

Agenda Item	6.1
Report No	PLN/040/26

HIGHLAND COUNCIL

Committee: North Planning Applications Committee

Date: 05 August 2026

Report Title: 25/01650/S36: Carn Fearna Wind Farm Limited
Land 4km northeast of Garve

Report By: Area Planning Manager - North

Purpose/Executive Summary

Description: Carn Fearna Wind Farm - Erection and operation of a wind farm for a period of 50 years, comprising of 9 wind turbines, 5 (T1, T2, T3, T4 and T8) with a maximum blade tip height of 200m, and 4 T5, T6, T7 and T9) with a maximum blade tip height of 180m, access tracks, borrow pits, substation, control building, and ancillary infrastructure

Ward: 05 – Wester Ross, Strathpeffer and Lochalsh

Development category: National

Reason referred to Committee: National development

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

Members are asked to agree the recommendation to **RAISE OBJECTION** to the application as set out in section 11 of the report

1. PROPOSED DEVELOPMENT

- 1.1 The Highland Council has been consulted by the Scottish Government's Energy Consents Unit (ECU) on an application made under Section 36 of the Electricity Act 1989 (as amended) for the construction and operation of Carn Fearna Wind Farm and associated infrastructure with an anticipated generating capacity of 64.8MW.
- 1.2 The proposed development comprises:
- nine turbines, five of which (Ts 1, 2, 3, 4, and 8) would have a maximum ground to tip height of 200m, with the remaining four turbines (Ts 5, 6, 7, and 9) having a maximum ground to tip height of 180m;
 - turbine foundations with permanent crane hardstanding areas measuring 3,750m² and temporary laydown areas measuring 7,450m² each;
 - 11.6km of new and 3.3km of upgraded access track with a standard running width of 6m, wider on bends, passing places and turning heads;
 - New/upgraded site access junction with the A832(T), as well as an offsite turning circle at Inchbae Lodge on the A835 for use by abnormal indivisible loads (AIL) to allow AIL to enter the site from the southbound approach;
 - 11 new and up to five upgraded water crossings;
 - onsite substation compound measuring 12,000m²;
 - three temporary construction compounds and concrete batching plant;
 - underground electrical cabling to run alongside internal access tracks;
 - search areas for up to three onsite borrow pits to extract up to 147,345m³ of material; and,
 - 1.2ha of onsite tree felling (offsite felling for AIL delivery is not identified within the submission).
- 1.3 The submission advises that the generating station's grid connection will be via the Corriemoillie substation 5.5km to the west. However, an assessment of the environmental effects of the grid connection, including cumulative effects, is omitted from the environmental impact assessment submitted with the application. Nevertheless, the Council has subsequently issued its EIA Screening opinion that EIA is required for the grid connection (THC ref. 25/00219/SCRE), which was agreed by the ECU and a Scoping opinion from the Council (THC ref. 25/02377/SCOP) and the ECU has since been issued to SSEN Transmission.
- 1.4 A micrositing allowance of 100m is requested for turbines and ancillary infrastructure, which would be used to avoid or minimise environmental, or engineering constraints identified during pre-construction ground investigation or construction phase excavation works. These constraints may include any areas of deeper peat, higher elevations of ground, watercourse buffers, Ground Water Dependent Terrestrial Ecosystems and cultural heritage assets, amongst others. While there may be some leeway for on-ground and low-lying infrastructure to be micrositied over 100m, for turbines, the Council would

agree to a micrositing limit of 50m from the approved location to ensure the visual effects of the proposal do not significantly diverge from the proposal as submitted and appraised through the landscape and visual impact assessment.

- 1.5 The applicant has proposed a reduced aviation safety lighting scheme that would see four turbines installed with 2,000 candela (full strength) visible red aviation safety lights (Ts 1, 4, 7, and 9), although the brightness would be reduced by 90% to 200 candela during times of good visibility. The final design of the turbines including colour and finish, infrared aviation lighting, ancillary electrical equipment, landscaping and fencing etc. would be agreed with the Planning Authority at the time of project procurement, which can be secured by condition. While indicative drawings for these elements are set out in the application, turbine manufacturers regularly update the designs that are available, thereby necessitating the need for some flexibility in the approved design details.
- 1.6 Permission is sought to operate the wind farm for 50 years; a further application would be necessary to determine any future re-powering proposal. If the decision is made to decommission the wind farm, the turbines and all above ground infrastructure would require to be removed. Turbine foundations would be removed to 1m below ground level with the top 1m reprofiled with soil and seeded following an agreed method statement. The retention of any tracks and other elements of the development would require a separate planning application at the end of the period of the consent, which would be assessed and determined in line with the extant Development Plan in place at the time.
- 1.7 Whilst public consultation for Section 36 applications is not mandatory under the provisions of the Electricity Act 1989 (as amended), the applicant held an initial round of in-person community engagement events between 21 and 23 November 2023 in Contin, Tarvie, Strathpeffer, and Dingwall. Exhibition materials were also made available online for four weeks on the dedicated project webpage. Three further in-person events were hosted on 15 and 16 May 2024 in Contin, Garve, and Strathpeffer. The events were advertised in the local press, as well as via direct mail to over 1,700 households in the area. Public feedback along with the applicant's response to the public feedback, is summarised in the Pre-Application Consultation (PAC) Report submitted with the application.
- 1.8 The Applicant also attended a Pre-application Advice Service for Major Developments (PREMAJ) meeting hosted by the Council with other statutory consultees in attendance (THC ref. 23/03462/PREMAJ) for a proposal of 14 x 200m turbines. The applicant also participated in a wind farm design workshop for a reduced proposal of 14 x 200m maximum tip height turbines.
- 1.9 Through the PREMAJ, the applicant was advised of Council officers' significant concerns regarding the landscape and visual impacts of the development. These concerns related to the proposal's siting and design likely to lead to significant effects on landscape character and landscape designations, as well as significant visual effects on residents, recreational and outdoor users, along with road and transport users, due to the:

- site's elevation leading to high visibility of the proposal in the surrounding area;
- location and scale of the turbines having the potential to overwhelm important landscape features including the regionally distinctive Ben Wyvis landmark and the special qualities of the corresponding Ben Wyvis Special Landscape Area;
- location being partially within of the Rhiddoroch – Beinn Dearg – Ben Wyvis Wild Land Area (WLA 29), as highlighted by NatureScot;
- need for aviation safety lighting extending the proposal's detrimental effects into twilight hours and hours of darkness;
- cumulative effects including that turbines would introduce turbines to an area that currently provides respite from turbine development, particularly for receptors travelling on important regional routes including the A832 and A835.

1.10 The application is supported by an Environmental Impact Assessment report (EIAR), the contents of which have been informed through EIA Scoping. The EIAR contains the following chapters:

- Chapter 1: Introduction;
- Chapter 2: Site Description and Design Evolution;
- Chapter 3: Description of the Development;
- Chapter 4: Policy Framework;
- Chapter 5: EIA Methodology;
- Chapter 6: Scoping and Consultation;
- Chapter 7: Landscape and Visual;
- Chapter 8: Ecology;
- Chapter 9: Ornithology;
- Chapter 10: Geology, Hydrology, Hydrogeology and Peat;
- Chapter 11: Archaeology and Cultural Heritage;
- Chapter 12: Noise and Vibration;
- Chapter 13: Site Access, Traffic and Transport;
- Chapter 14: Socio-economics, Tourism, Recreation and Land Use;
- Chapter 15: Aviation;
- Chapter 16: Other Environmental Considerations; and,
- Chapter 17: Schedule of Commitments.

1.11 The EIAR is also accompanied by Figures, Visualisations, Technical Appendices, and an EIA Non-Technical Summary (NTS) (EIAR Volume 1), while the overall submission is supported by a Pre-Application Consultation Report, a Design Statement, Marine Science Scotland (MSS) Checklist, and a Planning Statement, which also accompany the overall submission. The applicant has also suggested a list of revisions to the ECU's and Head of Planning Services' 'Onshore Wind Standard Conditions Section 36 Consent and Deemed Planning Permission (February 2025)' template.

- 1.12 No amendments have been made to the proposal since it was submitted to the ECU in April 2025.

2. SITE DESCRIPTION

- 2.1 The 1000ha upland site is located 1.5km northeast of Garve, 3.3km east of Lochluichart, and 12km east-northeast of Dingwall. The site encompasses a raised undulating moorland covered plateau that is incised by lochans and watercourses, and enclosed by several well-defined rounded summits including, Meall Ruighe an Fhirich, Carn Fearna, Beinn a' Ghuilbein, Carn Loch an Tuirc, Meall Odhar Beag and Carn Gorm.
- 2.2 The highest point within the site is the summit of Little Wyvis at its northwest corner at 760m above ordnance datum (AOD). The site's lowest point is 120m AOD at the site junction with the A835 near Silver Bridge located at the site's east and within Strath Garve. The turbines themselves would be sited on ground levels between 400m and 486m AOD with a line of turbines formed of Ts 1 - 5 below the steeper southwest facing slopes of Little Wyvis and Carn Gorm. Turbines Ts 5 – 9 would be sited within the craggier knolls to the west and south of the shallow glacial basin that hosts Loch a' Bhealaich and Loch na Geàrra.
- 2.3 The other main waterbody within the site is the Loch an Tuirc west of the turbine area and above the steep, wooded, eastern slopes of Strath Garve. Several waterbodies also cross the site with those on the north and western section of the site generally flowing westwards to discharge to the Black Water including the Allt a' Mhuilinn and Allt Abhagaith. Watercourses in the central section of the site such as the Allt na Goibhle and the Allt an Achaidh Mhòir generally flow southwards to discharge into Loch Garve, while watercourses in the southeastern section of the site also flow south to Loch na Croic or east to the Rogie Burn. All of the onsite watercourses, however, flow via the Blackwater to the River Conon to ultimately discharge into the Beauly Firth / North Sea.
- 2.4 There are several residential, agricultural, and rural commercial properties peppered along Strath Garve near the A835 with denser concentrations at Garve to the west, Tarvie to the south, and Contin to the southeast. The nearest sensitive properties are Tigh Fiodha Larder near the site entrance, and Bridgefield House Little Garve, The Cottage, Coach House, and Strathgarve Lodge, all of which are located off the U3131 between the site and the A835 (EAIR Volume 3a, Figure 12.1b Noise Assessment and Monitoring Locations Wind farm site). Further south, the A835 road forks with the A834 south of the application site on the more settled farmed slopes and plains of the Rivers Peffery and Conon. These plains host the larger population centres of Conon Bridge, Dingwall, Maryburgh, and Strathpeffer.

Landscape Character, Landscape Designation, and Wild Land

- 2.5 All proposed turbines and main onsite permanent infrastructure, with the exception of the site access junction and the first steep section of access track, would be located within

landscape character type (LCT) LCT331: Rounded Rocky Hills - Ross and Cromarty. The specific landscape character area (LCA) of this LCT, referred to within the EIA as the Carn Fearn Unit, is relatively small and discrete, and includes the Corbett of Little Wyvis.

2.6 The access junction is sited within the adjacent LCT330 Rounded Hills and Moorland Slopes – Ross and Cromarty, which adjoins the Carn Fearn LCA to the west, while a small section of the access track crosses the southwest corner of the adjoining Ben Wyvis LCA of LCT329 Rounded Mountain Massif.

2.7 The hosting LCA also adjoins the following LCTs:

- LCT340 Strath – Ross and Cromarty, to the southeast;
- A further unit of LCT330 Rounded Hills and Moorland Slopes – Ross and Cromarty to the east; and,
- LCT335 LCT Wooded Glens and Rocky Moorland, to the south

2.8 There are several other LCTs within the study area, including:

- LCT339 Inland Strath;
- LCT341 Forest Edge Farming;
- LCT340 Strath – Ross and Cromarty;
- LCT342 Farmed River Plain;
- LCT345 Farmed and Forested Slopes – Ross and Cromarty;
- LCT346 Open Farmed Slopes; and,
- LCT347 Open Steep Farmed Slopes.

2.9 There are four National Scenic Areas (NSAs) within the EIA study area:

- Glen Strathfarrar NSA, 21km west-southwest of the nearest turbine;
- Dornoch Firth NSA, 30km northeast of the nearest turbine;
- Wester Ross NSA, 33km west of the nearest turbine; and
- Glen Affric NSA, 37.5km southwest of the nearest turbine.

2.10 Due to distances from, and limited visibility of, the proposal within these NSAs, detailed assessments of the proposal's likely impacts on the Special Qualities of each have been scoped out of the EIA with the agreement of NatureScot.

2.11 In terms of regional landscape designations, Ts 1, 2, 3, and 5 would be adjacent to, and T4 within, the regionally designated Ben Wyvis Special Landscape Area. Other Special Landscape Areas (SLAs) within the study area are:

- Fannichs, Beinn Dearg and Glen Calvie SLA, 13km to the northwest at its nearest point;
- Strathconon, Monar and Mullardoch SLA, 14km to the southwest;
- Loch Ness and Duntelchaig SLA, 28km to the south-southeast;
- Cromarty Sutors, Rosemarkie and Fort George SLA, 30km to the east; and,

- Drynachan, Lochindorb and Dava Moors SLA, 40km to the southeast.

2.12 The applicant has assessed the impact of the development on the Dominant Landmark and Uninterrupted Panoramas Special Quality of the Ben Wyvis SLA. Effects on the SLQs of all other SLAs have been scoped out of assessment due to distances and intermittent visibility of the proposal with the agreement of THC officers.

2.13 In addition to the above, there are six Wild Land Areas (WLAs) within or partially within the 45km study area:

- WLA29 Rhiddoroch – Beinn Dearg – Ben Wyvis, 0km from the application site;
- WLA24 Central Highlands, 8.5km southwest of the nearest turbine;
- WLA28 Fisherfield - Letterewe – Fannichs, 11km west-northwest of the nearest turbine;
- WLA26 Coulin and Ledgowan Forest, 32km west-southwest of the nearest turbine;
- WLA27 Flowerdale - Shildaig – Torridon, 39.5km west of the nearest turbine;
- WLA34 Reay – Cassley, 40km north of the nearest turbine.

2.14 Turbines Ts 2 – 5 and Ts 8 and 9 would be sited within WLA 29 Rhiddoroch – Beinn Dearg – Ben Wyvis and an assessment of the likely impacts on the Wild Land Qualities of that WLA only is included within the EIA.

2.15 Key recreational and tourist activities in the wider area include, but are not limited to, walking, bird watching / birding / twitching, stalking / hunting / fishing, golf, climbing and mountaineering, paragliding, horse riding, road cycling and mountain biking.

Environmental Designations and Habitats

2.16 The site is not covered by any international or national statutory designation for natural heritage. There is a total of 13 such designations and one non-statutory National Natural Reserve within 10km of the application site, and 20km for those designated for migratory geese. These designations are set out below (from EIAR Volume 2, Chapter 8: Ecology, Table 8.6 – Statutory ecological designated sites, and Chapter 9: Ornithology, Table 9.5 – Statutory ornithological designated sites).

2.17

Designation	Distance to Site Boundary	Qualifying Interests
Special Areas of Conservation (SAC)		
Ben Wyvis	1.4km northeast	Acidic scree. Alpine and subalpine heaths. Blanket bog.

		Clear-water lakes or lochs with aquatic vegetation and poor to moderate nutrient levels. Dry heaths. Montane acid grasslands. Plants in crevices on acid rocks. Tall herb communities.
Conon Islands	6km southeast	Alder woodland on floodplains.
Loch Ussie	6.6km southeast	Clear-water lakes or lochs with aquatic vegetation and poor to moderate nutrient levels.
Special Protection Areas (SPA)		
Ben Wyvis	2.4km northeast	Breeding dotterel.
Glen Affric to Strathconon	3km southwest	Breeding golden eagle.
Cromarty Firth SPA and Ramsar site	10.5km east	Wintering greylag goose. Breeding osprey. Breeding common tern. Overwintering wetland species.
Inner Moray Firth SPA and Ramsar site	16.5km southeast	Wintering greylag goose. Breeding osprey. Breeding common tern. Overwintering wetland species.
Sites of Special Scientific Interest (SSSI)		
Ben Wyvis	1.4km northeast	Blanket Bog. Upland assemblage. Dystrophic and oligotrophic lochs. Vascular plant assemblage.

Lower River Conon	6km southeast	Open water transition fen (includes swamp). Saltmarsh. Wet woodland.
Loch Ussie	6.6km southeast	Oligo-mesotrophic loch. Upland oak woodland.
Allt nan Caorach	9km northeast	Subalpine dry heath. Upland birch woodland.
National Nature Reserves (NNR) (Non-statutory)		
Ben Wyvis	1.4km northeast	Species of interest include – Golden eagle, ptarmigan, dotterel, and snow bunting.

- 2.18 The site comprises several upland habitats with the most dominant being blanket bog and wet and dry heaths, although invasive rhododendron has been surveyed on parts of the bog. Lower and sloping portions of the site comprise acid and marshy grasslands and bracken that are used for agricultural grazing. Higher elevations host non-vascular habitats (which describes species such as mosses, liverworts and hornworts, and lichen heath) with the scarce species of dwarf birch also found on higher altitude blanket bog. There is an area of birch woodland within the centre of the site and conifer plantations along its boundary, while an area of long-established woodland (of plantation origin) overlaps the site's southwest (see EIA Volume 3a, Figure 8.3: NVC Survey Plan and Volume 2, Chapter 8: Ecology, Paragraph 8.6.16).
- 2.19 Classes 1 and 2 peatlands, which are defined as nationally important carbon rich soils, deep peat, and priority peatland habitat of high conservation value are present within the site. Class 1 occupies much of the central and western areas of the site with Class 2 being present to the southwest. Class 5 non-priority peatland is also well represented particularly at the site's eastern extent. 17% of the site area was surveyed to contain peat depths of over 1m and up to 4.8m.
- 2.20 Evidence of badger, mountain hare, pine marten, water vole, and deer was recorded within the site. Red squirrel records were returned within 2km of the site, with some suitable habitat recorded within it. There were no nearby records of otter, although habitat is deemed suitable. The site is located within a Scottish wildcat priority area and contains suitable foraging habitat; however, no den sites or other evidence of the species was recorded. Myotis species of bat along with brown long-eared, common and soprano pipistrelles were also recorded on site, as was suitable habitat for small number of

migratory and non-migratory fish within three watercourses planned for new crossings (Allt Fionnaidh, Allt Abhagaith, and Allt na Goibhle).

- 2.21 Additionally, the site and surrounds have been surveyed for ornithological interests with several sensitive species recorded during flight activity surveys including golden eagle, hen harrier, merlin, peregrine falcon, red kite, white-tailed eagle, golden plover, greenshank, greylag goose, pink-footed goose, red-throated diver, teal, and whooper swan. Several breeding birds were also recorded including barn owl, golden eagle, goshawk, osprey, peregrine, and common crossbill, curlew, golden plover, greenshank, mallard, oyster catcher, ptarmigan, red-grouse, snipe, and teal. Four black grouse leks were also recorded within the study area, two on site, while surveys returned limited evidence of breeding divers on the lochs within the site.

Built and Cultural Heritage

- 2.22 There are no designated cultural heritage assets on site and only two Scheduled Monuments, SM2720 Little Garve Bridge, 80m east of Tigh Na Drochit, and SM1667 Achilty, henge 180m NE of The Croft, are 5km or less of the nearest turbine. Several more designated sites are within 10km of the turbines six of which are scoped into the assessment with the agreement of Historic Scotland, including:

- SM13745 Henge, 135m SW of Fiodh Mhor;
- SM1672 Knock Farril, fort, Knockfarrel, Fodderty;
- SM2312 Heights of Brae, chambered cairn 375m NNW of Firth View;
- SM2466 Clachan Corrach, chambered cairn 375m E of Beallach Farm;
- SM1668 Henge, and 180m W of Teanagainn Cottage.

- 2.23 One Category A-Listed Building, LB14030 Fairburn Tower, and two Garden and Designed Landscapes, GDL00174 Fairburn and GDL0094 Castle Leod, are included in the EIA assessment. The greater concentration of designated sites in the study area are to the southeast of the application site between 5km and 10km in the settled farmed river plains.

- 2.24 There are several non-designated historical assets within the site dating from post-medieval to modern that are generally associated with land management, particularly concentrated close to the access track, with fewer within wind farm area proper. The potential for buried and unrecorded archaeological assets though is low.

Cumulative Development

- 2.25 Appendix 1 of this report provides details of operational, consented, under construction, and application stage (in planning) wind farm projects within the 45km landscape and visual impact assessment (LVIA) study. The cutoff date for the applicant's LVIA was 14 November 2024 (EIAR Volume 2, Chapter 7: Landscape and Visual Impact Assessment).
- 2.26 The status of several schemes in the cumulative assessment study has changed since the LVIA's cutoff date, however. Strathrory Wind Farm Redesign (THC ref. 22/02442/FUL) is

constructed and will be likely be operational very soon. Aberarder Wind Farm is not included in the cumulative table however is around 45km from the application site and is currently under construction. Chrathaich and Garvary Wind Farms are now consented while 12 pre-application schemes have moved to the in-planning stage, and five further schemes are at the pre-application Scoping stage.

3. PLANNING HISTORY

- | | | | |
|-----|------------------|--|-------------------------------------|
| 3.1 | 31 July 2025 | 25/02377/SCOP: Carn Fearna Wind Farm Grid Connection - The proposed development is for the installation of approximately 7.5km of 132 kV OHL, supported by wooden H poles, to connect the proposed CSE compound and the proposed extension to the existing Corriemoillie 132 kV substation | Scoping application decision issued |
| 3.2 | 10 February 2025 | 25/00219/SCRE: EIA Screening Opinion for construction and operation of a 132kV single circuit overhead line (OHL) of approximately 7km to connect the proposed Carn Fearna Wind Farm to the existing Corriemoillie Substation | Screening application EIA required |
| 3.3 | 25 August 2023 | 23/03238/SCOP: Carn Fearna Wind Farm -EIA Scoping request for the erection and operation of a wind farm, comprising up to 14 wind turbines with a tip height of approximately 200m, Battery Energy Storage | Scoping application decision issued |

System (BESS) and ancillary infrastructure

- | | | | |
|-----|---|---|-------------------------------------|
| 3.4 | 10 October 2023 | 23/03462/PREMAJ Carn Fearna Wind Farm - 14 wind turbines with a tip height of up to 200m | |
| 3.5 | 5 September 2014 | 13/04791/FUL: Carn Gorm Wind Farm - Formation of 42 mw wind farm, including erection of 14 wind turbines on 70m towers (height to tip 115m) (rotor diameter 90m), erection of control building and sub-station, erection of anemometer mast, formation of hardstandings, borrow pits, access tracks, temporary construction compound and site entrance/turning facility | Application refused |
| 3.6 | 31 May 2013 | 13/00844/PAN: Erection of 19 wind turbines & associated ancillary works (Carn Gorm Wind Farm) | PAN reported to Committee |
| 3.7 | 20 November 2012 | 12/04019/SCOP: Formation of wind farm of up to 19 turbines with generating capacity of up to 47.5mw (blade tip height 125m) | Scoping application decision issued |
| 3.8 | THC refused the application for Carn Gorm Wind Farm (THC ref. 13/04791/FUL), which was proposed for the same site, on the grounds that the proposal would result in significantly detrimental effects on the Ben Wyvis Special Landscape Area, and the Ben Wyvis mountain massif, Wild Land Area 29 – Rhiddoroch – Beinn Dearg – Ben Wyvis, and significantly detrimental visual effects including cumulative and sequential effects on | | |

transport routes. The subsequent appeal was dismissed by the Reporter appointed by Scottish Ministers.

4. PUBLIC PARTICIPATION

4.1 Advertised: EIA Development and Unknown / Bad Neighbour:

- The Scotsman - 25 April 2025
- Edinburgh Gazette - 25 April 2025
- The Press and Journal - 25 April and 02 May 2025
- Ross-shire Journal - 25 April and 02 May 2025

Representation deadline: 04 June 2025

4.2 THC 0

:

4.3 ECU 1,045 objections

:

4.4 Material considerations raised are summarised as follows:

- a) Conformity with the Development Plan, and other related national energy policy documents.
- b) Whether the EIA has assessed all environmental effects including cumulative assessments with other proposed wind farms.
- c) The planning history of the site - consideration that the site has been refused for a wind farm previously.
- d) Residential and community amenity impacts including from noise and shadow flicker as well as risk to community health and safety from accidents pollution events.
- e) Concern regarding the carbon footprint of the development including from disturbance of carbon rich soils and land take.
- f) Contribution to national and international renewable energy targets.
- g) Socio-economic impacts including on local businesses, employment opportunities, tourism and recreational interests.
- h) Siting, layout, and design considerations including proximity to communities and schools.
- i) Landscape impacts including cumulative impacts and effects on landscape character including a regionally significant landmark, SLAs, WLAs,
- j) Visual effects including from specific viewpoints, settlements, locations, and routes including the A832, A835, and the North Coast 500, and concerns with red aviation safety lighting, and the visual impact from the grid connection.
- k) Effects on the experience of dark skies.
- l) Impacts on the historic environment including Garve Bridge and Culloden Battlefield.

- m) Ecological effects including cumulative effects on protected species and ornithological interests, biodiversity, habitats including peatland habitats, and habitat management.
- n) Impacts on designated sites for natural heritage.
- o) Impacts on trees.
- p) Impacts on geological interests.
- q) Concern regarding site decommissioning and recycling/reuse of turbine components.
- r) Traffic, transport, and impacts on the public road network including the structural integrity of Council maintained roads and road safety, as well as cumulative impacts.
- s) Impacts on the water environment.
- t) Impacts on crofting.

4.5 Non-material considerations raised are summarised as follows:

- a) The need for the development including grid capacity as well as exceedance of local and national energy consumption.
- b) The profile of the applicant/developer.
- c) Developer profits.
- d) The profile of the contributor submitting a representation.
- e) Impacts on property values.
- f) Impacts on democracy.
- g) Electricity costs.
- h) Turbine manufacturing processes.
- i) Constraints payments.
- j) Preference for other types of energy generation.
- k) Preference for offshore locations for wind turbines.
- l) Impacts on house prices.
- m) Assertion that the application represents a breach of Human Rights
- n) Individual claims to mental health impacts and made on behalf of others.
- o) Caesium fallout in peat (SEPA's position is that this does not pose a realistic risk to human health).
- p) Electro-magnetic fields generated by turbines as these do not pose a threat to human health.
- q) Blade pass frequency (THC's EHO has advised that this refers to infrasound, which has been discounted as a significant issue to human health by the established guidance).
- r) Impact of the application on public resource and funds.
- s) Speculation that wind farm development leads to depopulation of rural areas.
- t) Green-washing.
- u) Assertion that the proposal would lead to criminal vandalism.
- v) Accusation of THC officer corruption.

5. CONSULTATIONS

Community Councils (CC)

- 5.1 **Garve and District (host) CC objects** to the proposal on the grounds of visual, cumulative, ecological and environmental effects including effects from concrete bases being left in situ, as well impacts from traffic and transport on public roads. It questions the need for the development.
- 5.2 **Strathpeffer (host) CC objects** to the application on the grounds of the site's planning history, its landscape impacts including on the Ben Wyvis SLA and on WLA29 – Rhiddoroch – Beinn Dearg – Ben Wyvis, as well as its visual impacts and cumulative impacts. It questions the need for the development including its location away from areas of highest energy consumption and considers the rate of community benefit payments to be low having not been index linked to the 2014 figure of £5,000 MW per annum.
- 5.3 **Contin CC objects** to the application on the grounds of detrimental visual effects and notes specific views of concerns. Additionally, it objects on the grounds of ecological impacts, traffic, transport and road impacts during construction, and cumulative impacts with other wind farm developments in the area. It considers the rate of community benefit payments to be low having not been index linked to the 2014 figure of £5,000 MW per annum, and that the socio-economic benefits are short term and small with the scheme resulting in disbenefits overall.
- 5.4 **Dingwall CC** was notified by the Council but has not provided a response to either the Council or the ECU.
- 5.5 **Kiltearn CC** was notified by the Council but has not provided a response to either the Council or the ECU.
- 5.6 **Marybank, Scatwell and Strathconon CC** was notified by the Council but has not provided a response to either the Council or the ECU.
- 5.7 **Maryburgh CC** was notified by the Council but has not provided a response to either the Council or the ECU.
- 5.8 **Muir of Ord CC** was notified by the Council but has not provided a response to either the Council or the ECU.

Consultees for the Highland Council

- 5.9 **Access Officer** does not object but highlights that the popular and well accessed main walking route on Little Wyvis would be directly impacted by construction, which would require mitigation measures to be agreed with the Council prior to commencement and secured by condition for an Outdoor Access Management Plan. It considers that the visual amenity of several popular routes within the area including Ben Wyvis would be

significantly impacted by the development and advises that the Land Reform (Scotland) Act 2003 provides access rights over the wind farm site but that there is little evidence that the site area is popular for public access.

