with limited areas of distant and partial visibility of the turbine lighting as indicated in EIAR Figure 4.9.1.

7.75 There are three special qualities (SQs) identified for this SLA; the dramatic Great Glen; the contrasting intimate plateau; and the historic landscape. These are the attributes of a landscape which make it special in terms of landscape and scenery. SQ assessment involves considering; which particular aspects of SQs may be susceptible to a proposed change; how these SQs are expressed and experienced by people (e.g. from particular locations, routes etc.); and how the change might affect people's perception of SQs from these locations.

7.76 This SLA is particularly sensitive to additional large features upon the side slopes or ridge lines on both sides of Loch Ness. 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.

7.77 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. As detailed above, despite the increase in tip height over the consented scheme, the development will present as a number of distant blade tips from loch level. This is considered to preserve the existing pattern of wind energy development and doesn't substantively undermine mitigation measures previously used in the area. Effects from VP14, 19, 20 and two A82 roadside viewpoints south of Drumnadrochit (EIAR Figure 4.7a and b) also illustrate effects from loch side locations. It is agreed that significant adverse visual effects would not occur from these locations, and there would be no significant effects to perceived SQs.

7.78 Meall Fuar-mhonaidh (VP11) is 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. From west of the Great Glen, Meall Fuar-mhonaidh is

the most accessible hill summit from where the 'Dramatic Great Glen' can be appreciated, also affected by views to the proposed development. Views to the linear form of Loch Ness within the wider Great Glen are available to the south-west and north-east, but in the direction of the proposed development the Great Glen and Loch Ness are screened by landform and not visible, and its turbines would be seen beyond Stratherrick.

7.79 The applicant does not identify any significant adverse visual effects from this viewpoint. However, the assessment somewhat undervalues the view ('Medium' value) for a location within an SLA and given the important status of Loch Ness as a valued landscape beyond just its designation. Nevertheless, there is agreement with the overall 'High' sensitivity assessment and 'Low' magnitude of visual change. The Council's Landscape Advisor considers that the assessment of a 'Moderate' and non-significant effect is reasonable, particularly when taking into consideration the effect of the consented Cloiche wind farm on baseline conditions. However, Officers consider that the track in the initial years post construction, will be obvious and lead the eye up the landform towards the turbine development, leading to significant effects. However, once the trees establish (visualisation details 15 years post construction) the track will be less visually obvious and the effects will not be significant.

7.80 Elevated views around Loch Ness would be experienced from the Great Glen Way (VPs 13 and 21). From VP13, qualities of the 'Dramatic Great Glen' are not strongly expressed, being partly screened by roadside vegetation, and from where visual effects would not be significant. The Great Glen is more visible from VP21, but from here visual effects would also not be significant adverse, and there would be no significant effect to the SQs of the 'Dramatic Great Glen'.

7.81 The Council's Landscape Advisor advises that the proposed development would be visible from a more southerly section of the Great Glen Way (Upper Route) south of Invermoriston, from a distance of approximately 12km. The LVIA has not identified this upper route of the Great Glen way as a visual receptor. This route provides a good vantage point for appreciation of Loch Ness and the Great Glen, with many people choosing this route over the lower route because of the availability of such views. The ZTV indicates visibility to several turbines and significant adverse visual (and cumulative visual) effects are possible from part of the route. The outlook from the more affected area is to the northeast, from where aspects of the SLQ which can be appreciated are its simple, linear nature and 'grand proportions', and its context of elevated hills.

7.82 It is however notable that there is a considerable level of existing and consented development visible east of the Great Glen including Corriegarth and its consented extension, Dunmaglass Estate (operational) and the under construction Aberarder, affecting north easterly views. While its effects would be adverse, the Council's Landscape Advisor concludes that the addition of the proposed development would not significantly alter the appreciation of the Great Glen from this location given the visibility to existing / consented levels of development in the Monadhliath Rolling Uplands.

7.83 Aspects of the 'Dramatic Great Glen' SQ are susceptible to this type of development where there are opportunities to appreciate these special qualities coincident with

views to the proposal. However, the EIAR finds no significant effects to the 'key characteristics' of the SLA, or significant effects to its overall integrity. This assessment is accepted and Officers find that the overall landscape impacts of the development are within acceptable limits.

Visual Impact

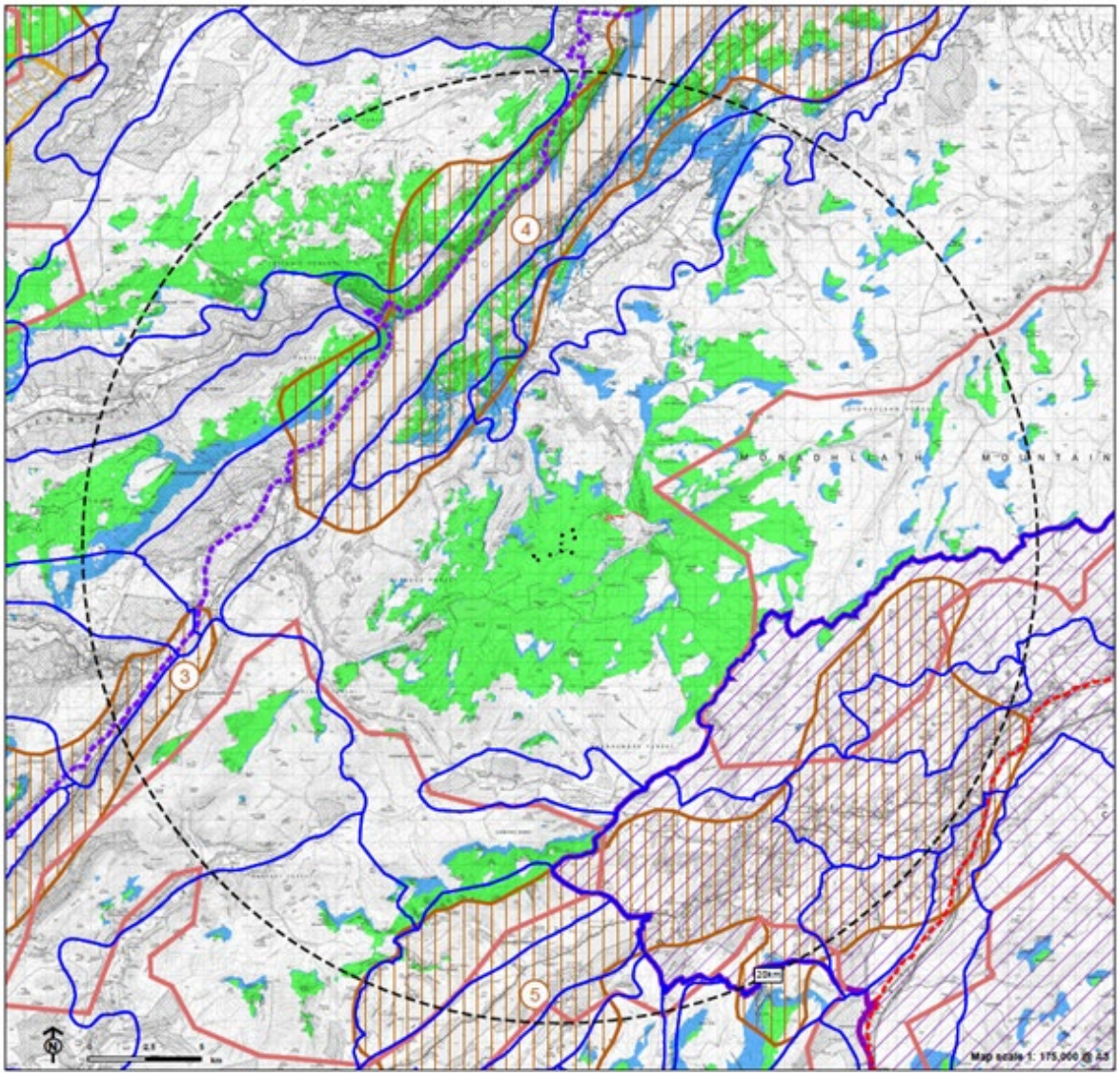
7.84 Visual impact is considered with the aid of the criterion set out in Section 4 of the OWESG, with assessment against the criterion and a view taken as to whether the threshold set out in the guidance is met or not, contained in Appendix 5. The OWESG criterion is a useful tool to inform wind farm 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.

7.85 Within 20km the ZTV (EIAR Figures 4.2.5) demonstrates that some visual containment is afforded due the proposals location to the south and east of the summit of Carn Easgann Bana (779m AOD). Visibility is partially restricted to the east by a rolling plateau which rises to Meall nan Ruadhag (700m AOD). The plateau ridge to the north-west of the turbine layout terminates at Carn Dubh, (762m AOD), provides containment to the north. To the east and west of these hills the terrain drops steeply to Glen Markie and Glen Brein respectively. A band of theoretical visibility extends along the narrow plateau ridgeline to the west of Glen Brein.

7.86 The EIAR states that theoretical visibility also extends southwards across the Glendoe basin to the northern edge of the Sherramore Forest, higher land then cuts visibility to the south. Visibility extends west to Cairn Chuilinn at the Glendoe Forest before the terrain drops steeply towards the Great Glen. To the east, visibility is fragmented by Coire an Eich, Glen Markie and Allt Odhar, beyond this is the plateau of the central Monadhliath. Smaller areas of visibility coincide with the western plateau edges of the Monadhliath to the north of Glen Markie within the Corriegarth Estate. Beyond this core visual envelope theoretical visibility is further fragmented.

7.87 The EIAR also highlights that to the south a band of theoretical visibility lies across the summit plateau of the Creag Meagaidh massif, at 13km from the nearest turbine. To the south-east, intermittent areas of visibility follow the summits along the Cairngorm National Park boundary on the south-eastern edge of the Monadhliath. To the north across Stratherrick, this is limited by large areas of forestry. There are small patches of potential visibility across the northern and eastern summits of the Monadhliath, on the south-west facing summit slopes such as Carn a' Choire Ghlaise (788m AOD). Towards the outer edge of the 20km radius, the western edge of the Great Glen is heavily forested; however, there will be areas of open visibility from the moorland hills above.

7.88 EIAR Figure 22 (shown below) provides a comparative blade tip ZTV (20km) between the consented Dell scheme and the proposed re-design. The green areas identify areas of combined theoretical visibility for both schemes. The solid blue areas indicate the potential additional visibility of the redesign.



7.89 When considering the additional visibility of turbines beyond that experienced as a result of the operational wind farm there are limited new areas of visibility. This is detailed on EIAR Figure 4.5.1: Cumulative ZTV: Dell with all Built and Consented Sites (45km). A notable area is the potential new visibility from Loch Ness near Urquhart Castle. However, as addressed above, any new visibility from this location will be restricted to turbine blade tips and will not result in significant effects.

7.90 Any large-scale wind energy scheme can be expected to result in significant visual effects. This point is acknowledged through the OWESG, which explains that significant effects do not automatically translate to unacceptable effects. Following a review of the applicant's Landscape and Visual Impact Assessment (LVIA), there are some areas of difference between officers and the applicant. The EIAR includes a visual impact assessment from each of the 22 viewpoints. Officers' visual assessment is detailed in Appendix 4 of this report.

7.91 Pertinent findings are:

- From recreational viewpoints, Officers consider that this type of receptor has a high susceptibility to changes in views. The applicant has identified a high

susceptibility for most of these viewpoints, apart from VP9 (Summit of Carn na Saobhaidhe) and VP16 (Summit of Meall Dubh, Beinneun Forest).

- The applicant has identified that the proposed development (solus assessment) will give rise to significant visual effects at two viewpoints within a radius of 4km of the site. These are:
    - VP1 Summit of Carn Dubh
    - VP2 above Glendoe Dam
- The EIAR identifies cumulative impacts at three viewpoints. These are:
    - VP1 Summit of Carn Dubh
    - VP2 above Glendoe Dam
    - VP9 Summit of Carn na Saobhaidhe
    - VP17 Inchlaggan, Glen Garry

- In addition to the above Officers have identified significant adverse effects at three further viewpoints:
    - VP6 Summit of Carn a' Chuilinn
    - VP10 Summit of Carn Ban
    - VP11 Summit of Meall Fuar-mhonaidh (track – short / medium term)

- Furthermore, Officers have also identified significant cumulative adverse visual effects at:
    - VP6 Summit of Carn a' Chuilinn

- 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:
    - VP4 Summit of Carn an t-Suidhe
    - VP9 Summit of Carn na Saobhaidhe
    - VP12 Summit of Carn Liath
    - VP16 Summit of Meall Dubh, Beinneun Forest

7.92 From many of the viewpoints it is considered that its design and visual relationship with cumulative schemes could have been improved through further mitigation. With the reduction in the height of turbines to 149.9m as suggested by Officers. With that said, it is not considered that the suggested change would alter the visual impacts to a point where it would change the level of significance in EIA terms. In addition, as acknowledged previously, changes also need to be balanced against the benefits of the proposal in its current form.

7.93 What follows is a summation of the visual impacts grouped by receptors. Consideration of each viewpoint based on the applicant's methodology (Technical Appendix 4.1) is contained within Appendix 4 of this report.

Residential Receptors

7.94 There are limited residential receptors in proximity of the application site. The impact on residential receptors has been assessed from VP5 (Approach to Glenbrein Lodge), VP7 (B852, Stratherrick/General Wade's Military Road to the South of Whitebridge) and VP17 (Inchlaggan, Glen Garry). Although not from a

settlement, VP 13 Great Glen Way, above Loch Ness (to the north of Bunloit), is representative of the typical nature of views from Bunloit. Residential receptors are considered by the applicant to be High sensitivity receptors, officers agree.

7.95 There will not be visibility toward the development from within any nearby settlements. Between 5km – 10km theoretical visibility indicated to tip height for up to 3-4 turbines at a collection of properties at Knockcarrach, Easter Drummond, Drummond Cottages and Wester Drummond, which are located along the northern side of the B862. Viewpoint 7, Figure 4.3.7, B862, Stratherrick/General Wade's Military Road to the South of Whitebridge, is representative of the typical nature of views.

7.96 As indicated by VP7, views will largely be restricted to blade tips only and seen on the skyline. The applicant suggests that views will only be available under clear weather conditions. The lower sections of the proposed access track within Glen Brein will be visible, although this is likely to be become less visible as the proposed tree planting matures. However, the upper section of the track will remain visible. Bhlaraidh Wind Farm and consented extension, has a minor cumulative influence, this influence will increase with Loch Liath Wind Farm (awaiting appeal decision) in views to the northwest. Overall, the applicant records no significant effect. Officers do not dispute this assessment.

7.97 From Invermoriston (12.5km away) theoretical visibility to hub height is possible for up to three turbines. However, it is noted that, in reality, visibility will be heavily restricted by the existing forestry plantations and also the riparian woodland beside the River Moriston, so this is not considered further in the applicants detailed assessment. More distant visibility (15-20km) is theoretically possible from settlements at Grotaig – Bunloit (16.5km), Upper Lenie (20km) and Scattered settlement beside the A82 between Achnahannes and Boglashin (18.5-21.5km) and have been included in the applicant's full assessment. Viewpoint 13, Great Glen Way, above Loch Ness (to the north of Bunloit), is considered representative of the typical nature of views. From properties next to the A82, wireframes (EIAR 4.7.1a-b and 4.7.2a-b.13) are representative of the typical nature of partial views that will be experienced from the A82, which would be limited to select intermittent blade tips.

7.98 Visibility from these more distant settlements will largely be restricted to turbine blades which will be seen on the skyline, but visibility will be dependent on weather conditions. However, there is some possible that visibility of the turbines may extend into the night-time due to visible aviation lighting, but this will be very distant and limited in area. The EIAR identifies no significant effects to visual receptors from within settlements in isolation. However, significant cumulative effects are identified at VP 17 (minor road at Glen Garry at Inchlaggan, above Loch Garry), when Beinneun 2 Wind Farm application is factored in. This will extend the presence of wind turbines further south within the Beinneun Forest. However, the solus assessment for Dell 2 is that there will be no significant visual effects at this distant VP (30.5km from the proposal).

Road Based Receptors

7.99 The impact on road users has been assessed from VP5 (Approach to Glenbrein Lodge), VP7 (B862, Stratherrick/General Wade's Military Road to the South of Whitebridge), VP 15 (B862 adjacent to Loch Ceo Glais), VP 17 Inchlaggan, Glen Garry, VP19 (A82 layby north of Drumnadrochit) and VP 22 (Suidhe Chuimein). Roadside wireframes are also provided for the A82 (EIAR Figs. 4.7.1 and 4.7.2).

7.100 The OWESG identifies 'Key Routes' as the A82(T), B862 (for LN6 specifically at Stratherrick), B851 Strathnairn and Loch Ness Side, A9(T), A833 Glen Convith, A831 Glen Urquhart, A887T Glen Moriston, A87(T) above Loch Garry, B861 Tombreck-Inverness, B852 South Loch Ness Shore, Dunain-Blackfold-Abriachan, Minor Road Caiplich (UC1072) and the minor road Bunloit. 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.

7.101 The ZTV indicates that there would be no or very limited views of the proposed development from several key routes identified in the OWESG and have been scoped out of further assessment. However, sections of visibility are indicated for the A82(T), B862, A833, A887 and were taken forward by the applicant for further assessment.

7.102 The ZTV indicates that sections of the A82(T) to the west of Loch Ness will have theoretical visibility. However, the road is largely tree-lined and actual visibility will be filtered by this and existing topography. Partial visibility may be possible where it passes through Invermoriston and for short sections between Lower Lenie and Achnahannes to the south of Drumnadrochit. This is illustrated by Roadside Viewpoints 1 and 2 which indicate that blade tips maybe visible at distance of 20.5km. There is also a short section of partial visibility along a c.2km section of the route, over a distance of 23.5km, as it passes back into the Great Glen to the north of Drumnadrochit, this is illustrated by VP19, which again is contained to blade tips. No significant effects are predicted along this key route.

7.103 A short section of the A887 is shown to have potential visibility as the route approaches Invermoriston; however, generally visibility is contained by the built form and dense tree cover. There is also a small section of potential visibility from the A833 north of Drumnadrochit as it descends into Glen Urquhart, this will be at a distance in excess of 24km. No significant effects are predicted.

7.104 Small sections of partial theoretical visibility of turbines are indicated from the B862 as it passes through Stratherrick. This is represented by a single turbine blade tip shown at VP7, at a distance of around 7.8km. The access track will also be evident from this viewpoint. However, as the woodland planting matures the visual impact of the track will reduce overtime. A short section of partial visibility of five turbine blades is indicated to the south of the junction with the B851 as the route descends to Loch Farraline. Further visibility is indicated to the north adjacent Loch Ceo Glais, illustrated by distant visibility (23km) of turbine blades at VP15. No significant effects are predicted along this key route.

7.105 Overall, the EIAR identifies no significant effects to visual receptors from road based routes on account of the proposed development. As identified above, a significant cumulative effect is identified at VP 17 (minor road at Glen Garry at Inchlaggan, above Loch Garry), when Beinneun 2 Wind Farm application is factored in. This will extend the presence of wind turbines further south within the Beinneun Forest. However, the solus assessment for Dell 2 is that there will be no significant visual effects at this distant VP (30.5km from the proposal). Officers generally agree with these conclusions.

Recreational Receptors

7.106 Due to the remote site location and limited visibility from roads and residential receptors, with the exception of VP5, VP7, VP17, and VP19, the remaining 18 from the 22 selected viewpoints are representative of views obtained from recreational users of the outdoors. Officers consider that this type of receptor has a high susceptibility to changes in views. The applicant has identified a high susceptibility for most of these viewpoints, apart from VP9 (Summit of Carn na Saobhaidhe) and VP16 (Summit of Meall Dubh, Beinneun Forest).

7.107 Part of the design approach was to minimise visibility of the redesign from the Great Glen (including the Great Glen Way), Urquhart Castle, The Cairngorms National Park, Loch Ness and the A82. These are considered important tourism and recreational receptors.

7.108 The applicant has identified major/moderate and significant adverse visual effects from two elevated recreational viewpoints:

- VP1 Summit of Carn Dubh (2.5km): This is a close range, elevated view from the north-western edge of the Monadhliath range. Dell increases the visual envelope of turbines over that of Stronelairg, buts sits within the lateral spread of the consented Cloiche scheme. The proposed development will sit in the foreground from this summit VP; lower parts of the turbine bases are obscured due to the landform. Dell will be noticeable and contrasts with the existing and consented turbines of Stronelairg and Cloiche.

- VP2 Above Glendoe Dam (4km): This is located to the north of Glendoe reservoir above the reservoir's dam and represents the potential effects walkers within the Monadhliath to the west. The position of the proposed turbines is just contained within the Glendoe Basin, but it does to some extent dilute this containment afforded to Stronelairg and is not as strong as that afforded to the consented Dell layout. Stronelairg Wind Farm is seen immediately to the right of the proposed development. When Dell is seen as a linear extension to the Stronelairg cluster, the contrast in scale of the proposed turbines is particularly noticeable. Unlike Stronelairg and Cloiche, the hubs and blades of the proposed development will now break the skyline.

7.109 In addition, Officers have identified significant adverse visual effects at:

- VP 6, Summit of Carn a' Chuilinn (7.5km): This is an elevated summit within the Monadhliath 7.5km to the west of the application site. Dell will be seen as a lateral extension to the Stronelairg cluster, the contrast in scale of the

proposed turbines is particularly noticeable. Officers consider that the applicant has understated the effects from this VP. It is noted that a reduction in turbine height may have resulted in the avoidance of a significant effect with smaller turbines integrating better with the existing cluster, albeit that this cannot be confirmed without an updated visual material.

- VP10: Summit of Carn Ban (12.85km): This is an elevated summit within the Monadhliath range at the edge of the Cairngorms National Park. This visualisation is noted as being poor, due to the significant cloud cover to the rear. The proposed development will be seen in partial overlap with Stronelairg Wind Farm, extending the footprint of development to the north, creating a lateral extension to the visual envelope and contrasts with the scale of the Stronelairg cluster. The solus effects are considered by officers to be significant.

- VP11: Summit of Meall Fuar-mhonaidh (16km): This is a popular local hill summit and highest point on the west side of Loch Ness. The turbines will be more noticeable and visible of the Stronelairg / Cloiche turbine cluster. Whilst the Dell re-design doesn't increase the lateral spread over turbines over Stronelairg and the consented Cloiche Wind Farms, so wouldn't increase the degree of encirclement of this VP. The proposed development would to some extent 'bring forward' the Stronelairg / Cloiche wind farm cluster through its positioning and the larger turbine size, with more turbines appearing above the skyline. LVIA somewhat undervalues the view ('Medium' value) for a location within a Special Landscape Area and given the important status of Loch Ness as a valued landscape beyond just its designation.

  Whilst it is considered the effects of the turbines are moderated by the baseline wind energy and the distance to the receptor, the combined effects of the track are considered in the short/medium term to give rise to significant effects. Officers consider that the track in the initial years post construction, will be obvious and lead the eye up the landform towards the turbine development. However, once the trees establish (visualisation details 15 years post construction) the track will be less visually obvious and the effects will not be significant.

7.110 The applicant identifies solus significant effects on recreational receptors within 4km of the proposed development. Officers identify significant effects within 16km.

7.111 As identified above, CNPA do not object to the scheme and highlights that there would be negligible visibility of the proposed wind farm on its own from within the Cairngorms National Park.

7.112 The OWESG identifies a number of key recreational routes such as The Great Glen Way, Great Glen Canoe Trail and Caledonian Canal and lochs. From these and lower-level viewpoints no significant visual effects are predicted in the applicant's assessment. The ZTV also indicates that there will be no visibility of the proposal from railway lines, the National Cycle Route 7, the Speyside Way or the South Loch Ness Trail. The majority of the core paths do not fall within the zone of visibility. One core path shows distant visibility, IN22.02 – Abriachan to Drumnadrochit. This

route follows the route of the Great Glen Way to the north of Drumnadrochit and is included within the applicant's assessment of effects.

7.113 As identified above, in response to the popularity and sensitivity of Loch Ness (VP19, RV1 and RV2: roadside VPs on the A82) and Urquhart Castle (VP 14 and VP21). Officers have continually sought to avoid/minimise visibility from the water and along the surrounding loch level routes and approaches. The assessment and visualisations indicate additional blade tip visibility only and officers agree that these effects are not significantly adverse. Whilst it is likely (as with the consented Dell scheme) that a reduction in turbine height to 149.9m (as recommended by Officers) would have avoided any loch level visibility. It is considered that the presentation of additional blade tips from the loch/ Urquhart Castle will not substantively undermine the current pattern of wind energy development, or the mitigation measures secured to date.

7.114 Viewpoints 21 (Great Glen Way, to the north of Drumnadrochit – 25.5km distant) and 13 (Great Glen Way, above Loch Ness, to the north of Bunloit – 19km), illustrate effects on views from the western slopes of Loch Ness, and the Great Glen Way. The closest part is 10km to the northwest of the application site. For the majority of the route, theoretical visibility occurs within the context of the existing and extensive forestry cover. As the route climbs out of the Great Glen and onto the farmland above, between Grotaig and Bunloit, there will be more visibility as indicated by VP13, with blade tips and three hubs visible above the Monadhliath. Other small sections of blade tip visibility are also predicted north of Drumnadrochit. No significant effects are reported on this route.

7.115 Whilst in general agreement, the Council's Landscape advisor also advises that the proposal would be visible from a more southerly section of the Great Glen Way (Upper Route) south of Invermoriston, from a distance of approximately 12km. The LVIA has not identified this upper route of the Great Glen way as a visual receptor. This route provides a good vantage point for appreciation of Loch Ness and the Great Glen, with many people choosing this route over the lower route because of the availability of such views. The ZTV indicates visibility to several turbines and the Council's Landscape advisor has highlighted that significant adverse visual (and cumulative visual) effects are possible from this part of the route.

Cumulative Effects

7.116 In terms of cumulative effects, a key consideration is the relationship between Stronelairg/Cloiche and the proposal. The applicant contends that the layout and design of the wind farms has been carefully considered, and whilst there will be locally noticeable differences between the wind farms. Within the wider setting of the vast upland landscape of the Monadhliath the separate developments will appear as a single combined wind farm. The large presence of Stronelairg/Cloiche and the proposed development within the Glendoe Basin will give rise to significant cumulative visual effects.

7.117 The applicant has identified significant cumulative visual effects from:

- VP1 Summit of Carn Dubh (2.5km): There will be successive cumulative effects when seen in the context of the now consented Corriegarth extension

in views to the east. The turbines of the proposed development will be noticeable in views, resulting in locally significant cumulative effects.

- VP 2 Above Glendoe Dam (4km): The addition of the proposed development will result in combined cumulative effects with Stronelairg and Cloiche. The turbines of the proposed development will be noticeable in views, resulting in locally significant cumulative effects.
- VP9 Summit of Carn na Saobhaidhe (12km): Dell will result in combined cumulative effects with the baseline of built sites at Corriegarth and Stronelairg/Cloiche. The turbines of the proposed development will be noticeable in views, resulting in locally minor and not significant cumulative effects. However, there will be significant cumulative effects when seen in the context of the Corriegarth extension site (was at appeal, now consented) experienced in foreground of views to the southwest.
- VP17 Inchlaggan, Glen Garry: From this distant viewpoint (30.5km) on a minor road at Inchlaggan. The addition of the proposed development will result in imperceptible combined cumulative effects with the baseline of built sites. Culachy Wind Farm (decision pending from Scottish Ministers) if consented would be seen in views to the east and would have a greater visual impact than Dell. However, significant cumulative effects are identified when Beinneun 2 (was at scoping now an application) site is factored in. This will extend the presence of wind turbines further south within the Beinneun Forest.

Officers also identify significant cumulative effects at:

- VP6 Summit of Carn a' Chuilinn (7.5km): From this viewpoint, Stronelairg is seen immediately to the right of the proposal; this cluster is further intensified with the consented Cloiche. Corriegarth and Dunmaglass/Aberarder Wind Farms will be visible as distant elements on the horizon. Officers consider that there will be similar effects to VP2, albeit at a greater viewing distance.

- VP11: Summit of Meall Fuar-mhonaidh (16km): There will be combined cumulative effects with Corriegarth and Cloiche/Stronelairg and total cumulative effect when seen in the context of the Corriegarth extension (now consented) and Culachy (with decision pending from Scottish Ministers) in combined views to the west and south respectively. Officers consider that there will be significant effects in the short / medium term post construction from the access track. However, once the planting has established the effects will be reduced and will not be significant.

Construction

7.118 The applicant anticipates an 18-month construction period. A Construction Traffic Management Plan (CTMP) will manage impacts upon the local road network. A Construction Environment Management Plan (CEMP) would also be in place during the construction phase. An outline CEMP has been provided - EIAR Technical Appendix 2.1. Compliance with the CEMP will be overseen by a suitably qualified and experienced Environmental/Ecological Clerk of Works (ECoW). These matters can be secured by condition.

7.119 The CEMP would ensure that construction methods avoid, minimise and control potentially adverse significant environmental. The CEMP will also contain a Pollution Prevention Plan, Construction Method Statements, a Peat Management Plan (draft – EIAR Technical Appendix 8.2), a Site Waste Management Plan, a Water Quality Management Plan, a Construction Traffic Management Plan (CTMP), An Abnormal Loads Traffic Management Plan, a Staff Travel Plan, an Outdoor Access Management Plan, a Site Restoration Plan, Species Protection Plans, a Construction Breeding Bird Protection Plans, Habitat Restoration Management Plan and a Decommissioning and Reinstatement Plan.

7.120 Construction is scheduled from 07:00 - 19:00 Monday to Friday and Saturday 07:00 to 13:00. No working is proposed on Sundays and public holidays. The applicant proposes exceptions for foundation pours and turbine erection, where both activities need to be continuous. The Councils Environment Health Team note that noise from construction at the turbine sites is unlikely to be a significant issue due to the distance from sensitive receptors. However, there is potential for disturbance arising from the construction of access tracks and from construction traffic. Access will be via a new road and bridge in close proximity to houses at Killiechoilum. It is also noted that the temporary construction compound will be located in close proximity to the property 'Maryland'.

7.121 The construction noise assessment has identified several noise sensitive receptors in the area close to the new access track. The report states that two properties, Maryland and Killiechoilum Cottage are rental properties and that the landlords are financially involved in the development. In addition, the intention is that Maryland will be used by construction staff during the construction period and has not been considered further in the assessment. The report also states that Killiechoilum Cottage is rented out for short-term lets and therefore any adverse noise impact would represent a commercial consideration for the financially involved owner rather than a residential amenity consideration. Environmental Health have no objection to this approach and no objections from either property have been received.

7.122 The assessment indicates that construction noise levels will be highest at Killiechoilum Cottage (76dB) and at Killiechoilum Farmhouse (71dB). However, Environmental Health anticipates that the highest noise levels will be for a relatively brief period, as work on the track moves along. Construction traffic noise has also been assessed and while noise levels are lower than from construction work, there will be a significant number of HGV movements on a daily basis.

7.123 Whilst Environmental Health have no objection, it expects that the developer will employ the best practicable means to reduce the impact of noise from construction activities and requests that a construction noise mitigation scheme is secured by condition. Environmental Health has also requested that a scheme for the suppression of dust is secured by condition.

7.124 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.

7.125 Approximately 16.1km of access tracks and spurs will be required to facilitate access to the Proposed Development as shown in EIAR Figures 2.1a-e. This will comprise approx. 10.4km of newly constructed track, approx. 2.5km of newly constructed floating track, approx. 2.5km of upgraded existing estate track and approx. 0.7km of temporary access track to facilitate access to borrow pit 2. Close to the Old Shielings, the applicant is proposing to incorporate a pair of hairpin bends (EIAR Figs. 2.1a and 2.1c) which is in order to facilitate the 500m gain in altitude required to reach the turbines. The EIAR contends that the hairpins have been located to avoid extensive cut and fill operations in peat areas and hence reduce any potential peat slide risk. As a consequence, the track will need to be carefully excavated into the hillside.

7.126 The applicant is committed to agreeing a robust Construction Method Statement (CMS) to ensure that the construction of the track is delivered in accordance with best practice techniques. SEPA are content, but state that Turbine 2 and areas of track will impact on near natural peatland habitat, a habitat condition that should be avoided due to it generally experiences low greenhouse gas emissions and may be sequestering carbon. Further amendments could reduce this impact, and site-specific measures are required to ensure that surrounding habitats do not become dried out.

7.127 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, the overrun area for abnormal loads at the site entrance, the two borrow pits and the temporary access track used to access borrow pit 2 will be restored and this can be secured by a 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.

7.128 Eleven new watercourse crossings are required to facilitate the development. SEPA have submitted a holding objection due to a lack of information in relation to the proposed change in design of the access track approach to the Allt Breineag crossing. The design now includes an access road on a 1m high raised embankment is a new element to the development. Such an embankment would result in loss of floodplain capacity and create a considerable barrier to flood flow conveyance. SEPA now request further information to demonstrate that the development will not increase flood risk elsewhere. The Council's Flood Risk Management Team also object to the application on the grounds of a lack of information on flood risk.

7.129 In terms of effects upon private water supplies (PWS), SEPA have no objection but request a condition requiring water quality monitoring to be undertaken fortnightly for the duration of any construction within 100 m of the source. Environmental Health also requests a monitoring and mitigation plan, which includes a PWS risk assessment, mitigation measures, monitoring and details of an alternative supply of water in the event of the supply being disrupted or contaminated.

7.130 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

7.131 EIAR Chapter 10 assesses the expected impact of this development, particularly through the construction phase. This is supported by a Transport Assessment (TA) (EIAR Technical Appendix 10.1). 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, staff travel plans, measures to minimise potential for dust/debris pollution, traffic management measures and working hours as well as speed limits. A framework CTMP is detailed in EIAR Appendix 10.1. The applicant also supports the establishment of a liaison group, which again can be secured by condition.

7.132 A new permanent access bellmouth arrangement from the B862 is required to serve the proposed development. In addition, two new bellmouths are required where the access crosses the unclassified Killiechoilum/Ardochy road. The access junction layout is provided in Annex B of EIAR Appendix 10.1. The Council's Transport Planning Team do not object to these aspects of the scheme and request that the final details are secured by condition.

7.133 However, Transport Planning note that access arrangements from the U1209 Killiechoilum / Ardochy local public road should only be for the construction access needing to cross it linking the main access from the B862 to the proposed wind farm. Transport Planning would not support any construction or ongoing operational access being taken along the U1140 Whitebridge to Killin local public road and the U1209 Killiechoilum / Ardochy Road. All such access should be taken from the new junction with the B862. This can be secured by condition.

7.134 As agreed with consultees, the study area (EIAR Figure 10.1) for the Transport Assessment (TA) is: the A9(T) between Longman Roundabout and Aviemore; the B851 between the A9(T) and the junction with the B862; and the B862 between Fort Augustus and the B851 junction.

7.135 The EIAR details that the Abnormal Indivisible Load (AIL) components are proposed to be delivered from the Port of Entry (PoE) at Inverness Harbour and subsequently via the A9(T), B851 and B862 (EIAR Figure 10.3). The submission also states that the vast majority of construction-related traffic would access the site from the A9(T) using the B851 and B862. However, it assumes that 25% of workforce traffic would be from Fort Augustus, using the southern section of the B862.

7.136 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 volumes associated with construction of the proposed development is predicted to occur in month nine of the construction programme. During this month, an average of 97 HGV movements is predicted per day, and it is estimated that there will be a further 35 car and light

van movements per day to transport construction workers to and from the site.

7.137 Although not objecting, the Council's Transport Planning Team note that the EIAR is based on a number of assumptions, for instance the use of concrete batching on site and the route of the raw materials, that 40% will be transported to the site via a shared minibus and that 50% of the gravel required for the development can be sourced from the on-site borrow pits. Transport Planning states that if the assumptions made within the EIAR change to the extent that traffic impacts are significantly different it expects any permission issued to recognise that the scale of mitigation / financial contribution towards local road improvements would also need to be adjusted accordingly to reflect the scale of change identified.

7.138 As a consequence, Transport Planning require that a mechanism is built into the CTMP which allows for the accurate quantification of numbers and types of vehicles accessing the site during the construction period. This can be secured by condition.

7.139 As outlined in EIAR Technical Appendix 10.1, the total peak traffic movements are not predicted to increase by more than 10% at 6 of the 9 survey locations within the study area. The exceptions are survey locations 1) B851, Inverarnie, which will see a total increase of 10.26%, location 2) B862, Errogie which will be 17.12% and location 3) B862, north of the site access which will be 15.48%. 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 at these three locations and will range from 37.83% - 50.04%. However, the EIAR contends that in relation to road capacity there is between 74.99% and 95.23% of road capacity left, as such the applicant contends that the roads can accommodate the development.

7.140 Whilst not objecting Transport Planning note that these roads are recognised in the South Loch Ness Road Improvements Strategy as being substandard poor-quality routes. These are not capable of supporting protracted periods of impact from high numbers of large commercial goods vehicles.

7.141 This was raised as part of the original Dell permission. Scottish Ministers concluded that a suitable financial contribution was required towards road upgrades in accordance with the South Loch Ness Road Improvement Strategy. The current submission recognises this and that improvements on the B851 / B862 corridor is required. The applicant is engaging with Council Officers to agree a commensurate amount towards local road improvements. Transport Planning request that a scheme to deliver improvements be secured by condition.

7.142 The finalised CTMP will also include a requirement for the conclusion of a 'Wear and Tear' Agreement in accordance with Section 96 of the Roads (Scotland) Act 1984. This agreement will require an appropriate inspection regime and a suitable Road Bond or other financial arrangement to protect The Council from any extraordinary expenses in having to repair damage inflicted to the local public roads that can be attributed to the construction activities of this development.

7.143 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; Staff Travel Plan and off-road

improvements site mitigation then no significant residual effects are anticipated in respect of traffic and transport.

7.144 In terms of wider public access, the Council's Access Officer has no objection but requires approval an Outdoor Access Management Plan prior to construction commencing on site to be secured by condition. The plan should stand on its own and not be part of the CEMP or CTMP.

7.145 Subject to conditions it is considered that the likely road and traffic impacts from this development can be satisfactorily managed and is considered to be acceptable.

Water, Flood Risk, Drainage and Peat

7.146 The applicant assessment is outlined in EIAR Chapter 8. It is supported by several Technical Appendices; Outline Habitat Restoration and Management Plan (OHRMP) (Technical Appendix 6.5), Peat Landslide Hazard and Risk Assessment (PLHRA) (Technical Appendix 8.1), Outline Peat Management Plan (OPMP) (Technical Appendix 8.2), Watercourse Crossing Schedule (Technical Appendix 8.3), Groundwater Terrestrial Ecosystems (GWDTE) (Technical Appendix 8.4) and an Allt Breineag Hydrological Study (Technical Appendix 8.5). An updated Flood Risk Assessment (FRA) was submitted as part of the 'clarification' document in March 2025.

7.147 The EIAR sets out that mitigation by design has been used as far as practical. For instance, no development buffers around watercourses (except for watercourse crossings), locating infrastructure on shallower peat where possible, in areas outside of potential peat slide risk and with due regard to habitat sensitivities and the use of floating access tracks. The developer is also committed to employing good practice techniques during construction and operation of the proposed development. A finalised CEMP can be secured by condition, and a qualified Environmental/ Ecological Clerk of Works will also be appointed to supervise construction and restoration phases. This will ensure that potential sources of pollution are effectively managed to avoid pollution events throughout the construction phase.

7.148 New watercourse crossings will be required at the 11 locations (EIAR Figure 8.3), nine of these are minor watercourses requiring bottomless culverts; however, two single span bridge crossings will be required over Allt Breineag and Allt a' Choire Dhuibh. The SEPA Flood Maps indicate that the majority of the site is remote from any areas of high, medium or low fluvial flood risk. However, a more detailed hydrological assessment, including flood risk associated with Allt Breineag, is detailed in EIAR Technical Appendix 8.5.

7.149 As detailed above, following the submission of the applicant's 'clarification document' in March 2025, SEPA have submitted a holding objection. This is due to a lack of information relating to the proposed change in design of the access track approach to the Allt Breineag crossing. The clarification document included a high-level flood risk analysis of the Allt Breineag crossing to try to demonstrate that the risk of flooding and mitigation is achievable and therefore a detailed flood risk study is not required at this stage and can be determined later at the detailed design stage.

7.150 The design now includes an access road on a 1m high raised embankment is a new element to the development. Such an embankment would result in loss of floodplain capacity and create a considerable barrier to flood flow conveyance. SEPA now request further information to demonstrate that the development will not increase flood risk elsewhere. The Council's Flood Risk Management Team (FRM) also object to the application on the grounds of a lack of flood risk information in relation to the crossing of Allt Breineag and causeway. It requests an updated Flood Risk Assessment and associated proposals is provided.

7.151 On the basis of the above, SPAC is recommended to maintain an objection to the development as the applicant has not satisfactorily demonstrated the effects of flood risk. This is contrary to NPF4 Policies 11 (Energy) and 22 (Flood risk and water management), Highland-wide Local Development Plan Policies 64 (Flood Risk), 67 (Renewable Energy Developments) and The Highland Council's Supplementary Guidance: Flood Risk and Drainage Impact Assessment. It is anticipated that further information will be provided by the applicant prior to determination and that both SEPA and the Council will be consulted to reassess this aspect of the proposed development.

7.152 Although no response from Scottish Water was made to the ECUs consultation request, it is noted that in its Scoping response, Scottish Water detailed that the proposed development is located within a catchment area in which a Scottish Water drinking water abstraction is located. The EIA reports that following a further review of the Drinking Water Protection Area (DWPA) map, the applicant has stated that the DWPA is located on the north-western side of the B862 and connects with Loch Ness. The proposed access junction and access track are located to the south-east of the B862 and downgradient of the DWPA with no hydraulic connectivity. On this basis, the applicant contends that other than the embedded mitigation measures presented with the EIAR no further consideration of the DWPA is considered necessary.