- 5.10 **Archaeology Officer – Historic Environment Team** does not object to the proposal and advises that there no significant direct or indirect impacts to known assets are anticipated. Additionally, the officer advises that the potential for buried, unrecorded assets is low and that precautionary monitoring would not be required provided that good practice measures are included in the Construction Environment Management Plan, in the event that previously unrecorded assets are discovered during construction works.
- 5.11 **Conservation Officer – Historic Environment Team** does not object and advises that of limited impacts on listed buildings in the wider area, which are generally greater than 5km from the development. The officer advises that the larger impact on the setting of an historic asset would be from Little Garve Bridge, which is a Scheduled Monument and under the remit of Historic Environment Scotland.
- 5.12 **Ecology Officer objects** to the proposal on the grounds that the avian flight survey data is outdated, that biodiversity enhancement measures and peatland restoration measures fall short of that required by NPF4, as well as on the grounds that the mitigation hierarchy has not been followed so that the layout avoids priority blanket bog habitats.
- 5.13 **Environmental Health** does not object subject to conditions to secure noise limits from the operation of the wind farm at noise sensitive properties and to secure that the Construction Environment Management Plan includes a private water supply action plan and construction noise mitigation measures.
- 5.14 **Forestry Officer objects** to the proposed development due to a lack of supporting information regarding the impact on roadside trees along the proposed route for the delivery of abnormal indivisible loads.
- 5.15 **Landscape Officer objects** to the application on the grounds that the development will result in significant detrimental effects on landscape character, the designated Ben Wyvis Special Landscape Area including the regionally distinctive landmark of the Ben Wyvis Massif itself, as well as significant detrimental visual effects on several residential, recreational, and transport user receptors over a wide geographical area.
- 5.16 **Transport Planning** does not object and advises that the proposal could proceed without having a detrimental impact on the Council maintained road network subject to compliance with an agreed Construction Traffic Management Plan and Abnormal Load Management Plan, and subject to appropriate mitigation measures along with completion of a Section 96 Wear and Tear Agreement with financial mechanism, all of which should be secured by condition prior to works commencing on site.

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- 5.17 **British Horse Society** does not object but advises that vehicles travelling to and from the site are likely to meet equestrians on the road and that drivers should be aware of this risk and take note of its published “Guidance to drivers of large vehicles”. It considers that equestrians using tracks and paths near to the site and construction activities should be considered during construction activities and within the Outdoor Access Management Plan.
- 5.18 **British Telecom** does not object as the proposal is not anticipated to not cause interference to BT’s current and presently planned radio network.
- 5.19 **Defence Infrastructure Organisation** does not object subject to conditions to secure its prior approval of an appropriate aviation lighting scheme as well as details of turbine locations and height, construction equipment heights, along with the dates for the commencement of construction activities and the first operation of the development. This information is required for aviation charting purposes in the interests of aviation safety.
- 5.20 **Highlands and Islands Airports Ltd.** does not object to the application subject to conditions to secure an assessment and any further mitigation relating to the Instrument Flight Procedures of Inverness Airport, should one be deemed to be required, along with a Radar Mitigation Scheme relating to the Primary Surveillance Radar at Inverness Airport.
- 5.21 **Historic Environment Scotland** does not object to the proposal but advises that the development would have a significant effect on the setting of Little Garve, bridge over Black Water (SM2720), but that it would not raise issues of national importance. It has also considered effects on the settings of the Heights of Brae Chambered Cairn (SM2312), Knock Farril Fort (SM1672), Clachan Corrach Chambered Cairn (SM2466), Henge, 135m SW of Fiodh Mhor (SM13745), Teanagairn Cottage, henge 155m W of (SM1668), as well as the Category A-Listed Fairburn Tower (LB14030), and associated Garden and Designed Landscape (GDL00174), and that of Castle Leod (GDL00094).
- 5.22 **Joint Radio Company** does not object as the development has cleared, subject to a 50m micro-siting limit, with respect to radio link infrastructure operated by local energy networks.
- 5.23 **Mountaineering Scotland objects** to the proposal on the grounds of adverse visual impacts and impacts on the visual amenity of recreational users of both Ben Wyvis and Little Wyvis, when experienced from, and in long distance views to, both landscape features.
- 5.24 **National Air Traffic Services** does not object as the proposal does not conflict with its safeguarding criteria.
- 5.25 **NatureScot objects** to the proposal pending outstanding information in relation to the Glen Affric to Strathconon Special Protection Area. It has considered the proposal’s impacts in

relation to several other sites designated for international and national natural heritage including Cromarty Firth SPA, Inner Moray Firth SPA and Ramsar site, Conon Island Special Area of Conservation (SAC), and Ben Wyvis Special SPA and SAC and advises that due to their status, the requirements of the Conservation (Natural Habitats, &c.) Regulations 2017 as amended (the “Habitats Regulations”) apply and that Scottish Ministers must complete appropriate assessments where required. It also advises however, that subject to mitigation measures being secured by condition, the conservation objectives and integrity of these sites will not be adversely affected, nor will the impacts on a species of outstanding conservation importance be significant.

- 5.26 NatureScot has considered impacts against the regionally distinctive landscape of Ben Wyvis Massif and advises that the proposal would lessen the landmark quality of the feature and that visual effects may not meet NPF4 Policy 11e (ii) due to the extensive nature of effects on the distinctive landscape. It advises that the scale of the proposal in comparison with the Massif becomes more apparent with distance diminishing its prominence. It also advises that the proposal would result in significant adverse effects on Wild Land Quality 1 (A range of awe-inspiring massive, high rounded hills and plateau, as well as steep rocky peaks and ridges, offering elevated views) across approximately 5km of the southwestern arm of WLA29 Rhiddoroch – Beinn Dearg – Ben Wyvis that would likely lead to the removal of that section from the Wild Land Area designation.
- 5.27 **Royal Society for the Protection of Birds objects** to the proposal on the grounds that it has not been satisfactorily demonstrated that the proposal will not have an adverse impact on the integrity of the Glen Affric to Strathconon Special Protection Area.
- 5.28 **Scottish Environmental Protection Agency** does not object subject to conditions to secure its prior approval of watercourse crossings along with a finalised Peat Management Plan, a Drainage Management Strategy, and a Decommissioning, Restoration and Aftercare Strategy, and to ensure that micro-siting does not move infrastructure onto peat deeper than currently shown, appropriate management of the proposed borrow pits, and that works are undertaken in accordance with the good practice methods and outline construction environmental management plan submitted with the application.
- 5.29 **Scotways** does not object subject to conditions to preserve public recreational access through the site. It provides advice on public access routes, tracks, and paths in and surrounding the application site area.
- 5.30 **Transport Scotland** has requested additional information in relation to the site access junction as well as the proposed abnormal load turning facility, which would both be off the A835(T) including swept path plans and road safety audits. It also requires further consideration of how the impact of HGVs on an identified accident cluster on the A835(T) can be minimised. This information has not been submitted to the ECU.

6. DEVELOPMENT PLAN POLICY AND OTHER MATERIAL POLICY CONSIDERATIONS

- 6.1 Appendix 3 of this report provides details of the documents which 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 Section 36 applications in a similar manner given that planning permission may be deemed to be granted.
- 7.2 Schedule 9 of The Electricity Act 1989 contains considerations in relation to the impact of proposals on amenity and fisheries. These considerations mean the Scottish Ministers, and the developer, require to:
- have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and,
 - reasonably mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.
- 7.3 It should be noted that for applications under the Electricity Act 1989 that the Development Plan is just one of several considerations, and therefore Section 25 of the Town and Country Planning (Scotland) Act 1997, which requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise, is not engaged. That said, the application still requires to be assessed against all policies of the Development Plan relevant to the application, all national and local policy guidance, and all other material considerations relevant to the application.

Planning Considerations

- 7.4 The key considerations in this case are:
- a) Compliance with the Development Plan and Other Government Policy;
 - b) Energy and Economic Benefits;
 - c) Construction Impacts;
 - d) Siting, Layout, and Design;
 - e) Landscape and Visual Impacts;

- f) Natural Heritage (including ornithology);
- g) Built and Cultural Heritage;
- h) Roads, Transport and Access;
- i) Water, Flood Risk, Drainage and Peat;
- j) Noise and Shadow Flicker;
- k) Telecommunications;
- l) Aviation and Radar;
- m) Decommissioning and Aftercare;
- n) Planning Compliance and Monitoring; and,
- o) Other Material Considerations.

Compliance with the Development Plan and Other Government Policy

- 7.5 Appendix 3 of this report provides an assessment of compliance with the Development Plan / Other Material Policy Considerations. In summary, the Development Plan comprises National Planning Framework 4 (NPF4), the adopted Highland-wide Local Development Plan (HwLDP), and two area based Local Development Plans with the north of the site falling within the West Highland and Islands Local Development Plan area, corresponding to the site access, part of borrow pit 1, and T1, and the southern and larger section of the site falling within the Inner Moray Firth Local Development Plan 2 (IMFLDP2) area, which would host the remainder of the site infrastructure, along with all statutorily adopted supplementary guidance, including the Onshore Wind Energy Supplementary Guidance (OWESG), which includes a Landscape Sensitivity Appraisal for the Black Isle, surrounding hills and Moray Firth coast (including Dava Moor).
- 7.6 In addition to the above, the community led Garve and District Local Place Plan (LPP) (September 2024 to August 2029) has also been registered with the Council. While not forming a part of the Development Plan, the LPP is now a material consideration with the decision maker to decide the appropriate weight to be given in the overall assessment of the application. Of most relevance to this application, the LPP sets out the community's desire for community renewable energy projects, improved connections between communities, and enhanced public access including footpaths.
- 7.7 The principle of wind farm development is established in national policy, with the proposed development being of national importance for the delivery of the national Spatial Strategy. NPF4 considers that Strategic Renewable Electricity Generation and Transmission Infrastructure will assist in the delivery of the Spatial Strategy and Spatial Priorities for the north of Scotland, and that Highland can continue to make a strong contribution toward meeting Scotland's ambition for net zero. Alongside these ambitions, the strategy for Highland aims to protect environmental assets as well as to stimulate investment in natural

and engineered solutions to address climate change. This aim is not new and will clearly require a balancing exercise to be undertaken, which is reflected throughout NPF4.

- 7.8 The above 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 20GW 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.
- 7.9 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 7 provides an assessment against the ten Landscape and Visual Assessment Criteria contained within Section 4 of the Onshore Wind Energy Supplementary Guidance.

Energy and Economic Benefits

- 7.10 The Council continues to respond positively to the Government’s renewable energy agenda. Installed onshore wind energy developments within Highland account for around 30% of the national installed onshore wind energy capacity, with a substantial number of onshore wind farm applications pending consideration at present.
- 7.11 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. The proposed development would provide 64.8MW of installed capacity. Based on a typical capacity factor, the development is likely to generate enough renewable electricity each year which would be expected to power the equivalent of more than 56,000 homes on average each year.
- 7.12 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”.

- 7.13 The applicant's assessment of the carbon losses and gains estimates a total loss of between 82,502 and 71,300 tonnes of CO₂e due to lifecycle emissions of the turbines including embodied losses from the manufacture of the turbines, soil disturbance, forestry felling, and provision of backup power generation. The scheme is estimated to produce annual carbon savings of 170,047 tonnes of CO₂e based on coal-fired generation, 76,296 tonnes of CO₂e based on fossil fuel-mix of electricity generation, and 37,248 tonnes of CO₂e based on grid-mix of electricity generation figures (Section 4 of EIAR Volume 4, Technical Appendix 16.1: Carbon Calculator Report). The maximum estimated carbon payback time of the proposed development, is estimated at 2.2 years, although anticipated at 1.6 years, following which the proposal would be considered to contribute to national targets for the reduction of CO₂e emissions.
- 7.14 The applicant anticipates a construction period of 23 months and an operational lifetime of 50 years. There are likely to be some adverse effects caused by construction traffic and disruption, particularly due to HGV movements and when abnormal loads are delivered to site. However, such projects can also offer investment and opportunities to the local (Highland), Scotland (regional), and UK economy, including to business ranging across the construction, haulage, electrical, and service sectors.
- 7.15 As detailed in EIAR Chapter 14: Socio-economics, Recreation, Tourism and Land Use, the applicant estimates the total construction costs of the development to be £101 million (2024 prices) and that the development will result in the following benefits:
- Construction Phase (Table 14.33):
 - £31.6 million net Gross Valued Added (GVA) and 340 net job years in the UK;
 - £20.2 million net GVA and 218 net job years in the Scotland; and
 - £ 4.7 million net GVA and 50 net job years in Highland.
- 7.16 The applicant anticipates that the proposal would result in an annual average of three permanent direct jobs during the operational phase of the development, related to servicing, maintenance, repairs, and other operational support, and an annual average of 10 permanent indirect jobs in the Highland area. While the construction and operational phase economic contributions are positive and beneficial, they are not significant overall.
- 7.17 The Council published its Social Value Charter for Renewables Investment in June 2024, which has been brought to the applicant's attention. The Council's Community Wealth Building Team has been notified of the proposal who will liaise with the applicant directly to maximise community wealth building opportunities as established under NPF4 Policy 25, as well as the community benefits as per the applicant's stated commitment within the submission (EIAR Volume 2, Chapter 14, Paragraphs 14.9.7 – 14.9.9). While information on the proposed contributions to a Community Benefit Fund are signposted here to provide context for Members, Members will be aware that community benefits are not material to this assessment.

Construction Impacts

- 7.18 Construction of the wind farm would be carried out over four main phases throughout the 23 month construction period: 1) site preparation including site clearance, road and junction upgrades, and establishing construction compounds and welfare facilities; 2) main construction activities including installing internal access tracks and service roads, turbine hardstandings and cabling amongst other associated works; 3) commissioning including turbine delivery and installation as well as testing; and 4) demobilisation including removal of temporary infrastructure, restoration and reinstatement.
- 7.19 As stated, there are likely to be some adverse impacts during construction caused by construction traffic and the delivery of abnormal loads. A Construction Traffic Management Plan (CTMP) along with schemes for the delivery of turbine parts and other abnormal indivisible loads (AIL) and to protect and maintain road integrity, can be secured by conditions to manage the impacts on the local Council maintained roads. EIAR Volume 2, Chapter 13: Site Access, Traffic and Transport outlines the mitigation measures that would be included with the finalised CTMP, which, along with any additional requirements from the Council's Transport Planning Team and Transport Scotland, should be secured by conditions prior to construction works commencing on site and/or delivery of turbine parts and other abnormal indivisible loads (AIL).
- 7.20 The CTMP should be reviewed throughout the works and informed by feedback from ongoing engagement with the community through a Community Liaison Group to ensure that the affected community councils and other stakeholders are kept up to date and consulted before and during the construction period. Impacts from AIL deliveries and the requirement for pre-construction road and structure upgrades for Council maintained roads are considered in more detail in the Roads, Traffic and Access section of this report.
- 7.21 A finalised Construction and Environmental Management Plan (CEMP) would be in place during the construction phase with an Outline CEMP provided in EIAR Volume 4, Technical Appendix 3.1: Outline Construction and Environmental Management Plan. The CEMP would control potentially polluting activities and prevent adverse impacts on river catchments, water supply catchments, and the wider environment during construction. The Principal Contractor would implement measures outlined within the CEMP and the Schedule of [environmental] Commitments as set out in EIAR Volume 2, Chapter 17: Schedule of Commitments. Both documents would be updated following more detailed ground investigations, which would be undertaken post-consent, with finalised versions requiring to be secured by conditions in agreement with the relevant internal and Statutory Consultees.
- 7.22 As part of, and along with, the CEMP, construction must also comply with finalised and agreed plans and strategies for pollution prevention; construction methods; peat and soil management; site waste management; construction dust management; water quality management and fish monitoring; species protection; breeding bird protection;

construction traffic management; biodiversity enhancement and habitat management; historic environment protection; and site restoration and aftercare. Compliance with the CEMP and other plans and strategies will be overseen by a suitably qualified and experienced Environmental Clerk of Works (EnvCoW) and any other qualified Clerks of Work or consultants as required, which should be secured by condition.

- 7.23 The anticipated construction hours would be from 08:00 - 19:00 Monday to Friday and Saturday 08:00 to 13:00. No working is proposed on Sundays (public holidays are not specifically mentioned) although the applicant proposes exceptions for delivery of AIL. Concrete delivery and foundation pours would require flexibility due to logistical factors outwith the applicant's control such as scheduling controls imposed by Police Scotland and weather constraints for example. Works that would not result in noise at sensitive properties would also be permissible outwith these hours provided the proper environmental controls are in place, such as minimising disturbance on wildlife through light pollution for example.
- 7.24 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.
- 7.25 The Council's Environmental Health Officer (EHO) has no objection and advises that construction noise at turbine sites is not likely to result in significant issues at noise sensitive receptors, due to separation distances, but that the formation of the site junction and access tracks, along with subsequent construction traffic, is likely to be closer to receptors and result in adverse impacts. It is expected that the developer and Principal Contractor will employ the best practicable means to reduce the impact of noise and vibration from construction activities, as well as to control the impact from dust on receptors, at all times, with schemes for the same to be secured through the CEMP.
- 7.26 As detailed in EIAR Volume 4, Technical Appendix 10.3: Schedule of Watercourse Crossings, eleven new, and the potential upgrading of five, watercourse crossings would be required within the site. Additionally, only the offsite turning circle would be within an area of known flood risk (from the Abhainn Srath Rannoch fluvial source) while no infrastructure would be within 50m of watercourses or water bodies, with the exception of tracks and watercourse crossings. Since 01 November 2025, water management is now regulated under the Environmental Authorisations (Scotland) Regulations 2018 (EASR), as governed by SEPA who has not objected to the proposal subject to conditions for its consultation and agreement on the finalised design of the offsite turning circle, all watercourse crossings, and the management of carbon rich soils including peat.
- 7.27 The applicant has requested a micrositing allowance of up to 100m for wind turbines and associated infrastructure including tracks and other hardstanding. Micrositing is acceptable within reason to address unforeseen onsite environmental constraints. However, the requested 100m limit is beyond the standard 50m for turbines which generally ensures that

the final turbine layout does not deviate substantially to what has been assessed through the landscape and visual impact assessment (LVIA). As such, it is considered reasonable to request a 50m micro-siting limit of turbines in the event Scottish Ministers consent the development, along with a reasonable vertical micro-siting limit to ensure that turbines are not sited on noticeably higher elevations of ground; in this instance a limit of 3m would be sought given the landscape and visual sensitivities of the location.

- 7.28 There may be more flexibility for micro-siting other ground based and low-rise on-site infrastructure provided it avoids moving infrastructure into watercourse buffers, Ground Water Dependent Terrestrial Ecosystems (GWDTE), and does not disturb additional peat resources to that shown in the EIAR or increase impacts on natural or cultural heritage assets including unknown archaeology. It should also be noted, however, that repositioning tracks and turbine hardstandings etc., would also have landscape and visual implications. Nevertheless, all of micro-siting limits should be controlled through condition along with requirements to ensure that any movement from the consented locations are subject to approval by the Environmental Clerk of Works (EnvCoW) with the consultation of the Council and Statutory Consultees where required.
- 7.29 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. Restoration of the temporary construction compound areas, verges, turbine base edges and the site borrow pit areas can be secured through the CEMP.
- 7.30 Should the development be granted consent, a Community Liaison Group (CLG) should be set up to ensure that the community council and other stakeholders are kept up to date and consulted before and during the construction period.

Siting, Layout and Design

- 7.31 Chapter 2, Volume 1 of the EIAR describes the site and the proposed development's evolution through four design iterations including 14 turbines at 200 m to blade tip at Scoping stage (Layout A), through to 11 turbines at the First Exhibition (Layout B) revised to nine turbines with a mixed height (200 m / 180 m to blade tip) (Layout C) and up to the EIAR Design Freeze layout also for nine turbines following further tweaks (five at 200 m – T1, 2, 3, 4 and 8 and four at 180 m to blade tip – T5, 6, 7 and 9) (Layout D).
- 7.32 The reasons for the site's selection are reported in Chapter 2, Volume 1 of the EIAR paragraph 2.2.9) which states that "[a] number of factors were considered when selecting the site for the Proposed Development including:
- the presence of a very good wind resource (determined by initial desk-based studies);
 - the availability of the site for wind energy development;
 - the site was subject to a previous onshore wind application, Carn Gorm, in 2014;
 - no planning policies which, in principle, preclude wind energy development;
 - no internationally or nationally designated sites within the site boundary;

- suitable ground conditions with limited areas of deep peat;
- suitable access point from the adjacent A835; and
- existing tracks on the site which would help minimise the length of new track required”.

7.33 The design of the wind farm has followed a constraints-led approach in order that mitigation on environmental effects is embedded within the design, with key constraints including landscape and visual, topography and ground conditions, environmental designations, proximity to residential properties, protected habitats and species, watercourses and private water supplies, cultural heritage features, aviation and radar constraints, recreation resource, fixed communication links, and wind and yield analysis.

7.34 The proposed development has undergone several iterations with each layout involving a review of wireline visualisations from key landscape and visual receptors, consideration of setting impacts on cultural heritage assets, potential noise effects on residential properties, impacts to peat, hydrology, ecology and consideration of the energy generation seeking to maximise wind yield. Turbine tip heights explored during the design process ranged from 180 m to 220 m, including the use of varied tip heights across the site. The applicant also consulted with THC at pre-application stage and a design workshop was also undertaken separately. The applicant notes that feedback from both meetings has been incorporated into the design evolution process.

7.35 The Design Statement notes that the landscape and visual effects of the proposed development have been a key consideration throughout the design process. It lists a number of landscape and visual considerations as follows:

- “the relationship of the Proposed Development with the site, in terms of its landform and topography, scale, enclosure, elevation, and complexity;
- the relationship of the Proposed Development with the Ben Wyvis massif, in terms of the Ben Wyvis SLA, landscape character and views towards and from the massif;
- the effect of the Proposed Development on WLA 29;
- effects on views from key sensitive visual receptors;
- effects on the Residential Visual Amenity of residents of the area around the site;
- effects of visible aviation lighting; and
- effects of infrastructure.”

7.36 The planning history of wind farms in the area has been a consideration and in particular the refused Carn Gorm Wind Farm for 14 x 115 m turbines (THC ref. 13/04791/FUL), the site of which overlaps the current application site. Unacceptable landscape and visual effects were key reasons for refusal including significant detrimental effects including cumulative effects on the Ben Wyvis SLA and impairing the integrity of the SLA; significant detrimental effects on the Ben Wyvis WLA and significant detrimental effects on the visual impacts on Marybank, summit of Ben Wyvis, Contin, An Cabar and the A832 from Torriegorry to Gorstan. It was also noted that the proposed development would be within the setting of Ben Wyvis and would be damaging to the setting of the SLA.

- 7.37 With regard to the relationship of the proposed development with the site and its landscape character, Paragraph 3.6 of NatureScot's Siting and Designing Wind Farms in the Landscape Version 3a (August 2017) states that "Areas of transition between landscape character types are often particularly sensitive, such as the change from a lowland strath to upland foothills or scarp slopes." The Rounded Rocky Hills Landscape Character Type (LCT) – Carn Fearna unit provides a clear example of a transitional landscape, located between the highly distinctive terrain of the Ben Wyvis Massif (rounded mountains and hills) and associated land-cover to the north and the lower lying strath and wooded glen landscapes to the south, west and east.
- 7.38 The proposed turbines are of broadly consistent height across the site; however, the underlying landform within the 'host' Rounded Rocky Hills LCT – Carn Fearna unit is variable due to its pronounced undulating topography. Consequently, the apparent height of individual turbines would vary across the array in relation to the skyline and surrounding landform, resulting in an uneven and less coherent composition. While these variations would generally be less perceptible in medium to long-distance views from the south and southeast, they would be clearly evident in close-range views from these directions, including Viewpoint (VP) 8: Loch Kinellan and VP10: Marybank. The effect would be considerably more pronounced in views from the west, particularly from VPs 1: Garve, 2: Gorstan, 3: Tarvie, 24: A835 south of Loch Garve, 26: A832, Strath Bran, and 28: A832 near Torriegorry. From these locations, the turbine array would appear to rise and fall with the undulating landform, creating noticeable variations in turbine height, tip elevation and alignment. Rather than reading as a simple, cohesive array, the turbines would form a more visually complex and irregular composition, drawing greater attention to the interaction between the development and the landform. This would result in a more visually complex composition, influencing the perception of landscape scale, depth and landform.
- 7.39 In considering the relationship between the proposed development and the Ben Wyvis Massif, including the SLA, it is noted that three of the nine turbines are located within the Ben Wyvis SLA, and a further two are located very close to its boundary. The applicant notes in its Design Statement at Paragraph 10.4.1 that this relationship was one of the principal considerations in the design of the proposed development in relation to the appearance of the proposed development in views towards and from the Massif.
- 7.40 In relation to views towards the Massif, paragraph 10.5.2 of the Design Statement states that a key objective has been to ensure separation between the proposed development and the Massif and includes a series of visualisations in the Design Statement illustrating the "effective separation between the turbines and distinctive whaleback of the Ben Wyvis Massif". In the same document in paragraph 10.11, the applicant states that "The Ben Wyvis Massif covers the vast rounded mountain landform of Ben Wyvis and its smaller foothills to the east and west". The definition of the Ben Wyvis Massif is therefore unclear as it is presented by the applicant.

- 7.41 It is the view of officers that the Ben Wyvis Massif comprises not only the principal massif but also the characteristic 'whaleback' landform and the lower hills to the east and west. The distinctive landform of Little Wyvis and its lower slopes form the 'tail' of this feature and are integral to the wider setting of the Massif, within which the proposed turbines would be located. This is clearly evident in several VPs that illustrate the full extent of the Massif and its distinctive 'whaleback' profile, particularly in views from the south and southeast (VPs 8: Loch Kinellan, 10: Marybank, 11: Knockfarrel, 14: Culbokie, 15: A862, West of Inverness, 16: Great Glen Way, 17: Inverness Castle, 18: Milton of Leys, 19: Culloden Battlefield, 21: A9, Black Isle and 22: A835 / B9169 Crossroads).
- 7.42 Resultantly, the design of the wind farm is not considered by officers to provide an appropriate degree of separation between the proposed development and the Massif. It is acknowledged that, in some views, there is physical separation between the proposed turbines and the head of the Ben Wyvis plateau's characteristic 'whaleback' landform. However, it is not accepted that the proposed development would occupy a peripheral position relative to the principal focus of the view. Rather, by virtue of its scale, movement, and location, the proposed development would introduce an additional focal point in views from the south and southeast, altering the perception of landscape scale and distance and eroding the integrity of the distinctive 'whaleback' profile that defines the skyline. NatureScot notes in its consultation response of 3 October 2025 that "the turbines would both compete for dominance whilst diminishing the existing prominence of the distinctive landform feature of the Ben Wyvis massif". Officers are in agreement with the opinion of NatureScot in this regard.
- 7.43 NatureScot's Siting and Designing Wind Farms in the Landscape Version 3a also states (at paragraph 3.27) that "Skylines are of critical importance", noting that "The skyline may be especially valued if it conveys a sense of wildness; forms the backdrop to a settlement; is a particularly distinctive landform, or where notable landmarks and/or cultural features appear on it". In this instance, Officers consider the distinctive landform of Ben Wyvis to contribute to its landmark status, adding emphasis to the importance of preserving its unique skyline, which includes the skyline of the surrounding summits that contribute to the Massif's setting. The NatureScot paragraph continues to state "...the design of a wind farm from key viewpoints and routes should ensure it does not detract from the character of a distinctive skyline." The guidance continues, at paragraph 3.28 to state that "Care should be taken to ensure that the wind farm does not overwhelm the skyline." Paragraph 3.29 further states that "Distinctive and prominent skylines should not be interrupted by turbines". It is clear then, that in this case, the siting of the proposed development represents a clear departure from this basic design principle.
- 7.44 As reported in the Design Statement and despite efforts being made to reduce the effects of the proposed development on views towards the distinctive Ben Wyvis Massif, the very nature of the site's location at the foot of Little Wyvis means that the skyline would be interrupted as the viewer's eye follows and descends the landform. The proposed development would detract from the distinctive skyline of the Massif and, by virtue of its

scale, movement and location, would assume visual prominence in views from the south and southeast. Furthermore, its siting on the 'tail' of the characteristic 'whaleback' landform would adversely affect the integrity of the wider setting of the Massif. This is particularly evident at VPs 8: Loch Kinellan, 10: Marybank, 11: Knockfarrel, 15: A862, West of Inverness and 22: A835 / B9169 Crossroads.