7.153 In terms of private water supplies (PWS), the applicant has undertaken a site survey and identified four supplies in the vicinity of the development. Further assessment has identified that there is no pathway risk between the works and the sources of these supplies however, there is potential for damage to pipework serving the supply to Ardochy and Glenbrein Lodges from access track construction activities. As detailed above, SEPA and Environmental Health have no objection, but request that a Private Water Supply Monitoring and Mitigation plan is secured by condition.

7.154 In terms of Groundwater Dependent Terrestrial Ecosystems (GWDTEs), the EIA reports that based on the assessment of bedrock geology and aquifer characteristics, it is considered that the water table across the site is predominantly fed by rainwater and as such no significant effects are predicted with regards to GWDTEs within the site. SEPA has not raised concerns in relation to the proposals impacts on GWDTE.

7.155 Peat surveys recorded depths of between 0m (no peat) and 4.2m. Whilst not objecting, SEPA state that the survey information does not follow best practice guidance and that more could be done. In particular, SEPA notes that Turbine 2 and areas of track will impact on near natural peatland habitat, further amendments

could reduce this impact, and site-specific measures are required to ensure that surrounding habitats do not become dried out.

7.156 SEPA also confirm that excavated peat is not an acceptable material to use to form landscape bunds. It also recommends that a finalised Peat Management Plan is secured by condition. This should be informed by further peat probing work, it should also demonstrate how micro-siting (and other measures) have been used to further minimise both peat disturbance and impacts on near natural habitat. It should also contain a recalculation of the volumes of peat excavated and how and where it will be used and site-specific measures proposed to reduce impacts on near natural habitat. Impacts upon peatland habitat will be discussed further in the 'Natural Heritage' section below.

7.157 In relation to peat stability, a Stage 2 Peat Landslide Hazard and Risk Assessment (PLHRA) has been submitted which takes account of comments made by Ironside Farrar, who is the Scottish Government's advisor on the risk of peat slide. Following this, Ironside Farrar has no objection and considers that, subject to mitigation contained within the PLHRA, the risk of peat slide is not significant.

7.158 Modified blanket bog comprises at least 60% of the turbine envelope, with smaller proportions of wet modified bog/acid flush mosaic. Other habitats include blanket bog, wet modified bog, flushes and springs, lichen/wet heath, acid grassland and bare peat. In contrast, the access track corridor is dominated by blanket bog and dry dwarf shrub heath mosaics, with lesser areas of mixed woodland, wet dwarf shrub heath, wet modified bog, flushes and springs, acid grassland and bare peat. The EIAR calculates that approximately 26.75ha of priority peatland habitat, the majority of which NatureScot consider to be montane bog, would be lost as a result of the proposed development (including estimated direct and indirect, permanent and temporary losses). Permanent direct losses would be 7.95ha, permanent direct and indirect losses would be 25.14ha.

7.159 The Outline Habitat Management and Biodiversity Enhancement Plan indicates that there will be extensive areas of peatland restoration, including the restoration of up to 6ha of bare peat by infill of restoration cells in hagged areas using surplus peat excavated during construction, the restoration of partially vegetated hagged areas by using conventional reprofiling techniques over an area of approximately 231ha, approximately 8km of gully blocking to reducing erosive events and the collapse of peat faces and the grazing control in three areas to allow recovery of vegetation (peatland and up to 57 ha of montane heath). Whilst NatureScot welcome that the area of peatland restoration (which is in line with its recommended 1:10 ratio of loss: offsetting), it does not consider that the loss of montane bog could be offset by restoration due to the sensitivity and value of this habitat and object to the proposed development. This is detailed further in the 'Natural Heritage' section below.

7.160 In addition to the conditions identified above, SEPA also require conditions to ensure that construction works are carried out in line with the measures prescribed in the submission a condition should be included requiring adherence to the Schedule of Mitigation, Good Practice, Enhancement and Monitoring (EIAR Appendix 1.2) and the Outline Construction Environmental Management Plan

(EIAR Appendix 2.1).

Natural Heritage (including ornithology)

7.161 The applicant's assessment is outlined in EIAR Chapters 6 and 7. Overall, the EIAR concludes that there will be no significant residual effects during the construction, operation, and decommissioning, either individually or cumulatively from the development. The applicant is 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).

7.162 **Designated Sites – Natural Heritage**: The proposed development is not located within any statutory sites designated for its ornithological or ecological interest, but there are numerous in the study area.

7.163 The proposed development is close to the Loch Knockie and nearby Lochs Special Protection Area (SPA) protected for its breeding population of Slavonian grebe. The site's status means that Scottish Minsters are required to consider the effect of the proposal on the SPA before it can be consented (commonly known as Habitats Regulations Appraisal). However, NatureScot advise that due to the lack of suitable habitat on and around the proposed development site this species is unlikely to occur on the proposed development site or be affected by this proposal. It is therefore unlikely that the proposal will have a significant effect on any qualifying interests either directly or indirectly.

7.163 In relation to the Glendoe Lochans SSSI which is protected for its breeding population of Slavonian grebe and common scoter. NatureScot again consider that due to the lack of suitable habitat on and around the proposed development site that the proposal will not have a significant effect on any qualifying interests either directly or indirectly.

7.164 **Species Protection:** Within the survey area evidence was found for otter and water vole. No evidence was found for pine martin, badger, red squirrel. NatureScot advise that pre-construction surveys and Species Protection Plans (SPP) are required in relation to water vole, mountain hare, otter, bats and wildcat. It is also recommended that the final Habitat Management and Enhancement Plan include measures for the creation of suitable habitat for wildcat.

7.165 In relation to ornithological interests, NatureScot welcomes the applicant's intention to produce a Construction Breeding Bird Protection Plan and recommends that this includes the mitigation proposed within the EIAR to avoid disturbance to breeding Schedule 1 birds and black grouse. This will be included as part the CEMP.

7.166 In relation to Golden eagles, operational disturbance/displacement effects are reported as being minor adverse and not significant. Annual mortality risks are also considered to be minor and not significant. The applicant is committed to providing an annual contribution of £20,000 to the Regional Eagle Conservation Management

Plan (RECMP) for the operational lifetime of the proposed development.

7.167 NatureScot welcome the Golden Eagle Topographical (GET) modelling undertaken, however, note that it is not currently clear whether all application stage and consented wind farms (e.g. Cloiche and Corriegarth 2) have been included in the cumulative assessment of foraging habitat loss. NatureScot recommend that the applicant clarifies this point. If these developments have not been included, it recommends that an updated cumulative assessment of habitat loss is undertaken by the applicants.

7.168 **Habitat Loss and Restoration:** The EIAR calculates that approximately 26.75ha of priority peatland habitat, the majority of which we consider to be montane bog, would be lost as a result of the proposed development (including estimated direct and indirect, permanent and temporary losses). Permanent direct losses would be 7.95ha, permanent direct and indirect losses would be 25.14ha.

7.169 NatureScot's scoping advice was that since the previous application was submitted the Carbon and Peatland 2016 map had been published and indicated that the turbine area and part of the proposed access were within an area mapped as nationally important Class 1 peatland. It also advised that where there are significant effects on high quality peatlands then it may object to a proposal. Since then, NatureScot's: Advising on peatland, carbon-rich soils and priority peatland habitats in development management guidance, June 2023, has also been published, which pre-dated the submission of the current application.

7.170 As detailed in its consultation response to the ECU and the latest position statement issued to the DPEA as part of the appeal process, NatureScot object to the proposed development due to the significant adverse impacts on montane bog, which is a priority peatland habitat. Montane bog is a blanket bog which occurs at high-altitude i.e. above 600m. This habitat is considered particularly sensitive to damage and is difficult to restore due to challenging climatic conditions and the time taken for vegetation to establish at higher altitudes. Habitat maps provided in the EIAR indicate that the majority of priority peatland habitat that would be lost to or impacted by the development is above 600m (including all of the turbines and part of the access track).

7.171 Although disputed by the applicant, NatureScot considers that the montane bog on this site to be high quality and supports attributes of near-natural condition, with this being identified through on-site survey. While there is evidence of damage to the peatland from eroding peat and impacts from herbivores, there are also signs of habitat recovery with areas of bare peat being colonised by peat forming vegetation. There is also scope for carrying out additional restoration interventions to further improve the condition of the peatland within the red line boundary of the development and beyond. While the varied state of the habitat within this development is recognised, NatureScot considers that the site supports a high value habitat, and the species composition of a montane bog.

7.172 The submitted Outline Habitat Restoration Management Plan (OHRMP -Technical Appendix 6.5) proposes a 231ha area of peatland restoration which is broadly in line with NatureScot's guidance (which recommends a 1:10 ratio of loss: offsetting). Whilst NatureScot consider the OHRMP to be well considered, it contends that due

to the sensitivity and value of this habitat that the effects cannot be overcome by offsetting. NatureScot conclude that this development and its impact upon montane bog is such that it raises issues which are of national interest.

7.173 It is recommended that SPAC raises an objection to the application as it would have a detrimental impact on montane bog, a priority peatland habitat, the loss of which cannot be offset by restoration due to the sensitivity and value of this habitat. This is considered contrary to NPF4 Policies 1 (Tackling the Climate and Nature Crises), Policies 3 (Biodiversity), 4 (Natural Places) and 5 (Soils), Highland-wide Local Development Plan Policy 67 (Renewable Energy Developments), Policy 2 of The Inner Moray Firth Local Development Plan 2, the Council's Biodiversity Enhancement Supplementary Guidance, and NatureScot's Peatland Guidance - Advising on peatland, carbon-rich soils and priority peatland habitats in development

Forestry

7.174 The proposed development will result in the 5.81 hectares of woodland removal. This includes an area of commercial woodland. NPF4 Policy 6 c) notes that "Development proposals involving woodland removal will only be supported where they will achieve significant and clearly defined additional public benefits in accordance with relevant Scottish Government policy on woodland removal. Where woodland is removed, compensatory planting will most likely be expected to be delivered". The Council's Forestry Team originally objected to the application on the grounds of non-compliance with NPF4 Policy 6c) or the Control of Woodland Removal policy. Scottish Forestry made similar observations.

7.175 As part of the applicant's 'clarification' document submitted to the ECU in March 2025, further details were outlined. This included the Outline Habitat Management Plan drawing; Proposed Native Woodland Figure 6.5.8 Jan 2025 Update) in Appendix D. The area is located east of the Allt Breineag between Glenbrein Lodge and the Allt a' Choire Dhuibh in the south.

7.176 To compensate the loss of woodland, the application proposes to create 67 hectares of new native woodland, designed open ground, and an additional 5.6 hectares of lower-density broadleaves on the upper margins to create a transition zone between woodland and montane heath is proposed as part of the Outline Habitat Management Plan. In line with consultee comments and to ensure the removal of commercial woodland is adequately compensated, the plan includes 3.5 hectares of higher-density Scots Pine and Silver Birch at the northern extent of the proposed enclosure adjacent to the existing Ardoch Woodland. This area will allow for management of timber production in addition to habitat restoration.

7.177 There is ancient woodland close to the proposed access corridor, located within 27m. To ensure that there is no loss of this woodland resource (NPF4 Policy 6c) the applicant is proposing a tree protection zone around this area to ensure there is encroachment by machinery or storage of materials during construction. This can be secured by condition.

7.178 The compensatory planting plan and supporting information is considered to now address the requirements of The Highland Council's Control of Woodland Removal

policy and will deliver an equivalent or greater woodland area on appropriate site types with at least equivalent woodland-related net public benefits. The Forestry Team has withdrawn its objection subject to planning conditions securing a detailed Compensatory Planting Plan (including future maintenance) and tree protection measures.

7.179 Subject to conditions there are no outstanding consultee objections on Forestry matters. This aspect of the proposal is considered acceptable.

Built and Cultural Heritage

7.180 EIAR Chapter 5 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 Council's Historic Environment Team (Archaeology) accepted at the Scoping stage that proposed development can rely on the EIAR undertaken for the consented development, except for undertaking a reassessment of the development's potential effects on the setting of designated heritage assets within the outer study area, including an assessment of cumulative impacts. As such the application is supported by a targeted walkover survey of the site.

7.181 There are no designated heritage assets within the site, but there are six non-designated assets. The EIA reports that none of the six known non-designated heritage assets within the Site will be physically impacted by the proposed development. Where onsite access tracks pass through known heritage assets (MHG2750 and MHG57989), the existing estate track will be used; as these areas have been previously disturbed by the existing estate track, this will result in no additional physical impacts. In terms of archaeological potential, the assessment splits the site into three zones (EIAR Vol 3, Figure 5.1). Zone 1 (lower slopes of the Strath) is reported as having a potential that unknown assets will be directly impacted during construction, Zone 2 (open moorland above the valley floor) is reported as low potential and Zone 3 (steep ground up to the rolling plateau) is negligible.

7.182 The Outline CEMP includes best-practice measures to mitigate any direct physical impacts upon unknown heritage assets, or accidental impacts upon known heritage assets within the site. Subject to this the EIA reports no significant effects. The Council's Historic Environment Team has no objection and is content that the EIAR provides an appropriate level of information and assessment. It will be possible to limit the direct impacts to within an acceptable range, but a detailed Written Scheme of Investigation will be secured by condition.

7.183 With regard to indirect setting effects, none of the six known non-designated heritage assets within the site are located within the ZTV for the proposed development and with agreement from consultees has been scoped out of further assessment. Beyond the site, there are 13 designated heritage assets within the outer study area (EIAR Vol 3, Figure 5.2). Based on ZTV analysis and consultee responses at the Scoping stage, further detailed assessment was taken forward at one of these assets. 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. In line with a request from Historic Environment Scotland (HES) the application is

supported by visualisations from Urquhart Castle (EIAR Figs. 4.3.14a-d and 4.3.16a-d).

7.184 HES do not object and confirm that it is broadly content with the EIAR, although point to some issues with the significance criteria used in the assessment. In relation to Urquhart Castle, HES contend that the setting of the monument is best appreciated when considered alongside its position on Loch Ness; situated on a promontory with water on one side and a deep ditch on the other, it commands a long stretch of the loch. There are clear outward views in all directions, except inland to the west where the ground rises sharply, and reciprocal inward views especially from Loch Ness. Retention of these inward and outward views is important to maintaining the cultural significance of the monument.

7.185 The visualisations show that the blade tips of five of the proposed turbines would be visible in outward views from the monument looking south down the loch, as well as in inward views of the monument from the north to the south. However, given the distance to the proposals at over 21km and the length of blade tip showing intermittently above the skyline, it is considered that the blade tips would be barely perceptible from the monument. HES contend that the scheme would have a negligible impact on the setting of Urquhart Castle.

7.186 Subject to conditions it is considered that effects upon cultural heritage can be satisfactorily managed. This aspect of the proposal is considered to be acceptable.

Noise and Shadow Flicker

7.187 EIAR chapter 9 outlines the applicant's assessment in relation to the potential construction and operational noise and vibration effects on nearby residential receptors. The noise assessment is contained within EIAR Technical Appendix 9.1 and uses nine noise locations.

7.188 In terms of operational noise, the applicant's assessment concludes that predicted levels from the development are well below the simplified ETSU standard of 35db LA90. The maximum predicted levels at the nearest noise sensitive receptor being 23dB LA90. Environmental Health has no objection but note that it is not considered appropriate to have noise limits so far in excess of predicted levels as this can cause issues with cumulative assessments for other developments. The usual approach is to adopt a 2dB buffer above predicted levels, however, levels this low could present difficulties if compliance monitoring was required in the event of a noise complaint. In practical terms, Environmental Health notes that at such low levels, the likelihood of complaints is virtually zero however, there are ways to get round any issues by undertaking monitoring at a proxy location much closer to the wind farm.

7.189 It is understood from the applicant's 'clarification document' (March 2025) that following discussions with Environmental Health an agreement in principle has been reached for a flexible monitoring process. This includes the implementation of a scheme of monitoring to address any noise complaints, with procedures for assessing individual turbine noise levels. Corrective actions, including tonal penalties, will be applied as necessary. This aspect of the proposal does not raise a concern and is not a reason for raising an objection. It is considered that a suitable

condition could be secured in the event that consent is granted.

7.190 In terms of construction noise, as detailed above, the Environment Health Team notes that noise from construction at the turbine sites is unlikely to be a significant issue due to the distance from sensitive receptors. However, there is potential for disturbance arising from the construction of access tracks and from construction traffic. Whilst Environmental Health has no objection, it expects that the developer will employ the best practicable means to reduce the impact of noise from construction activities and requests that a construction noise mitigation scheme is secured by condition.

7.191 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 considers that it is appropriate to extend this limit to 11 rotor diameters, due to the area's northerly latitude. The nearest property is 2.9km away, so 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.

7.192 Subject to conditions noise and amenity impacts can be satisfactorily managed. This aspect of the proposal is considered to be acceptable.

Aviation

7.193 The EIAR contains an Aviation Impact Assessment (EIAR Appendix 2.2) which 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 securing 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 submitted to the MOD 14 days prior to commencement of works.

Telecommunications

7.194 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 than a planning condition would nonetheless be sought to secure a scheme of mitigation should an issue arise.

Other material considerations

7.195 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 require 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.

7.196 The requirement to decommission the wind farm at the end of its operation 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 an Interim Decommissioning, Restoration and Aftercare Strategy for approval prior to the commencement of any development. This draft strategy will inform a future Site Decommissioning, Restoration and Aftercare Plan and the terms of an appropriate financial bond, which shall be in the Council's favour. This is in order to secure these works in the event the operator is not able to fulfil its decommissioning, restoration and aftercare obligations.

7.197 The finalised plan 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 plan would then be implemented within 18 months of the final decommissioning of the development unless otherwise agreed in writing with the Planning Authority.

7.198 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.

8. Matters to be secured by Legal Agreement

8.1 No legal agreement is required should consent be granted. A decommissioning and restoration financial guarantee can be secured by condition. The majority of the area denoted for the compensatory woodland is located within the red line boundary with the remaining located within the wider estate. This can be secured by condition. Regional eagle monitoring can be conditioned through securing an appropriate scheme. The securing road improvements associated with the South Loch Ness Road Improvements Strategy are also anticipated to be secured through condition, alongside a wear and tear agreement, once the CTMP is finalised.

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 60MW 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 no public objections with the Energy Consents Unit having received one objection. In addition, Stratherick and Foyers Community Council object to the application. NatureScot object on the grounds that the proposal would have a detrimental impact on montane bog, a priority peatland habitat. SEPA and the Council's Flood Risk Management Team object on the grounds of a lack of information regards flood risk. 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 180m to 200m height of the proposed turbines, with the previously consented scheme being 115.5m to 130.5m in height, there is no doubt the proposed development will increase the presence of wind energy development in the immediate and wider surrounding area. For this development such impacts would occur not just due to the scale of turbines proposed, but also the applicant's decision to continue to pursue the previously consented access route on the hillside of the Great Glen. This access will draw the eye towards the wind farm for a number of years in the short to medium term, until the proposed extensive surrounding hillside woodland planting has established.

9.4 NPF4 makes clear that significant landscape and visual impacts are to be expected from wind farm developments, however, these do not automatically translate into unacceptable effects. In this case, effects on landscape character would occur relatively locally, within 5km of the turbines, affecting the Rolling Uplands LCT only. There would also be some locally significant changes with the track access, but this would not significantly change key landscape characteristics or be experienced on a wider scale. The EIAR finds no significant effects to the 'key characteristics' of the Loch Ness and Duntelchaig Special Landscape Area, and therefore no significant effects to its overall integrity. This assessment is accepted and the overall landscape impacts of the development are within acceptable limits.

9.5 In relation to visual effects, the applicant identifies in solus significant adverse effects at two of the 22 selected representative viewpoints. Unsurprisingly, these are the closest into the site, VP1 Summit of Carn Dubh, and VP2 above Glendoe Dam, both located within 4km. In addition, Officers have identified significant adverse visual effects at three further viewpoints, VP6 Summit of Carn a' Chuilinn, VP10 Summit of Carn Ban, and VP11 Summit of Meall Fuar-mhonaidh. For VP11, this is from across the other side of the Great Glen looking south at a distance of 16km, with this effect being experienced in the short-medium term post construction. Once woodland mitigation is established around the site access track, longer term significant effect from this viewpoint have however been designed out. Therefore, long term residual significant visual effects are identified by Officers within a distance of 12.9km, with these effects being restricted to upland areas on the southern side of the Great Glen in the Monadhliath Mountains, in locations where there is already visibility of the wider Stronelairg Wind Farm cluster. When considering the in-combination cumulative effects, this broadly correlates with

identified significant cumulative visual effects with these to occur within a distance of 12km.

9.6 Although Officers considered that more could be done to improve the proposal and its cumulative fit with the established wind farm cluster in this location, the applicant has not taken this forward. Whilst turbines of the proposed scale are not considered appropriate in all locations, following careful analysis, a reduction in turbine height to Officers suggested height of up to 149.9m, would not alter the significance of any identified landscape and visual effects, with the possible exception of VP6 Summit of Carn a' Chuilinn at a distance of 7.5km.