- 7.45 The views towards the Massif from the northwest are less widely available than those from the south and southeast. However, where visible, the 'whaleback' landform of the Massif is well understood and appreciated. This is evident in VPs 25: A835 Loch Glascarnoch and 32: Am Faochagach. The proposed development would be less evident along the A835 at Loch Glascarnoch where it would appear on the lower slopes of Little Wyvis with intervening landform screening the lower parts of the turbines, however, in VP32: Am Faochagach, the proposed development would detract from the overall appreciation of the wider setting of the Massif. Even in long-distance views such as from VPs 18: Milton of Leys and 19: Culloden Battlefield, the scale and movement of the turbines could draw attention.
- 7.46 In relation to views from the Massif, the applicant notes in paragraph 10.6.1 of the Design Statement that "Views from the Ben Wyvis Massif are of key importance in the layout design of the proposed development, as high points within the Massif gain spectacular views across the surrounding landscape, which is widely varied in character." VPs 4, 5 and 6, Little Wyvis, An Cabar, and Ben Wyvis respectively, are all important representative views of the Massif. VPs 5 and 6 are located on the head and spine of the characteristic 'whaleback' ridge of the Ben Wyvis Plateau, while VP4 represents views from Little Wyvis, which forms the 'tail' of the distinctive 'whaleback' landform and contributes to the wider setting of the Massif.
- 7.47 It is agreed that visibility from the summit of Ben Wyvis (VP6) has been reduced through the design process, however, despite this, the proposed development (seen as hubs and blades) would add close range, from within 6km of, wind farm development to this summit compared to other more distant visible operational and consented wind farms. The closest operational wind farm is Novar Wind Farm located 8km to the east of the summit. Although the proposed turbine towers would be contained below the skyline, the rotating blades would extend above the foreground landform, creating an intrusive visual presence. The proposed turbines would reinforce awareness of the wind farm for hillwalkers continuing along the ridge from An Cabar (VP5), as both locations form part of the same walking route from Black Water. Views from other distinctive peaks of the Massif would be greatly affected including An Cabar, and Little Wyvis (VP4). This is discussed in detail in Appendix 5 in relation to the particular VPs.
- 7.48 In addition to the above, six of the nine turbines of the proposed development are located within the southwestern part of WLA29 Rhiddoroch – Beinn Dearg – Ben Wyvis. Whilst the applicant notes that it has not been possible to remove all visibility from the WLA, it states that the proposed development has been specifically designed to minimise and mitigate

significant effects on the wild land qualities (WLQs) of the WLA. NatureScot contends that the resultant material change to the experience of one WLQ is to such a degree that the 5km area southwest of Ben Wyvis would no longer merit inclusion within the WLA. These effects would result from the siting of the proposed development partially within the WLA, compounded by the vertical scale of the turbines and visible aviation lighting, and are not considered by NatureScot to be easily overcome by siting, design or other mitigation. This view is accepted.

- 7.49 With regard key sensitive visual receptors, the applicant notes in its Design Statement (paragraph 11.4.3) that “the design iteration has also made a considerable difference to the appearance of the proposed development at a number of key sensitive viewpoints...” It provides illustrations for a number of design VPs including 11: Knockfarrel, 23: A835, Contin, 24: A835, south end of Loch Garve, 27: A32 Lochluichart and 28: A32 near Torriegorrie.
- 7.50 Given the location of the site and the scale and positioning of the turbines, it is not accepted that these highly sensitive views have been successfully mitigated. All of these views would be significantly affected by the proposed development where the layout of the wind farm is perceived as a poor fit in relation to the underlying landform and against good design principles, as set out in NatureScot’s Siting and Designing Wind Farms in the Landscape Guidance Versions 3a (2017). The proposed layout has not achieved all the design objectives set out in the Design Statement. This is discussed in detail in Appendix 5 in relation to the particular VPs.
- 7.51 Furthermore, the proposed development has sought to minimise effects during the hours of darkness in the LVIA (Chapter 7, Volume 1) through a reduced lighting scheme (Technical Appendix 15.1, Volume 4), whereby it has been agreed with the Civil Aviation Authority that only four of the nine turbines would be lit on the hub, as well as avoiding the need for the use of intermediate lighting on the turbine towers. Nevertheless, there would be a number of significant effects experienced during the hours of darkness from several locations which are considered in the respective Hours of Darkness – Effects of Aviation Lighting section below.
- 7.52 In addition to the design of the proposed development on its own, it is equally important that siting, layout, and design principles consider the cumulative effects arising from a proposal’s relationships with other wind energy developments in its wider context given the ever-increasing presence of turbines in the landscape. Wind farm design should take into account the baseline and potential additional changes to the current baseline.
- 7.53 As such, factors such as the degree to which nearby developments follow similar ‘development patterns’ in terms of siting, layout, and design can determine the degree to which schemes sit harmoniously or discordantly together in the landscape. Therefore, similarities and differences between receiving landscapes and LCTs; the degree to which the size and scale differences between the schemes and individual components, especially turbine proportions such as relative tip and hub heights, rotor diameters, and direction of

rotor spin, are experienced by receptors and what effects these have on receptors such as the enjoyment of the view qualities, amongst others, are key in the assessment of landscape and visual effects.

- 7.54 Indeed, NatureScot's Siting and Designing Wind Farms in the Landscape Guidance Versions 3a (2017) notes that it can be particularly challenging to accommodate multiple wind farms in an area and so advances wind farm design objectives of limiting visual confusion and reinforcing the appropriateness of each development for its location.
- 7.55 There are no other operational, consented or other application wind farms within the 'host' Rounded Rocky Hills LCT: Carn Fearna unit, which is a relatively small LCT unit. There is, however, the operational Fairburn Wind Farm (20 turbines at 100m to blade tip) located in another unit of this LCT 9km to the south in the wider area. Other closer operational and consented wind farms are located in other LCTs including the cluster of Corriemoillie (17 turbines at 125 m to blade tip), Lochluichart and Extension (23 turbines at 125 m to blade tip), Kirkan (17 turbines at 175 m to blade tip) and Lochluichart Extension II (5 turbines at 149.9 m to blade tip), all located between 8-10km to the west in the Rounded Hills and Moorland Slopes LCT. The operational Novar and Extension (50 turbines at 55.5 m/99.5 m to blade tip) is located to the northeast at 13km distance within the Rounded Mountain Massif LCT.
- 7.56 It is clear then that the proposed development would affect a new unit of the Rounded Rocky Hills LCT which is not directly affected by other operational and consented wind farms, however, they may have an indirect, non-significant effect on it. The proposed development would bring turbine development close to the Strath LCT in comparison to operational and consented wind farms which would have some but limited effects on this LCT. The proposed development would also bring turbine development very close to the southwestern and central parts of the Rounded Mountain Massif LCT however the Corriemoillie cluster would have some indirect effects on the LCT at further distance. The smaller Novar and Extension Wind Farm would have direct effects on northeastern parts of this LCT.
- 7.57 In general, the proposed development deviates from the established pattern of operational and consented wind farms which are largely associated with less sensitive and larger upland areas, set away from the 'dominant landmark' Massif.
- 7.58 The operational Novar and Extension Wind Farm, although visible in the same view from the south / southeast in combination with the proposed development (for example, VPs 14: Culbokie and 21: A9: Black Isle), would appear less apparent on the skyline given its smaller scale. It would be located further than the proposed development from the summit of Ben Wyvis by 2km on a separate collection of hills separated by Glen Glass and would not be associated with the Massif itself which is evident in VPs 14: Culbokie and 21: A9, Black Isle.

- 7.59 Moreover, proposals for new and repowering schemes in the study area continue to come forward and are at various stages of pre-application and application stages, the ones of most relevance include the application Abhainn Dubh (9 turbines at 149.9 m to blade tip) located on the lower slopes of the Rounded Hills and Moorland Slopes LCT; the application Ceislein (11 turbines at 200/250 m to blade tip) to the southeast of Novar, Creachan (13 turbines at 200/180 m to blade tip), Ballach (20 turbines at 200/230 m to blade tip) and the pre-application Novar Repowering (9 turbines at 200/220 m to blade tip). The pre-application Tarvie Wind Farm near Contin has been withdrawn.
- 7.60 As such, the future cumulative baseline scenario remains uncertain at this stage, with each proposal to be determined on its own merit. For the purposes of this assessment, a consideration of the total cumulative effects of the proposed development with wider future in-planning and scoping schemes is avoided in favour of the additional cumulative effects of the proposed development, that is those effects attributable to the scheme, so that that this scheme's contribution to cumulative landscape and visual effects can be better understood and to avoid making undue judgements on schemes yet to be determined.
- 7.61 Not only is consideration of how the siting, design of multiple developments relate to each other and the cohesiveness of their relationship to their surroundings from fixed viewpoints important, but also how wind farms relate to each other in terms of their frequency when moving through the landscape. Such consideration includes understanding the visual separation between schemes, which is important in order to allow receptors to experience and appreciate the character of the landscape and any special natural, architectural, cultural, and historic features in between. Care and attention are therefore required regarding design, siting and location to avoid detrimental sequential effects on important routes in the wider area.

Ancillary Infrastructure

- 7.62 In terms of design of the infrastructure on the site including the substation, access tracks, borrow pit search areas and temporary compounds, these appear to have been located to reduce landscape, visual, and other environmental effects, particularly from low-lying receptors. However, some sections of access track would be visible from these receptors notably from Strath Garve. Some of these components would be visible from higher ground such as the summit of Little Wyvis (VP4) and the upper section of its walking route located less than 1km to the nearest turbine, and some other surrounding hills summits to the south, southwest and northwest.
- 7.63 The final design of ancillary components requires to be conditioned as details of final design are not all shown within the EIAR. The applicant is aware of the Council's requirement for associated buildings to be designed in a manner appropriate to the wind farm's Highland context. The applicant has not yet committed to house transformers within the turbines themselves or externally. Housing them internally is the Council's preferred

option in order to reduce the visual clutter of additional infrastructure and could be secured by condition.

Summary to the Siting, Layout, and Design Section

- 7.64 As with all wind farm development, there remains potential for significant residual landscape and visual effects that require further consideration even though mitigation is, or should be, embedded into the design. Any assessment must pay particular attention to the specific hosting and neighbouring LCTs of the receiving landscape along with the landscape composition they engender, as well as any landscape designations in the wider area, susceptible receptors, as well as public views and the amenity of residents, recreational, and road user receptors.
- 7.65 Whilst the proposed development would not introduce a new type of development into the wider landscape, its close visual relationship with the Ben Wyvis Massif would detract from the perception of its distinctive 'whaleback' landform and erode the appreciation of the Massif as an iconic and dominant landmark, particularly in views from the south, southeast and northwest.
- 7.66 The implications of the proposed development on the physical and perceptual experience of the landscape and visual experience of the receptor are considered in the respective Landscape and Visual Effects sections below. In short, the appraisal sets out that Officers consider that the proposed development would be perceived as a poor fit within the landscape due to its scale, elevation, and location thereby detracting from the appreciation of the 'dominant landmark' of the Ben Wyvis Massif, the distinctive 'whaleback' landform, which includes Little Wyvis and its lower slopes when viewed from the south, southeast and in some views from the west and southwest, and having an adverse effect on the SLQs and integrity of the Ben Wyvis SLA. The design of the proposed development does not follow all the principles sets out in the NatureScot Guidance 'Siting and Designing Wind farms in the Landscape' Version 3a (2017) and also does not meet several of the Council's OWESG (2016) Criterion, the latter which is set out in Appendix 6 of this Report.
- 7.67 As noted in EIA Volume 2, Chapter 3: Description of the Development, the applicant has proposed a 100m micrositing allowance to allow the proposed development to respond to and mitigate against unforeseen environmental constraints during construction works. The need for this is however contested and should not exceed 50m as the changes to the positioning of turbines of greater than 50m would result in a significantly changed proposal than that which has been assessed through the applicant's landscape and visual impact assessment, which is provided in EIA Volume 2, Chapter 7: Landscape and Visual Impact Assessment, and hereafter referred to as the 'LVIA'.

Landscape Effects

- 7.68 There are several aspects to consider in determining whether the proposed development represents an acceptable degree of effect on landscape character, including:

- effects on the Landscape Character Type (LCT) as a whole, as well as the specific unit of the LCT (referred to as the Landscape Character Area (LCA)), and on neighbouring LCTs;
- effects on the local landscape composition closer to the proposed development; and,
- direct and indirect effects on landscape designations.

Landscape Character Effects

7.69 The main part of the site, in which all of the proposed turbines and majority of the infrastructure are located is within the Rounded Rocky Hills LCT: Carn Fearna unit, which corresponds with BL42: Carn Gorm and Carn Lochan Tuirc within THC's Landscape Sensitivity Appraisal for Black Isle, Surrounding Hills and Moray Firth Coast (LSA-BI). A short section of access track (new and upgraded) is located within the Rounded Mountain Massif LCT: Ben Wyvis unit, which corresponds with BL41 within the LSA-BI.

7.70 Both LCTs, along with other surrounding LCTs are considered in the applicant's assessment, including:

- LCT330: Rounded Hills and Moorland Slopes at the:
 - Corriemoillie Forest/Strath Rannoch unit (outwith of the scope of the LSA-BI); and,
 - Strath Sgitheach unit corresponding with BL38: Above Dingwall in the LSA-BL;
- LCT341: Forest Edge Farming at the Kinellan unit corresponding with BL16: Ulladale and Kinellan in the LSA-BL;
- LCT340: Strath - Ross & Cromarty (no corresponding unit in the LSA-BI);
- LCT335: Wooded Glens and Rocky Moorland corresponding to BL43: Rogie and Tarvie in the LSA-BI; and,
- Rounded Rocky Hills LCT: Lochluichart unit (outwith of the scope of the LSA-BI).

7.71 The remaining LCTs within the study area have been scoped out of the assessment due to relative visibility, distance, and other mitigating factors such as existing development including wind farms meaning the proposed development would have limited to no effect on these landscape resources.

7.72 The applicant's assessment concludes significant effects on the landscape character of the site and some parts of its surroundings up to approximately 5.5km away from the proposed development, including the following LCTs:

- Rounded Rocky Hills (LCT 331);
- Rounded Hills and Moorland Slopes (LCT 330);
- Rounded Mountain Massif (LCT 329);
- Forest Edge Farming (LCT 341);
- Strath - Ross & Cromarty (LCT 340); and

- Wooded Glens and Rocky Moorland (LCT 335).

- 7.73 Whilst the geographical extent of significant effects on these LCTs are broadly agreed, the applicant has underassessed the level of effect on LCT331: Rounded Rocky Hills and LCT329: Rounded Mountain Massif whereby officers consider that the proposal would result in detrimental effects, particularly on these LCTs.
- 7.74 For LCT331: Rounded Rocky Hills (Carn Fearna unit), the applicant's LVIA states at paragraph 7.10.15 that the value of LCT 331a (referred to as the Carn Fearna unit) is Medium. Although the partial overlap of the host LCT with the Ben Wyvis SLA is recognised within the applicant's assessment, the implications of this, according to the LVIA, are tempered by the limited extent of the unit.
- 7.75 However, officers note that 'extent' is not included as a contributing factor to determining landscape value in the LVIA methodology in Technical Appendix 7.1. Nor is the extent of a landscape unit deemed to be an appropriate mechanism for determining landscape value in GLVIA 3 or its complementary Technical Guidance Note 02/21: Assessing landscape value outside national designations.
- 7.76 Despite recognising the Rounded Rocky Hills as a transitional landscape (LVIA paragraph 7.10.8), the important role of this landscape in forming a transition between a number of different LCTs, including that it connects the Wooded Glens and Rocky Moorland of Rogie and Tarvie to the Rounded Mountain Massif as noted in the LSA-BI. Indeed, the LSA-BI notes that the susceptible characteristics of BL42 include the setting of Ben Wyvis and the Ben Wyvis SLA, not least because of its location adjacent to LCT329: Rounded Mountain Massif – Ben Wyvis unit, means that any development within it would be seen to be intimately associated with the Ben (OWESG, Page 83). However, these factors are not taken into consideration in the applicant's value and susceptibility judgements set out in the LVIA. There also appears to be limited commentary or consideration as to how this important transitional role may be disrupted or altered by the presence of the proposed development.
- 7.77 With regard to the above, officers consider that the applicant has under-assessed the sensitivity of the 'host' Rounded Rocky Hills LCT (Carn Fearna unit) to the proposed development which is considered to be of a High-Medium value and High susceptibility given the small size of the LCT unit and its partial overlap with the Ben Wyvis SLA, resulting in a High-Medium sensitivity. It is not agreed that the value, as assessed in the LVIA, is tempered by the limited extent of this unit. Most of the landscape characteristics remain relatively strong as described in the NatureScot LCT description. The extent of baseline human influences is not so significant as to limit the value of the landscape.
- 7.78 Whilst the magnitude of change is agreed as High to High-medium, this would result in a Major to Major-Moderate level of effect which would be Significant adverse across much of this small LCT rather than Major-Moderate and Moderate as assessed by the applicant. This relatively small undulating plateau on which the proposed development would be

located is, as noted, a transitional landscape between the lower Strath Garve and wooded glens to the south, west and east, and the rounded mountains and hills (including the Ben Wyvis Massif) to the north. A number of its key characteristics would be altered by the proposed development including “Low intensity land use and limited access contrasts with adjacent farmed plains and straths” and “Extensive views of adjoining plains, firths and mountains from higher levels”.

- 7.79 However, it is noted that there is no specific VP within this unit but part of the walking route to Little Wyvis passes very close to the LCT boundary to the north affording these views to the south / southeast towards the proposed development. Although occasional masts and pylons are largely absorbed by the rocky landform and vegetation, the proposed development, owing to its scale, massing and spatial extent, would form a conspicuous new element within the landscape. The wind farm would contrast with the existing landform and vegetation and materially alter the landscape character by introducing a dominant large-scale human intervention.
- 7.80 The applicant concludes that the addition of the proposed development to the existing and predicted baseline scenarios would not give rise to significant cumulative landscape effects. Officers do not agree with this conclusion. In particular, officers do not accept the applicant's assertion that the cumulative magnitude of change would be moderated by the theoretical visibility of other, more distant wind farm developments. Whilst such developments may exert a limited indirect influence on this LCT, they do not materially reduce the effects arising from the proposed development itself. This is because proposed development would represent the principal source of cumulative change within this LCT, giving rise to a high cumulative magnitude of change and resulting in a Major to Major-Moderate adverse landscape effect, turning this small LCT into a wind farm landscape. This effect is considered to be significant.
- 7.81 For LCT329: Rounded Mountain Massif (Ben Wyvis unit), BL41 in the LSA-BI, officers consider that the applicant underassesses the magnitude of change which should be High closest to the proposed development up to around 2km reducing to High-Medium and Medium up to 5.5km, and Low beyond this distance. This part of the LCT continues to have limited human influence. This magnitude of change would result in a Major to Major-Moderate Significant level of effect within 2km. There is visibility of human intervention from within the Ben Wyvis unit, but these influences are not so great as to limit the magnitude of change to High-Medium as assessed in the LVIA.
- 7.82 Officers do agree with the applicant that cumulative effects on this LCT would be Significant, however, the level of effect would be higher at Major to Major-Moderate rather than Moderate. The officer appraisal of level of effect takes account of the proximity of the proposed development to the LCT, whereby the proposal would have the greatest level of effect on the southwestern parts of the Ben Wyvis unit.
- 7.83 Based on the above appraisal, officers consider that the location, scale, elevation, and spread of the proposed development would result in an overtly prominent development

that would undermine the integrity of distinctive key landscape characteristics and character areas; with detrimental landscape effects on the 'host' Rounded Rocky Hills LCT (Carn Fearn unit), and the Rounded Mountain Massif LCT (Ben Wyvis unit).

- 7.84 Indeed, it is the ever-present Rounded Mountain Massif of Ben Wyvis along with its neighbouring rounded hills, including the 'host' Rounded Rocky Hills LCT (Carn Fearn unit), that provides not only the backdrop to, but also the focal point of, so many surrounding LCTs. In addition to forming a distinctive landmark, the Massif's characteristic 'whaleback' landform and its rounded foothills make a significant contribution to the spatial structure of the landscape. Together, they create a pronounced transition between the remote, rugged hills and strath LCTs to the west and the more complex, dynamic settled LCTs to the east, where farming, forestry, settlements, and industry are concentrated. It is the rich interplay and transition between these LCTs, with the Massif and its rounded foothills forming the central organising feature, that creates and unifies the distinctive sense of place across much of the Inner Moray Firth area and beyond into Wester Ross. As described in the LSA-BI, 'Ben Wyvis and its supporting hills are a pivotal and defining landmark for the area, acting as a compass, timepiece and a weathervane'.
- 7.85 The introduction of large-scale, skylined turbines on this landform would Significantly alter the Massif's landscape function by creating a prominent new infrastructure focus within the Massif's setting. The turbines would draw attention away from the Massif and its largely unaltered landscape context, eroding its pivotal role as the defining landscape feature of the area and diminishing the distinctive character and sense of place of the wider Inner Moray Firth and beyond to the eastern parts of Wester Ross. In that way, the proposed development would have a Significant and unacceptable effect on the landscape composition of the wider area. These effects link directly to the Massif's designation as a Special Landscape Area, the impact on the SLQ of which is discussed below.

Designated Landscapes – Ben Wyvis Special Landscape Area

- 7.86 The applicant has undertaken assessments of the proposal's effects on the Special Landscape Qualities (SLQs) of the Ben Wyvis Special Landscape Area (SLA) as described in the SLA Citation, with the assessment reported in the LVIA at Section 7.10.
- 7.87 The eastern part of the site including three turbines (T1, T2 and T4) and associated infrastructure are located within the SLA although T3 and T5 are located very close to the SLA boundary as illustrated in EIAR Volume 3a, Figure 7.4b: Landscape Designations (20km Radius). Therefore, there would be both direct and indirect effects on the SLA as a result of the proposed development. The SLA includes Little Wyvis, its lower slopes and the steep hillside to its west and southwest towards Strathgarve Forest. The undulating plateau, where most of the turbines would be located, extends southwest from the foot of the hillside and is just outwith the SLA boundary.
- 7.88 The applicant has included an assessment on its one overarching SLQ – 'Dominant Landmark and Uninterrupted Panoramas' with five sub-sections considered individually.

The SLQ description describes the presence of Ben Wyvis as a 'dominant landmark' feature in the wider surrounding landscape and the extensive often panoramic outward views from the broad and fairly level summit ridge. The SLA is not only valued for its extensive panoramic views of the Highlands out from this mountain, but also as an important feature in the landscape for settlements in the Inner Moray Firth, not least of which is the City of Inverness.

- 7.89 The applicant's assessment has concluded that the proposed development would have some effect on the one SLQ of the SLA with the magnitude of change assessed as Medium-low across all five aspects resulting in a Moderate and Significant level of effect on the southernmost part of the SLQ. The applicant also notes that this effect would be localised and intermittent which is disputed. Officers consider that the significant effect would be higher than Moderate and the effect would not be localised or intermittent. Further detail is provided below.
- 7.90 NatureScot responded to the application under landscape effects stating that "due to the shelf-like nature of the landform on which the proposal lies (VP22) the proposed turbines would appear as a well-defined and contained cluster, however due to their height and very close proximity to the Ben Wyvis Massif, the proposal would appear to dominate the distinctive features and profile, lessening the landmark quality that Ben Wyvis provides in and around the Easter Ross region (VP15)." This appraisal is accepted and is relevant to the SLQ of the SLA.
- 7.91 The applicant assesses the sensitivity of the SLA as High-medium combining a High-medium susceptibility and high-medium value, which is disputed. Officers consider that the sensitivity of the SLA as High. Ben Wyvis presents an iconic, dominant landscape feature and is a focus in views from many parts of the surrounding landscape. The views from Ben Wyvis of the surrounding landscapes are also of importance, as experienced by the many hill walkers drawn to this area. Much of the SLA also overlaps with national, although non-statutory WLA designation of the Rhiddoroch – Beinn Dearg – Ben Wyvis WLA. The value is therefore assessed as high considering all these factors.
- 7.92 In relation to susceptibility, given the distinctive skyline formed by the Massif, the importance of expansive outward views and absence of existing wind energy developments within the SLA, susceptibility is considered to be high. It is acknowledged that whilst baseline wind farms would have some influence on the SLA, these would be located at further distance in comparison with the proposed development which is partly located within the SLA. Therefore, this influence would not temper the overall susceptibility despite the simpler landform of this landscape. However, the proposed development would form the western 'tail' of this iconic whale-shaped landform, which is a distinctive feature of the landscape.
- 7.93 The SLA's sensitivities to change are listed in the citation and include expansion of built elements that would detract from the exposed open grassy slopes, as well as the construction of linear features into the exposed mountain and moorland landscape and

large-scale features in surrounding areas that could adversely affect the quality of existing panoramic views into areas with strong qualities of remoteness and wildness. Additionally, other manmade objects on open and exposed slopes can interrupt the expansive panoramas. As described in the citation, the SLA is atypical in that dominant landmark aspect of its special quality, which can only be appreciated from outwith its boundaries and with that in mind, the views within the surrounding area are orientated towards the SLA and will therefore impact this special quality to varying degrees depending on distance and the nature of the views towards it.

- 7.94 The citation notes that the convex form of the mountain, however, is less visible from its immediate surroundings and most clearly appreciated from more moderate to distant views such as from Inverness and the Black Isle. The principal effect of the proposed development on the SLA's distinctive landmark quality would be experienced in those views where the turbines would detract from the visual influence of the Massif by competing for visual prominence, thereby reducing the Massif's perceived dominance within the landscape.
- 7.95 In the above regard, the proposed development would not appear peripheral to the form of the mountain in views from the south as noted by the applicant. Instead, the proposed development would introduce an additional focal point on the lower slopes of Little Wyvis, in views from the south and southeast, negatively influencing the perception of landscape scale and distance. These lower slopes are the lower foothills of the Massif. A number of VPs illustrate this effect, most notably VPs 8: Loch Kinellan, 11: Knockfarrel, 14: Culbokie, 15: A862 west of Inverness, 21: A9, Black Isle and 22: A835 / B9169 Crossroads. VP28: A832 near Torriegorry in the west also illustrates the effect of the proposed development with the distinctive summit of Little Wyvis. However, in this view, the overall Massif is not well appreciated. There are also some longer distance views from the south / southeast that illustrate the close relationship of the turbines with the Massif including VP18: Milton of Leys Primary School.
- 7.96 The effect on outward panoramic views would be to introduce larger and significantly nearer turbines to the Massif including the summits of Little Wyvis (VP 4), An Cabar (VP5) and Ben Wyvis (VP6) where the turbines would be back clothed by landform in views to the southwest against an area displaying lesser qualities of remoteness and wildness in comparison to views to the northwest. Although only a small proportion of the proposed turbines would be visible from the summit of Ben Wyvis, they would reinforce awareness of the wind farm for hillwalkers continuing along the ridge from An Cabar (VP5), as both locations form part of the same walking route from Black Water. From all three notable summits of the Massif, it is the proximity and extent of visibility of the turbines that would detract from the summit experience although it is acknowledged this would be slightly less from the summit of Ben Wyvis itself.
- 7.97 Based on the above assessment, the proposed development would result in Significant adverse effects on the 'Dominant Landmark and Uninterrupted Panoramas' SLQ of the

SLA. The effects would vary between Major, Major-moderate and Moderate as a result of a High-medium to Medium and Medium-low magnitudes on the SLQ. The proposed development would appear to disrupt the 'Dominant Landmark and Uninterrupted Panoramas' of the Ben Wyvis Massif including the 'panoramas' available from the Corbett of Little Wyvis. The turbines would clearly be within the setting of the SLA including three turbines being within the SLA and would compromise this landmark quality. The proposed development would affect the distinctiveness and sense of place of the Massif which has a strong identity.

- 7.98 In relation to the effect on the integrity of the SLA, the applicant concludes that the proposed development would have a significant adverse effect on the integrity of the area or the qualities for which the SLA has been identified. The assessment further states that the effect would be intermittent and localised and restricted to the southernmost part of the SLA with a maximum Moderate effect during daylight hours, and not significant effects during the hours of darkness resulting from aviation lighting.
- 7.99 Officers agree that the integrity of the SLA would be compromised by the proposed development but do not accept that these effects would be localised or intermittent. Instead, the landscape qualities of the southwestern part of the SLA would be significantly altered. The proposed development would introduce a substantial increase in visible human influence through the addition of large-scale infrastructure, with effects on the SLQ extending across a considerably wider area than the applicant has assessed, as described above.
- 7.100 Accordingly, the adverse direct and indirect effects cannot reasonably be characterised as localised or intermittent. The integrity of the SLA would therefore be compromised, and, in this respect, the proposed development fails to satisfy the requirements of OWESG Criterion 3, which seeks to ensure that valued natural and cultural landmarks are respected. Furthermore, the distinctive identity of the characteristic 'whaleback' landform would be eroded.
- 7.101 With regards the proposal's effects on the SLQ during the hours of darkness, the applicant has assessed these as not significant. This judgement is agreed. However, it should be noted that there are views in and out of the SLA, referenced as part of the SLQ, that have been assessed for significant visual effects in the 200cd scenario by both the applicant and landscape officer; namely, VPs 4: Little Wyvis, 5: An Cabar and 28: A832 near Torriegorrie. Officers, also assess significant visual effects at VPs 4 and 5 when vertical directional intensity mitigation is taken into consideration. What is clear from the appraisal of visual effects (see Paragraphs 7.157 – 7.164) of this report below), is that the aviation lighting would be a distracting feature that would shift focus from the dominant landmark, especially during dusk when the Massif would be silhouetted, as well as dawn when the Massif would be in direct sunlight in good weather conditions.