9.7 In addition, key to the acceptability of the landscape and visual effects of this proposal is the avoidance of wider visibility across the low-lying areas within the Great Glen and on Loch Ness itself, with visibility here having been designed out, with the exception of infrequent blade tips. No significant effects are reported across the majority or recreational routes, with the possible exception of a southerly section of the Great Glen Way Upper Route, south of Invermoriston from a distance of around 12km. No significant effects are predicted in relation to Urquhart Castle (VP14 and VP21). In upland areas, the wind farm would also be experienced as part of the established wider cluster of wind farms in this location, thereby helping to mitigate the horizontal extent of cumulative wind farm development in the landscape. Overall, the landscape and visual effects are acceptable with the design of the wind farm, not unduly undermining mitigation previously secured through other wind energy schemes. This proposal has however tested the parameters of this to the limit, with the identified residual landscape and visual effects not weighing in favour of the development. These effects must be balanced against the contribution the development would make towards tackling climate change and the uplift from the previous consented wind farm at this location. In that regard, the proposal can be considered to benefit from in-principle policy support.

9.8 In summary, whilst the landscape and visual effects are on balance acceptable, in determining appropriateness to consenting a redesigned wind farm in this location, it is also incumbent on the decision maker to reassess the proposal's compliance with all other up to date environmental policies, taking into account all other material considerations.

9.9 In this case, a critical new material consideration is the introduction of NatureScot's Advising on "peatland, carbon-rich soils and priority peatland habitats in development management guidance" 2023, which post-dates the consented Dell scheme. If applied, this guidance precludes the loss of the sites underlying montane bog, a priority peatland habitat, which NatureScot confirm is present across the site and its loss cannot be offset by restoration due to the sensitivity and value of this habitat. The severity of this impact should not be viewed lightly, as this matter has also resulted in SSEN having modified and removed the intended underground grid connection to serve this proposed wind farm; the connection routing was intended to be through Stronelairg Wind Farm heading southwards to Melgarve substation.

9.10 To date, the applicant has also failed to satisfactorily demonstrate that the development can adequately deal with flood risk associated with the development. Outstanding objections are noted from SEPA and the Council's Flood Risk Management Team. Such concerns relate to the proposed access raised river

crossing design, and without sight of a redesigned proposal or detailed flood risk assessment, the current proposal does not conform with NPF4 Policies 22 (Flood risk and water management), Highland-wide Local Development Plan Policies 64 (Flood Risk), and The Highland Council's Supplementary Guidance: Flood Risk and Drainage Impact Assessment.

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 sufficient regard to the desirability of preserving natural beauty, and the significant detrimental effects cannot be mitigated. This is by virtue of the location and design of the wind farm, resulting in an outstanding objection from NatureScot pertinently in relation to impacts upon montane bog, a priority peatland habitat.

9.12 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 all other applicable material considerations.

10. IMPLICATIONS

10.1 Resource: Significant staff and financial resources should the application proceed to Public Local Inquiry, however, expert advice in relation to peatland habitat is expected to be led by NatureScot and the government's technical advisor.

10.2 Legal: If an objection is raised maintained, the application will be subject of 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 OBJECTION** to the application for the following reasons:

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 1 (Tackling the Climate and Nature Crises), Policies 3 (Biodiversity), 4 (Natural Places) and 5 (Soils), Highland-wide Local Development Plan Policy 55 (Peat and Soils), Policy 60 (Other Important Habitats and Article 10 Features), Policy 67 (Renewable Energy Developments), Policy 2 of The Inner

Moray Firth Local Development Plan 2, 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, the loss of which cannot be offset by restoration due to the sensitivity and value of this habitat.

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 by virtue of failing to demonstrate compliance with NPF4 Policies 11 (Energy) and 22 (Flood risk and water management), Highland-wide Local Development Plan Policies 64 (Flood Risk), 67 (Renewable Energy Developments) and The Highland Council's Supplementary Guidance: Flood Risk and Drainage Impact Assessment, as the development has not satisfactorily demonstrated the effects of flood risk.

Signature: Bob Robertson

Designation: (Acting) Planning Manager – South

Author: Peter Wheelan

Background Papers: Documents referred to in report and in case file.

Relevant Plans:

Document Type	**Document No.**	**Version No.**	**Date Received**
PLAN 1 LOCATION PLAN	FIGURE 1.1		11th May 2023
PLAN 2 SITE LAYOUT PLAN	FIGURE 2.1a		11th May 2023
PLAN 3 SITE LAYOUT PLAN	FIGURE 2.1b		11th May 2023
PLAN 4 SITE LAYOUT PLAN	FIGURE 2.1c		11th May 2023
PLAN 5 SITE LAYOUT PLAN	FIGURE 2.1d		11th May 2023
PLAN 6 SITE LAYOUT PLAN	FIGURE 2.1e		11th May 2023
PLAN 7 TURBINE ELEVATION (180m)	FIGURE 2.2a		11th May 2023
PLAN 8 TURBINE ELEVATION (200m)	FIGURE 2.2b		11th May 2023

Appendices: Appendix 1 - Cumulative Wind Farm Developments

Appendix 2 - Development Plan and Other Material Policy Considerations

Appendix 3 - Compliance with the Development Plan / Other Material Policy Considerations

Appendix 4 - Viewpoint Assessment Appraisal – Visual Impact

Appendix 5 - Assessment against Landscape and Visual Assessment Criteria contained within Section 4 of the Onshore Wind Energy Supplementary Guidance

Appendix 1 – Cumulative Wind Farm Developments (within 45km)

A1.1 This list has been updated by Officers to reflect the most recent position as of September 2025. 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
Operational Sites			
Stronelairg	67	125-135m	500m south
Corriegarth	23	120m	7.8km
Dunmaglass*	33	120m	15km
Bhlaraidh	32	135m	17.6km
Millennium	26	115-125m	18km
Beinneun	32	136m	24.5km
Corrimony	5	100m	21.5km
Glen Kyllachy	20	110m	29.5km
Farr	40	100m	29km
Auchmore	2	80m	41km
Consented / under construction			
Cloiche	37	149.9m	2.6km
Corriegarth 2**	14	149.9m	7.3km
Bhlaraidh Extension	15	180m	17km
Aberarder	12	130m	19km
Chrathaich**	14	149.9m	21km
Tomchrasky**	14	185m	24.5km
Bunloinn**	10	200m	31km

Moy	20	126.5m	40km
Tom Nan Clach Extension**	7	149.9km	45km
Application / Appeal Sites			
Culachy (at appeal)	8	200m	11.5km
Loch Liath (at appeal)	13	180-200m	18.5km
Balnespick***	9	200m	35km
Beinneun 2***	19	200m	22.2 km
Scoping			
Glenmarkie****	65	250m	5km
Fasnakyle/Fiodhag	43	149.9m	23km
Fairburn Extension	14	200m	46km
Bhlaraidh Extension variation****	15	230m	17km

*sites were consented are now operational

**sites that have since been consented.

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

****sites that have since been submitted at scoping stage

Appendix 2: 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.

A3.4 This Plan also identifies nearby Whitebridge as a growing settlement where proportionate and appropriate rural development can be supported where it will help bolster the smallest, established settlements. A number of Placemaking Priorities are identified for Whitebridge, including using the Stratherrick and Foyers Community Action Plan as a material consideration in determining planning applications and investment decision; safeguarding the pockets of native and ancient woodland from development and enhancing the role of watercourses, including River Fechlin, as part of green and blue infrastructure to deliver nature-based solutions to tackling flooding, and wetland and natural buffers. More recently the Stratherrick and Foyers Local Place Plan was registered by the Highland Council (September 2023). The site falls within the area covered by the Local Place Plan.

Onshore Wind Energy Supplementary Guidance (OWESG) (2016)

A3.5 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.

A2.6 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 is 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 lies within Landscape Character Area (LCA) LN6: Monadhliath ridge and tops, Rolling Uplands. The LN6 appraisal concludes that there is limited scope for additional large turbines within the existing pattern. Turbines should

- Not breach skyline when viewed from north side of Loch Ness.
- Be set back from Key Routes
- Preserve mitigation established by current schemes
- Maintain the landscape setting of each existing scheme.
- Avoid coalescence with current positioning
- Respect spacing and scale of existing development pattern.

A2.7 **Other Highland Council Supplementary Guidance**

- 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

A2.8 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.

A2.9 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).

A2.10 The Council has published in draft a Landscape Sensitivity Study for the Dava and Monadliath area following the new Landscape Sensitivity Appraisal Methodology by NatureScot. To date it has not been subject to public consultation and does not form part of the adopted development plan. It is however a useful other material consideration as it provides useful context for the landscape sensitivities in the area.

Other National Legislation, Policy and Guidance

A2.11

- 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)
- 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)

- NatureScot: Advising on peatland, carbon-rich soils and priority peatland habitats in development management (2023)
- Scottish Government Planning Guidance Biodiversity (2025)

Appendix 3 - Compliance with the Development Plan / Other Material Policy Considerations

National Policy

A3.1 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.

A3.2 **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 out 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.

A3.3 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.

A3.4 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.

A3.5 **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, NatureScot currently object to the proposed development on the grounds of an unacceptable impact upon montane bog which is a priority peatland habitat, the loss of which cannot be offset by restoration due to the sensitivity and value of this habitat.

A3.6 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.

A3.7 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.

As detailed in the LVIA section of this report, the Loch Ness and Duntelchaig SLA is the only SLA designation potentially materially affected by the Proposed Development. However, as detailed in this report no significant effects to 'key characteristics' of the SLA, or significant effects to its overall integrity are anticipated.

A3.8 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 EIA reports that there will be no significant adverse effects on the wild land qualities, with no material change to the experience of wild land qualities of WLA 19: Braeroy – Glenshirra – Creag or WLA 20: Monadhliath.

A3.9 NPF4 Policy 6 b) notes that "Development proposals will not be supported where they will result in: i. Any loss of ancient woodlands, ancient and veteran trees, or adverse impact on their ecological condition; ii. Adverse impacts on native woodlands, hedgerows and individual trees of high biodiversity value… iii. Fragmenting or severing woodland habitats, unless appropriate mitigation measures are identified and implemented in line with the mitigation hierarchy.

The Councils Forestry Team have now withdrawn its objection and request a condition securing tree protection measures which will ensure that there is no loss of ancient woodland.

A3.10 NPF4 Policy 6 c) notes that "Development proposals involving woodland removal will only be supported where they will achieve significant and clearly defined additional public benefits in accordance with relevant Scottish Government policy on woodland removal. Where woodland is removed, compensatory planting will most likely be expected to be delivered".

The proposed development will result in the 5.81 hectares of woodland removal. To compensate the loss of woodland, the application proposes to create 67 hectares of new native woodland, designed open ground, and an additional 5.6 hectares of lower-density broadleaves on the upper margins to create a transition zone between woodland and montane heath is proposed as part of the Outline Habitat Management Plan. There are no outstanding consultee objections on this matter, subject to a final HMP being secured by condition.

A3.11 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.

A3.12 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.

A3.13 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.

A3.14 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

A3.15 It is considered the proposal is not in overall conformity with NPF4 Policy 11, particularly with regards to 11 e) viii effects on flood risk and e) ix biodiversity.

A3.16 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 Loch Ness and Duntelchaig SLA and the scheduled monuments of Urquhart Castle.

A3.17 It is considered the proposal is in generally in overall conformity with Policy 57, Policy 61 and Policy 67 of HwLDP. Policy 57 requires all development proposals be assessed considering 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.

A3.18 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.

A3.19 **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 offshore electricity generation, including electricity storage, from renewables exceeding 50 megawatts capacity;

Highland wide Local Development Plan (HwLDP)

A3.20 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”.

A3.21 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.

A3.22 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.

A3.23 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.

It is considered the proposal is not in overall conformity with HwLDP Policy 55 (Peat and Soils), Policy 60 (Other Important Habitats and Article 10 Features), Policy 64 (Flood Risk) and 67(Renewable Energy Developments).

The Inner Moray Firth Local Development Plan 2 (IMFLDP2)

A3.24 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.

A3.25 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.

A3.26 This application is supported by an ecological assessment and an Outline Habitat Restoration Management Plan (OHRMP -Technical Appendix 6.5) has been submitted with the application. This proposes a 231ha area of peatland restoration which is broadly in line with NatureScots guidance (which recommends a 1:10 ratio of loss: offsetting). Whilst NatureScot consider the OHRMP to be well considered, it contends that due to the sensitivity and value of this habitat that the effects cannot be overcome by offsetting. NatureScot conclude that this development and its impact upon montane bog is such that it raises issues which are of national interest.

A3.27 The Stratherrick and Foyers Local Place Plan (SFLPP) was registered by the Highland Council (September 2023). The site falls within the area covered by the Local Place Plan. The SFLPP consolidates key objectives from the area's Community Action Plan (2021), which include:

- Nurturing the environment
- Sustaining the economy
- Developing the community

The applicant has stated that it is committed to working with the community and

The Highland Council to ensure that the proposed development supports the aims of the SFLPP and provides lasting benefits to the local area.

Onshore Wind Energy Supplementary Guidance (OWESG)

A3.28 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

A3.29 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 5 of this report.

Landscape Sensitivity Study

A3.30 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) LN6: Monadhliath ridge and tops, Rolling Uplands. The LN6 appraisal concludes that there is limited scope for additional large turbines within the existing pattern. Turbines should

- Not breach skyline when viewed from north side of Loch Ness.
- Be set back from Key Routes
- Preserve mitigation established by current schemes
- Maintain the landscape setting of each existing scheme.
- Avoid coalescence with current positioning
- Respect spacing and scale of existing development pattern.

A3.31 Visual receptors of highest sensitivity within LN6 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

- B862 Stratherrick
- A9

Key views identified are

- Loch Ness West
- Great Glen from Meall Fuar-mhonaidh

A3.32 In terms of sensitivity, the appraisal notes: This LCA is generally visible from either within the LCA or from more distant elevated vantage points. The height of existing schemes means that development on the ground may be visible where the ground level itself is not, making distinctions between developments indistinct. Therefore, maintaining space between the developments is important to prevent coalescence. Although the LCA is large, it forms a strong contrast to the Rugged and Rocky LCTs which oppose it across the Great Glen. That contrast has a value, which should be protected by ensuring that wind energy development on the elevated ground on both sides of the Great Glen remains inferior in scale and extent to the landscape character and does not diminish their apparent distinctiveness or the effect of the Great Glen as a great natural boundary. For LN6 the degree of landscape character sensitivity to large scale wind farms is scored on a scale of 1-4 as being 2-3, where 1 being most susceptible to change.

A3.33 The appraisal concludes the following on potential for wind energy development:

- No scope for small or medium turbines wind energy development
- Limited scope for Micro turbines where closely associated with buildings additional large turbines within the existing pattern

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

A3.34 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.

A3.35 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.

A3.36 The document recognises that there may be a need to develop onshore wind energy development on peat. However, NatureScot object to the application as it would have a detrimental impact on montane bog, which is a priority peatland habitat, the loss of which cannot be offset by restoration due to the sensitivity and value of this habitat.

A3.37 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.

A3.38 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.

A3.39 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.

A3.40 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 4 – Visual Assessment Appraisal (Operational only)

			Proposed Development			Cumulative Effect (In addition effects = built + consented (In total effects = built + consented + planning stage).	
Viewpoint / distance and direction to development	App / THC	**Sensitivity of the Receptor** (Susceptibility / value of the view) High, Medium, Low, Negligible	**Magnitude of change** (Scale of Change / Extent / Duration) Substantial, Moderate, Slight, Negligible and None	**Level of Effect** (Magnitude of change / Sensitivity of Receptor)	**Significance** (Major and Major/Moderate is significant)	**Level of Cumulative Effect** (Magnitude of Change / Sensitivity of Receptor)	**Significance**
VP1: Summit of Carn Dubh, 762m AOD Proposed development is located 2.5km to the south-west of this VP	APP	High	Moderate	**Major/Moderate**	**Significant**	In addition - **Major/Moderate** In total - **Major/Moderate**	**Significant** **Significant**
	THC	High	Moderate	**Major/Moderate**	**Significant**	In addition - **Major/Moderate** In total - **Major/Moderate**	**Significant** **Significant**
	This VP represents the potential effects of the proposed development upon walkers within this north-western edge of the Monadhliath range. Not within any landscape designations. • Theoretical Visibility: Eight turbines to tower and hub, tower and blades, one turbine to hub and blades only. (Consented Dell scheme – VP 1: The view is a partial one with all 14 of the turbines predicted to be visible but seen only from hub height, considered to have a significant effect). • Night-time Visibility: Turbines T01, T02, T06, T08, T09 will have visible lighting at between 220 and 98 candela under clear conditions. The proposed development will sit in the foreground from this summit VP; lower parts of the turbine bases are obscured due to the landform. Whilst it will intensify the number of turbines visible, it will be less than the consented scheme. There is greater spacing between the larger turbines when compared to the consented Dell scheme which arguably creates a simpler composition and less turbine stacking. However, unlike the consented development, the turbines associated with the re-design will break the skyline, which contrasts with the existing and consented turbines of Stronelairg and Cloiche. Dell WF increases the visual envelope of turbines over that of Stronelairg, buts sits within the lateral spread of the consented Cloiche scheme. There will be successive cumulative effects when seen in the context of the now consented Corriegarth extension in views to the east. The turbines of the Proposed Development will be noticeable in views, resulting in locally Major/Moderate and Significant cumulative effects. • Likely effect of officers recommended mitigation (reduction in tip height to 149.9m): May reduce the scale of the turbines from this VP, but it is						

			Proposed Development			Cumulative Effect (In addition effects = built + consented (In total effects = built + consented + planning stage).	
Viewpoint / distance and direction to development	App / THC	**Sensitivity of the Receptor** (Susceptibility / value of the view) High, Medium, Low, Negligible	**Magnitude of change** (Scale of Change / Extent / Duration) Substantial, Moderate, Slight, Negligible and None	**Level of Effect** (Magnitude of change / Sensitivity of Receptor)	**Significance** (Major and Major/Moderate is significant)	**Level of Cumulative Effect** (Magnitude of Change / Sensitivity of Receptor)	**Significance**
	unlikely to reduce the overall level of effect in EIA terms. It would avoid the need for visible aviation lighting.						
VP2: above Glendoe Dam Proposed development is located 4km to the east of this VP	APP	High	Moderate	**Major/Moderate**	**Significant**	**Major/Moderate**	**Significant**
	THC	High	Moderate	**Major/Moderate**	**Significant**	**Major/Moderate**	**Significant**
	This viewpoint is located to the north of Glendoe reservoir above the reservoir's dam. It represents the potential effects of the Proposed Development upon walkers within the Monadhliath to the west. Not located within any landscape designations. • Theoretical Visibility: Seven turbines to tower and hub, tower and blades, two turbines to hub and blades only. (Consented Dell scheme – 13 turbines visible- considered to have a significant effect) • Night-time Visibility: Turbines T01, T02, T06, T08, T09 will have visible lighting at between 220 and 98 candela under clear conditions. Stronelairg Wind Farm is seen immediately to the right of the proposed development; this group is further intensified with the consented Cloiche WF which will also be located to the right of Dell WF. Distant views are afforded to the wind farms around the Corriegarth cluster (note that the Corriegarth extension has now been consented). With the adjacent operational and consented schemes, the development will add to the extensive lateral array of this turbine cluster. The position of the proposed turbines is just contained within the Glendoe Basin, but it does to some extent dilute this containment afforded to Stronelairg and is not as strong as that afforded to the consented Dell layout. When seen as a linear extension to the Stronelairg cluster, the contrast in scale of the proposed turbines is particularly noticeable from this VP. Unlike Stronelairg and Cloiche, the hubs and blades of the proposed development will now break the skyline, this effect was avoided with the consented layout. Stronelairg and Cloiche Wind Farms are seen to the right of the view within Glendoe Basin appearing as a single extensive wind farm, whilst Corriegarth and Dunmaglass/Aberarder Wind Farms will be visible as distant elements on the horizon to the left of the image. The turbines of the Proposed Development will be noticeable in views, resulting in locally Major/Moderate and Significant cumulative effects • Likely effect of officers recommended mitigation (reduction in tip height): The applicant submitted comparative wireframes for this VP in Appendix						

			Proposed Development			Cumulative Effect (In addition effects = built + consented (In total effects = built + consented + planning stage).	
Viewpoint / distance and direction to development	App / THC	**Sensitivity of the Receptor** (Susceptibility / value of the view) High, Medium, Low, Negligible	**Magnitude of change** (Scale of Change / Extent / Duration) Substantial, Moderate, Slight, Negligible and None	**Level of Effect** (Magnitude of change / Sensitivity of Receptor)	**Significance** (Major and Major/Moderate is significant)	**Level of Cumulative Effect** (Magnitude of Change / Sensitivity of Receptor)	**Significance**
	F of the 'clarification' document submitted to the ECU in March 2025. No wireframe was submitted which showed all 9 turbines at 149.9m as recommended by officers, which would have been of benefit. T1, 4, 5, 8 and 9 were shown at 180m high and turbines 2, 3, 6 and 7 being reduced to 150m. T1 is the nearest to the operational turbines, but this has not been reduced to 150m in the comparative wireframe, so the full effect of the reduction in height of all the turbines is not demonstrated. However, from these it can be inferred that the reduced scale of turbines would better assist with the integration of the scheme with the existing and consented turbines. Whilst the turbines will still appear larger than Stronelairg, the visual relationship is less jarring and would reduce the effects of skylinning. However, it is unlikely to reduce the overall level of significance identified for this viewpoint. A reduction in height would also avoid the need for visible aviation lighting.						
VP3: Summit of Meall na h-Aisre, 862m AOD Proposed development is located 6km to the north of this VP	APP	High	Slight	Moderate	Not Significant	Moderate	Not Significant
	THC	High	Slight	Moderate	Not Significant	Moderate	Not Significant
	This viewpoint is located at the summit of Meall na h-Aisre at an elevation of 862m AOD. It represents the potential effects of Dell Wind Farm upon walkers within the Monadhliath to the south of the Proposed Development. • Theoretical Visibility: All nine turbines to tower, hub and blades. (Consented Dell scheme all 14 turbines visible Ten of the turbines will be fully visible from base upwards, with the bases of the remaining four hidden – considered to have a significant effect).). • Night-time Visibility: Turbines T01, T02, T06, T08, T09 will have visible lighting at between 220 and 250 candela in clear conditions. The EIA reports that the turbines will be seen in the background of Stronelairg Wind Farm. They will appear as part of a single large wind farm and that the difference in the scale of the turbines will be less evident because of perspective. Officers consider that the scale of the turbines in relation to Stronelairg will be noticeable from this VP as they sit to the rear and side of Stronelairg, creating a jarring composition. The hubs of the proposed turbines in comparison to the consented scheme will break the horizontal line marking the plateau landform in which the development sits. Officers agree that this will give rise to moderate but not significant effects. • Likely effect of officers recommended mitigation (reduction in tip height): The applicant submitted comparative wireframes for this VP in Appendix						

			Proposed Development			Cumulative Effect (In addition effects = built + consented (In total effects = built + consented + planning stage).	
Viewpoint / distance and direction to development	App / THC	**Sensitivity of the Receptor** (Susceptibility / value of the view) High, Medium, Low, Negligible	**Magnitude of change** (Scale of Change / Extent / Duration) Substantial, Moderate, Slight, Negligible and None	**Level of Effect** (Magnitude of change / Sensitivity of Receptor)	**Significance** (Major and Major/Moderate is significant)	**Level of Cumulative Effect** (Magnitude of Change / Sensitivity of Receptor)	**Significance**
	F of the applicant's 'clarification' document submitted in March 2025 to the ECU. No wireframe was submitted which showed all 9 turbines at 149.9m as recommended by officers. However, it can be inferred that the recommended reduction in height would bring all hubs below the horizontal line marking the host plateau and help with integration and perception of scale. A reduction in height would avoid the need for visible aviation lighting.						
VP4: Summit of Carn an t-Suidhe 450m AOD Proposed development is 6.4km to the south-east of this VP	APP	High	Slight (short term) Negligible (long term)	Moderate (short term) Moderate/Minor (long term)	Not significant Not significant	In addition - Minor In total - Moderate/Minor	Not Significant Not Significant
	THC	High	Slight (short term) Slight (long term)	Moderate (short term) Moderate/Minor (long term)	Not significant Not significant	Moderate/Minor	Not Significant
	This viewpoint is located at the summit of popular viewpoint at Carn an t-Suidhe. It represents the potential effects of Proposed Development upon walkers accessing the popular Carn an t-Suidhe viewpoint. Located with the Loch Ness and Duntelchaig SLA. • Theoretical Visibility: No visibility of wind turbines. Two sections of the access track leading to the wind farm will be visible in the short term. • Night-time Visibility: None EIAR identifies that two sections of the access track will be visible in the short term, traversing the lower moorland slopes within upper Glen Brein. These features will visually integrate over the medium term as the proposed native woodland planting establishes and begins to mature. Until that occurs, the line of the track and its associated cuttings will be more obvious and noticeable. As it weathers and vegetation become established, the effect will reduce, although officers conclude in the long term this will be a slight rather than negligible effect, but not significant. It must be noted that this track was consented at appeal, as part of the original Dell WF scheme. The addition of the track associated with the Proposed Development will result in limited cumulative effects with the operational site at Corriegarth and the now consented Corriegarth wind farm extension.						

			Proposed Development			Cumulative Effect (In addition effects = built + consented (In total effects = built + consented + planning stage).	
Viewpoint / distance and direction to development	App / THC	**Sensitivity of the Receptor** (Susceptibility / value of the view) High, Medium, Low, Negligible	**Magnitude of change** (Scale of Change / Extent / Duration) Substantial, Moderate, Slight, Negligible and None	**Level of Effect** (Magnitude of change / Sensitivity of Receptor)	**Significance** (Major and Major/Moderate is significant)	**Level of Cumulative Effect** (Magnitude of Change / Sensitivity of Receptor)	**Significance**
	• Likely effect of officers recommended mitigation (reduction in tip height): No effect, turbines are visible from this VP.						
VP5: Approach to Glenbrein Lodge Proposed development is 6.5km to the south of this VP	APP	Medium	Negligible	Minor	Not Significant	In addition- Minor In total - Moderate	Not Significant
	THC	Medium	Negligible	Minor	Not Significant	In addition- Minor In total - Moderate	Not Significant
	This viewpoint is located close to the B862, on the minor access road that approaches Glenbrein Lodge. It represents the potential effects of the Proposed Development upon vehicular road users, who may be residents or visitors to the lodge and surrounding properties. The viewpoint is not located within any landscape designations. • Theoretical Visibility: Two blade tips (T3 and T7). Section of access track within Upper Glen Brein. (Consented Dell scheme VP7 - no visible turbines, access track still visible) • Night-time Visibility: none Only the very tips of the turbine blades will be visible behind the hills, seen against the skyline. EIAR identifies that the access track leading to the wind farm will be visible as a linear element in the short term, traversing the lower moorland slopes and rising up Glen Brein to the left and centre of the view. The track will visually integrate over the medium term as the exposed surfaces weather, the proposed native woodland planting establishes, and the track restoration measures begin to mature, this is accepted. Must be noted that this track was consented at appeal, as part of the original Dell WF scheme. Bhlaraidh Wind Farm is visible in successive views as a distant element to the north-west, beyond Loch Ness. Bhlaraidh Extension (consented and proposed variation at scoping) will be seen in the distance as further development to the north. Chrathaich WF is now consented, Loch Liath WF is at appeal so remains in planning.						

			Proposed Development			Cumulative Effect (In addition effects = built + consented (In total effects = built + consented + planning stage).	
Viewpoint / distance and direction to development	App / THC	**Sensitivity of the Receptor** (Susceptibility / value of the view) High, Medium, Low, Negligible	**Magnitude of change** (Scale of Change / Extent / Duration) Substantial, Moderate, Slight, Negligible and None	**Level of Effect** (Magnitude of change / Sensitivity of Receptor)	**Significance** (Major and Major/Moderate is significant)	**Level of Cumulative Effect** (Magnitude of Change / Sensitivity of Receptor)	**Significance**
	• Likely effect of officers recommended mitigation (reduction in tip height): Likely to be no theoretical visibility of the turbines, access track will still be visible.						
VP6: Summit of Carn a' Chuilinn, 816m AOD Development is located 7.5km to the north-east of this VP	App	High	Slight	Moderate	Not Significant	Moderate	Not Significant
	THC	High	Moderate	**Major/Moderate**	**Significant**	**Major/Moderate**	**Significant**
	This viewpoint is located on the summit of Carn a'Chuilinn at an elevation of 809m AOD. It represents the potential effects of the Proposed Development upon walkers within the Monadhliath to the west of the application site. • Theoretical Visibility: Seven turbines to tower and hub, tower and blades, two turbines to upper tower, hub and blades only. (consented scheme 11 turbines likely to be visible – considered to result in a significant effect). • Night-time Visibility: Turbines T01, T02, T06, T08, T09 will have visible lighting at between 220 and 250 candela in clear conditions. Stronelairg Wind Farm is seen immediately to the right of the Proposed Development; this cluster is further intensified with the consented Cloiche WF which will also be located to the right of Dell WF. Corriegarth and Dunmaglass/Aberarder Wind Farms will be visible as distant elements on the horizon to the left of the image. When seen as a lateral extension to the Stronelairg cluster, the contrast in scale of the proposed turbines is particularly noticeable. Unlike Stronelairg, Cloiche and the consented Dell scheme, the hubs and blades of the proposed development will be visible against the skyline. Similar effects to VP2, although viewed at a greater distance. Officers consider that the applicant has understated the effects from this VP, giving rise to significant effects, including additional cumulative effects. • Likely effect of officers recommended mitigation (reduction in tip height). The applicant submitted comparative wireframes for this VP in Appendix F of the applicant's 'clarification' document submitted in March 2025 to the ECU. No wireframe was submitted which showed all 9 turbines at 149.9m as recommended by officers. However, it can be inferred that the recommended reduction in height is likely to bring all hubs below the horizon which helps with perception of scale and visual integration. A reduction in turbine height may have resulted in the avoidance of a significant effect with smaller turbines integrating better with the existing cluster, albeit that this cannot be confirmed without an updated visual material.						

			Proposed Development			Cumulative Effect (In addition effects = built + consented (In total effects = built + consented + planning stage).	
Viewpoint / distance and direction to development	App / THC	**Sensitivity of the Receptor** (Susceptibility / value of the view) High, Medium, Low, Negligible	**Magnitude of change** (Scale of Change / Extent / Duration) Substantial, Moderate, Slight, Negligible and None	**Level of Effect** (Magnitude of change / Sensitivity of Receptor)	**Significance** (Major and Major/Moderate is significant)	**Level of Cumulative Effect** (Magnitude of Change / Sensitivity of Receptor)	**Significance**
	Reduction in height would avoid the need for visible aviation lighting.						
VP7: B862 Stratherrick South of Whitebridge Proposed development is 7.8km to the south of this VP	App	Medium	Slight	Minor	Not Significant	There will be no additional or total cumulative effects arising from built, consented or planning stage schemes.	
	THC	Medium	Slight	Minor	Not Significant		
	This viewpoint is located on the B862 (**OSWEG key route/ key design objective for the applicant**), to the south of the village of Whitebridge in Stratherrick. It represents the potential effects of Proposed Development upon travellers along the road, who may be local residents of the area, visitors or tourists. Located within the Loch Ness and Duntelchaig SLA. • Theoretical Visibility: One set of blade tips (T3). Sections of the access track will be visible. (Consented Dell scheme VP11– one turbine tip visible but access is still visible. • Night-time Visibility: none EIAR identifies, that only the upper section of Turbine 3 will be visible behind the hills, seen against the skyline. This will be very difficult to discern within the large-scale upland landscape, and it is unlikely that the turbine will be noticed by most receptors. Two short sections of the access track leading to the wind farm will be visible, firstly traversing the lower moorland slopes in the central middle-ground of the image, and then again in the distance as the track passes through upper Glen Brein. These features will visually integrate over the medium term as a result of weathering and as the existing woodland planting within the middle ground establishes and begins to mature, alongside the proposed track restoration measures which will assist in integrating the track – this is accepted by officers. There will be no additional or total cumulative effects arising from built, consented or planning stage schemes. • Likely effect of officers recommended mitigation (reduction in tip height): Likely to be no change in theoretical visibility.						
VP8: Summit of Geal Charn, 916m	App	High	Slight	Moderate	Not Significant	In addition - Moderate/Minor In total - Moderate/Minor	Not Significant Not Significant

			Proposed Development			Cumulative Effect (In addition effects = built + consented (In total effects = built + consented + planning stage).	
Viewpoint / distance and direction to development	App / THC	**Sensitivity of the Receptor** (Susceptibility / value of the view) High, Medium, Low, Negligible	**Magnitude of change** (Scale of Change / Extent / Duration) Substantial, Moderate, Slight, Negligible and None	**Level of Effect** (Magnitude of change / Sensitivity of Receptor)	**Significance** (Major and Major/Moderate is significant)	**Level of Cumulative Effect** (Magnitude of Change / Sensitivity of Receptor)	**Significance**
AOD Proposed development is 9.15km to the north-west of this VP	THC	High	Slight	Moderate	Not Significant	In addition - Moderate/Minor In total - Moderate/Minor	Not Significant Not Significant
This viewpoint is located on the summit of Geal Charn, at an elevation of 916m AOD, on the western boundary of the Cairngorms National Park. It represents the potential effects of the Proposed Development upon walkers within the Monadhliath and visitors to the National Park. Minimising effects on the CNP was a design objective for the applicant. • Theoretical Visibility: Nine turbines to tower, hub and blades. (Consented Dell scheme VP8 – 14 turbines visible - considered to have a significant effect from this VP). • Night-time Visibility: Turbines T01, T02, T06, T08, T09 will have visible lighting at between 220 and 250 candela in clear conditions. The turbines will be seen to the rear of the existing Stronelairg Wind Farm which are already prominent in this view. The proposed turbines would not extend the lateral visual envelope beyond Stronelairg and Cloiche WF (consented), but it would add a layer and increase the depth of wind turbines within this cluster. Unlike Stronelairg and Cloiche, the proposed turbines extend above the landform to the rear, with hubs on the skyline. However, it does reduce the respite between this cluster and more distant schemes clustered around Bhlaraidh WF. Neither CNP nor NatureScot have objected in relation to effects on the CNP. EIA reports - The addition of the proposed development will result Moderate/Minor and Not Significant cumulative effects. The total cumulative effect of built/consented/planning/scoping stage schemes will result in a Moderate/Minor and Not Significant successive cumulative effect when seen in the context of the Loch Liath and Chrathaich Planning Stage sites and the Fasnakyle and Beinneun II Scoping stage sites experienced in combined views to the north-west. Officers note that Chrathaich has now been consented and Beinneun II has now been submitted as an application. • Likely effect of officers recommended mitigation (reduction in tip height): A reduction in height would avoid the need for visible aviation lighting and reduce the difference in scale in relation to the existing turbines.						

			Proposed Development			Cumulative Effect (In addition effects = built + consented (In total effects = built + consented + planning stage).	
Viewpoint / distance and direction to development	App / THC	**Sensitivity of the Receptor** (Susceptibility / value of the view) High, Medium, Low, Negligible	**Magnitude of change** (Scale of Change / Extent / Duration) Substantial, Moderate, Slight, Negligible and None	**Level of Effect** (Magnitude of change / Sensitivity of Receptor)	**Significance** (Major and Major/Moderate is significant)	**Level of Cumulative Effect** (Magnitude of Change / Sensitivity of Receptor)	**Significance**
VP9: Summit of Carn na Saobhaidhe, 811m AOD Development is 12km to the south-west of this VP	App	Medium	Slight	Minor	Not Significant	In addition – Minor In total – **Major/Moderate**	Not significant **Significant**
	THC	High	Slight	Moderate/Minor	Not Significant	**Major/Moderate**	**Significant**
	This viewpoint is located at the summit of Carn na Saobhaidhe, 811m AOD, in the Monadhliath range. It represents the potential effects of the Proposed Development upon walkers in the hills to the north-east. Not within any landscape designations however, the summit is a Corbett. • Theoretical Visibility: Eight turbines to tower and hub, tower and blades, one turbine to hub and blades only (Consented Dell scheme VP18 – all 14 visible, one as a blade tip, effects not significant). • Night-time Visibility: Turbines T01, T02, T06, T08, T09 will have visible lighting at between 220 and 250 candela in clear conditions. Officers consider that this type of receptor has a high rather than medium susceptibility to changes in views. Corriegarth Wind Farm is seen as a large-scale development in the central foreground of the view. Stronelairg is partially seen as a distant wind farm appearing above the plateau ridgeline of Doire Meurach within the Monadliath. Millennium and Beinneun wind farms are seen to the right of the image as distant elements above the Great Glen.Beyond the summit the land falls gently away to the Killin valley and then rises again to the plateau that the Proposed Development will be located upon; in the distance the large-scale peaks of the Creag Meagaidh massif are visible on the horizon. The EIAR states that Proposed Development will be seen within the extent of the consented Stronelairg Wind Farm and will be seen as part of the same wind farm. However, in terms of composition the proposed unlike Stronelairg and Cloiche and the consented Dell scheme, the hubs from proposed turbines will break the skyline. Effects are considered to be moderate/minor but not significant, particularly given that the receptor's focus will be the consented turbines in the foreground.						

			Proposed Development			Cumulative Effect (In addition effects = built + consented (In total effects = built + consented + planning stage).	
Viewpoint / distance and direction to development	App / THC	**Sensitivity of the Receptor** (Susceptibility / value of the view) High, Medium, Low, Negligible	**Magnitude of change** (Scale of Change / Extent / Duration) Substantial, Moderate, Slight, Negligible and None	**Level of Effect** (Magnitude of change / Sensitivity of Receptor)	**Significance** (Major and Major/Moderate is significant)	**Level of Cumulative Effect** (Magnitude of Change / Sensitivity of Receptor)	**Significance**
	The applicant reports that the addition of the Proposed Development will result in combined cumulative effects with the baseline of built sites at Corriegarth and Stronelairg/Cloiche. The turbines of the Proposed Development will be noticeable in views, resulting in locally Minor and Not Significant cumulative effects. The total cumulative effect of built/consented/planning stage schemes will result in Major/Moderate and Significant cumulative effects when seen in the context of the Corriegarth extension site experienced in foreground views to the south-west. Corriegarth has since been consented. Officers agree that there will be significant cumulative effects. • Likely effect of officers recommended mitigation (reduction in tip height): Would reduce skylinning and prominence, it would also avoid the need for visible aviation lighting.						
VP10: Summit of Carn Ban 942m AOD Proposed development is located 12.85km to the north-west of this VP	App	High	Slight	Moderate	Not Significant	In addition - Moderate/Minor In total - Minor	Not Significant Not Significant
	THC	High	Slight/moderate	Moderate	**Significant**	In addition - Moderate/Minor In total - Minor	Not Significant Not Significant
	• New visualisation submitted to address officer concerns about date and age of photos. The location plan also shows that the original is from the summit of Carn Dearg and not Carn Ban. The new visualisation appears to be from Carn Ban, but it contains cloud to the rear of the turbines which renders the cumulative schemes floating in cloud. This viewpoint is located on the summit of Carn Ban, 942m AOD, within the Monadhliath range at the edge of the Cairngorms National Park. It represents the potential effects of the Proposed Development upon walkers on this Munro. Minimising effects on the CNP was a design objective for the applicant. • Theoretical Visibility: Nine turbines to the upper tower, hub, tower and blades. (Consented Dell VP 20 - all 14 turbines visible – significant effect) • Night-time Visibility: Turbines T01, T02, T06, T08, T09 will have visible lighting at between 220 and 250 candela in clear conditions.						