Rhiddoroch - Beinn Dearg - Ben Wyvis Wild Land Area

- 7.102 It is also considered appropriate to summarise NatureScot's significant concerns regarding the proposal's impacts on the Wild Land Qualities (WLQs) of the Rhiddoroch - Beinn Dearg - Ben Wyvis Wild Land Area (WLA) given that the proposal is partially sighted within it.
- 7.103 This nearly 90,500ha WLA extends from Elphin in Northwest Sutherland at its northwest extent to southeastern slopes of the Ben Wyvis Massif and surrounding summits in Ross and Cromarty. Its four WLQs relate to its mountain peaks and summits, its deep penetrating glens, along with its sense of remoteness, sanctuary, and solitude. Six of the nine turbines are located within the southwestern portion of the WLA and as such, the applicant has presented an assessment of the impacts on its WLQs at Section 7.11 of EIAR Volume 2, Chapter 7.
- 7.104 The applicant's assessment has concluded that there would be a Moderate and Significant effect on WLQ 1 ("A range of awe-inspiring massive, high rounded hills and plateaux, as well as steep rocky peaks and ridges, offering elevated panoramas") for up to 5km distance from the proposed development. The assessment goes on to state that the effect on the WLQ would be localised and not direct despite the partial siting of the proposal within the WLA.
- 7.105 In its consultation response, NatureScot advises that the significant adverse effects on WLQ1 described in the EIAR, would constitute a material change in the experience of the quality to such a degree that the 5km area southwest of Ben Wyvis would no longer contribute to the wider WLA. NatureScot considers these effects to result from, not only the siting of the proposal partially within WLA 29, but also the vertical scale of the turbines and their visible aviation lighting extending their impacts into the hours of darkness. NatureScot does not consider these effects to be easily overcome by siting, design, or other mitigation and advises that the proposal, when considered against the current baseline without the consented Kirkan scheme, may conflict with NPF4 Policy 4(g).
- 7.106 It will be for the Scottish Ministers to decide on the acceptability of the reduction of the extent of the effective WLA with NatureScot being the technical advisor on WLA matters to the government. As such, it is not the Officer recommendation to include effects on the WLA as a reason for objection.

Visual Effects

- 7.107 Section 7.12 of the LVIA provides the applicant's visual assessment from each of the 33 viewpoints, including an assessment of what the applicant considers the significance of the visual effects would be for receptors at each viewpoint. This informs the applicant's assessment of visual effects on what are considered the principal visual receptors scoped into the EIAR; namely, residential receptors at Garve and Contin, various recreational

receptors including users of outdoor paths and trails, and road and transport receptors on routes in the wider surrounding area.

- 7.108 Unsurprisingly, there is some difference between the applicant's assessment and the appraisal undertaken by Council's officers, which is to be expected when such assessments are dependent on the application of professional judgement. Differences in judgement on the specific viewpoints are set out in Appendix 5 of this report and in the main text below.
- 7.109 The applicant assesses significant visual effects out to approximately 10km distance from the proposed development to the north, northeast, south, southeast and west at 14 out of 33 viewpoints including Viewpoints (VPs) VP1: Garve, VP2: Gorstan, VP3: Tarvie, VP4: Little Wyvis, VP5: An Cabar, VP6: Ben Wyvis, VP8: Loch Kinellan, VP10: Marybank, VP11: Knockfarrel, VP12: Peffery Way, VP23: A835 Contin, VP24: A835 Loch Garve, VP27: A832 Lochluichart and VP28: A832 Torriegorrie.
- 7.110 There is disagreement with the applicant on the level of effect and Significance at the VPs 14: Culbokie, 21: A9 Black Isle, 22: A835 / B9169 Crossroads, 26: A832, Strath Bran, 29: Sgurr a'Mhuilinn, and 32: Am Faochagach where officers assess these as significant increasing the geographical extent of significant effects to up to approximately 15km to the southeast, and up to approximately 20km to the west, southwest and northwest where the proposed development would be visible from higher ground.
- 7.111 The applicant has also underassessed the level of effect at a number of VPs including VP1: Garve, VP3: Tarvie, VP10: Marybank, VP 12: Peffery Way, VP23: A835 Contin, VP24: A835 Loch Garve, VP27: A832 Lochluichart, and VP28: A832 Torriegorrie. This is due to the difference in professional judgment on assessing sensitivity and / or magnitude which results in a different level of effect. Nevertheless, these viewpoints are agreed as significant.
- 7.112 There are other non-significant viewpoints which have also been underassessed including VP18: Milton of Leys Primary School, VP25: A835 Loch Glascarnoch, and VP31: An Coileachan.
- 7.113 In addition to the effects of the proposal as an in solus development, the applicant's LVIA has considered the cumulative effects that may arise when the proposed development is added to three different scenarios of operational, under-construction, consented and application-stage wind farms.
- 7.114 The applicant's cumulative assessment concludes that significant cumulative effects would arise for visual receptors due to the addition of the proposed development in views with other operational, consented, and application stage wind farms at four VPs; specifically, VP3: Tarvie, VP4: Little Wyvis, VP5: An Cabar, and VP6: Glas Leathad Mor, Ben Wyvis. Whilst the officer appraisal has agreed that these four viewpoints would experience significant cumulative effects, the appraisal as set out in Appendix 5 sets out the officer

opinion that the applicant has underassessed the level of cumulative effect at VPs 3, 4, and 5.

7.115 Officers also consider that there would be significant cumulative effects as a result of the addition of the proposed development at several other VPs including VP8: Loch Kinellan, VP11: Knockfarrel, VP14: Culbokie, VP21: A9, Black Isle, VP22: A835 / B9169 Crossroads, VP24: A835 Loch Garve, VP29: Sgurr a'Mhuilinn and VP32: Am Faochagach.

7.116 In general terms, the significant visual effects are a result of the proposed development introducing, or increasing the prominence of, large scale turbines of contrasting scale, colour, texture, movement and character to its receiving transitional and scenic landscape into many sections of views currently free or with limited influence of wind farm development.

7.117 For the current scheme, these significant visual effects are increased and / or exacerbated in views by the poor and incoherent composition of the turbine array. Rather than presenting as a balanced and cohesive development, the array lacks a consistent rhythm and orderly arrangement, resulting in a visually discordant composition that increases its prominence within the view. This effect arises where irregular spacing between turbines creates an uneven spread across the array, with outlier turbines extending the perceived horizontal spread of the development and increasing its visual influence within the view. It is further reinforced where turbines overlap and stack, introducing visual clutter, and where variations in hub and blade tip heights disrupt the coherence and rhythm of the skyline profile. A combination of one or more of these compositional issues would be experienced by receptors at the locations represented by VPs 8: Loch Kinellan, 10: Marybank, 12: Peffery Way at Fodderty Cemetery, 21: A9, Black Isle, 22: A835 / B9169 Crossroads, 26: A832, Strath Bran, 27: A832 Lochluichart, and 32: Am Faochagach.

7.118 The visibility of turbine bases, crane hardstandings, access tracks and other ground-based infrastructure, particularly in short and medium range views, also contributes to the proposal's significant residual visual effects. For example, the wind farm's contrasting scale, colour, and texture to the moorland site, and / or the scarring appearance of the wide access tracks required for HGVs and turbine deliveries, are particularly apparent in VPs 2: Gorstan, 3: Tarvie, 4: Little Wyvis, 5: An Cabar, 8: Loch Kinellan, 22: A835 / B9169 Crossroads, 23: A835, Contin, and 28: A832 near Torriegorrie.

7.119 Additionally, the elevated turbine towers and hubs would be skylined in views at many locations, which contributes to its prominence over a wide geographical area (see VPs 1: Garve, 2: Gorstan, 3: Tarvie, 8: Loch Kinellan, 10: Marybank, 11: Knockfarrel, 12: Peffery Way at Fodderty Cemetery, 14: Culbokie, 21: A9, Black Isle, 22: A835 / B9169 Crossroads, 23: A835, Contin, 24: A835 Loch Garve, 26: A832, Strath Bran, 27: A832, Lochluichart, and 28: A832 near Torriegorrie). In certain locations the turbines would change the character of views by replacing the sloping moorland backdrop with turbine development (see VPs 12: Peffery Way at Fodderty Cemetery, and 23: A835, Contin for example).

- 7.120 In several locations the turbines would encroach (VPs 27: A832, Lochluichart, and 28: A832 near Torriegorrie) on, or even obscure (VPs 3: Tarvie and 23: A835, Contin), the mountain Massif for visual receptors. In other locations, the siting of the skylined turbines on the 'tail' of the 'whaleback' mountain Massif, and therefore within the setting of Ben Wyvis, would appear apparent (see VPs 8: Loch Kinellan, 10: Marybank, 11: Knockfarrel, 14: Culbokie, 21: A9, Black Isle, and 22: A835 / B9169 Crossroads. Although the turbines would not appear skylined from VP32: Am Faochagach, they would be clearly positioned on the whaleback tail feature, with T1–T5 appearing to encroach upon and visually constrain upon Little Wyvis. Their placement would diminish the perceived separation between the landform features, creating the impression that the turbines hem in and compress the characteristic profile of Little Wyvis.
- 7.121 From several medium to long range views (generally between approximately 5 km and beyond 20 km), the proposed development would appear to occupy a disproportionately wide extent of the landscape for an array of only nine turbines, (albeit one that includes up to 200m to tip turbines). This perception arises from the positioning of the turbines in relation to prominent landscape features, including hill summits, field patterns, forestry blocks and settled areas, for example. This effect is illustrated in VPs 11: Knockfarrel, 14: Culbokie, 21: A9, Black Isle, 26: A832, Strath Bran, 27: A832, Lochluichart, and 29: Sgurr a'Mhuilinn.
- 7.122 Similarly, given the height of the turbines, the turbines would appear oversized when viewed alongside readily recognisable scale references within the landscape, including the telecommunications mast on Meall Ruighe an Fhìrich, overhead line towers and poles, buildings and housing, woodland and individual trees. From the more dynamic and settled landscapes of the east, and to an extent from the settled straths to the west of the site, the proposed development would appear disproportionately large in relation to the existing pattern of human intervention associated with farming, forestry, settlement and industry. These effects are clearly illustrated in VPs 2: Gorstan, 3: Tarvie, 10: Marybank, 11: Knockfarrel, 12: Peffery Way at Fodderty Cemetery, 14: Culbokie, 21: A9, Black Isle, 22: A835 / B9169 Crossroads, 23: A835, Contin, 24: A835 Loch Garve, 26: A832, Strath Bran, 27: A832, Lochluichart, and 28: A832 near Torriegorrie.
- 7.123 Even where other wind farms are visible in the views, the proposed development would have the greatest visual effect at many of the VP locations, particularly where it brings development of a much larger scale closer to the receptor (see VPs 3: Tarvie 4: Little Wyvis, 5: An Cabar, 6: Glas Leathad Mor, Ben Wyvis, 11: Knockfarrel, and 23: A835, Contin for example), where the scale difference with other existing turbines is apparent (see VPs 3: Tarvie, 5, 11: Knockfarrel, 21: A9, Black Isle, 22: A835 / B9169 Crossroads, 24: A835 Loch Garve, and 32: Am Faochagach for example), and where it increases the vertical and horizontal extent of wind energy development (see VPs 4: Little Wyvis, 5: An Cabar, and 6: Glas Leathad Mor, Ben Wyvis for example).

- 7.124 The result is a distracting and visually prominent large development whose scale and appearance are disproportionate to its landscape context, drawing the eye and reducing the sense of scale and distance in the landscape. Given the proposed development's elevated position and proximity to Ben Wyvis, it would appear within, and introduce a wholly new feature to, the setting of the Ben Wyvis Massif, detracting from the distinctive skyline of the Massif which dominates the wider area over long distances. The proposed development would have the greater effect in the overall cumulative picture at many locations, while increasing the prominence and presence of existing turbines to receptors in wider views. In that way, the proposed development would significantly reduce the intrinsic scenic, indeed dramatic, qualities of views, while for residential, recreational, and transport user receptors experiencing views from multiple surrounding locations.
- 7.125 Based on the officer's appraisal, the larger and significant part of these effects are predicted to be experienced by visual receptors up to around 15km to the southeast and up to 20km from the turbines to the west, southwest, and northwest. However, while the visual effect at several more distant VPs has not been assessed as Significant for the purposes of the LVIA, it is noted here that the effects from many of the VPs are highly illustrative of NatureScot's comments in its response that distance from the proposed development and Ben Wyvis Massif increases the distracting influence on Massif. This effect would be experienced by receptors at VPs 15: A862, west of Inverness, 16: Great Glen Way near Ladycairn, 17: Inverness Castle, 18: Milton of Leys Primary School, 19: Culloden Battlefield, and to a lesser degree at VPs 20: Simpsons Garden Centre and 25: Loch Glascarnoch.
- 7.126 Receptors include large numbers of residents in settlements and scattered communities, road and rail users, tourists and those engaged in outdoor recreational activities. Due to the extent of significant visual effects on such a wide range of visual receptors, officers do not consider that they can sensibly be considered localised. Nor do officers consider that the proposed development's significant effects have been appropriately mitigated.

Residential Receptors

- 7.127 EIAR Volume 2, Chapter 7 has assessed the proposed development's likely effect on the Residential Visual Amenity (Technical Appendix 7.2, Volume 4) of six properties within a study area of 2km – the ones taken forward into the assessment include Tigh Fiodha Larder, Tigh Fiodha, Little Wyvis and Silverbridge Lodge. The other two properties at Strathgarve Lodge are excluded from the assessment as they are outwith the ZTV of the proposed development. All four properties are located around Silver Bridge to the northwest of the proposed development. The closest property to the proposed development is Tigh Fiodha Larder, located approximately 1.7km to the nearest proposed turbine (T6).
- 7.128 The RVAA complies with the Landscape Institute's Residential Visual Amenity Assessment TGN 2/19. The RVAA indicates that one of the four properties (Tigh Fiodha Larder) would

experience a major and significant visual effect which has a high-medium magnitude of change. This property is also owned by the landowner and is a holiday let. The remaining three properties would not experience any significant effects due to the limited theoretical and actual visibility of the proposed development that is likely to be gained due to screening by landform, woodland and other buildings. It goes on to conclude that none of the four properties would reach the Residential Visual Amenity Threshold. These findings are agreed.

- 7.129 In terms of settlements, the applicant's assessment has concluded Significant visual effects for residents in parts of Contin (Major or Major-moderate adverse) (VP23) and Garve (Major-moderate or Moderate adverse) (VP1). Significant effects have also been assessed on views from residential areas that are not classified as settlements but do host residential receptors including Gorstan (Major adverse) (VP2), Lochluichart (Major-moderate or Moderate adverse) (VP27), Marybank (Major-moderate or Moderate adverse) (VP10) and Tarvie (Major adverse) (VP3). Tarvie would also experience significant visual cumulative effects due to the addition of the proposed development. Officers agree that the visual effects on parts of the two settlements and other residential areas above would be Significant and adverse.
- 7.130 Officers also assess additional Significant visual effects (including significant cumulative effects) for residents in the settlement of Culbokie (Moderate adverse). This is represented by VP14 and assessed in detail in Appendix 5 of this report. Many of the residents, particularly those in the central and southern parts of the settlement would have similar views to that of VP14 and would be significantly affected by the proposed development. Some residents in the northern part of the settlement would also be significantly affected where there are clear views to the northwest.

Recreational Receptors

- 7.131 The applicant's assessment has concluded significant visual effects for recreational receptors on paths (including Core Paths) up to 10km distance where there is a clear, open view with high visibility of the proposed development including Core Path at Loch Kinellan (VP8) (Major-moderate adverse), Core Path at Knockfarrel (VP11) with views from this location considered to be key views within the LSA-BI study area (Major-moderate adverse), and Peffery Way at Fodderty Cemetery (VP12) (Moderate adverse). The above judgements are agreed with the exception of VP12: Peffery Way where the officer appraisal considers a higher sensitivity resulting in a higher level of effect (Major-moderate adverse).
- 7.132 Whilst the applicant does not specifically identify other paths which are likely to be significant within 10km, these are likely to include paths where there are open views in and around Contin, similar to VP23: A835, Contin (Major adverse), at Marybank, similar to VP10: Marybank (Major-moderate adverse) and the main walking route to Little Wyvis from Silverbridge.

- 7.133 Critically, officers also identify additional significant visual effects beyond 10km from sections of Core Paths and the John O’Groats Trail in and around Culbokie, similar to VP14 (Moderate adverse); and a section of the NCN1 cycle route near the crossroads of the A835 and B9169, similar to VP22 (Moderate adverse). These are reported in the Viewpoint Appraisal in Appendix 5 of this report.
- 7.134 Notwithstanding Significant visual effects on the routes as described above, the overall recreational amenity and user experience of paths of the proposed development would not be adversely impacted, with the exception of the main walking route to Little Wyvis, where it is considered that the recreational amenity and user experience of the route would be Significantly adversely impacted.
- 7.135 The applicant’s assessment has also concluded significant visual effects for receptors from hilltops / walking destinations at Little Wyvis (VP4) (Major adverse), An Cabar (VP5) (Major adverse) and Glas Leathad Mor (Ben Wyvis) (VP6) (Moderate adverse). These judgements are agreed.
- 7.136 Additionally, officers also identify additional significant visual effects on other hilltops including Sgurr a’Mhuilinn (Corbett) (VP29) (Moderate adverse) and Am Faochagach (Munro) (VP32) (Moderate adverse). Other hilltops not represented by VPs that are likely to be significantly affected would be Beinn a’Chaisteil (Corbett) (Moderate adverse) which would have similar views to VP32 and would be closer; and Meallan nan Uan (Corbett), located adjacent to Sgurr a’Mhuilinn (Corbett) (VP29) (Moderate adverse).
- 7.137 Effects on the NC500 Tourist Route are considered in the applicant’s assessment under transport receptors.
- 7.138 There are two new recreational receptors which have been recently opened to the public since the applicant’s assessment; namely Inverness Castle and the Sir Hector MacDonald Memorial Tower.

Inverness Castle

- 7.139 The applicant has undertaken its assessment from the Castle Esplanade (Viewpoint 17) as the Castle including the South Tower was not opened to the public at the time. Officers have undertaken their appraisal from both the South and North towers in Appendix 5 of this report, noting that only the South tower is currently accessible to the public. The officer’s appraisal concludes a Moderate-minor and Not Significant effect from the top of the towers in comparison to a Minor and Not Significant undertaken by the applicant from the Esplanade.

Sir Hector MacDonald Memorial Tower

- 7.140 This 30m tall National Monument located on the southern hillside above Dingwall was opened to the public in July 2026. Visitors climbing the 127 steps are afforded panoramic

views of the surrounding landscape in all directions. Visitors would be of High sensitivity accounting for their high susceptibility and high value of the view.

- 7.141 Officers visited the Monument on 16 July 2026. All the proposed turbines are likely to be seen on the skyline to the northwest from the top of the Monument at approximately 12km distance. The turbines are likely to be partly noticeable in this elevated view with intervening landform and forestry in the midground likely to screen some of the turbine towers and bases of all the turbines. The turbines would be seen above the town of Dingwall and in the context of other single smaller-scale turbines to the west which would appear closer to the viewer. Given the limited extent of visibility as a result of the intervening landform and forestry, the magnitude of change would be Medium-low resulting in a Moderate effect which would be Not Significant.

Transport Receptors

- 7.142 The applicant's assessment has concluded significant visual effects from several sections of the A835 including in the vicinity of Contin (VP23) and the southern end of Loch Garve (VP24); several sections of the A832 including in the vicinity of Marybank (VP10) and Torriegorrie (VP28); and several sections of the Inverness – Kyle of Lochalsh Railway Line including in the vicinity of Garve (VP1), southern end of Loch Garve (VP24) and Lochluichart (VP27). Whilst the above judgements are broadly agreed, officers consider that in some instances, the level of effect would be higher for road users including those on the NC500 and assess additional significant effects from other locations along the routes as noted below.
- 7.143 It is to be noted that the applicant has not specially assessed minor roads (B or C roads) as visual receptors unless they are a receptor as part of a viewpoint. For example, minor roads are considered in the assessment for VPs 2, 3, 16 and 22. Officers consider that there would be significant visual effects from several minor roads in the study area, particularly those in the south and southeast given the settled nature of this part of the landscape.

A835

- 7.144 The A835, approximately 110km in length, from Tore in the southeast to Ledmore Junction in the northwest is a tourist route as well as a route used by commuters. Approximately 14km of the route overlaps with the NC500 between Wester Moy and Garve before it joins the A832, and approximately 50km between the A832 junction at Corrieshalloch and Ledmore junction also overlaps with this tourist route. Whilst the section of the route between Garve and Corrieshalloch is not a designated tourist route, some users of the NC500 may use this section of road as a short-cut rather than taking the route through Wester Ross, therefore it is reasonable to assume that tourists will often use the entire route of the A835. It is also the main road link to Ullapool, its harbour and the ferry to the Western Isles.

- 7.145 Officers consider the sensitivity of users along this route to vary between High to High-medium. The route travels through a number of settlements including Contin and Garve which would have close range views of the proposed development resulting in significant effects. There are views of the Ben Wyvis Massif from the south and southeastern parts, and northwestern parts of the route, and from many parts of these sections, the proposed development would also be visible within the wider setting of the Massif.
- 7.146 Some operational and consented wind farms that are visible from the route include Corriemoillie, Fairburn, Kirkan, Lochluichart and Extension, Lochluichart Extension II, and Novar and Extension. Other wind farms, including Auchmore 1 and 2, Coire ne Cloiche and Strathrory have theoretical visibility but have very limited influence on views from the road. Corriemoillie and Lochluichart and Extension are the closest cumulative wind farms to the A835, lying several kilometres to the south of the road as it runs along the southern edge of Loch Glascarnoch. The proposed development would largely have cumulative visibility with the Corriemoillie, Lochluichart and Kirkan schemes from several sections of the route, along with some distant visibility of Fairburn and Novar wind farms.
- 7.147 Travelling from southeast to northwest on the A835, the first notable visibility of the proposed development would be between the B9169 junction (VP22: A835 / B9169 Crossroads) and before the road descends down to meet the Canon Bridge junction including a layby where officers consider there would be significant visual effects (Moderate adverse) between 0.5-1km. This section has been assessed as Not Significant by the applicant.
- 7.148 From west of the Marybank junction (Wester Moy) to the Tarvie junction via Contin, the proposed development would be visible to varying extents from many stretches of this section of the route, except for breaks where there are intervening buildings and vegetation. This is a notable section of visibility where the proposed development would be significant and the only wind farm visible at close range in an area which presents an attractive and dramatic transition from lowland to highland. The proposed turbines would also have a particularly discordant effect on this section of the route as evidenced in VP23: A835 Contin (Major adverse). Whilst existing and consented cumulative wind farms are visible just west of Tarvie, they would appear distant through gaps in vegetation along the route, such as at VP24: A835 Loch Garve (Major adverse due to the proposed development).
- 7.149 The proposed development would be further visible from Garve (VP1: Garve) where significant visual effects (Moderate adverse) would be experienced for road users including those on the NC500. This short section has been assessed as Not Significant by the applicant. Beyond Garve, there would be some short sections of significant effects between Gorstan, Little Garve junction and Silverbridge (Major to Major-moderate adverse). Beyond Silverbridge, the proposed development would be behind the direction of travel.

7.150 The journey along this route going from northwest to southeast would be more interrupted by the views of the proposed development particularly in the areas to the north and south of Garve from sections between Silverbridge, Gorstan and east of VP24: A835 Loch Garve (Major adverse). There would be no significant effects from the section along Loch Glascarnoch as the proposed development would be visible beyond the consented Kirkan Wind Farm.

A832 and the Inverness – Kyle of Lochalsh Railway Line

7.151 Effects on these two transport routes are likely to be similar given the proximity of the routes to each other between the A835 junction and the Achnasheen junction, although they have different sensitivities. It is recognised that when travelling by train, users generally look out of a window to either side of the train. Whilst drivers in vehicles are focussed on the road ahead, passengers in vehicles, particularly tourists, would be looking out of the windows to gain an appreciation of the surrounding landscape.

7.152 Approximately 25km of the A832 between Gorstan and south of Achansheen (after which there is no theoretical visibility), and approximately 7.7km between Wester Moy and Muir of Ord also overlaps with the NC500, which covers large parts of the study area excluding the section of the route between Muir of Ord and the Black Isle. Officers consider the sensitivity of users along much of this route to vary between High to High-medium along the A832 and Medium for railway users.

7.153 Considering the ZTV for the proposed development there would be significant lengths of the routes from nearly 26km away and continuing to be in view as close as 3km away from the turbines for eastbound travellers. The extent of visibility and number of turbines visible would vary dependent on intervening features such as vegetation or local landform. Some stretches would have open views of the turbines in the direction of travel and in some stretches the turbines would be screened by Intervening vegetation.

7.154 Officers assess significant visual effects from as far as 20km around Knockbain (VP26: A832 Strath Bran) (Moderate adverse) to 3km at Gorstan (VP2: Gorstan) (Major adverse) via Lochluichart (VP27: A832 Lochluichart) (Major-moderate / Moderate adverse) and Torriegorrie (VP28: A832 Torriegorrie) (Major adverse). The applicant does not assess significant effects at VP26: A832 Strath Bran. The turbines would appear in the direction of travel and in the centre of the channelled view.

7.155 Between Lochluichart and Gorstan they would also appear prominent and very readily apparent. Some turbines would be stacked and overlapping with one another in some views. Overall, they would have a discordant effect on this section of the routes for eastbound travellers. This is considered to be a Significant effect due to the reduced opportunities for visual respite from the proposed development along this section of the routes. There would be very limited visibility of any other wind farms from this section of the route.

7.156 From west to east, the first theoretical views of the proposed development would be from south of Muir of Ord consistently to the A835 junction at Wester Moy via Marybank. However, actual visibility is limited between Muir of Ord and Urray due to intervening screening by built form and vegetation. This leaves open parts of the route between west of Urray and Marybank for around 1.7km where westbound travellers would experience uninterrupted views of the turbines resulting in significant visual effects (Major-moderate adverse). As the road turns right in Marybank, the last section of the route is around 1km when it meets the A835. From this section, there would be intermittent views due to intervening screening, however, where visible, there would be significant visual effects (Major-moderate adverse).

Hours of Darkness – Effects of Aviation Lighting

7.157 The hours of darkness assessment is presented in the LVIA, Chapter 7 Volume 1 of the EIAR and generally follows the NatureScot 2024 Guidance on Aviation Lighting Impact Assessment. The lighting strategy (Technical Appendix 15.1 Volume 4 of the EIAR) has been agreed with the CAA which proposes medium intensity ‘steady’ red aviation lights (2000cd) at four of the nine turbines (T1, T4, T7 and T9) with no tower lights. The lighting strategy also includes implementation of intensity reduction mitigation and vertical directional intensity mitigation.

7.158 In terms of visual effects during the hours of darkness, the applicant assesses significant effects in the 200cd scenario at the following locations:

- views from residential areas at Gorstan (as seen at VP2) and Tarvie (VP3);
- views from hilltops/walking destinations at Little Wyvis (VP4) and An Cabar (VP5) (and an effect on WLA29 at these locations);
- the core path at Loch Kinellan (VP8);
- intermittent/very intermittent effect on views gained by people travelling on the A835 between Garve (VP1) and the south end of Loch Garve (VP24) but not at these VPs;
- the view gained by people who have stopped in the layby on the A835 at VP24;
- intermittent/very intermittent effect on views gained by people travelling on the A832 at and around Torriegorrie (VP28);
- very intermittent significant effects on views gained by people travelling on the Inverness – Kyle of Lochalsh railway line on the stretch between east of the Black Water bridge and west of Gorstan;
- views from core paths up to approximately 5.5km away from the proposed development.

7.159 The above judgements are broadly agreed. However, as noted above, officers assess additional significant effects at VPs 4: Little Wyvis, 5: An Cabar, and 11: Knockfarrel (a key view in the LSA-BI) when vertical directional intensity mitigation is taken into consideration although VP11 is assessed not significant by the applicant under both scenarios.

- 7.160 VP4: Little Wyvis – It is noted that the applicant has not visited this VP during the hours of darkness to undertake the assessment or produced any hours of darkness visualisations. Officers agree that there would be significant effects (Moderate) in the 200cd scenario without vertical directional intensity mitigation. When the use of vertical directional intensity mitigation is taken into consideration, the three 200cd lights would be perceived as 13cd. Whilst the lights are below the horizon and back clothed by landform, the lights on T7 and T9 would appear in generally a darker context in comparison with T4 which would appear in the same context as other baseline lighting beyond.
- 7.161 Nevertheless, all three lights would be the closest levels of lighting to the viewer at the summit in comparison to other baseline lights and would therefore be readily visible. The lights of T1 may also be visible from the mid-slopes of the walking route to or from the summit where the vertical intensity is likely to be different than at the summit. The magnitude is therefore assessed as Medium and the effect would be Moderate and significant when vertical directional intensity mitigation is taken into consideration.
- 7.162 For VP5 (An Cabar), it is noted that the applicant has not visited this viewpoint during the hours of darkness to undertake the assessment or produced any hours of darkness visualisations. Officers agree that there would be significant effects (Moderate) in the 200cd scenario without vertical directional intensity mitigation. When the use of vertical directional intensity mitigation is taken into consideration, the three 200cd lights would be perceived as 18cd.
- 7.163 However, whilst the lights are below the horizon and back clothed by landform, the lights on T4, T7 and T9 would generally appear in a darker context rather than part of the baseline lighting context further to the south / south-west. Nevertheless, all three lights would be the closest levels of lighting to the viewer at the summit in comparison to other baseline lights and would therefore be readily visible. Taking account of the intervening distance, the magnitude is therefore assessed as Medium-Low and the effect would be Moderate and significant (High-medium sensitivity) when vertical directional intensity mitigation is taken into consideration.
- 7.164 For VP11: Knockfarrel, it is noted that the applicant has not visited this viewpoint during the hours of darkness to undertake the assessment or produced any hours of darkness visualisations. Whilst there would be some lights associated with scattered residential properties on the lower slopes and valley floor in the direction of the proposed development, much of the baseline view is relatively dark. The three 200cd lights (T4, T7 and T9) would be visible as a feature on the skyline and downslopes of Little Wyvis and would be seen contrasting and detracting from the distinct dark form of the Massif including Little Wyvis and Ben Massif, particularly at dusk and dawn. The magnitude is assessed as Medium and the effect would be Moderate and significant (High-medium sensitivity). When the use of vertical directional intensity mitigation is taken into consideration, the three 200cd lights would be perceived as 38cd. The lights would continue to be noticeable in the context; however, the magnitude would reduce to Medium-low and the effect would remain

Moderate and Significant when vertical directional intensity mitigation is taken into consideration.