			Proposed Development			Cumulative Effect (In addition effects = built + consented (In total effects = built + consented + planning stage).	
Viewpoint / distance and direction to development	App / THC	**Sensitivity of the Receptor** (Susceptibility / value of the view) High, Medium, Low, Negligible	**Magnitude of change** (Scale of Change / Extent / Duration) Substantial, Moderate, Slight, Negligible and None	**Level of Effect** (Magnitude of change / Sensitivity of Receptor)	**Significance** (Major and Major/Moderate is significant)	**Level of Cumulative Effect** (Magnitude of Change / Sensitivity of Receptor)	**Significance**
	The proposed development will be seen in partial overlap with Stronelairg Wind Farm, extending the footprint of development to the north, creating a lateral extension to the visual envelope and contrasts with the scale of the Stronelairg cluster. It also results in sky lining effects on the horizon of this mountain range. The addition of the proposed development is reported to result in combined cumulative effects with the baseline of built sites at Stronelairg/Cloiche and Bhlaraidh/Bhlaraidh Extension (and proposed variation at scoping), resulting in locally Moderate/Minor and Not Significant cumulative effects. The total cumulative effect of built/consented/planning/scoping stage schemes will result in a Minor and Not Significant combined cumulative effect when seen in the context of the Loch Liath and Chrathaich Planning Stage sites and the Fasnakyle Scoping site experienced in combined views to the north- west. Chrathaich Wind Farm has since been approved. Officers agree the cumulative effects will not be significant. • Likely effect of officers recommended mitigation (reduction in tip height): The applicant submitted comparative wireframes for this VP in Appendix F of the 'clarification' document submitted in March 2025 to the ECU. Would still appear larger than Stronelairg, but more in line with Cloiche, which is located at the other side of the Stronelairg array, creating a book end effect.						
VP11: Summit of Meall Fuar-mhonaidh, 699m AOD Proposed development is located 16km to the south of this VP	App	High	Slight	Moderate	Not Significant	In addition - Moderate/Minor In total - Moderate	Not Significant Not Significant
	THC	High	Moderate	**Major/Moderate**	**Significant (short/medium term)**	**Major/Moderate**	**Significant (short/medium term)**
	• New visualisation submitted to address officer concerns about clarity of the image. **OWESG key view and key design viewpoint.** Representative of views experienced by recreational users of the outdoors. Popular local hill summit and highest point on the west side of Loch Ness, within Loch Ness and Duntelchaig SLA. Representative of views from other hills on this side of Loch Ness						

			Proposed Development			Cumulative Effect (In addition effects = built + consented (In total effects = built + consented + planning stage).	
Viewpoint / distance and direction to development	App / THC	**Sensitivity of the Receptor** (Susceptibility / value of the view) High, Medium, Low, Negligible	**Magnitude of change** (Scale of Change / Extent / Duration) Substantial, Moderate, Slight, Negligible and None	**Level of Effect** (Magnitude of change / Sensitivity of Receptor)	**Significance** (Major and Major/Moderate is significant)	**Level of Cumulative Effect** (Magnitude of Change / Sensitivity of Receptor)	**Significance**
		• Theoretical Visibility: Nine turbines to hub and blades and access track through Glen Brein. (Consented Dell scheme VP17– possible all 14 turbines are evident but some only at blade tips and access track visible – not significant effect) • Night-time Visibility: Turbines T01, T02, T06, T08, T09 will have visible lighting at between 220 and 250 candela in clear conditions. The turbines will be more noticeable and visible of the Stronelairg/ Cloiche turbine cluster. Whilst the Dell re-design doesn't increase the lateral spread over turbines over Stronelairg and the consented Cloiche Wind Farms, so wouldn't increase the degree of encirclement of this VP. The proposed development would to some extent 'bring forward' the Stronelairg/ Cloiche wind farm cluster through its positioning and the larger turbine size, with more turbines appearing above the skyline. LVIA somewhat undervalues the view ('Medium' value) for a location within a Special Landscape Area and given the important status of Loch Ness as a valued landscape beyond just its designation. Whilst it is considered the effects of the turbines are moderated by the baseline wind energy and the distance to the receptor, this combined effects of the track are considered in the short/medium term to give rise to significant effects. Officers consider that the track in the initial years post construction, will be obvious and lead the eye up the landform towards the turbine development. However, once the trees establish (visualisation details 15 years post construction) the track will be less visually obvious and the effects will not be significant. The EIA reports that addition of the Proposed Development will result in combined cumulative effects with the baseline of built sites at Corriegarth and Cloiche/Stronelairg. The turbines of the Proposed Development will be noticeable in views, resulting in locally Moderate/Minor and Not Significant cumulative effects. The total cumulative effect of built/consented/planning stage schemes will result in Moderate and Not Significant cumulative effects when seen in the context of the Corriegarth extension (now consented) and the Culachy (at appeal) Stage site experienced in combined views to the west and south respectively. As detailed above, Officers consider that there will be significant effects in the short /medium term post construction. However, once the planting has established the effects will be reduced and will not be significant in EIA terms. • Likely effect of officers recommended mitigation (reduction in tip height) The applicant submitted comparative wireframes for this VP in Appendix F of the 'clarification' document submitted in March 2025 to the ECU. No wireframe was submitted which showed all 9 turbines at 149.9m as					

			Proposed Development			Cumulative Effect (In addition effects = built + consented (In total effects = built + consented + planning stage).	
Viewpoint / distance and direction to development	App / THC	**Sensitivity of the Receptor** (Susceptibility / value of the view) High, Medium, Low, Negligible	**Magnitude of change** (Scale of Change / Extent / Duration) Substantial, Moderate, Slight, Negligible and None	**Level of Effect** (Magnitude of change / Sensitivity of Receptor)	**Significance** (Major and Major/Moderate is significant)	**Level of Cumulative Effect** (Magnitude of Change / Sensitivity of Receptor)	**Significance**
	recommended by officers, which would have been of benefit. From this it is inferred that the recommended reduction in height brings the hubs below or close to the horizon, this would be further improved if all the turbines were shown at 150m. Whilst the turbines still appear larger than those of Stronelairg, its integration is better with the Cloiche turbines. A reduction in height would avoid the need for visible aviation lighting.						
VP12: Summit of Carn Liath, 1006m AOD Proposed development is located 15.4km to the north of this VP	App	High	Slight	Moderate	Not Significant	Moderate/Minor	Not Significant
	THC	High	Slight/Moderate	Moderate	Not Significant	Moderate/Minor	Not Significant
	• New visualisation submitted to address officer concerns – excessive snow cover. This viewpoint is located at the summit of Carn Liath, at an elevation of 1006m AOD. It represents the potential effects of the Proposed Development upon walkers within the Creag Meagaidh massif. • Theoretical Visibility: Nine turbines to tower, hub and blades. • Night-time Visibility: Turbines T01, T02, T06, T08, T09 will have visible lighting at between 250 and 220 candela in clear conditions. The turbines will be seen in the background of the Stronelairg Wind Farm, the turbines will appear larger than the operational turbines and all but one of the turbine hubs breaking the skyline. Their vertical forms will contrast with the undulating horizontal landscape of the Monadhliath and the distant hills. Officers consider that this underplays the magnitude of change, although the effects are still reported as not significant. The EIAR reports that addition of the Proposed Development will result in combined cumulative effects with the baseline built/consented sites at Stronelairg/Cloiche, and in successive views with Bhlaraidh and Bhlaraidh Extension (and proposed variation at scoping), resulting in locally Moderate/Minor and Not Significant cumulative effects. The total cumulative effect of built/consented/planning/scoping stage schemes will result in a Moderate and Not Significant successive cumulative effect when seen in the context of the Loch Liath and Chrathaich Planning Stage sites and the Fasnakyle Scoping Stage site experienced in successive views to the north-west. Chrathaich has since been consented. Officers accept there will be no significant cumulative effects.						

			Proposed Development			Cumulative Effect (In addition effects = built + consented (In total effects = built + consented + planning stage).	
Viewpoint / distance and direction to development	App / THC	**Sensitivity of the Receptor** (Susceptibility / value of the view) High, Medium, Low, Negligible	**Magnitude of change** (Scale of Change / Extent / Duration) Substantial, Moderate, Slight, Negligible and None	**Level of Effect** (Magnitude of change / Sensitivity of Receptor)	**Significance** (Major and Major/Moderate is significant)	**Level of Cumulative Effect** (Magnitude of Change / Sensitivity of Receptor)	**Significance**
	• Likely effect of officers recommended mitigation (reduction in tip height). The applicant submitted comparative wireframes for this VP in Appendix F of the 'clarification' document submitted in March 2025 to the ECU. the recommended reduction in height brings the hubs below or close to the horizon which helps with perception of scale and depth. A reduction in height would avoid the need for visible aviation lighting.						
VP13: Great Glen Way, above Loch Ness (to the north of Bunloit) Proposed development located 19km to the south of this VP.	App	Walkers - High Road Users- Medium	Negligible	Walkers – Minor Road Users – Minor	Not Significant	In addition -minor In total - moderate	Not significant Not significant
	THC	High	Negligible	Minor	Not Significant	In addition -moderate In total - moderate	Not significant Not significant
	This viewpoint is located on a minor road, which runs along the plateau upland above the northern bank of, and parallel to, Loch Ness. The road forms part of the Great Glen Way **(OWESG – Key recreational route)**, a long-distance footpath between Inverness and Fort William. The viewpoint represents the potential effects upon vehicular road users and walkers on the Great Glen Way. The viewpoint is within the Loch Ness and Duntelchaig SLA. • Theoretical Visibility: Four turbines to hub and blades only, five turbines to parts of blades only (Consented Dell scheme VP12: upper blade tips of 7 turbines for the consented Dell scheme) • Night-time Visibility: Applicant has clarified that Turbines T01, T02, T06 and T08, will have visible lighting at between 98 and 42 candela in clear conditions and not T09 as originally reported. The wireframe indicates that all nine of the turbines will be partially visible from this viewpoint. The EIAR states that very little of the turbines will be seen due to screening by the intervening landform, and only the upper parts of the blades of the turbines may be visible behind the hills, seen against the skyline. Minor, not significant effects are accepted by officers. The Proposed Development will result in combined cumulative effects with the baseline of the built site at Corriegarth and the now consented Corriegarth extension. Cloiche wind farm maybe visible to the right of Dell, although it is unlikely that Stronelairg is perceptible. Culachy (at appeal) maybe experienced						

			Proposed Development			Cumulative Effect (In addition effects = built + consented (In total effects = built + consented + planning stage).	
Viewpoint / distance and direction to development	App / THC	**Sensitivity of the Receptor** (Susceptibility / value of the view) High, Medium, Low, Negligible	**Magnitude of change** (Scale of Change / Extent / Duration) Substantial, Moderate, Slight, Negligible and None	**Level of Effect** (Magnitude of change / Sensitivity of Receptor)	**Significance** (Major and Major/Moderate is significant)	**Level of Cumulative Effect** (Magnitude of Change / Sensitivity of Receptor)	**Significance**
	in combined views to the south respectively. • Likely effect of officers recommended mitigation (reduction in tip height) Likely to reduce visibility and a reduction in height would avoid the need for visible aviation lighting.						
VP14 The Motte, Urquhart Castle Proposed development located 19km to the south of this VP	App	High	Negligible	Minor	Not Significant	There will be no additional or total cumulative effects arising from built, consented or planning stage schemes.	
	THC	High	Negligible	Minor	Not Significant		
	The viewpoint from the castle's motte provides an appropriate position to represent the potential effects of the Proposed Development upon tourists visiting Urquhart Castle. **OWESG Key View.** Important tourist site and Scheduled Monument located within Loch Ness and Duntelchaig SLA. • Theoretical Visibility: Five turbines to blade tips only (Consented Dell scheme VP 13: no visibility of turbines). • Night-time Visibility: None The wireframe indicates that blade tips of five turbines will be theoretically visible from this viewpoint, seen beyond the plateau ridgeline of the Monadhliath. Foreground views to Loch Ness seen against the backdrop of the Monadhliath will continue to characterise the view to the south. EIAR identifies that in reality the tips will be so close to the horizon that they will be barely perceptible and at a distance of 19km – this is accepted. • Likely effect of officers recommended mitigation (reduction in tip height): May reduce the theoretical visibility of the turbines.						
VP15: B862 adjacent to Loch Ceo Glais	App	Visitors –High Road Users– Medium	Negligible Negligible	Minor – visitors Minor – road users	Not Significant Not Significant	Moderate/Minor – visitors Minor – road users	Not significant Not significant
	THC	High	Negligible	Minor	Not Significant	Moderate/Minor	Not significant

			Proposed Development			Cumulative Effect (In addition effects = built + consented (In total effects = built + consented + planning stage).	
Viewpoint / distance and direction to development	App / THC	**Sensitivity of the Receptor** (Susceptibility / value of the view) High, Medium, Low, Negligible	**Magnitude of change** (Scale of Change / Extent / Duration) Substantial, Moderate, Slight, Negligible and None	**Level of Effect** (Magnitude of change / Sensitivity of Receptor)	**Significance** (Major and Major/Moderate is significant)	**Level of Cumulative Effect** (Magnitude of Change / Sensitivity of Receptor)	**Significance**
Proposed development is located 23.2km to the south of this VP	This viewpoint is located on the B862 **(OWESG key route),** adjacent to Loch Ceo Glais. It represents the potential effects of the Proposed Development upon visitors to the loch and vehicular road users travelling along the B862. Located with the Loch Ness and Duntelchaig SLA. • Theoretical Visibility: Four turbines to hub and blades only, five turbines to the upper parts of blades only. (Consented Dell scheme- VP14: barely perceptible tips from 3 tubines). • Night-time Visibility: Turbines T01, T02 will have visible lighting at between 98 and 42 candela in clear conditions. The wireframe indicates that all nine of the turbines will be partially visible from this viewpoint; however, very little of the turbines will be seen due to screening by the intervening landform, and only the upper parts of the blades of the turbines may be visible behind the hills, seen against the skyline. This view of the Proposed Development will be extremely difficult to discern within the large-scale landscape, and it is highly unlikely that the turbine blades will be noticed by most receptors. The addition of the Proposed Development will result in combined cumulative effects with Corriegarth and the now consented extension. At appeal Culachy WF is unlikely to be discernible from this distance. The applicant has split the effects between visitors and road users – however, officers have just recorded the highest sensitivity (visitors) in its assessment. Moderate/minor not significant cumulative effects. • Likely effect of officers recommended mitigation (reduction in tip height): May reduce overall theoretical visibility and may avoid the need for visible aviation lighting.					
VP16 Summit of Meall Dubh, Beinneun Forest, 788m AOD	App	Medium	Slight	Moderate/Minor	Not Significant	In addition- Moderate/Minor In total - Moderate/Minor	Not Significant Not Significant
	THC	High	Slight	Moderate/Minor	Not Significant	In addition- Moderate/Minor In total - Moderate	Not Significant Not Significant
Proposed	This viewpoint is located at the summit of Meall Dubh, 788m AOD, overlooking the existing Millennium Wind Farm. It represents the potential effects of the Proposed Development upon walkers in the hills west of Fort Augustus. • Theoretical Visibility: Nine turbines to the upper tower, hub and blades. (Consented Dell scheme VP21 – 6 to hubs and 8 blade tips – not significant).						

			Proposed Development			Cumulative Effect (In addition effects = built + consented (In total effects = built + consented + planning stage).	
Viewpoint / distance and direction to development	App / THC	**Sensitivity of the Receptor** (Susceptibility / value of the view) High, Medium, Low, Negligible	**Magnitude of change** (Scale of Change / Extent / Duration) Substantial, Moderate, Slight, Negligible and None	**Level of Effect** (Magnitude of change / Sensitivity of Receptor)	**Significance** (Major and Major/Moderate is significant)	**Level of Cumulative Effect** (Magnitude of Change / Sensitivity of Receptor)	**Significance**
development located 24.3km to the east of this VP	• Night-time Visibility: Turbines T01, T02, T06, T08, T09 will have visible lighting at between 220 and 250 candela in clear conditions. Officers consider that this type of receptor has a high susceptibility to changes in views rather than medium. The proposed development will be seen in overlap and as part of Stronelairg Wind farm, though more noticeable and elevated than the turbines of Stronelairg. The existing turbines of the Millennium wind farm cluster are the main focus in views from this location, and due to the long separation distance, the Proposed Development will appear as a minor element within the large-scale landscape. Moderate/minor effects are reported – officers accept this. In terms of cumulative effects, the applicant reports that the addition of the Proposed Development will result Moderate/Minor and Not Significant cumulative effects. The total cumulative effect of built/consented/planning stage schemes will result in Moderate/Minor and Not Significant cumulative effects when seen in the context of the Corriegarth Appeal Stage site. Corriegarth is now consented. The Culachy (at appeal) site will extend the presence of wind turbines further south within the Monadhliath and will give rise to Moderate Not Significant total cumulative effect of built/consented/planning/scoping stage schemes. The Beinneun II application (previously reported at scoping Stage) site will be visible immediately to the south of the summit of Meall Dubh, within a new field of view. Officers consider this will give rise to Moderate and Not Significant cumulative effects. • Likely effect of officers recommended mitigation (reduction in tip height) A reduction in height would avoid the need for visible aviation lighting and may reduce its prominence when compared to Stronelairg.					
VP17 Inchlaggan, Glen Garry	App	Residents -High Road users-medium	Negligible	Minor	Not Significant	In addition - Minor In total – **Major/Moderate**	Not Significant **Significant**
Proposed	THC	High	Negligible	Minor	Not Significant	In addition - Minor In total – **Major/Moderate**	Not Significant **Significant**

			Proposed Development			Cumulative Effect (In addition effects = built + consented (In total effects = built + consented + planning stage).	
Viewpoint / distance and direction to development	App / THC	**Sensitivity of the Receptor** (Susceptibility / value of the view) High, Medium, Low, Negligible	**Magnitude of change** (Scale of Change / Extent / Duration) Substantial, Moderate, Slight, Negligible and None	**Level of Effect** (Magnitude of change / Sensitivity of Receptor)	**Significance** (Major and Major/Moderate is significant)	**Level of Cumulative Effect** (Magnitude of Change / Sensitivity of Receptor)	**Significance**
development is located 30.5km to the east of this VP	This viewpoint is located on the minor road through Glen Garry at Inchlaggan, above Loch Garry. The viewpoint provides an appropriate position to represent the potential effects of the Proposed Development upon residents and road users in Inchlaggan. • Theoretical Visibility: Four turbines to blade tips. (Consented Dell scheme VP16 no visibility) • Night-time Visibility: None The wireframe indicates that four turbine blade tips will be visible as very distant elements and will appear as a minor element within the large-scale landscape. The applicant has split the effects between residents and road users – however, officers have taken the highest sensitivity (residents) in its assessment. Officers agree with the overall minor and not significant effect. The addition of the Proposed Development will result in imperceptible combined cumulative effects with the baseline of built sites. Culachy WF (at appeal) if consented would be seen in views to the east and would have a greater visual impact than Dell WF. The applicant identifies a Major/Moderate significant cumulative effect is identified when Beinneun II Scoping Stage site is factored in, as this will extend the presence of wind turbines further south within the Beinneun Forest. Beinneun II has now been submitted as an application (previously reported as scoping). • Likely effect of Officers Recommended Mitigation (Reduction in tip height): May reduce the theoretical visibility of the turbines.						
VP18 A'Mharconaich, 975m AOD Proposed development is located 31.2km to the north-west of this VP.	App	High	Negligible	Minor	Not Significant	Moderate	Not Significant
	THC	High	Negligible	Minor	Not Significant	Moderate	Not Significant
	This viewpoint is located on A' Mharconaich to the south of Loch Ericht. It represents the potential effects of Dell Wind Farm upon walkers from a Munro summit within the Cairngorms National Park. Key design objective for the applicant was to minimise effects on the CNP. • Theoretical Visibility: Four turbines to hubs and blades, five turbines to parts of turbine blades. (Consented Dell scheme VP 19 – possible visibility of blades tip of 9 turbines) • Night-time Visibility: Turbines T01, T02, T06, T08, and T09 will have visible lighting at between 220 and 250 candela in clear conditions. The EIA reports that the turbines will be seen within the rolling upland hills, with only the blades and four hubs visible against the skyline. The form of the turbines will contrast with the horizontal landscape but, due to the long separation distance, they will be very difficult to distinguish. Stronelairg and Bhlaraidh						

			Proposed Development			Cumulative Effect (In addition effects = built + consented (In total effects = built + consented + planning stage).	
Viewpoint / distance and direction to development	App / THC	**Sensitivity of the Receptor** (Susceptibility / value of the view) High, Medium, Low, Negligible	**Magnitude of change** (Scale of Change / Extent / Duration) Substantial, Moderate, Slight, Negligible and None	**Level of Effect** (Magnitude of change / Sensitivity of Receptor)	**Significance** (Major and Major/Moderate is significant)	**Level of Cumulative Effect** (Magnitude of Change / Sensitivity of Receptor)	**Significance**
	Wind Farms will be seen as a large element, seen in overlap with the proposed development and will appear as part of the same development cluster – minor, not significant effects – officers accept this assessment. The addition of the proposed development will result in combined cumulative effects with the baseline built/consented sites at Stronelairg, Cloiche, Bhlaraidh and Bhlaraidh Extension (proposed variation at scoping), resulting in locally Moderate and Not Significant cumulative effects – officers agree. CNP and NatureScot have no objection in relation to impacts from the CNP. • Likely effect of officers recommended mitigation (reduction in tip height): reduce scale of turbines but not alter the overall level of effect and a reduction in height would avoid the need for visible aviation lighting.						
VP19 A82 layby north of Drumnadrochit Proposed development is 24.2km to the south of this VP	App	Medium	Negligible	Minor	Not Significant	There will be no additional or total cumulative effects arising from built, consented, planning stage schemes.	
	THC	Medium	Negligible	Minor	Not Significant		
	This viewpoint is located in a layby beside the A82 to the north of Drumnadrochit. The viewpoint is representative of the transitory receptors following the A82 beside Loch Ness with intermittent views along the Great Glen. Located with the Loch Ness and Duntelchaig SLA. • Theoretical Visibility: Six turbines to blades only (no turbines visible from with consented Dell scheme). • Night-time Visibility: none This VP is located on the **A82 (OWESG key recreational route)** - Views are filtered along this road due to existing roadside vegetation but breaks in this vegetation are available which opens up views across Loch Ness. The wireframe indicates that blades of six turbines. However, this is a partial distant view with the development seen as minor elements and seen beyond the ridgeline of the Monadhliath. Officers agree with the overall significance of effect outlined in the EIAR. Cumulative – No additional or total cumulative effects arising from built, consented, planning stage schemes from this particular VP. However, likely to be successive cumulative effects elsewhere along the A82.						