Landscape and Visual Appraisal Summary

- 7.165 The specific locational sensitivities of the site, which is situated on the elevated Carn Fearna unit of LCT331: Rounded Rocky Hills, are a key consideration in the Council's conclusion that there is no scope for wind farm development within this landscape unit. This sensitivity arises from the unit's important transitional role, linking a number of contrasting LCTs, including the lower Strath Garve and wooded glens to the south, west and east, and the rounded mountains and hills associated with the Ben Wyvis Massif, which is itself recognised as a designated 'dominant landmark'. The introduction of wind farm development within this context would therefore have the potential to affect the relationships between these adjoining landscapes and the wider role of the unit as a transitional and visually sensitive landscape. This conclusion is set out in the LSA-BI for BL42:Carn Gorm and Carn Lochan Tuirc.
- 7.166 Along with several key characteristics of the Rounded Rocky Hills LCT: Carn Fearna unit being significantly altered by the proposed development, the turbines would also introduce a prominent new infrastructure focus within the Ben Wyvis Massif's setting that would have an unavoidable and intimate association with the Massif, distracting from the Massif's 'whaleback' distinctive skyline in views of the landmark from far and wide, as well in outward views from within the SLA by virtue of their scale, movement, and texture.
- 7.167 These effects would Significantly alter the Massif's pivotal landscape function of providing a dramatic spatial definition between the LCTs of the wilder west and dynamic settled LCTs of the east, eroding its rank as the primary contributor to the sense of place of the wider Inner Moray Firth area and beyond to eastern parts of Wester Ross. In that way, the proposed development would result in a Significantly adverse effect on the Dominant Landmark and Uninterrupted Panoramas SLQ of the Ben Wyvis SLA, and therefore the integrity of the SLA itself.
- 7.168 Significant and adverse visual effects would be experienced by residential, recreational, and users of transport receptors for up to 15km to the southeast of the proposed development and 20km to its west, southwest and northwest, while, notably, its distracting influence on the landmark quality of the Ben Wyvis Massif would be experienced visually by receptors beyond this distance. These effects would extend into the hours of darkness, and especially during dusk where the aviation lighting would shift focus away from the Massif's silhouette towards the turbines, adversely affecting the quality and enjoyment of the spectacle for receptors.
- 7.169 Based on the above analysis, the proposal fails to meet 7 of the 10 Criteria set out in the OWESG; specifically:
- 1) The proposal does not respect the relationship between the Ben Wyvis Massif and the wider landscape;

- 2) The threshold where the key landscape characteristics that contribute to the transitional experience of the key transitional gateway location as defined by the Ben Wyvis Massif is breached;
- 3) The development by its presence would diminish the prominence of the Massif as a natural landmark and disrupt its relationship to its setting;
- 6) The proposal is a departure from the established pattern of wind farm development by virtue of its location within a small LCT unit adjacent to a designated landscape of high sensitivity;
- 8) The proposal would reduce the perception of scale and distance from a significant number of locations in the wider area; and,
- 10) The proposal does not respect the distinctiveness of landscape character as it does not maintain the integrity and variety of LCT units in the surrounding area.

7.170 The sheer range and breadth of the significant adverse landscape and visual effects associated with the proposed development cannot reasonably be considered as localised or intermittent. Nor is it considered that these effects can be easily overcome by siting, design, or other mitigation. As such, the unacceptable residual landscape and visual effects are suggested as Reasons 1 and 2 for refusal in Section 11 of this report.

Natural Heritage (including ornithology)

7.171 The applicant's assessment in relation to ecology and ornithology are set out in EIAR Chapters 8 and 9 respectively. Chapter 10 for Geology, Hydrology, Hydrogeology and Peat sets out the assessment of peat impacts when considered as a material that requires to be handled and managed appropriately rather than as a habitat. These chapters are supported by several technical appendices, including surveys on habitats and vegetation, protected species, fish habitat, and birds. An Outline Nature Enhancement Management Plan (ONEMP) (Habitat Management Plan equivalent) has also been submitted (EIAR Volume 4, Technical Appendix 8.5).

7.172 Overall, the EIAR together with the AEI submission conclude that subject to the recommended mitigation measures there will be no significant residual effects during the construction, operation, or decommissioning phases of the development, either individually or cumulatively with other developments. The applicant has committed to ensuring that construction practices will be in line with best practice guidance. Site specific environmental protection measures would also be fully detailed in the final CEMP, Peat Management Plan (PMP), pre-construction surveys will also be undertaken including for bats, badger, otter and pine marten, breeding birds (and any other protected species identified on site during the pre-construction surveys), along with biodiversity and habitat enhancement measures to be detailed through the finalised ONEMP. A condition can be used to ensure that all works are overseen by an Environmental Clerk of Works (EnvCoW).

Designated Sites

- 7.173 As detailed in Section 2 of this report, the proposal site is not covered by any international or national statutory designation for natural heritage with the nearest being Ben Wyvis Special Area of Conservation (SAC) 1.4km northeast, which covers the Site of Special Interest (SSSI) of the same name. The Ben Wyvis Special Protection Area (SPA) is within the boundary of the SAC and occupies a smaller area, with several other Natura2000 sites within 20km of the development including the Glen Affric to Strathconon SPA. The status of the sites means that the requirements of the Conservation (Natural Habitats, and c.) Regulations 1994 as amended (the 'Habitats Regulations') apply. Consequently, the Scottish Ministers as the competent authority are required to consider the effect of the proposal on SACs and SPAs, through Appropriate Assessments where required, before the proposal can be consented.
- 7.174 NatureScot has advised that it does not consider the proposal to result in adverse significant effects on the upland habitats qualifying interests of the Ben Wyvis SAC, as it is unlikely to displace significant numbers of deer from the site and surrounds into the SAC. Nor does NatureScot consider that the breeding dotterel qualifying interest of the SPA would be significantly adversely affected as no dotterel habit was recorded through surveys within the site.
- 7.175 NatureScot has also advised that the hydrological connection from the site to the Conon Islands SAC, which is protected for its floodplain alder woodland, means that without mitigation the development would have a significant effect on its qualifying interest. However, it considers that the sites distance from the designation along with implementation of good practice construction measures including pollution prevention controls and proposals for sediment management, which should be secured through the CEMP, would mean that the proposal would not adversely affect the integrity of the site.
- 7.176 Similarly, NatureScot considers the proposal to be within connectivity distance of both the Cromarty Firth SPA and the Inner Moray Firth SPA & Ramsar site and therefore would have a significant effect on the greylag goose qualifying interests of both sites. However, surveys recorded limited greylag goose flight activity at heights that would put the species at collision risk and noted a lack of suitable greylag goose foraging opportunities within the proposal site and surrounds. Consequently, the proposal is not considered to likely pose a significant collision risk to the greylag geese or result in disturbance of roosting geese.
- 7.177 However, the golden eagles using the application site are considered to be connected to the Glen Affric to Strathconon SPA, and therefore form part of its breeding golden eagle population qualifying interest. Due to the survey data submitted with the application being out of date, NatureScot has requested further vantage point survey data to bring the survey work up to date, as well as updated collision risk modelling information in respect of the SPA's breeding golden eagle interest. As of yet, this information has not been provided by the applicant and therefore is offered as Reason 3 for objection on the basis that insufficient information has been provided to demonstrate that the proposal will not have an

unacceptable impact on the breeding golden eagle population qualifying interest of the Glen Affric to Strathconon SPA.

7.178 With regard the Ben Wyvis National Nature Reserve, it is NatureScot's opinion that although the proposal would be visible from the reserve, it would not significantly detract from its role of inspiring people to value and enjoy Scotland's natural environment and that therefore, the objectives of the designation and its overall integrity will not be compromised. NatureScot also considers that its advice for the above Natura2000 and Ramsar sites covers the impacts on those SSSI national designations that were scoped in for assessment within the EIAR.

Other Ornithology Impacts (Wider Countryside Birds)

7.179 As noted above, the vantage point flight activity surveys are out of date and require to be updated before the proposal is determined as per the Council's Ecologist's holding objection, with surveys required to adequately cover dusk and dawn periods. Nevertheless, several sensitive species were recorded in vantage point flight activity surveys as well as during breeding raptor and owl searches and moorland breeding bird surveys. Surveyed species include golden eagle, white-tailed eagle, osprey, peregrine, goshawk, and barn owl, black grouse, golden plover, greenshank, greylag goose, pink-footed goose, ptarmigan, red-throated diver, and snipe amongst others.

7.180 Based on the flight activity surveys, only golden eagle and red kite were carried through to collision risk mortality modelling with the proposal considered to result in the loss of 0.076 non-breeding and 0.101 breeding golden eagle per year, and 0.072 non-breeding and 0.061 breeding red kite per year. NatureScot is satisfied that the proposal will not have significant impacts at the Natural Heritage Zone level (NHZ7) population of golden eagle but advises that future wind farm proposals affecting this population of golden eagle will likely have to model the cumulative collision impacts on the population. Moreover, it advises that should white-tailed eagle be surveyed during the updated flight activity surveys, then collision risk modelling for the species would be required.

7.181 Several mitigation measures are proposed in respect of breeding birds including maintaining appropriate buffers from lek (black grouse) and breeding sites (for ptarmigan for example), as well as from specific habitats including wetland and forest edges. NatureScot advises that mitigation measures for black grouse should also apply to the on-going maintenance of tracks during the operational phase of the development. Pre-construction nesting bird checks would also be implemented through the CEMP to ensure that any nest sites that are identified and avoided by construction works during the breeding season. However, the Council's Ecologist also recommends that modifications to the access track should be undertaken outside of the breeding bird season, and that carcass searches should be conditioned throughout the lifetime of the development to help inform of impacts of the turbines on birds (as well as bats).

Species Protection

- 7.182 Protected species surveys have identified the presence of badger, pine marten, water vole and mountain hare, as well as deer. Red squirrel records were returned within 2km of the site while some suitable habitat for red squirrel was recorded on site. There were no nearby records of otter although again, some habitat on site is deemed suitable for the species. It is also noted that most of the site is located within a Scottish Wildcat Priority Area and contains suitable foraging habitat, however no evidence of the presence of Scottish wild cat, including den sites or other signs, was recorded. The proposal site is predominantly on open ground with limited suitable habitat for bat species, although *Myotis* species along with Brown Long-eared, Common and Soprano Pipistrelles were recorded using the application site. Potential bat roost features were identified in domestic buildings and trees less than 300m from turbine locations and 130m from the access track. Three watercourses that tribute to the Black Water and River Conon, with planned new crossings were found to be suitable for small numbers of migratory and non-migratory fish.
- 7.183 Subject to pre-construction surveys of the site to inform Species Protection Plans (SPPs) being secured by conditions, the Council's Ecologist is generally satisfied with the protected species and fish habitat survey coverage for the proposal along with the embedded mitigation, which is set out in Section 8.7 of EIAR Volume 2, Chapter 8: Ecology, and Section 9.7 of EIAR Volume 2, Chapter 9: Ornithology. SPPs would require to be implemented during the wind farm construction, post construction reinstatement, forestry operations, and biodiversity enhancement works. The Council's Ecologist also advises that further assessment would be required if bat roost features are found to be impacted by the development. The proposal is designed with embedded mitigation for freshwater fish habitats such as 50m development free buffer strips from watercourses.
- 7.184 Environmentally sensitive construction practices would be employed during the construction and decommissioning phases of development under the direction of an Environmental Clerk of Works, which should be secured by condition, with the developer undertaking ongoing monitoring of sensitive receptors during the wind farm's operational phase.

Habitat Loss and Biodiversity Enhancement

- 7.185 The majority of the site is upland blanket bog, in a mosaic of wet and dry heaths, with some grazed grassland and bracken, an area of birch woodland and four lochs in the centre of the site. There are conifer plantations bordering the site and Rhododendron, an invasive non-native species (INNS), was found on parts of the bog. An area of long-established woodland (of plantation origin) overlaps a small area of the site to the south-west, and the scarce species dwarf birch was found on higher altitude blanket bog. A large proportion of the site is located within Class 1 Priority Peatland and 17% of the area was found to contain depths of over 1m up to a maximum depth of 4.8 m. The offsite turning circle would be located within a large agricultural field of improved grassland.

- 7.186 The Council's Ecologist also advises that it appears that the mitigation hierarchy has not been followed to avoid deep peat, particularly at the permanent substation compound where the average peat depth is 1.3m but over 3m in places, resulting in a need to excavate 15,600m³ of deep peat. SEPA has not iterated the same concern however.
- 7.187 Permanent direct land take for the development is predicted to be up to 31.9ha, with the development predicted to result in the direct and indirect permanent loss of 24.70ha of priority peatland habitat consisting of 16.12ha of peatland, 8.22ha of heath and below 0.2ha of both marshy grassland and NVC W4 woodland (typical mix of downy birch / Purple moor-grass / Sphagnum moss). A further 8.95ha of non-priority peatland is also predicted to be lost both directly and indirectly through development.
- 7.188 Permanent and temporary direct and indirect losses of priority habitats total 26.4ha however temporary areas would be reinstated in the post construction remediation stage of the development. It should be noted, however, that the applicant has calculated these figures using only a 10m buffer from infrastructure rather than the 30m recommended in NatureScot's Guidance: Advising on peatland habitats and carbon-rich soils in development management (revised March 2026), with no justification for the deviation. As such, the Council's Ecologist advises that these figures require to be revised in order to inform the finalised Nature Enhancement Management Plan (NEMP).
- 7.189 Five search areas for peatland restoration have been identified in the ONEMP totalling 270.6ha for potential restoration as being of degraded, modified, and / or eroded areas of peatland. The Council's Ecologist advises that a restoration area of over 328ha would be required to mitigate (offset) permanent and temporary peatland losses, along with a further 10% enhancement to accord with NPF4 Policy 3: Biodiversity. As such, the Ecologist advises that the ONEMP should seek to restore a minimum of 361.30ha of peatland habitat. However, and as stated, the applicant's figures are considered to underestimate the indirect losses of peatland habitat, while the submission has focussed on priority peatland instead of all peatland habitats, and consequently the Council's Ecologist has objected to the proposal pending further clarification, which is included within Reason 4 for objection.
- 7.190 Other biodiversity enhancement measures are set out in the ONEMP including:
- Managing grazing by deer and livestock;
 - Control of self-seeding commercial conifer saplings and bracken;
 - Marking deer fences to mitigate black grouse collisions;
 - Up to 3.91km of riparian, and 1.61ha of native, tree planting; and
 - Working with Buglife to enhance habitats onsite for invertebrates.
- 7.191 The Council's Ecologist has welcomed these measures however advises that the ONEMP should include measures to control, preferably eradicate, invasive rhododendron, particularly where it is encroaching on peatland and other priority habitats. A requirement for a metric to be provided has also highlighted that the biodiversity enhancement of non-

peatland habitats can be quantified, along with the need for the finalised NEMP to be implemented over a minimum 30-year period if not the 50-year lifetime of the development.

Ground Water Dependent Terrestrial Ecosystems

7.192 NVC vegetation communities M6, M15, M23, and W4, found within the Study Area are known for their potential to be groundwater dependent terrestrial ecosystems (GWDTE) (see Table 10.6: Site Specific Groundwater Dependant Terrestrial Ecosystem Assessment in EIAR Volume 2, Chapter 10: Geology, Hydrology, Hydrogeology and Peat). Following further review, the EIAR has concluded that each of these communities are sustained by rainfall, surface water, and / or ponding and waterlogging of soils adjacent to watercourses, rather than groundwater. Thus, it is not considered that the development would have a significant effect on Ground Water Dependent Terrestrial Ecosystems.

Forestry

7.193 Given that only 1.2ha of commercial forestry would be required to be felled within the application site for installing the access track and subsequent turbine deliveries, the applicant has scoped out the requirement to assess impacts on forestry and woodland within the EIAR. No consideration of impacts on trees and woodland resulting from turbine deliveries has been provided with the submission, which is disappointing given that the AIL route is through a heavily wooded area.

7.194 The Council's Forestry Officer has therefore objected to the proposal on the grounds that the applicant has not satisfactorily demonstrated that the delivery of abnormal indivisible loads to the site would not have an unacceptable impact on roadside trees, which is offered as Reason 5 for objection. The Forestry Officer advises that the Abnormal Load Assessment should be supported by an Arboricultural Impact Assessment to identify any offsite tree felling and / or tree surgery along with mitigation that may be required to ensure impacts on offsite trees and woodland are within acceptable limits.

7.195 Additionally, while the applicant has advised of its commitment to provide compensatory planting for the loss of commercial forestry, the extent, location, and composition of compensatory planting is not provided as the applicant states that this is yet to be agreed with Scottish Forestry. The EIAR advises that the 3.91km of riparian and 1.61ha of native tree planting proposals included within the ONEMP could potentially count as compensatory planting (see Paragraphs 3.5.23 - 3.5.25 of EIAR Volume 2, Chapter 3: Description of Development). The Council's Forestry Officer is satisfied that compensatory planting can be secured through condition given the relatively small area of woodland removal, however, advises that compensatory planting must be designated as such in the final Compensatory Planting Plan and NEMP.

Built and Cultural Heritage

- 7.196 EIAR Volume 2, Chapter 11: Archaeology and Cultural Heritage considers the historic environment value of the site and surrounds and sets out the potential for direct and setting effects on heritage assets including archaeological features as set out in Paragraphs 2.21 – 2.23 of this report. The Chapter is supported by a walkover survey, wireframes, and visualisations.
- 7.197 No direct effects on designated features are predicted. Historic Environment Scotland (HES) has focussed its response on considering setting impacts against Little Garve, bridge over Black Water (SM2720), Knock Farril, Fort (SM1672), and, Henge, 180m W of Teanagainn Cottage (SM1668). The greater of the setting impacts are considered to be on Little Garve, bridge over Black Water due to proximity to the wind farm, which appears in extensive views from and of the asset from its location. HES considers that the removal or redesign / re-location of T6 could mitigate these effects however does not consider the effect without mitigation to be so significantly detrimental as to raise issues of national importance and warrant its objection.
- 7.198 With respect to the latter two assets, the proposal is not considered to significantly impact on the ability to understand, appreciate and experience the strategic position of Knock Farril, Fort, nor to appear prominent enough to significantly detract from the astronomical associations of Henge, 180m W of Teanagainn Cottage. Similarly, the Council's Conservation Officer considers that the 5km+ distance of listed buildings to the turbines to be sufficient to limit setting impacts on the remainder listed buildings in the area.
- 7.199 No direct or indirect impacts on non-designated historical features are anticipated as a result of embedded mitigation in the design and layout of the proposal. The Council's Archaeologist is satisfied that the potential for the survival of buried, unrecorded assets is not such that precautionary monitoring would be justified beyond the standard inclusion of cultural heritage good practice procedures to be included in the CEMP.

Roads, Transport and Access

- 7.200 EIAR Volume 2, Chapter 13: Site Access, Traffic and Transport assesses the anticipated traffic impacts of the development with a main focus on the 23-month construction period. The assessment is supported by a Route Access Survey (EIAR Volume 4, Technical Appendix 13.1) and Figure 13.1: Sturdy Area, Traffic Count Locations and AILV Route (EIAR Volume 3a).
- 7.201 The study area for the applicant's assessment is identified as:
- A835(T) - Inchbae Lodge to A832 Junction;
 - A835(T) - A832 Junction to A834 Junction at Contin;
 - A835(T) - A834 Junction at Contin to A832 Junction at Moy Bridge;
 - A835(T) - A832 Junction at Moy Bridge to A862 Junction at Maryburgh Roundabout;
 - A835(T) - A862 Junction at Maryburgh Roundabout to B9169 Junction at Leanaig;

- A835(T) - B9169 Junction at Leanaig to A9(T) Junction at Tore;
- A9(T) - North of Tore Roundabout; and,
- A9(T) - Artafallie (B9161) to Tore Roundabout.

7.202 From the study area, it is clear that the larger part of the impacts from construction traffic would be on the trunk road network rather than Council maintained roads.

7.203 The assessment nevertheless assumes that all source materials, including concrete, required for the construction of the wind farm would be sourced offsite using local existing quarries as a worst-case scenario, although it should be noted that the proposal includes search areas for three onsite borrow pits and an onsite concrete batching plant.

7.204 The busiest month for construction traffic is anticipated to be month 2 where construction activities include works on the mobilisation and construction compounds, access and site tracks, crane hardstandings, and substation civils works are programmed concurrently. Table 13.11 – ‘Additional Vehicle Movements per Working Day Arising from the Proposed Development During Busiest Month’ (EIAR Volume 2, Chapter 13) projects that during that month, there will be an increase of HGV traffic of 159 on the A835(T) on all sections between Inchbae Lodge to its junction at the Tore Roundabout. A further 80 HGV movements per day are predicted on both sections of the A9(T), from its Junction with the B9161 near Artafallie to north of the Tore Roundabout. Transport Scotland also notes that Months 5, 6, 7, 8 and 9 will experience similar levels of 154 HGV movements per day, while construction activities will also result in additional car journeys as required by staff.

7.205 Transport Scotland notes in its response that the applicant’s assessment of effects on the trunk road is based on the increase of total number of vehicle movements, which does not adequately consider the impacts resulting from the increase of HGV movements. Its response also highlights that the junction of the A835(T) and A832 has been identified as an accident cluster site, which has not been given adequate consideration within the EIAR. Consequently, Transport Scotland requests that the condition for a Construction Traffic Management Plan (CTMP) includes appropriate measures to mitigate the impact of additional HGVs on the trunk road network and to ensure that the potential for accidents is not exacerbated.

7.206 In addition to reiterating the need for a comprehensive CTMP, Transport Planning’s response notes that many of the Council maintained roads serving quarries and material suppliers are not constructed to modern standards and are therefore vulnerable to additional HGV traffic beyond their current usage. As such, further detail that addresses the physical characteristics such as the condition of the carriageway, verges, and associated structures, of the Council adopted road network will be required to be secured by condition for Transport Planning’s prior approval before the commencement of development. This assessment is required in order to understand whether the road network can safely and suitably accommodate construction traffic without detriment to either the structural integrity of the road or other road users, and to outline any pre-commencement

improvements such as upgrading or installing new passing places, that may be required. The assessment should also be informed by up-to-date road safety data.

- 7.207 The applicant will likely be required to finalise a legal Section 96 Agreement under the Roads (Scotland) Act 1984 (as amended) to adequately compensate the public purse in the event of damage to Council maintained roads that can be reasonably attributed to the construction traffic generated by the proposal.
- 7.208 In terms of the transport of turbine components and any other abnormal indivisible loads (AIL), the EIAR identifies two potential Ports of Entry; Nigg (Route A) and Invergordon (Route B) (see EIAR Volume 4, Technical Appendix 13.1: Route Access Survey. The connecting roads from both ports to the trunk road network are adopted by Highland Council, and a swept path analysis has been undertaken to assess the potential impacts from the AIL. Most of the required mitigation involves the temporary removal of vegetation, bollards, and traffic signals to facilitate safe passage. However, at the junction of Academy Street and the C1063 in Invergordon, the use of third-party land and the removal of trees would also be necessary to avoid conflicts with existing infrastructure, including electricity poles. Transport Scotland also notes the requirement for accommodation works on the trunk road, including trimming vegetation, removing street furniture and road widening to create load-bearing surfaces, as well as the creation of the offsite turning circle at Inchbae.
- 7.209 As such, Transport Planning has requested a condition is attached to any consent requiring the submission and approval of an Abnormal Load Management Plan prior to the commencement of any works on site. Transport Scotland, however, has not specifically requested a condition for the same at this stage as it considers there to be outstanding information with regards AIL as it relates to site access, which is set out below.
- 7.210 The site access would be from a new junction off the A832(T) near Silverbridge and Black Water Falls around 2.6km north of the road's junction with the A835(T). The junction would be angled with the A832(T) such that AIL and associated vehicles would only be able to enter from the southbound carriageway, thus necessitating the turning circle at Inchbae Lodge. The junction would then link to existing track via a new linking track.
- 7.211 While indicative design details of the new access junction (EIAR Volume 3a, Figure 3.3: Indicative Junction Main Site) and the offsite turning circle (EIAR Volume 3a, Figure 3.4: Indicative Junction Off-Site Turning Circle) have been provided, Transport Scotland requires that new and amended junctions are supported by compliant road safety audits, along with a full set of swept path plans for the main site access junction. The swept path plans are required to demonstrate that construction HGVs can make all the intended turning movements at the junction. Unfortunately, this information remains outstanding and, although it would be likely that the applicant can provide it for any subsequent PLI and / or hearing procedure, its current omission is offered as Reason 6 for objecting to the application.

7.212 In terms of wider public access, the proposal site is publicly accessible through the Land Reform (Scotland) Act 2003 however does not appear to be a popular location for walkers in comparison to the well accessed main walking route on the Little Wyvis Corbett. As noted by the Access Officer, a large portion of this route would be directly impacted by construction as sections would form part of, or cross, the site's main access track. As such, mitigation to maintain favourable public access to the route should be secured through a condition for a finalised Outdoor Access Management Plan (OAMP) in the event that the proposal is approved. The OAMP should also provide for favourable public access if the wind farm becomes operational. The visual amenity of several other access routes, paths, and Core Paths in the area including the summit ridge of Ben Wyvis and An Cabar, that would not be directly impacted by the development, has been assessed in the Visual Impact Section of this report.

Water, Flood Risk, Drainage and Peat

7.213 The results of the applicant's hydrological, flood risk, drainage and peat (in relation to peat excavation, reuse, and landslide hazard risk) assessments are outlined in EIAR Volume 2, Chapter 10: Geology, Hydrology, Hydrogeology and Peat. The Chapter is supported by a Peat Landslide Hazard Risk Assessment (PLHRA) (EIAR Volume 4, Technical Appendix 10.1), an outline Peat Management Plan (PMP) (EIAR Volume 4, Technical Appendix 10.2), a Schedule of Watercourse Crossings (EIAR Volume 4, Technical Appendix 10.3), and a Private Water Supply Risk Assessment (PWSRA) (EIAR Volume 4, Technical Appendix 10.4), along with the Outline CEMP (EIAR Volume 4, Technical Appendix 3.1) and a Borrow Pit Assessment (EIAR Volume 4, Technical Appendix 3.2).

7.214 The site, including the offsite turning circle, is located within the Black Water (Altan Dubh) surface water catchment, which also includes the sub-catchments of Loch Garve, Loch na Croic and Rogie Burn, all of which discharge into the River Conon approximately 7km southeast of the site, and onwards to the Cromarty Firth and North Sea. Several tributaries cross the main site while the Abhainn Srath Rannoch tributary flows on the western boundary of the turning circle area.

7.215 Scottish Water does not appear to have provided a consultation response to the ECU however the EIAR confirms that none of the surface water catchments that drain the application site are designated for Drinking Water Protected Areas (DWPAs) and there are no hydrological connections to any DWPAs in the wider area.

7.216 Three private water supplies (PWS) have been identified close to or within the site whereby a stream sourced PWS (PWS01) that serves Tigh Fiodha, White House, and surrounding buildings to the south of the site's main access, is considered at risk from the development due to the proximity of the supply's pipework to the main access track (to be upgraded). As such, the applicant intends to provide a PWS Action Plan as part of the CEMP, which should be secured by condition. The Council's EHO has not objected on these grounds subject to the plan including a drawing of the supply source and distribution route in relation

to the development, a programme of water quality monitoring, details of mitigation measures to prevent physical disruption or contamination to the supply along with daily checks to ensure the measures are being properly implemented, and contingency measures in the event of an incident impacting the water supply.

- 7.217 With the exception of tracks and water crossings, the layout of the main wind farm area has been designed so that all infrastructure is outwith the 50m buffer zone around watercourses and water bodies. All watercourse crossings will be designed to accommodate a 1 in 200-year flow event plus climate change allowance, in line with SEPA guidance with the final designs to be approved by SEPA prior to the installation of any new or upgraded crossings.
- 7.218 The offsite turning circle, however, would be within the flood plains of the Abhainn Srath Rannoch and the Black Water and is therefore at-risk of flooding from the fluvial sources. In its response to the ECU, SEPA recommends re-locating the feature to a site that is not at known risk of fluvial flooding in the first instance. Otherwise, SEPA has requested that the CEMP condition includes a specific clause to ensure that construction of the turning circle does not involve landraising unless appropriate compensatory storage can be provided. This requirement is included to prevent increased flood risk elsewhere.
- 7.219 The CEMP, as implemented by the contractor during the construction phase, would be required to control potentially polluting activities and prevent adverse impacts on river catchments, properties, and the environment from construction activities. Specifically, the CEMP would include site specific drainage and pollution prevention plans as also required for the licence as subject to the EASR process controlled by SEPA.
- 7.220 As detailed in the outline Peat Management Plan (oPMP) (EIAR Volume 4, Technical Appendix 10.2), the peat depth surveys recorded varying depths of peat of less than 0.5m up to 4m. The layout of the scheme has sought to avoid deeper pockets of peat, defined as being greater than 1m in depth, although other environmental and technical constraints mean that the layout has not wholly avoided deep peat at this stage. The applicant intends to microsite infrastructure further following further survey work during construction works. Overall, 129,489m³ of peat is expected to be excavated with the majority of extracted peat relating to borrow pits and access tracks, along with turbine hardstandings and temporary crane pads.
- 7.221 All excavated peat is intended to be reused on site for reinstatement of temporary hardstandings, borrow pits, track verges, and habitat restoration. The EIAR advises that the reuse capacity exceeds excavation volumes with the estimated reuse potential considered to be 132,715m³, therefore, no offsite disposal is expected. Any offsite soil disposal in any case would be subject to SEPA authorisation and regulation.
- 7.222 The outline PLHRA submitted with the application does not appear to have been audited by Ironside Farrar as is standard for applications for wind farms on peat. Nevertheless, the report states that 90% of probes showed low risk of a peat landslide with the remainder

10% showing medium risk with the majority of these locations being away from turbines and other infrastructure. A total of 21 medium risk locations and three high risk locations were identified and carried over for further review. Section 6 of the outline PLHRA posits several embedded mitigation measures to be implemented before and during construction including site specific stability analysis using better quality geotechnical data, use of effective drainage techniques, and continued monitoring of excavated groundworks in line with known good practice techniques.

Noise and Shadow Flicker

- 7.223 EIAR Volume 2, Chapter 12: Noise and Vibration outlines the applicant's assessments in relation to the potential construction and operational noise as well as vibration caused by construction works on nearby residential receptors, who are generally located outside of the applications site along or just off the A835(T) west, south, and southeast of the application site.
- 7.224 The EHO is satisfied that the noise impact assessment demonstrates that noise from the development alone will meet the ETSU simplified standard of 35dB LA90. The assessment has also considered potential cumulative noise with the Tarvie wind farm development, which has been withdrawn according to the ECU. Nevertheless, the submitted information demonstrates that when taking wind direction into account, there is little likelihood of cumulative noise exceeding relevant limits. Similarly, the EHO has accepted the EIAR's position that noise generated at the substation will be negligible at sensitive locations.
- 7.225 Three sensitive receptors have also been identified as being within 11 rotor diameters distance and 130° of north of the turbines and therefore at risk from amenity impacts caused by shadow flicker from turbines (EIAR Volume 2, Chapter 16: Other Considerations). The detailed assessment has concluded that these properties would experience between 22 and 24 hours of shadow flicker annually based on a worst-case scenario; i.e., assuming the sun is always shining, the wind is always blowing, that windows of occupied rooms would be directly affected, and there is no screening. Below 30 hours per year of shadow flicker is not considered significant according to general industry rules of thumb, however, the likelihood of properties experiencing the maximum number of hours of shadow flicker in any case, is extremely low.
- 7.226 The EIAR advises that should mitigation be required, it can be provided in the form of implementing a shutdown scheme for the offending turbine (T6) in certain light conditions at times using a shadow flicker control module. In any case a standard condition can be included to secure a scheme for the avoidance or mitigation of Shadow Flicker at affected properties as a belt and braces approach.
- 7.227 It is noted here that representations have pointed to caesium fallout in peat along with electro-magnetic fields generated by turbines and blade pass infrasound frequency being potential sources of detrimental amenity and public health effects. These matters have not

been considered as part of the assessment as the established science does not consider them to pose realistic or significant threats to either amenity or human health.

Telecommunications

- 7.228 EIAR Volume 2, Chapter 16: Other Considerations also includes an assessment of the proposal's likely effects on microwave fixed links, with five fixed links having been identified running through the site and linked to the telecommunications mast to the west of the application site on the summit of Meall Ruighe an Fhirich. Several turbines were realigned during the design process to ensure that no telecommunication links would be impacted by the development and there are no outstanding issues from consultees in that regard.

Aviation and Radar

- 7.229 There are no unresolved objections from aviation interests, with no outstanding concerns raised. The MOD requests a condition which secures submission of an aviation safety lighting scheme detailing how the development would be lit throughout its operational life to maintain civil and military aviation safety; and aviation charting and safety management measures which request specified information is submitted to the MOD 14 days prior to commencement of works.

Decommissioning and Aftercare

- 7.230 The applicant has sought permission to operate the windfarm for 50 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. The Planning Authority also requires that any foundations remain on site; the exposed concrete plinths would also be removed to a depth of up to 1m below the surface, graded with soil and replanted. Cables also need 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 pre-development condition, unless otherwise agreed with the Planning Authority.
- 7.231 The requirements to decommission at its end of life is relatively standard and straight forward, with any request for re-powering to be considered through the submission of a future application. It is important to ensure that any approval of this project secures by condition a requirement to deliver a draft Decommissioning and Restoration Plan (DRP) for approval prior to the commencement of any development and ensure an appropriate financial bond is put in place to secure these works.
- 7.232 The finalised DRP would be expected to be submitted to and approved in writing by the Planning Authority in consultation with SEPA no later than 12 months prior to the final decommissioning of the site. The detailed DRP would then be implemented within 18

months of the final decommissioning of the development unless otherwise agreed in writing with the Planning Authority.

Planning Compliance and Monitoring

- 7.233 As with any wind farm, the Planning Authority would request that any forthcoming permission includes a clear description of development which specifies the operational lifetime, the precise number of turbines to be developed, the maximum blade tip height, the rotor diameter and includes details of all associated ancillary infrastructure. THC requests this detail in the description so that it conveys the scope and substance of the development and so that any amendments to these details are not left to planning conditions where this would be inappropriate; any such amendments could lead to scope for further redesign or re-powering without requiring a full fresh consent (which could also require substantial additional Council resource that would not be reflected in the fee).
- 7.234 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.

Other material considerations

- 7.235 The EIA has not considered the impact of the wind farm grid connection, which, due to a Scoping request made to the ECU by SSEN Transmission, is now known to be proposed via underground cable within the site to a cable sealing end providing connection to a 7.5km 132kV OHL supported on H wooden poles to the Corriemoillie 132kV substation. Both the Council and the ECU have issued Scoping opinions (THC ref. 25/02377/SCOP | ECU00006195) for the environmental and technical assessments that require to be assessed within the EIA for that element of the proposal.
- 7.236 Given that the infrastructure would be new and, as far as can be known, used by this development alone to connect to the grid, officers advise that the interdependency of the proposal and its grid connection, meaning that one could not function without the other, would strongly indicate that they both constitute a single project for the purpose of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017. As such, the environmental effects of the wind farm's grid connection should be considered prior to the decision to approve the development if Scottish Ministers are so minded. Members are reminded that any decision to approve the application without consideration of the significant effects of the whole project through the EIA would be unlawful as was clarified by the recent *Raeshaw Farms Ltd. Vs Scottish Ministers* (2026) Judicial Review decision.

7.237 However, this information is likely to be ready in time for any appeal procedure that would follow the Council's objection to the proposal, if Members are minded to uphold the recommendation. With that consideration in mind, it is not proposed to include the omission of grid connection considerations within the EIAR as a reason for objection in this instance.

Non-material considerations

7.238 The following matters that have been raised by third parties are not material to the assessment:

- a) The need for the development including grid capacity as well as exceedance of local and national energy consumption.
- b) The profile of the applicant/developer.
- c) Developer profits.
- d) The profile of the contributor submitting a representation.
- e) Impacts on property values.
- f) Impacts on democracy.
- g) Electricity costs.
- h) Turbine manufacturing processes.
- i) Constraints payments.
- j) Preference for other types of energy generation.
- k) Preference for offshore locations for wind turbines.
- l) Impacts on house prices.
- m) Assertion that the application represents a breach of Human Rights
- n) Individual claims to mental health impacts and made on behalf of others.
- o) Caesium fallout in peat;
- p) Electro-magnetic fields;
- q) Blade pass frequency;
- r) Impact of the application on public resource and funds.
- s) Speculation that wind farm development leads to depopulation of rural areas.
- t) Green-washing.
- u) Assertion that the proposal would lead to criminal vandalism.
- v) Accusations of THC officer corruption.

8. Matters to be secured by Legal Agreement / Upfront Payment

8.1 A decommissioning and restoration financial guarantee and a Section 96 Roads Agreement can be secured by condition. No legal agreement is required should consent be granted.

9. CONCLUSION

9.1 The Scottish Government gives considerable commitment to renewable energy and encourages planning authorities to support the development of wind farms where they can be situated in appropriate locations to operate successfully. The project has the potential

to contribute up to 64.8MW of renewable energy capacity towards Scottish Government targets and play a role in the route to a net zero Scotland. In addition, the development has potential to bring economic benefits to the area and to create new jobs.

- 9.2 However, as with all such proposals, the benefits of the scheme must be weighed against potential drawbacks and then considered in the round, taking account of the relevant policies of the Development Plan. As an application submitted under Section 36 of the Electricity Act 1989, it will be for the Scottish Ministers to decide whether the applicant has had sufficient regard to the preservation of amenity and the desirability of preserving the natural beauty, of conserving flora, fauna and geographic or physiographical features of special interest and of protecting site, buildings, and objects of architectural, historic or archaeological interest, to the extent that any such impacts are reasonably mitigated as required under Schedule 9 of the Act.
- 9.3 The report has set out that the impacts and effects of the proposal as they relate to construction, built and cultural heritage, and access, the water environment and peat, amenity as it relates to noise and shadow flicker, telecommunications, aviation and radar, as well as decommissioning and aftercare, would be within acceptable limits subject to the developer's compliance with conditions requested by consultees.
- 9.4 The assessment has however also considered the proposal against the criteria cited in the OSWESG, which provides guidance to developers to ensure their developments are suitably located and sensitively sited and designed to avoid unacceptable impacts on the development's wider context. In this case the development does not achieve the threshold for several of these criteria due to the sensitivities of the site's location, its elevation, and the subsequent positioning and exposure of its large-scale turbines.
- 9.5 As the report has set out, the proposal's siting in the Carn Fearna unit of LCT331: Rounded Rocky Hills – Ross and Cromarty Landscape Character Type (LCT), would have significant adverse effects on not only the host LCT, but also several neighbouring landscape character types. This small hosting unit of the LCT, which retains most of its moorland and blanket bog cover along with its distinct topographical characteristics with limited signs of human intervention, plays an important transitional role in connecting lower lying strath and wooded glen landscapes to the neighbouring LCT329: Rounded Mountain Massif. Most notably then, the hosting LCT plays an important supporting role in the setting of the highly distinctive natural landmark of Ben Wyvis Massif.
- 9.6 The Massif, which is recognised as a designated 'dominant landmark', along with its setting, also has an important landscape role for spatial definition across the Inner Moray Firth and eastern parts of Wester Ross in providing a pronounced and dramatic transition between the remote rugged hills and strath LCTs to the west, and the complex, dynamic settled LCTs to the east.
- 9.7 The siting of large-scale turbines of up to 200m turbines within this landscape context would introduce a prominent new infrastructure focus within the Ben Wyvis Massif's setting

that would have an unavoidable and intimate association with the Massif. The turbines would shift focus away from the Ben Wyvis' distinctive whaleback profile towards a new large-scale industrial feature, diminishing its natural landmark qualities and disrupting the relationships between adjoining landscapes by virtue of the scale, movement, and texture of the turbines. These effects would extend into the hours of darkness due to the effects from the red aviation lighting.

- 9.8 As described, the Ben Wyvis Massif is the principal defining and organising landscape feature that contributes most significantly to the sense of place across the Inner Moray Firth area and eastern parts of Wester Ross. The supporting role of the hosting LCT to this landscape function is recognised in the Council's Landscape Sensitivity Appraisal for Black Isle, Surrounding Hills and Moray Firth Coast, which concludes that there is no scope for large-scale wind farm development within the Carn Fearn Unit. This conclusion is borne out in the officer appraisal set out in this report, which has concluded that the significant landscape effects, would not only lead to unacceptable impacts on landscape character, but also landscape composition.
- 9.9 Moreover, it is Ben Wyvis Massif's unique landmark qualities, as experienced in views towards the Massif over a wide geographical area, along with the quality of outward views from the Massif and its supporting LCTs, that contribute to the 'Dominant Landmark and Uninterrupted Panoramas' Special Landscape Quality of the Ben Wyvis Special Landscape Area (SLA). Given the proposal's significantly adverse impacts on both these factors, it would therefore be significantly detrimental to not only the Special Landscape Quality, but also the integrity of the Ben Wyvis Special Landscape Area itself.
- 9.10 The officer appraisal of the proposal's visual effects has found that significant adverse visual effects would be experienced by residential, recreational, and users of transport receptors for up to 15km to the southeast of the proposed development and 20km to its west, southwest and northwest, while, notably, its distracting influence on the landmark quality of the Ben Wyvis Massif would be experienced visually by receptors beyond this distance. These effects would extend into the hours of darkness, and especially during dusk where the aviation lighting would shift focus away from the Massif's silhouette towards the turbines, adversely affecting the quality and enjoyment of the spectacle for receptors.
- 9.11 Significant weight has been given to the global climate and nature crises in this assessment. However, the proposal fails to meet the threshold of seven of the 10 criteria set out in the Council's Onshore Wind Energy Supplementary Guidance, which are written to make developers aware of key landscape and visual constraints and design their developments accordingly. In this instance, the geographical extent, nature, range, and breadth of significantly adverse landscape and visual effects associated with the proposed development cannot reasonably be considered to be localised or intermittent. Nor is it considered that these effects can be overcome by siting, design, or other mitigation. As such, the proposal's benefits and contributions to mitigate both climate and nature crises

are not considered to outweigh the unacceptable residual landscape and visual effects, which are recommended as Reasons 1 and 2 for objection in Section 11 of this report.

- 9.12 In addition to unacceptable residual landscape and visual effects, the report has set out that some information submitted with the report is insufficient, out of date, or has been omitted entirely. Specifically, the vantage point flight activity surveys submitted as part of the assessment of impacts on ornithology and related to the assessment of impacts on the qualifying interests of the Glen Affric to Strathconon Special Protection Area requires to be updated with new surveys. Without this information, it cannot be satisfactorily demonstrated that the proposal will not have an unacceptable impact on the breeding golden eagle population qualifying interest of the European Site, which is detailed in the recommended Reason 3 for objection.
- 9.13 Similarly, the submission has failed to adequately quantify the impact of the proposal on peatland habitat, nor has it assessed the offsite impacts of the delivery of abnormal loads on roadside trees, or the implications of such deliveries to road safety. These issues are detailed in Reasons 4, 5, and 6 for objection.
- 9.14 This application has been assessed principally against the policies set out in NPF4 and the Local Development Plan, including NPF4 Policy 1 for Tackling the climate and nature crises, NPF4 Policy 11 for Energy with its 13 considerations for project design and mitigation, along with the equivalent parallel HwLDP policy, Policy 67 for Renewable Energy, itself describing eleven tests as expanded upon within the OWESG. This HwLDP policy also reflects policy tests set out in other HwLDP policies, for example Policy 28 Sustainable Design.
- 9.15 All relevant matters have been taken into account when appraising this application. It is considered that the proposal does not reach the threshold of acceptability set out in Schedule 9 of The Electricity Act 1989, nor does it accord with the principles and policies contained within the Development Plan and is unacceptable in terms of applicable material considerations.

10 IMPLICATIONS

- 10.1 Resource: if the recommendation is upheld, the applicant would have the option to appeal the Council's decision through PLI.
- 10.2 Legal: Not applicable
- 10.3 Community (Equality, Poverty and Rural): Not applicable
- 10.4 Climate Change/Carbon Clever: if permitted the development would produce renewable energy.
- 10.5 Risk: Not applicable

10.6 Gaelic: Not applicable

11. RECOMMENDATION

Action required before decision issued to Scottish Ministers: No

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

A Members granting delegated authority to the Area Planning Manager – North to respond to the Scottish Government's Energy Consents Unit / Scottish Ministers regarding 1) any future Further / Supplementary Environmental Information, where that information does not materially change the scale of the proposed development, and 2) conditions that would be applied to any consent in the event that Scottish Ministers are minded to consent the application.

B Reasons for Objection

1. The application does not accord with the provisions of Section 36 of the Electricity Act 1989 by virtue of not demonstrating sufficient regard to the desirability of, and failing to reasonably mitigate effects detrimental to preserving natural beauty and conserving physiographical features of special interest because the siting of large-scale, skylined turbines at the location and ground based infrastructure would result in significantly detrimental landscape effects on Landscape Character Types LCT 331: Rounded Rocky Hills, LCT330: Rounded Hills and Moorland Slopes, LCT329: Rounded Mountain Massif, LCT341: Forest Edge Farming, LCT340: Strath – Ross and Cromarty, and LCT335: Wooded Glens and Rocky Moorland. The proposal would introduce an overtly prominent and new infrastructure focus within the largely unaltered LCT 331: Rounded Rocky Hills – Carn Fearn unit, which along with the neighbouring LCT330: Rounded Hills and Moorland Slopes, provides the setting for the Ben Wyvis Massif. The proposal would therefore significantly alter the landscape function of the Ben Wyvis Massif and its supporting LCTs in providing a pronounced and dramatic transition between the remote rugged hills and strath LCTs to the west, and the complex, dynamic settled LCTs to the east by shifting focus away from the Massif and its largely unaltered natural form and landscape context towards a new large-scale industrial feature. Furthermore, the proposal would be significantly detrimental to the interactions between and across multiple Landscape Character Types in the surrounding area. In that way, the proposal would be significantly detrimental to the wider landscape composition, of which the Ben Wyvis Massif is the principal defining and organising landscape feature that contributes most significantly to the sense of place of the Inner Moray Firth and eastern parts of Wester Ross. The proposal would not only be significantly detrimental to the Ben Wyvis Massif's unique landmark qualities as experienced in views towards the Massif over a wide geographical area but would also be significantly detrimental to the quality of outward

views from the Massif and its supporting LCTs that contribute to the 'Dominant Landmark and Uninterrupted Panoramas' Special Landscape Quality of the Ben Wyvis Special Landscape Area (SLA). In that way, the proposal would be significantly detrimental to the integrity of the Ben Wyvis SLA, a regionally significant designation. These significant adverse effects are not considered intermittent or localised, nor can they be overcome by siting, design or other mitigation. Nor are they clearly outweighed by social, environmental, or economic benefits. Consequently, the proposal does not accord with NPF4 Policies 11 (Energy) at e), Policy 4 (Natural Places) at a) is engaged as well as HwLDP Policies 67 (Renewable Energy Developments) and Onshore Wind Energy Supplementary Guidance, 28 (Sustainable Design), 57 (Natural, Built and Cultural Heritage), and 61 (Landscape).

2. The application does not accord with the provisions of Section 36 of the Electricity Act 1989 by virtue of not demonstrating sufficient regard to the desirability of, and failing to reasonably mitigate effects detrimental to preserving natural beauty and conserving physiographical features of special interest because the proposal would result in significantly detrimental visual effects for: 1) residential receptors, in particular for occupants of Tigh Fiodha Larder, and residents of Contin, Culbokie, Gorstan, Lochluichart, Marybank, and Tarvie; 2) recreational users of paths, hills and summits, including the Core Path RC45.01 Loch Kinellan, and Core Paths in and around Contin and Marybank, Peffery Way at Fodderty Cemetery, sections of Core Paths beyond 10km with open views towards the development, for users of the John O'Groats Trail in and around Culbokie, and in particular for users of the main access path to Little Wyvis from Silverbridge with the proposal being significantly detrimental to the recreational visual amenity of this path. Users of the National Cycle Route near the crossroads of the A835 and B9169, along with those gaining recreational access to hilltops / walking destinations at Little Wyvis, An Cabar, Glas Leathad Mor, Sgurr a'Mhuilinn, Am Faochagach, Beinn a'Chaisteil, and Meallan nan Uan would also experience significant adverse visual effects; and 3) users of transport routes including the, A832, A835, other Classes B, C and minor roads within the study area, and the Inverness – Kyle of Lochalsh Railway Line. Significant visual effects on receptors are demonstrated by VP1: Garve, VP2: Gorstan, VP3: Tarvie, VP4: Little Wyvis, VP5: An Cabar, VP6: Glas Leathad Mor, Ben Wyvis, VP8: Loch Kinellan, VP10: Marybank, VP11: Knockfarrel, VP12: Peffery Way at Fodderty Cemetery, VP14: Culbokie, VP21: A9, Black Isle, VP22: A835 / B9169 Crossroads, VP23: A835, Contin, VP24: A835 Loch Garve, VP26: A832, Strath Bran, VP27: A832, Lochluichart, VP28: A832 near Torriegorie, VP29: Sgurr a'Mhuilinn, and VP32: Am Faochagach. The addition of the proposed wind farm resulting in cumulative effects on receptors is demonstrated at VP3: Tarvie, VP4: Little Wyvis, VP5: An Cabar, VP6: Glas Leathad Mor, Ben Wyvis, VP8: Loch Kinellan, VP11: Knockfarrel, VP14: Culbokie, VP21: A9, Black Isle, VP22: A835 / B9169 Crossroads, VP24: A835 Loch Garve, VP29: Sgurr a'Mhuilinn, and VP32: Am Faochagach. The proposal will result in significant visual effects during the hours of darkness in views from residential areas at Gorstan and Tarvie, views from hilltops/walking destinations at Little Wyvis and An Cabar, the Core Path at Loch

Kinellan, in sections of the A835 between Garve and the south end of Loch Garve, views from the layby on the A835 at Loch Garve, views from the A832 at and around Torriegorrie and the Inverness – Kyle of Lochalsh railway line between east of the Black Water bridge and west of Gorstan, and views from Core Paths up to approximately 5.5km away from the proposed development. As such, the proposal will result in significantly detrimental visual effects across a broad area and a broad range of receptors that cannot reasonably be considered localised or sufficiently mitigated by the siting, layout, or design of the proposal nor clearly outweighed by social, environmental, or economic benefits. Consequently, the proposal does not accord with NPF4 Policies 11 (Energy) at e), Policy 4 (Natural Places) at a) is engaged as well as HwLDP Policies 67 (Renewable Energy Developments) and Onshore Wind Energy Supplementary Guidance, 28 (Sustainable Design), and 61 (Landscape).

3. The application does not accord with the provisions of Section 36 of the Electricity Act 1989 by virtue of not demonstrating sufficient regard to the desirability of conserving fauna and sites of special interest by virtue that the vantage point flight activity surveys submitted with the application and are out of date. As such, insufficient information has been provided to demonstrate that the proposal will not have an unacceptable impact on the breeding golden eagle population qualifying interest of the Glen Affric to Strathconon Special Protection Area. The application therefore fails to demonstrate reasonable mitigation of effects detrimental to fauna as also required by Schedule 9 of the Electricity Act 1989. Consequently, the proposal does not accord with NPF4 Policies 11 (Energy) at d) and e), Policy 4 (Natural Places) at a) and b), as well as HwLDP Policies 67 (Renewable Energy Developments) and Onshore Wind Energy Supplementary Guidance, 28 (Sustainable Design), 57 (Natural, Built and Cultural Heritage), 58 (Protected Species), and 60 (Other Important Habitats and Article 10 Features).
4. 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 conserving flora and fauna or that effects on flora have been reasonably mitigated as the proposal fails to appropriately quantify direct and indirect peatland habitat losses. Nor has it been demonstrated that peatland habitat losses will be sufficiently offset through the Outline Nature Enhancement Management Plan and an appropriate level of peatland habitat enhancement will be provided through peatland restoration. In that way, the proposal fails to demonstrate that it will conserve, restore and enhance biodiversity, including nature networks so they are in a demonstrably better state than without intervention as required by NPF4 Policy 3 b). Consequently the proposal does not accord with NPF4 Policy 11 (Energy) at e), and HwLDP Policies 67 (Renewable Energy Developments) and Onshore Wind Energy Supplementary Guidance, 28 (Sustainable Design), and 60 (Other Important Habitats and Article 10 Features).
5. 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 conserving

flora and fauna or that effects on flora have been reasonably mitigated as the proposal has not satisfactorily demonstrated that the delivery of abnormal indivisible loads to the site would not have an unacceptable impact on roadside trees. Consequently, the proposal does not comply with NPF4 Policies 11 (Energy) e), 6 (Forestry, woodland and trees) b), as well as HwLDP Policies 67 (Renewable Energy Developments) and Onshore Wind Energy Supplementary Guidance, 28 (Sustainable Design), and 51 (Trees and Woodland).

6. The proposal does not accord with NPF4 Policies 11 (Energy) e), 18 (Infrastructure First) at b) and 23 (Health and Safety) at b) as well as HwLDP Policies 67 (Renewable Energy Developments) and Onshore Wind Energy Supplementary Guidance, 28 (Sustainable Design), and 56 (Travel) as insufficient information has been provided in the form of Road Safety Audits to satisfactorily demonstrate that the site and the offsite turning circle can be safely accessed by abnormal indivisible load delivery vehicles.

Signature: Bob Robertson

Designation: pp Area Planning Manager - South

Author: Mark Fitzpatrick and Rohan Sinha

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

Relevant Plans: Plan 1 - Figure 1.1 Site Location
Plan 2 - Figure 3.1 Site Layout
Plan 3 - Figure 3.9 Typical Turbine Elevation
Plan 4 - Figure 3.12 Typical Substation Compound

Appendices: Appendix 1 - Cumulative Wind Farm Developments
Appendix 2 - Development Plan and Other Material Policy Considerations
Appendix 3 - Compliance with the Development Plan and Other Material Policy Considerations
Appendix 4 - LVIA Methodology
Appendix 5 - Viewpoint Visual Assessment Appraisal (operational only)
Appendix 6 – Appraisal Against THC's 10 Criteria

Appendix 1 – Cumulative Wind Farm Developments

Wind Energy Projects	No Turbines	Blade Tip Height	Distance from nearest proposed development turbine
Operational and Under Construction			
Corriemoillie	17	125m	8km
Fairburn	20	100m	9km
Lochluichart and extension	23	125m	9km
Lochluichart Extension II	5	149.9m	10km
Auchmore 1&2	2	17m	13km
Novar and extension	50	55.5m / 99.5m	13km
Coire na Cloiche	13	99.5m	23km
Beinn Tharsuinn (including Beinn an Oighrean)	19	80m / 99.5m	25km
Strathrory Redesign*	7	149.9m / 160m / 180m	36km
Corrimony	5	149.9m	37km
Bhlaraidh	32	125m / 135m	40km
Achany	19	100m	41km
Rosehall	19	90m	41km
Farr	40	101m	42km
Moy	20	126.5m	42km
Glen Kyllachy	20	110m	43km
Lairg	3	100m	44km

Aberarder	12	130m	45km
Consented			
Kirkan	17	175m	7km
Meall Buidhe	8	144.5m / 149.9m	31km
Chrathaich	14	149.9m	40km
Bhlaraidh extension	15	180m	40km
Garvary	24	180m	41km
Lairg II	10	150m / 180m / 200m	42km
Achany extension	18	149.9m	43km
In Planning			
Abhainn Dubh	5	149.9m	9.5km
Creachan	9	200m	12.5km
Ceislein	11	250m	16km
Ballach	20	230m	20km
Creachan	13	180m / 200m	20km
Inveroykel	20	230m	32km
Coille Beith	11	200m	33km
Cnoc Farasd	6	149.9m	34.5km
Loch Liath	13	180m / 200m	35km
Strathoykel*	11	200m	35km
Lynemore	12	200m	37km
Balblair	8	180m / 200m	38km
Allt an Tuir	9	200m	40km

Acheilidh	12	200m / 230m	42km
Achany Extension Redesign	18	200m	43km
Scoping (pre-application)			
Tarvie	11	200m	3.5km
Fairburn Extension	14	200m	11.5km
Glasa	27	250m	13.5km
Novar Repowering	10	180m	15km
Beinn Tharsuinn Repowered and Extended	31	180m	21km
Braelengwell	17	220m	31km
Carn Na Saobhaidh	29	200m	43km

- **Bold** are wind farms have either changed status or were not included in the applicant's cumulative list.
- * The decision to approve S36 Consent for Strath Oykel Wind Farm (19.4km from the application development, 11 x 200m turbines) was quashed by the Court of Sessions.
- Fiodhag (formerly Fasnakyle) 46 x 149.9m turbines is within the study area but has been in scoping beyond 5 years and is not included in the assessment (THC ref. 19/05046/SCOP).

Appendix 2 – Development Plan and Other Material Policy Considerations

DEVELOPMENT PLAN

National Planning Framework 4 (2023)

A2.1 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 18 – Infrastructure first

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

A2.2 28 - Sustainable Design

29 - Design Quality and Place-making

30 - Physical Constraints

31 - Developer Contributions

36 – Wider Countryside

51 – Trees and Development

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) / West Highlands and Islands Local Development Plan (WestPlan)

- A2.3 There are no site-specific policies covering the application site in either plan however Policy 2 – Nature protection, preservation and enhancement is relevant. Local area Development Plans identify Special Landscape Areas (SLA) within the plan area. As noted in section two, there are SLAs within the LVIA study area that would be impacted by the development.