			Proposed Development			Cumulative Effect (In addition effects = built + consented (In total effects = built + consented + planning stage).	
Viewpoint / distance and direction to development	App / THC	**Sensitivity of the Receptor** (Susceptibility / value of the view) High, Medium, Low, Negligible	**Magnitude of change** (Scale of Change / Extent / Duration) Substantial, Moderate, Slight, Negligible and None	**Level of Effect** (Magnitude of change / Sensitivity of Receptor)	**Significance** (Major and Major/Moderate is significant)	**Level of Cumulative Effect** (Magnitude of Change / Sensitivity of Receptor)	**Significance**
	• Likely effect of officers recommended mitigation (reduction in tip height): may reduce theoretical visibility.						
VP20: Castle Urquhart Visitor Car Park Proposed development is located 21.9km to the south of this VP	App	High	Negligible	No effect	Not Significant	There will be no additional or total cumulative effects arising from built, consented or planning stage schemes.	
	THC	High	Negligible	No effect	Not Significant	N/A	
	This viewpoint is located at the northern extent of the lower visitor car at Urquhart Castle **(OWESG Key View)**. The castle is a major tourist attraction and Scheduled Monument located within Loch Ness and Duntelchaig SLA. • Theoretical Visibility: Seven turbines to blades only. • Night-time Visibility: None The wireframe indicates that blade tips of seven turbines are theoretically visible, as distant minor elements from this viewpoint. The tips of the turbine blades would be difficult to discern, seen beyond the plateau ridgeline of the Monadhliath, especially given the distance and tree cover on the slope of the Glen. • Likely effect of officers recommended mitigation (reduction in tip height) may reduce theoretical visibility.						
VP21: Great Glen Way, to the north of Drumnadrochit Proposed	App	High	Negligible	Minor	Not Significant	In addition - Minor In total -Moderate/Minor	Not significant Not significant
	THC	High	Negligible	Minor	Not Significant	In addition - Minor In total -Moderate/Minor	Not significant Not significant

			Proposed Development			Cumulative Effect (In addition effects = built + consented (In total effects = built + consented + planning stage).	
Viewpoint / distance and direction to development	App / THC	**Sensitivity of the Receptor** (Susceptibility / value of the view) High, Medium, Low, Negligible	**Magnitude of change** (Scale of Change / Extent / Duration) Substantial, Moderate, Slight, Negligible and None	**Level of Effect** (Magnitude of change / Sensitivity of Receptor)	**Significance** (Major and Major/Moderate is significant)	**Level of Cumulative Effect** (Magnitude of Change / Sensitivity of Receptor)	**Significance**
development is located 25.5km to the south of this VP	• New visualisation submitted as officers were concerned about the legibility of the original due to extensive snow cover. This viewpoint is located on the Great Glen Way (**OWESG key route**), (and the parallel route of Core path IN22.02 – Abriachan to Drumnadrochit), which runs along the plateau upland above the northern bank of, and parallel to, Loch Ness. The route forms part of the long-distance footpath between Inverness and Fort William. The viewpoint represents the potential effects of the Proposed Development upon walkers on the Great Glen Way. Located within the Loch Ness and Duntelchaig SLA. • Theoretical Visibility: Nine turbines to parts of blades only. • Night-time Visibility: Turbines T01, T06, and T08 will have visible lighting at between 98 and 42 candelas in clear conditions. The wireframe indicates that all nine of the turbines will be visible from this viewpoint, partially seen behind the plateau of the Monadhliath and against the skyline. Whilst officers note that visibility will be experienced intermittently along the route of the Great Glen Way, due vegetation, receptors will be walking and taking in their surroundings and will feature in the central background of the view, when looking over the Glen. Effects are mitigated by the viewing distance of 25.5km. The addition of the proposed development will result in combined cumulative effects with the baseline of built and consented sites at Corriegarth, Cloiche and Stronelairg. Since submission, Corriegarth extension has been consented – agree it would result in minor and not significant cumulative effects. In total cumulative effects would include Culachy Wind Farm (currently at appeal) - agree it would result in moderate/minor and not significant cumulative effects. • Likely effect of officers recommended mitigation (reduction in tip height to 149.9m) A reduction in height is likely to avoid any theoretical need for visible aviation lighting and reduce visibility to just blade tips.						
VP22: Suidhe Chuimein, 393m AOD car park	App	Medium	Moderate	Moderate	Not Significant	In addition - Minor In total - Moderate	Not Significant Not Significant
	THC	Medium	Moderate	Moderate	Not Significant	In addition - Minor	Not Significant

			Proposed Development			Cumulative Effect (In addition effects = built + consented (In total effects = built + consented + planning stage).	
Viewpoint / distance and direction to development	App / THC	**Sensitivity of the Receptor** (Susceptibility / value of the view) High, Medium, Low, Negligible	**Magnitude of change** (Scale of Change / Extent / Duration) Substantial, Moderate, Slight, Negligible and None	**Level of Effect** (Magnitude of change / Sensitivity of Receptor)	**Significance** (Major and Major/Moderate is significant)	**Level of Cumulative Effect** (Magnitude of Change / Sensitivity of Receptor)	**Significance**
viewpoint on B862						In total - Moderate	Not Significant
Development is 6.1km to the south of this VP	This viewpoint is located at the Suidhe Chuilmein car park and viewpoint on the B862 **(OWESG key route)**, General Wade's Military Road. The viewpoint provides an appropriate position to represent the potential effects of the Proposed Development for travellers on the B862 and visitors using the viewpoint Located with the Loch Ness and Duntelchaig SLA. • Theoretical Visibility: One blade tip (T8) plus proposed access track through Glen Breinn. (Original Dell scheme – VP6 - no turbine visibility, but access track would be visible). • Night-time Visibility: None Only the tip of the turbine's blade will be visible behind the hills, seen against the skyline (no turbines visible from with consented Dell scheme). The turbine will be extremely difficult to discern within the large-scale upland landscape, and it is unlikely that the turbine will be noticed by most receptors. The EIAR identifies that the proposed access track will be partially visible rising through Glen Breinn in the short term. This feature will visually integrate over the medium term as the proposed native woodland planting establishes and begins to mature. Until that occurs, the line of the track and its associated cuttings will be more obvious. As it weathers and vegetation become established, the effect will reduce – assessment is accepted. Must be noted that this track was consented at appeal, as part of the original Dell WF scheme. Corriegarth, Aberarder and Dunmaglass Wind Farms are partially visible within the Monadhliath to the north-east. Bhlaraidh Extension Wind Farm is visible in successive views as a distant element to the north-west, and the Millennium/Beinneun cluster to the south west, beyond Loch Ness. The now consented Chrathaich WF may be discernible. Appeal sites of Loch Liath and Culachy will be partially visible in distant views to the north west beside Bhlaraidh Extension if consented. Beinnuen II Scoping Stage site will also be experienced in successive views. EIA reports minor and not significant in addition cumulative effects and moderate, not significant in total cumulative effects - officers agree with assessment • Likely effect of officers recommended mitigation (reduction in tip height) may reduce theoretical visibility of the turbines.					

Appendix 5 - Assessment against Landscape and Visual Assessment Criteria contained within Section 4 of the Onshore Wind Energy Supplementary Guidance

Criterion 1: Relationship between Settlements/ Key locations and wider landscape respected

Threshold: Turbines are not visually prominent in the majority of views within or from settlements/Key Locations or from the majority of its access routes.

As demonstrated by the ZTV and the visual impact assessment contained the turbines would not be visible from the majority of the main settlements within the study area. Where visible from residential areas, it is unlikely to lead to any significant visual effects.

Meall Fuar-mhonaidh (VP11) is regarded as a "Key Location". As detailed above the Council has continually sought to minimise effects from this landmark summit. As detailed in Criterion 3, below, no significant effects are reported in the EIAR, and it will not increase the degree of encirclement from this viewpoint. However, the turbines will be more noticeable and disparity in size/ scale might be perceived. Despite this, the Councils Landscape Advisor considers that the scale of visual change is moderated by the baseline wind energy and the distance from the receptor and will not be significant. However, Officers consider that combined effects with the proposed track will in the short/medium term post construction, give rise to significant effects. However, once the trees establish (visualisation details 15 years post construction) the track will be less visually obvious and the effects will not be significant.

There will be a very limited influence on views from Urquhart Castle and from the loch level on Loch Ness.

Generally, meets the threshold for this criterion.

Criterion 2: Key Gateway locations and routes are respected

Threshold: 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.

There are no key gateway locations specifically identified within the LN6 landscape character assessment area. There would be some degree of visual effect on a small number of the Key Routes, but these effects would not be significant. No significant effects are reported from the Great Glen Way. Whilst in general agreement with the applicant, the Councils Landscape advisor has highlighted possible significant adverse visual (and cumulative visual) effects are possible from the Great Glen Way (Upper Route) south of Invermoriston.

Generally, meets the threshold for this criterion.

Criterion 3: Valued natural and cultural landmarks are respected

Threshold: The development does not, by its presence, diminish the prominence of the landmark or disrupt its relationship to its setting.

This is considered to include the Great Glen, Meall Fuar-mhonaidh, Loch Ness and cultural landmarks such as Urquhart Castle.

From Meall Fuar-mhonaidh (VP11), the proposed development will not increase the lateral spread over turbines over Stronelairg and the consented Cloiche Wind Farms, so it will not increase the degree of encirclement of this VP. However, the proposed development would to some extent 'bring forward' the Stronelairg/ Cloiche wind farm cluster through its positioning and the larger turbine size, with more turbines appearing above the skyline. The turbines will be more noticeable and visible within the Stronelairg/ Cloiche turbine cluster, and therefore it is considered that while disparity in size/ scale might be perceived. The Councils Landscape Advisor considers that the scale of visual change is moderated by the baseline wind energy and the distance from the receptor and will not be significant. However, Officers consider that combined effects with the proposed track will in the short/medium term post construction, give rise to significant effects. However, once the trees establish (visualisation details 15 years post construction) the track will be less visually obvious and the effects will not be significant.

There will be a very limited influence on views from Urquhart Castle (VP 14 and 21) where there will be distant partial visibility to turbine blades away from the scheduled monument's foreground Lochside setting. Whilst no visualisation has been submitted from the loch level, likely visibility can be derived from VPs along the northern shores of Loch Ness (VP19, RV1 and RV2: roadside VPs on the A82). This indicates blade tip visibility only, which is in line with current levels of visibility from other operational or consented schemes.

Generally, meets the threshold for this criterion.

Criterion 4: The amenity of key recreational routes and ways is respected

Threshold: Wind Turbines or other infrastructure do not overwhelm or otherwise significantly detract from the visual appeal of key routes and ways.

The applicant identifies major/moderate and significant adverse visual effects from two elevated recreational viewpoints; VP1 and VP2, which are located within 4km of the site. In addition, significant cumulative effects are anticipated at VP9 which is 12km from the proposed development. Officers have identified further significant effects at VP 6, Summit of Carn a' Chuilinn, VP10: Summit of Carn

Ban and Meall Fuar-mhonaidh (VP11 – short/medium term). These effects are located within 16km of the proposed development.

The OWESG identifies a number of key recreational routes. No visibility of the proposal is available from railway lines, the National Cycle Route 7, the Speyside Way or the South Loch Ness Trail. The majority of the core paths do not fall within the zone of visibility. One core path shows distant visibility, IN22.02 – Abriachan to Drumnadrochit. This route follows the route of the Great Glen Way to the north of Drumnadrochit. From these and lower level viewpoints no significant visual effects are predicted in the applicant's assessment. No significant effects are reported from the Great Glen Way. Whilst in general agreement with the applicant, the Councils Landscape advisor has highlighted possible significant adverse visual (and cumulative visual) effects are possible from the Great Glen Way (Upper Route) south of Invermoriston.

Limited visibility of the proposal is anticipated from the loch level at Loch Ness, this will be restricted to additional blade tips, which is not considered to be significant and responds to the existing pattern of development.

Meets the threshold for this criterion in parts.

Criterion 5: The amenity of transport routes is respected

Threshold: Wind Turbines or other infrastructure do not overwhelm or otherwise significantly detract from the visual appeal of transport routes.

Many of the main transport routes within the study area are located within the lower lying glens, with the intervening landform and vegetation helping to reduce or avoid visibility. The ZTV indicates that there would be no or very limited views of the proposed development from several key routes identified in the OWESG and have been scoped out of further assessment. However, sections of visibility are indicated for the key routes identified as A82(T), B862, A833 and A887. These are often for short sections, with partial visibility of the proposed development and will be transitory in nature. There would be some degree of visual effect on a small number of the Key Routes, but these effects would not be significant. The proposal will not overwhelm the experience of journeys or detract from the visual appeal for travellers.

It is considered that the criterion is met.

Criterion 6: The existing pattern of Wind Energy Development is respected

Threshold: The degree to which the proposal fits with the existing pattern of nearby wind energy development.

Siting of the development is in general considered to reflect the existing pattern of wind farm development within OWESG LCA 10), particularly from Loch Ness. The proposed development will be seen as an extension to the existing Stronelairg turbines, extending the footprint of development to the north. It does benefit from some topographical containment within the landscape basin. The scheme will be seen within an established cluster of development within the southern sector of the Monadhliath Mountains. The Loch Ness Landscape Sensitivity study contained within the OWESG identifies that any remaining capacity for larger scale turbine development should be focused on existing wind energy clusters. In siting terms, the development is not considered to undermine previously instituted mitigation measures

However, the proposed turbines are larger in scale than the established development, with differences noticeable in a number of viewpoints (e.g. VP 2 and 6). It will also introduce the need for visible aviation lighting. However, from key viewpoints such as Meall Fuar-mhonaidh (VP11), significant visual effects have not been reported in the EIAR. Although Officers consider that the proposed track will in the short/medium term post construction, give rise to significant effects. However, the mitigation measures in the form of planting will overtime make the track less visually obvious and the effects will not be significant.

This criterion is partially met.

Criterion 7: The need for separation between developments and/or clusters is respected

Threshold: The proposal maintains appropriate and effective separation between developments and/ or clusters.

The proposed development will be sited to the north of the Stronelairg turbines and will be read as an enlarged wind turbine cluster when Cloiche Wind Farm is considered. Notwithstanding the concerns raised about scale of the proposed turbines. In siting terms, the proposal is not considered to introduce wind farm development to a new area currently not influenced by wind energy development. This will preserve the established pattern of development and avoid introducing development to a new area. The Loch Ness Landscape Sensitivity study contained within the OWESG identifies that any remaining capacity for larger scale turbine development should be focused on existing wind energy clusters.

Generally, meets the threshold for this criterion.

Criterion 8: The perception of landscape scale and distance is respected

Threshold: The perception of landscape scale and distance is respected.

From some views the differences in turbine sizes between the proposed development and the existing Stronelairg turbines will be

noticeable, which effects the existing perception of landscape scale and distance. However, this effect reduces with distance from the development. No significant effects are reported from key viewpoints e.g. Meall Fuar-mhonaidh (VP11). Although Officers consider that the proposed track will in the short/medium term post construction, give rise to significant effects. However, the mitigation measures in the form of planting will overtime make the track less visually obvious and the effects will not be significant.

This criterion is generally met.

Criterion 9: Landscape setting of nearby wind energy developments is respected

Threshold: Proposal relates well to the existing landscape setting and does not increase the perceived visual prominence of surrounding wind turbines.

The development would be located close to the existing Stronelairg Wind Farm and consent Cloiche wind farm cluster. It fits mostly within the 'bowl' landform so does benefit from some topographic containment to the northwest, where greater sensitivities lie, but is somewhat less contained than Stronelairg. It will be read as an expanded cluster of turbines, however, in local views the differences in turbine sizes between the Proposed Development and the existing Stronelairg turbines will be noticeable however, this effect reduces with distance.

Generally, meets the threshold for this criterion.

Criterion 10: Distinctiveness of Landscape character is respected

Threshold: Integrity and variety of Landscape Character Areas are maintained.

Adverse effects on landscape character would occur relatively locally (within~5km of the turbines) and will affect the Rolling Uplands LCT only. There would be some locally significant changes with the upgraded/ new track access, including tree planting, but this would not significantly change key landscape characteristics on a wider scale. Furthermore, the interplay of the different LCAs which come together to from the local composite landscape character would not be undermined by the proposed development interrupting the relationship between them

The criterion is met.

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for Dell Wind Farm Ltd

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Figure 1.1: Site Location

Site boundary

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Map scale 1:75,000 @ A3

0 2.5 5 km

CB:AHB EB:Hardie-Brown_A LUC FIG1_1_11892_r0_SiteLocation_A3L 09/12/2022
Source: LUC, Dell Wind Farm Ltd

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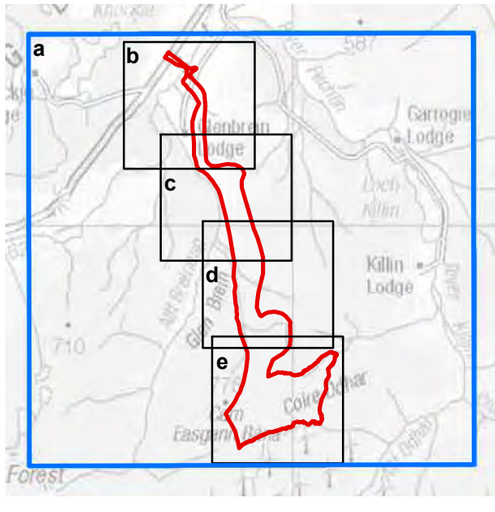
Figure 2.1a: Site Layout

Abnormal loads - Overrun area
CC1
CC2
CC3
BP1
BP2
1
2
3
4
5
6
7
8
9

- Site boundary
- Turbine - 180m tip height
- Turbine - 200m tip height
- Security office
- Met mast
- Control building
- New access track
- Upgraded access track
- Temporary access track
- Floating access track
- Substation
- Abnormal loads - Overrun area
- Crane hardstanding
- Temporary borrow pit (BP)
- Temporary construction compound (CC)



0 1 2 km

Map scale 1:35,000 @ A3

CB:AHB EB:Harbich_J LUC FIG2_1_11892_r0_SiteLayout_A3L 07/02/2023
Source: LUC, SLR, Dell Wind Farm Ltd

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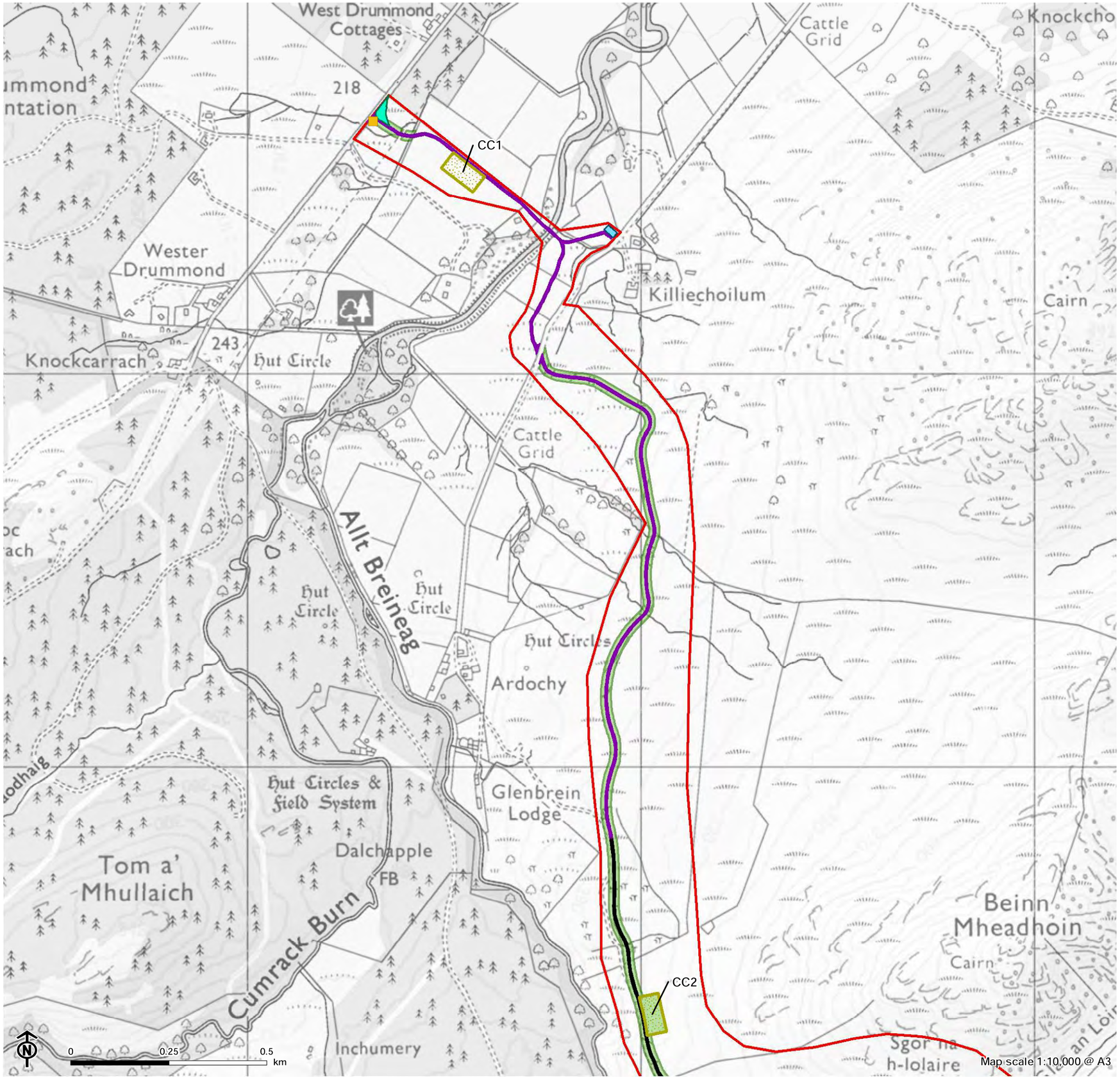
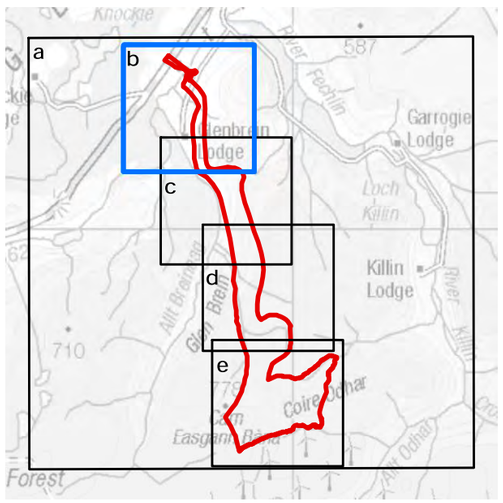
Figure 2.1b: Site Layout