Onshore Wind Energy Supplementary Guidance (OWESG) (2016)

- A2.4 The Onshore Wind Energy Supplementary Guidance (OWESG) provides additional guidance on the principles set out in HwLDP Policy 67 for renewable energy developments. The Guidance sets out the Council's agreed position on onshore wind energy matters, and, although reflective of Scottish Planning Policy at the time of its adoption prior to the adoption of NPF4, the document remains an extant part of the Development Plan and is therefore a material consideration in the determination of onshore wind energy planning applications. Nevertheless, the Spatial Framework included in the document is no longer relevant to the assessment of applications as in effect, the policies of NPF4 (specifically Policy

11, Energy) removes Group 2 Areas of significant protection from consideration by effectively making all land in Scotland either Group 1 Areas where wind farms will not be acceptable (National Parks and National Scenic Areas), or Group 3, Areas with potential for wind farm development

A2.5 The OWESG also contains the Loch Ness Landscape Sensitivity Study, the Black Isle, Surrounding Hills and Moray Firth Coast Sensitivity Study, and the Caithness Sensitivity Study. The site falls within the area covered by the Black Isle, Surrounding Hills and Moray Firth Coast Landscape Sensitivity Study. The proposed site sits within the Landscape Character Type (LCT) of Rounded Rocky Hills – Ross and Cromarty (NatureScot LCT331) as noted in section 2 of this report.

A2.6 **Other Highland Council Supplementary Guidance**

- Biodiversity Enhancement Planning Guidance (May 2024)
- Construction Environmental Management Process for Large Scale Projects (August 2010)
- 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)
- Visualisation Standards for Wind Energy Developments Construction Environmental Management Process for Large Scale Projects (2010)

OTHER MATERIAL POLICY CONSIDERATIONS

Emerging Highland Council Development Plan Documents and Planning Guidance

- A2.7 The Highland Local Development Plan is currently under review and with the Evidence Report having now been presented to Full Council in June 2026. It is anticipated the Proposed Plan will be published following publication of secondary legislation post NPF4.
- A2.8 In addition to the above, the community led Garve and District Local Place Plan (LPP) (September 2024 to August 2029) has also been registered with the Council. While not forming a part of the Development Plan, the LPP is now a material consideration with the decision maker to decide the appropriate weight to be given in the overall assessment of the application. Of most relevance to this application, the LPP sets out the community's desire for community renewable energy projects, improved connections between communities, and enhanced public access including footpaths.

Other International and National Legislation, Policy, and Guidance

- A2.9
- Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 – interim and annual targets replaced by Climate Change (Emissions Reduction Targets) (Scotland) Bill in November 2024
 - Climate Change Committee Report to UK Parliament (July 2024)
 - UK Government Clean Power Action Plan (Dec 2024)
 - Draft Energy Strategy and Just Transition Plan (2023)
 - Onshore Wind Energy Policy Statement (2022)
 - Draft Scottish Biodiversity strategy to 2045: tackling the nature emergency (2023)
 - Scottish Energy Strategy (2017)
 - 2020 Routemap for Renewable Energy (2011)
 - Energy Efficient Scotland Route Map, Scottish Government (2018)
 - Siting and Designing Wind Farms in the Landscape, SNH (2017)
 - Assessing Impacts on Wild Land Areas, Technical Guidance, NatureScot (2020)
 - Assessing the cumulative landscape and visual impact of onshore wind energy developments, NatureScot (2021)
 - Special Landscape Qualities - Guidance on assessing effects, NatureScot (updated 2025)
 - 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 4/1998 – The use of Conditions in Planning Permissions – this states that planning conditions should only be imposed when they meet all of the following six tests: 1) Necessary, 2) Relevant to planning, 3) Relevant to the development to be permitted, 4) Enforceable, 5) Precise; and Reasonable in all other respects.
- Circular 1/2017: Environmental Impact Assessment Regulations (2017)
- NatureScot: Guidance on Aviation Lighting Impact Assessment (2024)
- Residential Visual Amenity Assessment (RVAA), Landscape Institute (March 2019)
- Scottish Forestry Woodland Creation Application Guidance (November 2017)

Appendix 3 - Compliance with the Development Plan and 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 Scotland's environment is a national asset which supports our economy, identity, health and wellbeing. It sets out that choices need to be made about how we can make sustainable use of our natural assets in a way which benefits communities. The spatial strategy reflects legislation in setting out that decisions require to reflect the long-term public interest. However, in doing so it is clear that we will need to make the right choices about where development should be located ensuring clarity is provided over the types of infrastructure that needs to be provided and the assets that should be protected to ensure they continue to benefit future generations. The Spatial Priorities support the planning and delivery of sustainable places, where we reduce emissions, restore and better connect biodiversity; liveable places, where we can all live better, healthier lives; and productive places, where we have a greener, fairer and more inclusive wellbeing economy.
- 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.
- A3.6 In this instance, the report has set out that due to the submission failing to appropriately quantify direct and indirect peatland habitat losses, it has not been established that the losses will be sufficiently offset and an appropriate level of peatland habitat enhancement will be provided through peatland restoration. As such, the proposal does not comply with Policy 3 b).
- 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. In this instance, the proposal is not considered to accord with this clause due to the extent, nature, range and breadth of the significant landscape and visual impacts from the development.
- A3. The policy also clarifies the extent of effects that may be acceptable 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.

This is an important consideration given the proximity of the development natural heritage designations. In this instance, the proposal's impacts on the breeding golden eagle qualifying interest of the Glen Affric to Strathcarron SPA cannot be known due to out of date survey data being submitted with the application. As such,

the proposal does not accord with NPF4 Policy 4 b) as an appropriate assessment cannot be carried out by the competent authority due to the inadequate data.

- 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.
- A3. In this instance, the proposal's significantly detrimental impacts on the 'Dominant Landmark and Uninterrupted Panoramas' Special Landscape Quality of the Ben Wyvis Special Landscape Area are considered to be significantly detrimental to the site's integrity. These effects cannot be mitigated. The Council does not consider that the policy advocates a clinical weighing up of national development versus a non-national designation, particularly where the local importance of the proposal's social, environmental, or economic benefits are not established as is the case here and cannot be shown to 'clearly' outweigh the significant effects on the designation.
- 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.
- A3. In this instance, six of the nine turbines would be erected within Wild Land Area WLA29: Rhiddoroch – Beinn Dearg – Ben Wyvis Wild Land Area, leading NatureScot to conclude that the proposal would effectively remove around 5km of the southwestern arm of the WLA from the designation with no recourse to mitigate the effects. As such, NatureScot advises that the proposal may not accord with Policy 4g).
- A3.9 The proposal does not conflict with Policy 7 Historic Assets and Places, all impacts on historic resources have been found to be within acceptable limits.
- A3.10 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.

- A3.11 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.
- A3.12 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.
- A3.13 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, IMFLDP2 / WestPlan, and Highland Council Supplementary Guidance) published prior to NPF4, then the more recent document shall prevail. In this instances, IMFLDP2 is the most recent policy document having been published after NPF4, which contains policies relevant to this proposal including Policies 1: Low and Zero Carbon Development and 2: Nature Protection, Restoration and Enhancement. These policies are not considered to conflict with NPF4, while the older policies of HwLDP and the WestPlan, also not considered to conflict with NPF4, are not eliminated in their entirety as these documents remain an extant part of the adopted Development Plan.
- A3.13 It is considered the proposal is in not in overall conformity with NPF4 Policy 11, particularly with regards to 11 e) ii. which requires the proposed development project design and mitigation to demonstrate how the following impacts are addressed: Significant landscape and visual impacts, recognising that significant impacts are to be expected for some forms of renewable energy. Where impacts are localised and / or appropriate design mitigation has been applied, they will generally be considered to be acceptable.
- A3.14 The current proposal will have significant adverse landscape and visual impacts on a broad range of features/receptors across a broad area including but not restricted to:
- The Landscape Character of:
 - LCT331: Rounded Rocky Hills, LCT330: Rounded Hills and Moorland Slopes, LCT329: Rounded Mountain Massif, LCT341:

Forest Edge Farming, LCT340: Strath – Ross and Cromarty, and LCT335: Wooded Glens and Rocky Moorland.

- Landscape Composition by virtue of the proposal being significantly detrimental to the interactions between and across multiple Landscape Character Types in the surrounding area including the Ben Wyvis Massif, which is the principal defining and organising landscape feature that contributes most significantly to the sense of place of the Inner Moray Firth and eastern parts of Wester Ross.
- the Special Landscape Qualities and the integrity of the Ben Wyvis Special Landscape Area by virtue of being significantly detrimental to the Massif's unique landmark qualities as experienced in views towards the Massif over a wide geographical area, and being significantly detrimental to the quality of outward views from the Massif and its supporting LCTs, which contribute to the 'Dominant Landmark and Uninterrupted Panoramas' Special Landscape Quality of the designation.
- Significant visual impacts as experienced by residential, recreational, and users of transport routes receptors of a large geographical area extending 15km to the southeast, and up to approximately 20km to the west, southwest and northwest.

A3. It is not considered that the scale, nature, range and breadth of the above landscape and visual effects can be reasonably described as intermittent and localised. Nor can the effects be overcome through siting, design, or other mitigation and therefore the threshold of the 'appropriate design mitigation' policy test is not reached.

A3. The report also sets out that the submission also fails to satisfactorily demonstrate that the proposal will not have an unacceptable impact on the breeding golden eagle population qualifying interest of the European Site. The submission also fails to adequately quantify the impact on peatland habitat, assess the offsite impacts of the delivery of abnormal loads on roadside trees, and the implications of such deliveries to road safety, and thereby not according with NPF4 Policy 23 Health and Safety. These are further reasons why, based on the current submission, the application fails to comply with NPF4 Policy 11 e).

A3.15 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. Also, 28 Sustainable Design, Policy 51 Trees and Woodland, Policy 56 Travel, Policy 57 Natural, Built and Cultural Heritage, Policy 58 Protected Species, Policy 60 Other Important Habitats and Article 10 Features, and Policy 61 Landscape

- A3.16 It is considered the proposal is not in overall conformity with the above policies for the same reasons it is not considered to comply with NPF4 policies set out above.
- A3.17 In terms of HwLDP Policy 67, whilst the proposed development would contribute towards meeting renewable energy generation targets and may have a positive effect on the local and national economy (although these effects would not be significant and are unlikely to be of local import overall), the Council has to be satisfied that it is located, sited and designed not to be significantly detrimental overall. As established in detail in the report, officers consider that the proposal would result in greater environmental disbenefits overall and is not, therefore, supported in HwLDP Policy 67.
- A3.18 **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;
- A3.19 This brings the application under the environmental considerations set out in NPF4 Policy 11e) that require to be sufficiently mitigated against, and which largely correspond to their HwLDP Policy 67 equivalents. As has already been set out, in-solus and cumulative landscape and visual effects are significant and adverse across a broad range of receptors within a broad area including on landscape character, composition, a scenic designation of regional significance, and residential, recreational, and users of transport modes receptors, and are judged to be not within acceptable limits. Ecology, trees and road safety issues are also outstanding. Other matters can adequately be dealt with by condition however.

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 that 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. Following the recent judicial review decision on Raeshaw Farms Ltd v Scottish Ministers [2026] CSIH 10, it is clear that the EIA submitted with this development should include an environmental impact assessment of the grid connection for the proposal including cumulative effects, which is omitted from the submission.
- 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.
- A3.24 As for NPF4 Policy 11e) considerations, residual in-solus and cumulative landscape and visual effects are not within acceptable limits such that the disbenefits of the development are adjudged to outweigh the benefits overall.

Inner Moray Firth Local Development Plan 2 (IMFLDP2) / West Highlands and Islands Local Development Plan (WestPlan)

- A3.25 There are no site-specific policies covering the application site in either plan however Policy 2 – Nature protection, preservation and enhancement is relevant.

- A3.256 Local area Development Plans identify Special Landscape Areas (SLA) within the plan area. As noted in section two, there are SLAs within the LVIA study area that would be impacted by the development with the effects on the Special Landscape Quality and integrity of the Ben Wyvis SLA to be significant, adverse, and unacceptable.

Onshore Wind Energy Supplementary Guidance (OWESG)

- A3.27 The Council's OWESG is a material consideration in the determination of planning applications. The supplementary guidance does not provide additional tests in respect of the consideration of development proposals against Development Plan policy. However, it provides a clear indication of the approach the Council towards the assessment of proposals, and thereby aid consideration of applications for onshore wind energy proposals
- A3.28 The OWESG approach and methodology to the assessment of proposals is applicable and is set out in the OWESG Para 4.16 - 4.17. It provides a methodology for a judgement to be made on the likely impact of a development on assessed "thresholds" in order to assist the application of HwLDP Policy 67. The 10 criteria are particularly useful in considering visual impacts, including cumulative impacts. An appraisal of how the proposal meets with the thresholds set out in the criteria is included in Appendix 6 of this report.

Landscape Sensitivity Study

- A3.29 The OWESG also provides strategic considerations that identify sensitivities and potential capacity for wind farm development. These are called the Landscape Sensitivity Appraisals (LSA) and form part of the statutorily adopted Onshore Wind Energy Supplementary Guidance. The Appraisals identify Key Views, Key Routes and Gateways as well as Landscape Character Area sensitivities and guidance. The site would be located within landscape unit BL42: Carn Gorm and Carn Lochan Tuirc within THC's Landscape Sensitivity Appraisal for Black Isle, Surrounding Hills and Moray Firth Coast, which corresponds to LCT331: Rounded Rocky Hills - Ross and Cromarty as mapped and described by NatureScot. whereby the. The Landscape Sensitivity Appraisal for BL42 concludes that there is no scope for large-scale wind farm development within it.

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

- A3.30 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.

- A3.31 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.
- A3.32 The document recognises that there may be a need to develop onshore wind energy development on peat. Priority peatland is present on the site, however the impacts on peat and peatland habitat are not considered to be appropriately quantified.
- A3.33 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.
- A3.34 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.
- A3.35 Finally, the document also highlights technical considerations, those relevant to this application have been considered and mitigation, where required has been secured by condition.
- A3.36 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.

- A3.37 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 - LVIA Methodology

- A4.1. The applicant has presented a number of figures and visualisations to illustrate the landscape and visual effects of the proposed development both singularly and cumulatively with existing, consented and other proposed wind farm developments, although some of the cumulative information included with the submission is now out of date.
- A4.2. Following a review of the LVIA in Volume 1 Chapter 7 of the EIAR, sufficient information has been provided to enable an assessment and overall, the majority of the photomontages are considered to have been produced to a good standard. The exception to this is the applicant's poor baseline photography for Viewpoints 4: Little Wyvis, Viewpoint 5: An Cabar, Viewpoint 6: Ben Wyvis, Viewpoint 11: Knockfarrel, Viewpoint 15: A862 west of Inverness, Viewpoint 29: Sgùrr a' Mhuilinn, Viewpoint 30: Beinn a' Bha'ach Ard and Viewpoint 31: An Coileachan, which have been noted in the officer's viewpoint appraisal in Appendix 5 of this report.
- A4.3. The design evolution in Volume 1 Chapter 2 of the EIAR includes a description of the design process (and includes a separate design statement), whilst the LVIA in Volume 1 Chapter 7 of the EIAR includes an assessment against several LCTs, the SLQs of the Ben Wyvis SLA and the WLQs of the Rhiddoroch – Beinn Dearg – Ben Wyvis WLA. Assessments against all NSAs, other SLAs and WLAs have been scoped out of the LVIA.
- A4.4. In terms of visual amenity assessments of settlements, only Contin and Garve are scoped into the EIAR due to likely extensive visibility across these areas. Routes included are the A832, A835, Inverness – Kyle of Lochalsh Railway Line and Core Paths. The North Coast 500 Tourist Route is also assessed as part of the roads assessment.
- A4.5. A total of 33 viewpoints across a study area of 45km have also been assessed in the LVIA, however the viewpoints extend out only up to 35km. These viewpoints are representative of a range of receptors including settlements, dispersed communities, outdoor recreational users, and road users including tourists. A bare earth visibility of the proposed development can be appreciated from the ZTV to Blade Tip with Viewpoint locations (Figure 7.7a-d) and ZTV to hub height with viewpoint locations (Figure 7.8a-c). Other ZTV figures include Landscape Designations and Visibility (Figure 7.11a-b), Landscape Character Types and Visibility (Figure 7.10a-b), Wild Land Areas and Visibility (Figure 7.12a-b), Principal Visual Receptors and Visibility (Figure 7.13a-b) and Cumulative ZTVs (Figures 7.15a-y).
- A4.6. A Residential Visual Amenity Assessment (Technical Appendix 7.2, Volume 4) has also been undertaken by the applicant. The Hours of Darkness Assessment

and Wild Land Assessment has been included within the LVIA in Volume 1 Chapter 7 of the EIAR. Additional Wild Land and Cumulative wirelines are also produced in Technical Appendix 7.3-7.4, Volume 4. The information submitted is considered sufficient to allow the Council to come to a reasoned conclusion on the likely landscape and visual effects of the proposed development.

- A4.7 The methodology for the LVIA 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 clearly distinguish between what are considered to be significant and non-significant effects*”. The applicant assessed significant effects following the combination of judgements based on the sensitivity of the receptor against the magnitude of change.
- A4.8 The sensitivity of the receptor (landscape or visual) is defined by the receptor’s susceptibility to the change brought about by the proposed development against the importance (value) of the landscape resource / view.
- A4.9 For landscape, ‘susceptibility’ is the “*ability of the landscape receptor...to accommodate the development without undue consequences for the maintenance of the baseline situation and/or the achievement of landscape planning policies and strategies*” (GLVIA3, Page 88). For visual receptors, susceptibility is judged to be high, medium, or low with some receptors falling into intermediate brackets (high-medium or medium-low) within the applicant’s assessment.
- A4.10 The value of a landscape receptor, given as high, high-medium, medium, medium-low, or low is based on a range of factors including a review of landscape designations, landscape quality and landscape experience. Similar criteria are applied for views such as formal or informal recognition.
- A4.11 Judgement of magnitude of change is based on an assessment of factors including: size or scale of change; geographical extent of the effect, and in some situations, its duration and reversibility. The key elements of the proposed Development that will influence the level of change on views are the movement, form, material, colour and scale of the turbines, although infrastructure is also considered. Magnitude of change is described as High, high-medium, medium, medium-low, low, low-negligible or negligible.
- A4.12 According to the definitions provided in the LVIA Methodology, Volume 4 Table 1, effects of major and major-moderate correspond to significant effects. where ‘moderate’ effects are predicted, the LVIA advises that professional judgement has been applied to ensure that the potential for significant effects arising has been appropriately considered. Those effects classified as moderate-minor, minor or negligible are considered to be not significant. In combination effects of the proposed development are considered under three scenarios:

- 1) the present baseline, i.e., operational / existing developments and those under construction;
- 2) the predicted baseline, which additionally considers consented but as yet not constructed schemes; and,
- 3) the future baseline as considered against schemes awaiting determination at the time of the assessment, which the LVIA advises are considered on a case-by-case basis.

A4.13 The applicant provided a review of the landscape officer consultation response on 29 January 2026. In its review, it highlighted a point in relation to the LVIA assessing different levels of effect followed by assessing whether the effect is either significant or not significant as required by the EIA regulations. It is unclear why this point was included in the review as the landscape officer did not intend to indicate that the levels of effect were levels of significance. There is no dispute in relation to the LVIA methodology on how the levels of effect are assessed including the method on assessing the effects as significant or not significant.

A4.14 More significant cumulative landscape effects are considered to arise from changes to the landscape character of the study area whether through effects on key characteristics/features or whether the landscape is transformed into a different type, as set out in GLVIA3 at Paragraph 7.28. The methodology sets out that such effects occur where the proposed development extends or intensifies a landscape effect, or it fills an area such that it alters the landscape resource, or, where the interaction between the proposed development and other wind farms is such that the effect is greater than it should otherwise be.

A4.15 Similarly, more significant cumulative visual effects are considered to occur where the proposed development would extend or intensify a visual effect, where the proposed development fills an area such that it alters the character of the view/visual amenity, and / or, where the interaction between the proposed development and other wind farms is such that the effect is greater than it should otherwise be. Sequentially, more significant cumulative visual effects are considered to occur where the proposed development lengthens the time over which an effect is experienced for receptors moving through the landscape.

A4.16 It is noted here that it would be perfectly reasonable to expect a development of the type, size, scale, and texture of a wind farm to result in significant landscape and visual effects, bearing in mind that significant effects are not relative to the size and scale of the proposed development, and do not necessarily equate to unacceptable effects.

A4.17 The summary of the applicant's assessment and officer appraisal of this assessment, which highlights the differences and any concerns with regard to visual effect, can be found in Appendix 5 of this report. A summary table has also been included under the visual effects section. Critically, the officer appraisal

identifies significant visual effects at six additional viewpoints and significant cumulative effects at seven additional viewpoints than the applicant's assessment. Whilst the landscape officer concluded additional significant visual effects at four viewpoints and additional significant cumulative visual effects at five viewpoints in their initial consultation response, officers undertook a further assessment at all viewpoints as part of their appraisal. The applicant has also underassessed the level of effect at several viewpoints as noted in Appendix 5 of this report.

- A4.18 Officers generally agree with the assessment of susceptibility of visual receptors, noting that the Council considers local residents and recreational users focussed on an appreciation of the landscape qualities and surroundings such as hillwalkers, visitors to heritage assets and other attractions, other formal stopping places on scenic routes for example, and recreational users moving through the landscape at slower speeds, such as cyclists, to be visual receptors of high susceptibility to wind energy development. Officers also consider that passengers of faster moving vehicles may also be susceptible to changes in the view and visual amenity.
- A4.19 However, officers consider that the applicant has underassessed the value of a view for many receptors including a large number of viewpoints resulting in a lower sensitivity. It appears that the applicant has heavily relied on a high value relating largely to if a receptor is within a designated landscape or formally recognised. Whilst GLVIA 3 (paragraph 6.37) notes that judgement about the value of a view should take account of recognition of the value attached to particular views and indicators of the value attached to views by visitors which the applicant has taken into account, officers consider that the value of a view should be assessed on a case-by-case basis.
- A4.20 In some instances, whilst a view may not be necessarily within a designated landscape or formally recognised on OS maps, it could still have a high scenic value and landscape interest which increases the value of the view. For example, views from outside of, but which extend to or over a designated landscape (Ben Wyvis SLA in the case of the proposed development), as well as elevated views from trig points (which some people may head to because of the nature of the views from these locations), and those which are of particularly high scenic quality. In this instance, views of Ben Wyvis add particular value to the surrounding context, and therefore qualities such as rarity, uniqueness, scenic quality, enjoyment, cultural, naturalness could be easily eroded. Further, Item 6(3) of the GLVIA 3 Notes and Clarifications (Technical Guidance Note LITGN-2024-01) refers to value of views and notes that the scenic value can also be considered. This has been included as part of the officer's viewpoint appraisal in Appendix 5 of this report.

A4.21 A key part of the of the Council's assessment of landscape and visual effects is a consideration of the proposal against the Criterion set out in Section 4 of the Onshore Wind Energy Supplementary Guidance (OWESG), with the assessment against the criterion and view as to whether the threshold set out in the guidance is met or not, contained in Appendix 6 to this report. Furthermore, landscape and visual effects of the proposed development may be reversible as the scheme would be capable of being decommissioned as stated within the EIAR. However, as set out in Policy 11 (f) of NPF4, wind farm sites should be suitable in perpetuity, and it is therefore considered reasonable to assess the duration of all landscape and visual effects as non-reversible in that context.

Appendix 5 – Viewpoint Visual Assessment Appraisal

Cumulative Scenario 1 = The current baseline wind energy development Scenario includes wind farms that are operational or under construction (e.g. wind farms where there is certainty as to the presence and influence of these sites).

Cumulative Scenario 2 = The predicted baseline wind energy development Scenario includes consented (not yet constructed) wind farms as well as operational and under construction wind farms (e.g. wind farms where there is some degree of certainty as to their presence and influence).

Cumulative Scenario 3 = Application stage wind farm Scenarios are considered on a case-by-case basis as there is no certainty as to whether or not they will be present in the future. Officers have also included the application Beaulieu – Spittal 400kV Overhead Line in this Scenario within their appraisal.

			Proposed Development			Cumulative Assessment (Scenarios 1, 2 and 3)		
Viewpoint	App / THC	Sensitivity of Receptor (Susceptibility of receptor to change / value of the view)	Magnitude of change (Size or Scale / geographic extent) (Duration / reversibility maybe stated separately)	Level of Effect (Sensitivity of receptor / Magnitude of change)	Significance (Major & Major-Moderate are Significant). Moderate may be Significant or Not Significant.	Magnitude of Change (Size or Scale / geographic extent) (Duration maybe stated separately)	Level of Effect (Magnitude of change / Sensitivity of receptor)	Significance
VP1 Garve Distance 2.86km Looking E/NE	App	High-medium (residents and road users of the A835 including those on the NC500) – <i>High susceptibility and Medium value</i> Medium (railway users) – <i>Medium susceptibility and Medium value</i>	Medium (residents, railway users) Medium-Low (road users)	Moderate	Significant (residents, railway users) Not Significant (road users)	No relevant cumulative sites visible and the cumulative effect arising from the addition of the proposed development would be Not Significant.		
	THC	<u>High</u> (residents and tourists on the NC500) - <i>High susceptibility and High-medium value</i> Medium (<i>other road users and railway users</i>) – <i>Medium susceptibility and High-medium value</i>	Medium (<u>all receptors</u>)	<u>Major-moderate</u> (residents and tourists on the NC500) Moderate (other road users and railway users)	Significant (<u>all receptors</u>)			
The applicant's assessment is reported in paragraphs 7.12.12-32 of the LVIA, Chapter 7 of the EIAR. The applicant's assessment of sensitivity for residents and users of the North Coast (NC) 500 Tourist Route as High-medium is disputed due to an underestimation of the value of the view, which has been assessed by the applicant as Medium. Officers consider the value of the view to be High-medium.								

			Proposed Development			Cumulative Assessment (Scenarios 1, 2 and 3)		
Viewpoint	App / THC	Sensitivity of Receptor (Susceptibility of receptor to change / value of the view)	Magnitude of change (Size or Scale / geographic extent) (Duration / reversibility maybe stated separately)	Level of Effect (Sensitivity of receptor / Magnitude of change)	Significance (Major & Major- Moderate are Significant). Moderate may be Significant or Not Significant.	Magnitude of Change (Size or Scale / geographic extent) (Duration maybe stated separately)	Level of Effect (Magnitude of change / Sensitivity of receptor)	Significance
		Although the view is not within a designated landscape and includes some human influences, such as the road, houses and areas of coniferous forestry, it retains a good level of scenic quality. It represents the principal outlook within Strath Garve for residents and tourists travelling along the nationally promoted NC500. The view is experienced at close range and includes native and riparian woodland together with the distinctive landforms of Little Wyvis and Meall Ruighe an Fhirich, with coniferous forestry on the lower slopes. It is noted that this view would not be the main view of residents from their home given intervening screening from vegetation and landform, however it would represent people walking through Garve or waiting at the bus stop who are most likely to be local residents. All this contributes to a high-medium value and therefore High sensitivity of these receptors taking account of their high susceptibility. Recreational users travelling the NC500 specifically to experience the surrounding landscape are considered to be particularly sensitive receptors. The applicant's assessment of Medium sensitivity for other road users and railway passengers is accepted, as their Medium susceptibility is considered to be the determining factor despite the value of the view. The proposed turbines (two hubs and two blade tips) would be seen on the skyline in this short-range view affecting approximately 28° of the horizontal Field of View (FoV), the horizon formed by the ridge and western slopes of Meall Ruighe an Fhirich (432m AOD) with its two masts and the distinctive landform of Little Wyvis (763m AOD) further beyond. The turbines would be highly apparent at close range and seen in the most open aspect of the view on a prominent skyline with distinctive landform features. T6 and T1 would be the most prominent acting as focal points (8° horizontal FoV) whilst T7 and T8 would be seen as blade tips on the skyline and are also likely to draw the viewer's attention. The proposed development would introduce new large-scale vertical structures into the view, with T6 influencing the perceived scale of the landscape. The intervening landform would screen views of the lower parts of the turbine towers and low-lying components of the proposed development with the exception of short sections of access track. Magnitude is judged to be Medium. The applicant's assessment of Medium magnitude of change for residents and railway users is reasonable; however, it is not agreed that the magnitude would be reduced to Medium-low for road users. Officers consider that the magnitude also to be Medium for road users despite the view being perpendicular to the direction of travel or of a shorter duration at this location. A transient view doesn't necessarily reduce the magnitude of change. In this instance, the scale of change takes precedence over the extent and duration at this location. As a result, the effect on residents and tourists on the NC500 would be Major-moderate and Significant whilst for railway users and other road users would be Moderate and Significant. The cumulative assessment for all Scenarios is agreed as Not Significant. There is no visibility of any other wind farms from this viewpoint.						
VP2 Gorstan	App	High (residents) - <i>High susceptibility and Medium-low value</i>	High-medium	Major	Significant	No relevant cumulative sites visible and the cumulative effect arising from the addition of the proposed development would be Not Significant.		