- Site boundary
- Security office
- New access track
- Upgraded access track
- Abnormal loads - Overrun area
- Control room
- Temporary construction compound (CC)
- Forest felling



CB:AHB EB:Hardie-Brown_A LUC FIG2_1_11892_r0_SiteLayout_A3L 09/12/2022
Source: LUC, SLR, Dell Wind Farm Ltd

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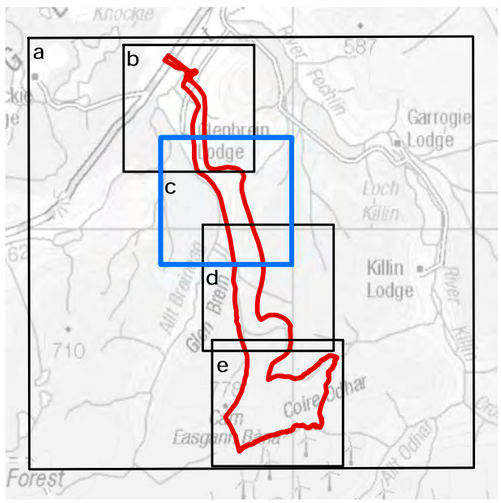
Figure 2.1c: Site Layout

- Site boundary
- New access track
- Upgraded access track
- Temporary access track
- Temporary borrow pit (BP)
- Temporary construction compound (CC)
- Forest felling



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CB:AHB EB:Hardie-Brown_A LUC FIG2_1_11892_r0_SiteLayout_A3L 09/12/2022
Source: LUC, SLR, Dell Wind Farm Ltd

Map scale 1:10,000 @ A3

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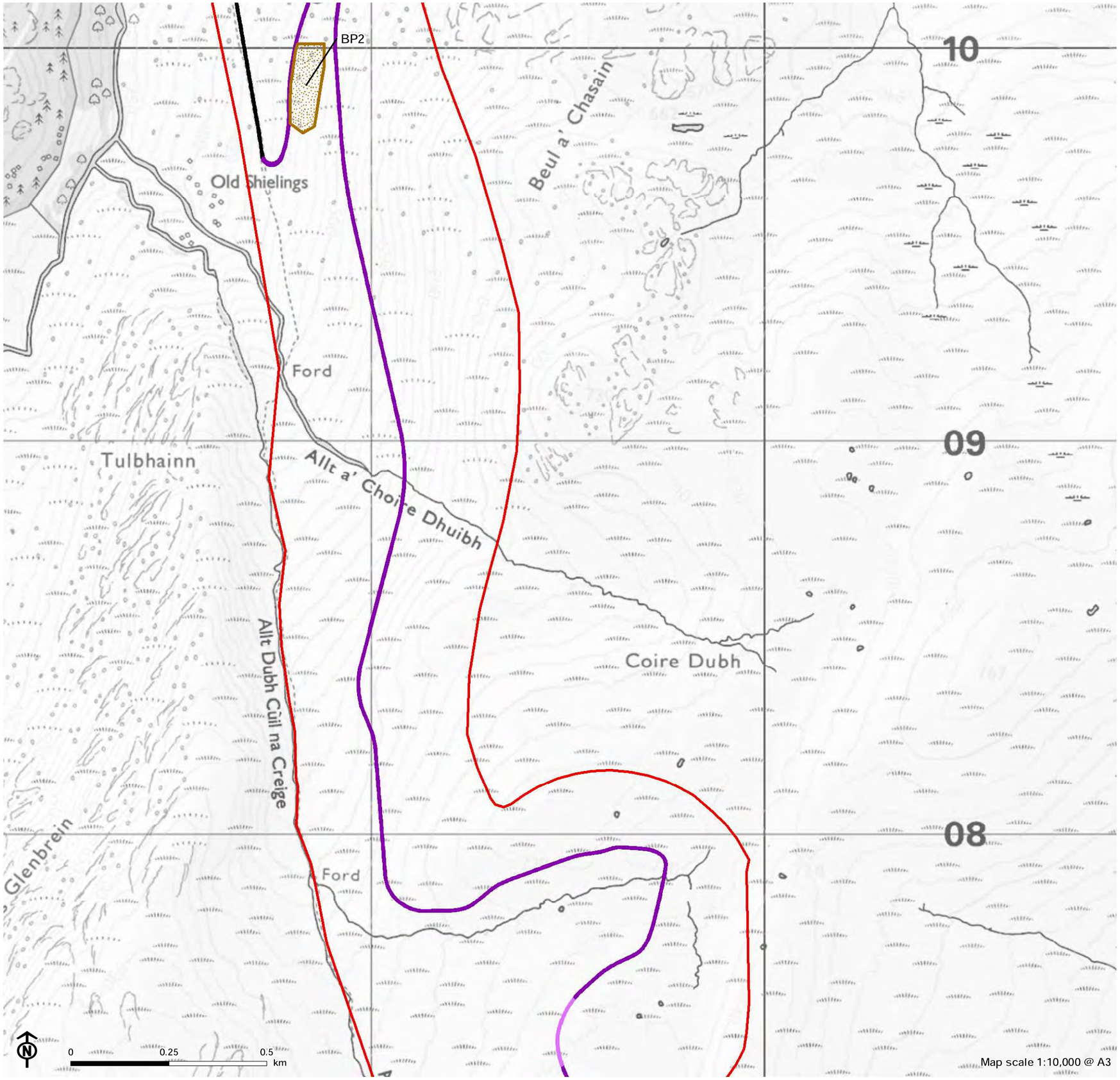
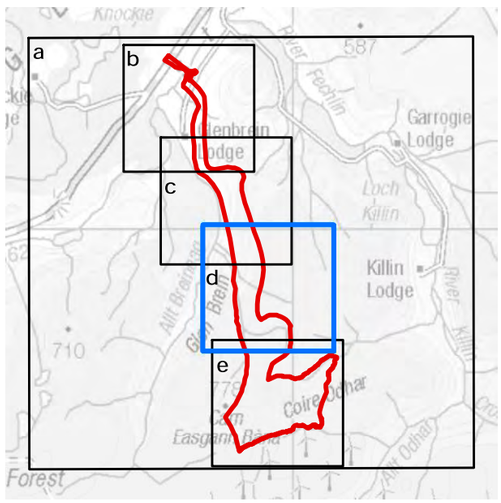
Figure 2.1d: Site Layout



Site boundary
New access track
Upgraded access track
Floating access track
Temporary borrow pit (BP)



Map scale 1:10,000 @ A3

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CB:AHB EB:Hardie-Brown_A LUC FIG2_1_11892_r0_SiteLayout_A3L 09/12/2022
Source: LUC, SLR, Dell Wind Farm Ltd

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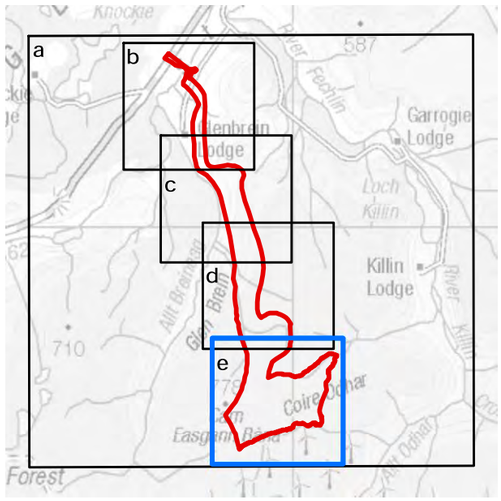
Figure 2.1e: Site Layout

- Site boundary
- Turbine - Layout 5 - Design freeze layout - 180m tip height
- Turbine - Layout 5 - Design freeze layout - 200m tip height
- Met mast
- New access track
- Floating access track
- Substation
- Crane hardstanding
- Temporary construction compound (CC)



CB:AHB EB:Hardie-Brown_A LUC FIG2_1_11892_r0_SiteLayout_A3L 09/12/2022
Source: LUC, SLR, Dell Wind Farm Ltd

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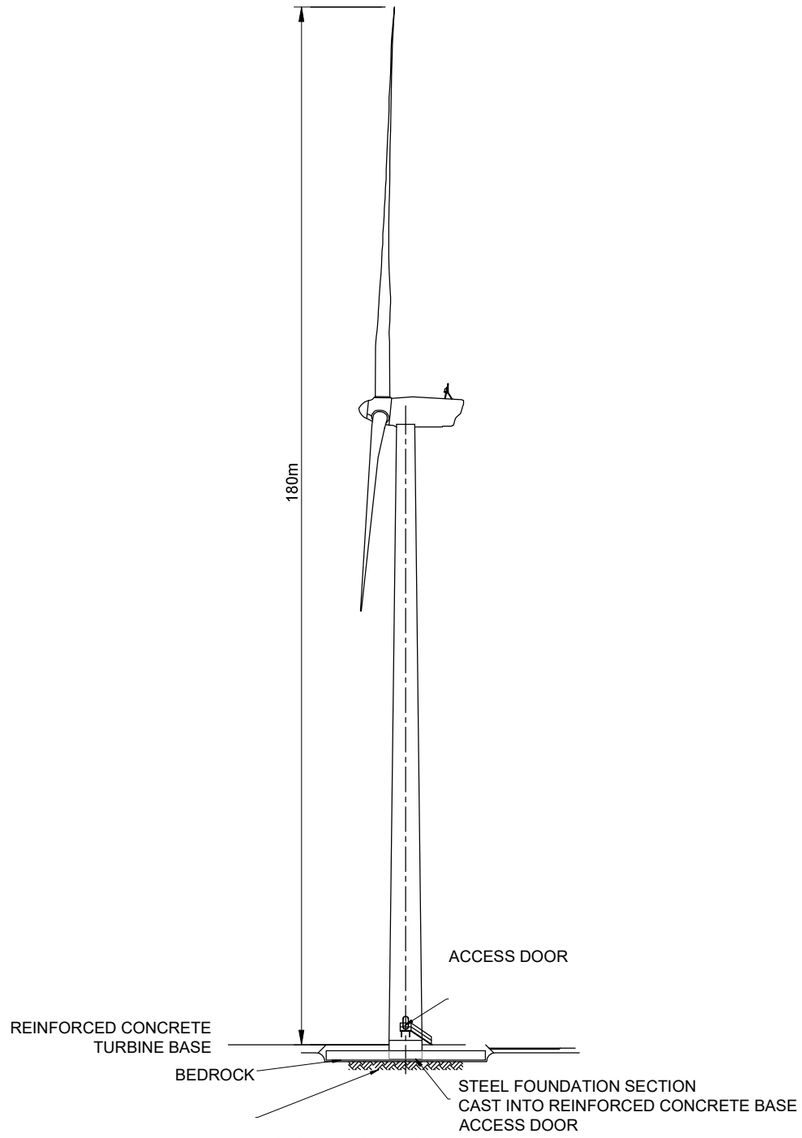
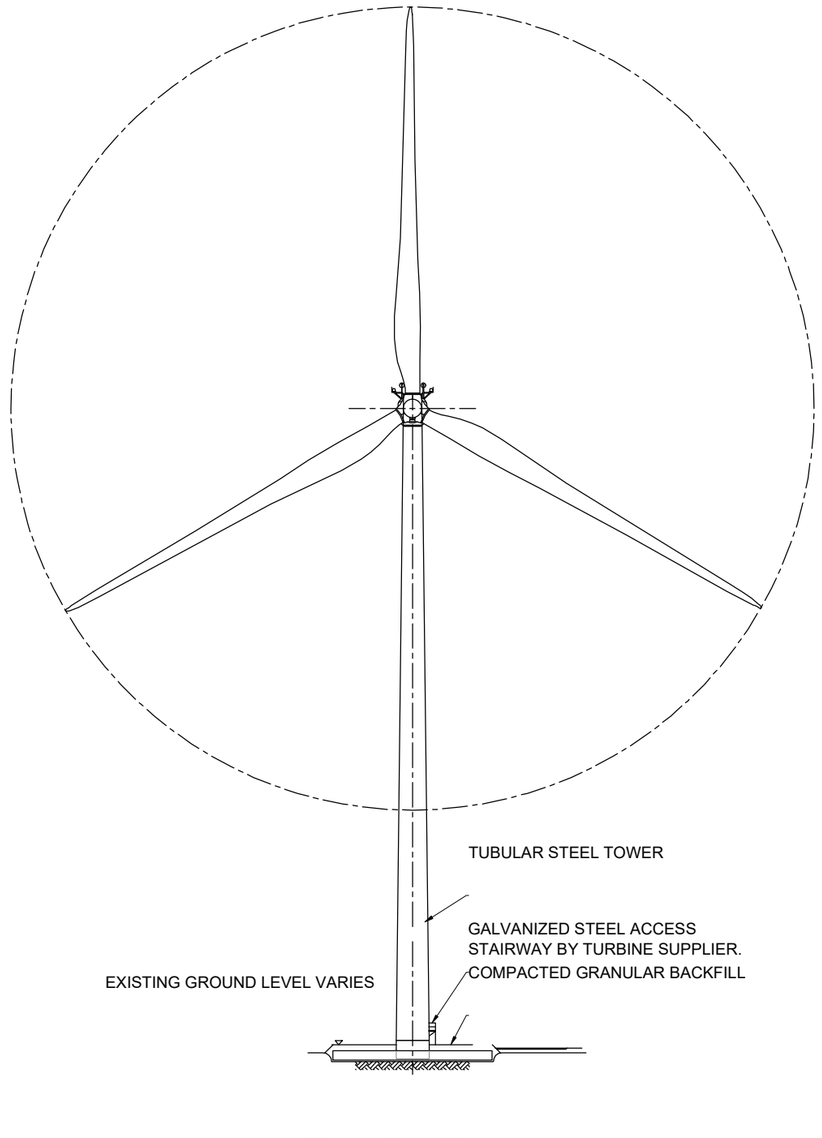
Figure 2.2a: Indicative Turbine Elevation 180m Tip Height



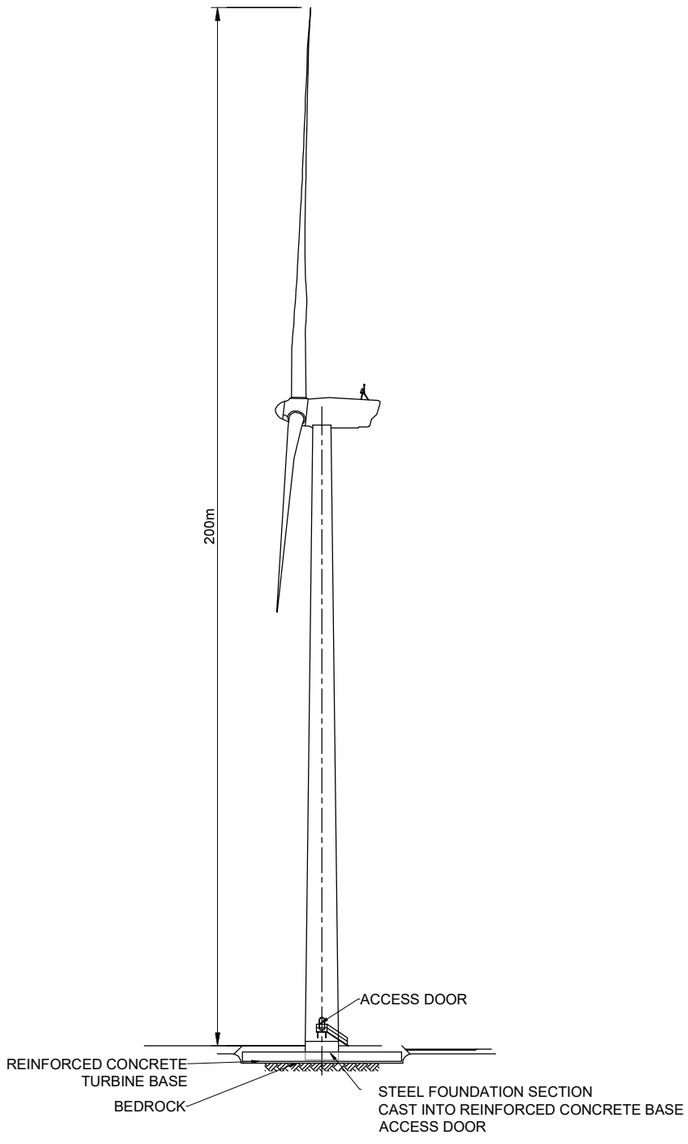
180m TIP HEIGHT
SIDE SECTIONAL ELEVATION



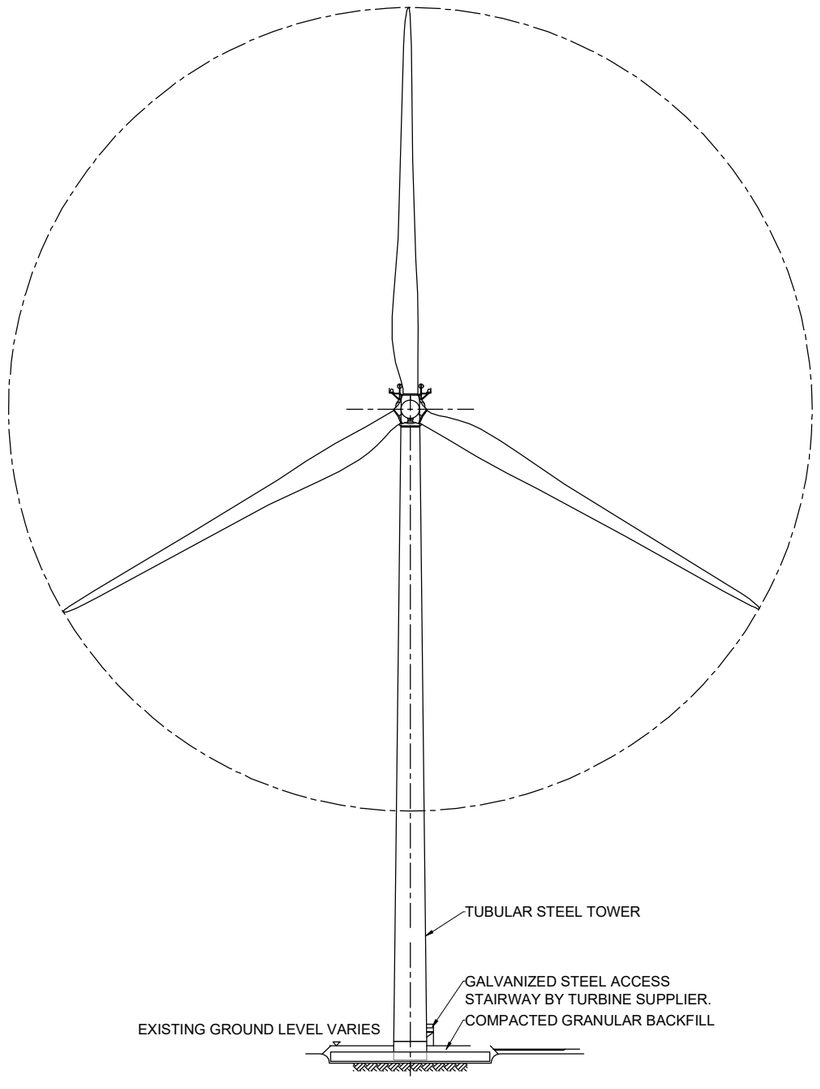
180m TIP HEIGHT
FRONT SECTIONAL ELEVATION

 Not to scale

Figure 2.2b: Indicative Turbine Elevation 200m Tip Height



200m TIP HEIGHT
SIDE SECTIONAL ELEVATION



200m TIP HEIGHT
FRONT SECTIONAL ELEVATION

 Not to scale