			Proposed Development			Cumulative Assessment (Scenarios 1, 2 and 3)		
Viewpoint	App / THC	Sensitivity of Receptor (Susceptibility of receptor to change / value of the view)	Magnitude of change (Size or Scale / geographic extent) (Duration / reversibility maybe stated separately)	Level of Effect (Sensitivity of receptor / Magnitude of change)	Significance (Major & Major-Moderate are Significant). Moderate may be Significant or Not Significant.	Magnitude of Change (Size or Scale / geographic extent) (Duration maybe stated separately)	Level of Effect (Magnitude of change / Sensitivity of receptor)	Significance
Distance 3.42km Looking E	THC	High (residents) - <i>High susceptibility and High-medium value</i>	High	Major	Significant			
	The applicant's assessment is reported in paragraphs 7.12.33-46 of the LVIA, Chapter 7 of the EIAR. Whilst the applicant's assessment of sensitivity is agreed as High, the value of Medium-low is disputed. Officers consider that the value of the view as High-medium. It is not accepted that the lack of formal recognition of this location as a viewpoint or the absence of a designation moderates the value of the view. The viewpoint is the main view for residents. The landscape in this view exhibits a relatively high scenic quality, with forested slopes rising towards the distinctive landforms of Little Wyvis and Ben Wyvis beyond. This is despite the presence of human influences, including telegraph poles, masts and areas of coniferous forestry, which do not detract significantly from the overall character and scenic quality of the view. The proposed turbines (comprising four hub views, two blades and one blade tip) would be visible on the skyline in this short to medium-range view, occupying approximately 24° of the horizontal FoV, the horizon formed by the ridge and western slopes of Meall Ruighe an Fhìrich (432m AOD) and the distinctive landform of Little Wyvis (763m AOD) and parts of An Cabar and Ben Wyvis further beyond. The existing mast on Meall Ruighe an Fhìrich would also be visible on the skyline but at a substantially lower height than the proposed turbines. The turbines would be highly prominent, occupying the most open part of the view on a skyline defined by distinctive landform features. Turbines T1, T2, T6 and T7 would be the most visually prominent, with T6 in particular acting as a focal point. The blades and blade tips of T3, T4 and T8 would also break the skyline and attract the viewer's attention. T1 would partially overlap the slopes of Little Wyvis, appearing as a slight outlier extending across the skyline. As illustrated in the applicant's visualisation, the turbines would be illuminated by the low evening sun under clear conditions, increasing their visual prominence. Intervening landform would screen the lower sections of most turbine towers and the majority of the low-lying infrastructure, with the exception of a section of access track crossing the hillside. Magnitude is judged to be High. The applicant's assessment of High-medium magnitude is disputed. The introduction of the turbines would result in a large-scale change to the view, increasing visual contrast with the surrounding landscape and reducing the prominence of the distinctive landform of Little Wyvis. This would result in a High magnitude of change, however, the effect is agreed with the applicant as Major and Significant, as a High sensitivity and High magnitude also results in a Major effect in accordance with the applicant's LVIA matrix in Table 1 of Technical Appendix 7.1, Volume 4. The cumulative assessment for all Scenarios is agreed as Not Significant. There is no visibility of any other wind farms from this viewpoint.							
VP3 Tarvie	App	High (residents) - <i>High susceptibility and Medium-low value</i>	High-medium	Major (residents)	Significant (residents & road users)	Medium-Low	Moderate (residents)	Significant (residents)

Viewpoint	App / THC	Sensitivity of Receptor (Susceptibility of receptor to change / value of the view)	Proposed Development			Cumulative Assessment (Scenarios 1, 2 and 3)		
			Magnitude of change (Size or Scale / geographic extent) (Duration / reversibility maybe stated separately)	Level of Effect (Sensitivity of receptor / Magnitude of change)	Significance (Major & Major-Moderate are Significant). Moderate may be Significant or Not Significant.	Magnitude of Change (Size or Scale / geographic extent) (Duration maybe stated separately)	Level of Effect (Magnitude of change / Sensitivity of receptor)	Significance
			The applicant's assessment of High-medium magnitude is disputed. The introduction of the turbines would result in a large-scale change to the view, creating a high degree of visual contrast with the existing landscape and overlapping the distinctive landforms of Little Wyvis and An Cabar. While parts of some turbine towers would be screened by intervening landform and several turbines would appear partially back clothed, these factors do not reduce the magnitude of change to the extent suggested by the applicant. This would result in a High magnitude of change; however, the effect is agreed with the applicant as Major and Significant for residents. Road users would experience a Major-moderate and Significant effect as a result of the Medium sensitivity and High magnitude, in accordance with the applicant's LVIA matrix in Table 1 of Technical Appendix 7.1, Volume 4. The cumulative assessment for the baseline Scenario (1) is disputed. The addition of the proposed development to Fairburn would result in a High cumulative magnitude of change. Both developments would be visible in different parts of the view with Fairburn appearing more distant and less apparent to the south in comparison with the proposed development which would have the greatest effect at this viewpoint to the north. It is not accepted that the cumulative magnitude of change would be moderated to a lower magnitude due to the presence of Fairburn. The proposed development has a much greater effect given its scale, proximity and extent of visibility and the addition of this development with Fairburn visible to the south would remain as a high cumulative magnitude of change resulting in a Major / Major-moderate and Significant cumulative effect for residents and road users. There would be no cumulative effect for Scenarios 2 and 3.					
VP4 Little Wyvis	App	High-medium (hillwalkers) – <i>High susceptibility and Medium value</i>	High	Major	Significant	Medium	Moderate	Significant
	THC	<u>High</u> (hillwalkers) – <i>High susceptibility and <u>High</u> value</i>	High	Major	Significant	<u>High</u>	<u>Major</u>	Significant
Distance 0.98km Looking S		The applicant's assessment is reported in paragraphs 7.12.69-90 of the LVIA, Chapter 7 of the EIAR. The weather conditions in the applicant's viewpoint photography are poor and on a clear day there is excellent visibility to the south, west and east across the lowlands and coast of the Black Isle, Cromarty, Easter Ross to the south, southeast and east and to the mountains of Strathfarrar, Fannichs, Sgurr a' Mhuillinn, Fionn Bheinn and Bein Dearg to the west. The applicant's assessment of sensitivity for walkers as High-medium is disputed. Officers consider the value of the view to be High. Whilst it is not marked as a specific viewpoint on an OS map or specifically signposted, it is a popular Corbett. There are, however, signs once across the road from the car park stating 'Hillwalking Access'. The Strava Global Heatmap¹ identifies this route to be the most well used and easiest route up the Corbett. The viewpoint is						

¹ <https://www.strava.com/maps/global-heatmap>

Viewpoint	App / THC	Sensitivity of Receptor (Susceptibility of receptor to change / value of the view)	Proposed Development			Cumulative Assessment (Scenarios 1, 2 and 3)		
			Magnitude of change (Size or Scale / geographic extent) (Duration / reversibility maybe stated separately)	Level of Effect (Sensitivity of receptor / Magnitude of change)	Significance (Major & Major- Moderate are Significant). Moderate may be Significant or Not Significant.	Magnitude of Change (Size or Scale / geographic extent) (Duration maybe stated separately)	Level of Effect (Magnitude of change / Sensitivity of receptor)	Significance
			also located within the Ben Wyvis SLA and on the edge of the Rhiddoroch – Beinn Dearg - Ben Wyvis WLA thereby indicating a high value. The sensitivity is therefore considered to be High. All of the proposed turbines (comprising eight hub views and one blade) would be visible to the south, positioned just below the summit of Little Wyvis and back clothed by the landform, occupying approximately 54° of the horizontal FoV. The turbines would be immediately apparent at close range and would appear dominant within the view. Their scale, movement and extent across a range of landscape backdrops would draw the viewer's attention. This would be the closest wind farm of this scale (180–200 m to blade tip) to a Corbett or Munro summit in the Highlands. By comparison, other operational or consented wind farms of a similar scale are located at greater distances from a Corbett or Munro. Under sunny morning conditions, the turbines would be illuminated by the low morning sun, further increasing their visibility against the surrounding landscape. At least half of the turbines would be visible at full height, while the lower sections of three to four turbine towers would be screened by intervening landform. Other components of the proposed development, including access tracks, the substation, hardstandings and the borrow pit, would also be clearly visible from the summit. Although parts of some turbine towers would be screened and the turbines would appear back clothed, these factors would not reduce their prominence or minimise their vertical influence, contrary to the applicant's assessment. The turbines would dominate and substantially alter views to the south, detracting from both the summit experience and the upper section of the western ascent. The final approach to the summit becomes progressively steeper from Strathgarve Forest with switchbacks leading to the summit. At several points along the switchbacks, the path runs alongside a relatively steep-sided slope that falls sharply towards Bealach Beag. This upper section of the route would also offer close-range views of the proposed turbines. Magnitude is judged to be High. The applicant's assessment of High magnitude of change for hillwalkers is reasonable and the effect of Major and Significant is agreed, however, the sensitivity of this viewpoint has been underassessed by the applicant as noted above. Officers further note that significant visual effects would also occur along much of the route to the summit, with the exception of the initial section of the walk, where intervening tree cover would limit visibility. The cumulative assessment for all three Scenarios is disputed with the applicant. In all three Scenarios, the addition of the proposed development would result in a High cumulative magnitude of change. The proposed development would be the closest wind farm and have the greatest effect at this viewpoint. It is not accepted that the cumulative magnitude of change will be moderated to a lower magnitude due to the presence of other wind farms which are more distant. The proposed development has a much greater effect given its scale, proximity and extent of visibility and the addition of this development with other wind farms would remain as a high cumulative magnitude of change resulting in a Major and Significant cumulative effect for walkers. The application Beaulieu – Spittal 400kV Overhead Line would be partially visible at mid-range (Not Significant), however the addition of the proposed development to the view would remain Major and Significant for hill walkers given the proximity and extent of visibility of the proposed development than the Overhead Line.					

Viewpoint	App / THC	Sensitivity of Receptor (Susceptibility of receptor to change / value of the view)	Proposed Development			Cumulative Assessment (Scenarios 1, 2 and 3)		
			Magnitude of change (Size or Scale / geographic extent) (Duration / reversibility maybe stated separately)	Level of Effect (Sensitivity of receptor / Magnitude of change)	Significance (Major & Major- Moderate are Significant). Moderate may be Significant or Not Significant.	Magnitude of Change (Size or Scale / geographic extent) (Duration maybe stated separately)	Level of Effect (Magnitude of change / Sensitivity of receptor)	Significance
		walking around Marybank is assessed as High, consistent with that of residents. Users of the NC500 who are travelling the route specifically to experience the landscape are considered to be particularly sensitive receptors due to their purpose and expectations of the journey. The only agreement with the applicant is that the sensitivity of residents is High and for hall users is High-medium. All nine proposed turbine hubs would be visible on the skyline, occupying approximately 8° of the horizontal FoV. They would be seen against a horizon formed by the distinctive landform features of Little Wyvis and Ben Wyvis, together with the forested slopes above Contin. The turbines would be readily apparent within this open aspect of the view, occupying a prominent skyline associated with valued landscape features. A substantial proportion of the turbine towers, together with sections of access track, would be visible, with only limited screening provided by intervening landform. The scale, movement and overlapping of the turbines would draw the eye and introduce a competing visual focus, detracting from the visual influence and perceived dominance of the Massif within the landscape, as also recognised by NatureScot. The turbines would occupy the 'tail' of the characteristic 'whaleback' landform, creating a direct visual association with the Massif and detracting from the distinctiveness of its profile. Furthermore, the turbine layout, including the spacing between turbines and areas of stacking and overlap, would create a discordant composition that would further reduce the visual quality of this sensitive location. Magnitude is judged to be Medium for all receptors. The applicant's assessment of Medium magnitude of change for residents, hall users and those walking around Marybank is reasonable, however it is not agreed that the magnitude would be reduced to Medium-low for road users. The magnitude is considered also to be Medium for road users despite the transient nature of the view. As a result, officers consider that the effect on residents, those walking around Marybank and tourists on the NC500 would be Major-moderate and Significant whilst for hall users would be Moderate and Significant. The cumulative assessment for all Scenarios is agreed as Not Significant. The application Beaulieu – Spittal 400kV Overhead Line would also be visible in the same view as the proposed development and would be Significant, however the addition of the proposed development to the view would remain Major-moderate / Moderate and Significant given the greater extent of visibility of the proposed development located beyond but at a higher elevation than the Overhead Line application. There would also be a combined Significant cumulative effect as a result of both developments.						
VP11 Knockfarrel	App	High (recreational users) – <i>High susceptibility and High-medium value</i>	Medium	Major-moderate	Significant	Medium-low	Moderate	Not Significant

			Proposed Development			Cumulative Assessment (Scenarios 1, 2 and 3)		
Viewpoint	App / THC	Sensitivity of Receptor (Susceptibility of receptor to change / value of the view)	Magnitude of change (Size or Scale / geographic extent) (Duration / reversibility maybe stated separately)	Level of Effect (Sensitivity of receptor / Magnitude of change)	Significance (Major & Major-Moderate are Significant). Moderate may be Significant or Not Significant.	Magnitude of Change (Size or Scale / geographic extent) (Duration maybe stated separately)	Level of Effect (Magnitude of change / Sensitivity of receptor)	Significance
VP14 Culbokie Distance 16.97km Looking W/NW	App	High (residents) – <i>High susceptibility and High-medium value</i>	Medium-low	Moderate	Not Significant	Low / Medium-low	Moderate-minor / Moderate	Not Significant
	THC	High (residents) – <i>High susceptibility and High-medium value</i>	Medium-low	Moderate	<u>Significant</u>	<u>Medium-low</u>	<u>Moderate</u>	<u>Significant</u>

The applicant's assessment is reported in paragraphs 7.12.243-258 of the LVIA, Chapter 7 of the EIAR.

The sensitivity of High (High susceptibility and High-medium value) is agreed with the applicant. The Ben Wyvis Massif including Little Wyvis is a 'dominant landmark' in views from the Black Isle including the settlement of Culbokie and the Culbokie Inn at this location.

All of the proposed turbines (five hubs and four blades / blade tips) would be visible on the skyline to the west/northwest, occupying approximately 6° of the horizontal FoV. The turbines would be readily apparent within this open aspect of the view, occupying a prominent skyline associated with distinctive landform features, most notably the 'dominant landmark' Ben Wyvis Massif, including the summit and lower slopes of Little Wyvis. Some of the front turbines would have the upper sections of their towers visible, while the lower tower sections, bases and other low-lying components would be screened by intervening landform. However, the turbines would still introduce a vertical element onto the undulating skyline and would diminish the existing dominance of the Massif within the landscape. The scale, movement and overlapping of the turbines would draw attention to the development and create a discordant relationship with the surrounding landscape context. The stacking and overlapping of turbines within the layout would further contribute to a visually incoherent composition at this location. While this is a broad view with several existing scale indicators and the turbines would be experienced at a moderate distance, their scale and extent of visibility would result in a readily apparent feature on the skyline. The proposed development would affect the perception of landscape scale and distance and would detract from the appreciation of the Massif as a dominant landmark. The turbines would occupy the 'tail' of the characteristic '*whaleback*' landform, creating a direct visual association with the Massif and detracting from the distinctiveness of its profile.

Although the applicant has assessed the magnitude of effect as Medium-low, officers consider that this underestimates the extent and nature of the visual effects arising from the proposed development. Taking account of the scale, movement, location and relationship with the Massif, the visual effect is assessed as Moderate and Significant.

The cumulative assessment for all Scenarios is disputed. In relation to Scenario 1 and 2, the addition of the proposed development would remain in a Medium-low cumulative magnitude of change. Other developments visible would appear less apparent due to their long distance in comparison with the

			Proposed Development			Cumulative Assessment (Scenarios 1, 2 and 3)		
Viewpoint	App / THC	Sensitivity of Receptor (Susceptibility of receptor to change / value of the view)	Magnitude of change (Size or Scale / geographic extent) (Duration / reversibility maybe stated separately)	Level of Effect (Sensitivity of receptor / Magnitude of change)	Significance (Major & Major- Moderate are Significant). Moderate may be Significant or Not Significant.	Magnitude of Change (Size or Scale / geographic extent) (Duration maybe stated separately)	Level of Effect (Magnitude of change / Sensitivity of receptor)	Significance
			The applicant's assessment of low magnitude of change and Moderate-minor and Not Significant is agreed. However, officers have assessed a higher sensitivity than the applicant as noted above which would also result in a Moderate-minor effect which would be Not Significant in accordance with the applicant's LVIA matrix in Table 1 of Technical Appendix 7.1, Volume 4. The cumulative assessment for all Scenarios is agreed as Not Significant.					
VP17 Inverness Castle Distance 28.65km Looking NW	App	High (visitors) – <i>High susceptibility and High-medium value</i>	Negligible (from Esplanade)	Minor	Not Significant	The cumulative magnitude of change would be negligible due to the negligible visibility of the Proposed Development, and the cumulative effect will be Not Significant.		
	THC	High (visitors) – <i>High susceptibility and <u>High</u> value</i>	Low-negligible (from top of South tower)	Moderate-minor to Minor	Not Significant	Low-negligible	Moderate-minor to Minor	Not Significant
			The applicant's assessment is reported in paragraphs 7.12.285-293 of the LVIA, Chapter 7 of the EIAR. It is noted that the Castle was undergoing refurbishment at the time of the applicant's assessment hence the assessment was undertaken from the esplanade outside the Castle. The officer's appraisal has been undertaken from the top of both the North and South towers of the Castle noting that only the South tower is currently accessible to the public. Whilst the sensitivity for visitors to the Castle is agreed as High, the value of High-medium assessed by the applicant is disputed. The South tower is a formal recognised viewing platform as part of the Castle's refurbishment and has interpretation boards at the top depicting the surrounding views. The location is a Category A listed promoted tourist resource. The scenic quality of the view is high looking north over the City of Inverness and towards the Ben Wyvis SLA where the 'dominant landmark' Massif is readily appreciated and understood. This results in a high value and therefore High sensitivity taking account of the high susceptibility of the receptors. All of the proposed turbines (six hubs and three blades) would be theoretically visible on the skyline to the northwest affecting approximately 3° of the horizontal FoV. The bases and lower turbine towers, and low-lying components would be largely screened by intervening landform and vegetation. Some of the hubs would be further screened by intervening forestry. The movement and appearance of the turbines would attract the attention of the viewer, even at this distance and in clear conditions, due to their proximity to Little Wyvis and their location on the 'tail' of the characteristic '<i>whaleback</i>' landform of the Massif. In this view, however, the turbines would not diminish the existing prominence of the Massif which would remain the dominant landmark in views to the north. Magnitude is judged to be Low-negligible.					

			Proposed Development			Cumulative Assessment (Scenarios 1, 2 and 3)		
Viewpoint	App / THC	Sensitivity of Receptor (Susceptibility of receptor to change / value of the view)	Magnitude of change (Size or Scale / geographic extent) (Duration / reversibility maybe stated separately)	Level of Effect (Sensitivity of receptor / Magnitude of change)	Significance (Major & Major-Moderate are Significant). Moderate may be Significant or Not Significant.	Magnitude of Change (Size or Scale / geographic extent) (Duration maybe stated separately)	Level of Effect (Magnitude of change / Sensitivity of receptor)	Significance
	The effect is slightly greater as Moderate-minor to Minor and Not Significant from the top of the South tower. Whilst it is agreed that the effect would be Not Significant, this viewpoint represents one of several key locations from which the Ben Wyvis Massif can be appreciated as a 'dominant landmark' in the context of the City of Inverness. The cumulative assessment for all Scenarios is agreed as Not Significant. The application Abhainn Dubh Wind Farm would be largely screened by intervening landform and vegetation, however, the application Lynemore Wind Farm would be more apparent in views to the south.							
VP18 Milton of Leys Primary School Distance 32.75km Looking NW	App	Medium (residents walking around the parking and school area) – <i>High-medium susceptibility and Medium-low value</i>	Low-negligible	Minor	Not Significant	The cumulative magnitude of change would be low-negligible due to the limited and distant visibility of cumulative wind farms and the low-negligible magnitude of change of the proposed development, and the cumulative effect would be Not Significant.		
	THC	<u>High-medium</u> (residents walking around the parking and school area) – <i>High-medium susceptibility and High-medium value</i> <u>High</u> (nearby residents of Milton of Leys) – <i>High susceptibility and High-medium value</i>	Low-negligible	Minor (residents walking around the parking and school area) Moderate-minor (adjacent residents)	Not Significant			
The applicant's assessment is reported in paragraphs 7.12.294-302 of the LVIA, Chapter 7 of the EIAR. The applicant's assessment of sensitivity as Medium is disputed. This is largely due to the underassessment of the value of the view. Although not within a designated landscape or no formal recognition as a viewpoint or no facilities for the enjoyment of the view, the scenic quality of the view is higher with panoramic, unobstructed views to the north across the Ben Wyvis SLA and its 'dominant landmark' Massif clearly visible, and, further away, the Fannichs, Beinn Dearg and Glen Calvie SLA. This is an iconic view from the Milton of Leys area looking north towards the Massif which is readily appreciated and								

			Proposed Development			Cumulative Assessment (Scenarios 1, 2 and 3)		
Viewpoint	App / THC	Sensitivity of Receptor (Susceptibility of receptor to change / value of the view)	Magnitude of change (Size or Scale / geographic extent) (Duration / reversibility maybe stated separately)	Level of Effect (Sensitivity of receptor / Magnitude of change)	Significance (Major & Major-Moderate are Significant). Moderate may be Significant or Not Significant.	Magnitude of Change (Size or Scale / geographic extent) (Duration maybe stated separately)	Level of Effect (Magnitude of change / Sensitivity of receptor)	Significance
	moderate distance, the turbines would remain readily apparent on the skyline due to their scale and extent of visibility. They would affect the perception of landscape scale and distance and would become a prominent feature within the wider setting of the Massif, reducing the extent to which it is appreciated as the dominant landscape feature. Although the applicant has assessed the magnitude of effect as Medium-low, officers consider that this underestimates the nature and extent of the visual effects. Taking account of the high-medium sensitivity of the view and the relationship of the turbines with the distinctive landform and skyline, the visual effect is assessed as Moderate and Significant. The cumulative assessment for all Scenarios is disputed. In relation to Scenario 1 and 2, the addition of the proposed development will remain as Medium-low cumulative magnitude of change. Other developments visible would appear less apparent due to their long distance in comparison with the proposed development which would have the greatest effect at this viewpoint. It is not accepted that the cumulative magnitude of change will be moderated to a lower magnitude due to the presence of other wind farms. In relation to Scenario 3, the addition of the proposed development with the application Abhainn Dubh Wind Farm is agreed as Medium-low magnitude however, officers consider that the cumulative effect would be Moderate and Significant rather than Moderate-minor and Not Significant assessed by the applicant. The application Beaulieu – Spittal Overhead Line would be visible in the far distance back clothed by landform (Not Significant), however the addition of the proposed development would remain Moderate and Significant.							
VP22 A835 / B9169 Crossroads Distance 14.96km Looking NW	App	Medium (road users) – <i>Medium susceptibility and Medium-low value</i>	Medium-low	Moderate-minor	Not Significant	Low	Minor	Not Significant
	THC	<u>High-medium</u> (road users, cyclists on nearby NCR1) – <u>High-medium</u> / <i>Medium susceptibility and High-medium value</i>	Medium-low	<u>Moderate</u>	<u>Significant</u>	<u>Medium-low</u>	<u>Moderate</u>	<u>Significant</u>
The applicant's assessment is reported in paragraphs 7.12.338-354 of the LVIA, Chapter 7 of the EIAR. This is one of the design viewpoints presented by the applicant in their design workshop. The sensitivity of Medium for road users as assessed by the applicant is disputed. Passengers in vehicles and cyclists, including users of the nearby National Cycle Route (NCR) 1, are considered to have a High-medium susceptibility to change at this location. The view towards the proposed development								

Viewpoint	App / THC	Sensitivity of Receptor (Susceptibility of receptor to change / value of the view)	Proposed Development			Cumulative Assessment (Scenarios 1, 2 and 3)		
			Magnitude of change (Size or Scale / geographic extent) (Duration / reversibility maybe stated separately)	Level of Effect (Sensitivity of receptor / Magnitude of change)	Significance (Major & Major- Moderate are Significant). Moderate may be Significant or Not Significant.	Magnitude of Change (Size or Scale / geographic extent) (Duration maybe stated separately)	Level of Effect (Magnitude of change / Sensitivity of receptor)	Significance
		is experienced in the direction of travel and includes the Ben Wyvis Massif, which forms a 'dominant landmark' within the wider landscape. The value of the view is therefore assessed as High-medium, resulting in an overall High-medium sensitivity. While the Landscape Officer assessed the sensitivity of this viewpoint as Medium in the consultation response, a further assessment by officers concludes that the sensitivity should be High-medium for the reasons set out above. All nine proposed turbine hubs would be visible on the skyline to the north-west, occupying approximately 5° of the horizontal FoV. The turbines would be readily apparent within the direction of travel and experienced within an open aspect of the view, occupying a prominent skyline associated with distinctive landform features, most notably the Ben Wyvis Massif which includes Little Wyvis. Most of the turbines would have their towers visible, while the lower sections of the towers, bases and the majority of low-lying components would be screened by intervening landform. Nevertheless, the turbines would introduce a vertical element onto the skyline and would detract from the visual influence of the Massif by competing for visual prominence, thereby reducing its perceived dominance within the landscape, as also recognised by NatureScot. The scale, movement and overlapping of the turbines would draw attention and introduce a prominent moving element within the view. The turbines would occupy the 'tail' of the characteristic 'whaleback' landform, creating a direct visual association with the Massif and detracting from the distinctiveness of its profile. The stacking and overlapping of turbines within the layout would further contribute to a visually incoherent composition at this location. Although this is a broad view with several existing scale indicators and experienced from a moderate distance, the turbines would remain readily apparent on the skyline due to their scale and extent of visibility. They would influence the perception of landscape scale and distance and would form a notable element within the wider setting of the Massif, reducing the extent to which it is appreciated as the dominant landscape feature. Whilst the applicant has assessed the magnitude of effect as Medium-low, officers consider that this underestimates the nature and extent of the visual effects. Taking account of the high-medium sensitivity of the view and the relationship of the turbines with the distinctive skyline and 'whaleback' landform, the visual effect is assessed as Moderate and Significant. The cumulative assessment for all Scenarios is disputed. In relation to Scenario 1 and 2, the addition of the proposed development will remain as Medium-low cumulative magnitude of change. Other developments visible would appear less apparent due to their long distance in comparison with the proposed development which would have the greatest effect at this viewpoint. It is not accepted that the cumulative magnitude of change will be moderated to a lower magnitude due to the presence of other wind farms. In relation to Scenario 3, the addition of the proposed development with the application Abhainn Dubh Wind Farm is also disputed and officers consider that the cumulative magnitude would remain Medium-low and the cumulative effect would be Moderate and Significant rather than Minor and Not Significant assessed by the applicant.						
VP23 A835, Contin	App	High-medium (residents, road users including tourists on the NC500) - <i>High susceptibility and Medium value</i>	High-medium / Medium	Major-moderate (residents) Moderate (road users)	Significant (all receptors)	No relevant cumulative sites visible and the cumulative effect arising from the addition of the proposed development would be Not Significant.		

			Proposed Development			Cumulative Assessment (Scenarios 1, 2 and 3)		
Viewpoint	App / THC	Sensitivity of Receptor (Susceptibility of receptor to change / value of the view)	Magnitude of change (Size or Scale / geographic extent) (Duration / reversibility maybe stated separately)	Level of Effect (Sensitivity of receptor / Magnitude of change)	Significance (Major & Major- Moderate are Significant). Moderate may be Significant or Not Significant.	Magnitude of Change (Size or Scale / geographic extent) (Duration maybe stated separately)	Level of Effect (Magnitude of change / Sensitivity of receptor)	Significance
		and distracting visual element, considerably detracting from the quality and character of the view. The stacking and overlapping of turbines within the layout would further reinforce a visually incoherent composition at this location. Magnitude is judged to be High-medium for all receptors. The applicant's assessment of High-medium magnitude of change for residents is reasonable, however it is not agreed that the magnitude would be reduced to Medium for road users including those on the NC500. Officers consider that the magnitude also to be High-medium for road users despite the transient nature of the view. Whilst it is a short duration, road users will be travelling no more than 20mph and would have a greater appreciation of their surroundings and the magnitude of change would still be the same. The scale of change would take precedence over the extent and duration in this instance. As a result, the effect on residents and tourists on the NC500 would be Major and Significant, in accordance with the applicant's LVIA matrix in Table 1 of Technical Appendix 7.1, Volume 4. Officers further note that views experienced by people walking around the village would be comparable to those illustrated from Viewpoint 23, with receptors primarily comprising residents and visitors. Open views towards the proposed development would also be available from areas in the west of the village, including the Contin Football Club and Sports pitches, and the Riverside Chalets and Caravan Park, where significant visual effects would likewise occur. The cumulative assessment for all Scenarios is agreed as Not Significant.						
VP24 A835, south end of Loch Garve Distance 2.83km Looking N	App	High-medium (road users including tourists on the NC500) – <i>High susceptibility and Medium value</i>	High-medium	Major-moderate (road users including tourists on the NC500)	Significant	Medium-low / Low	Moderate / Moderate-minor	Not Significant
	THC	<u>High</u> (road users including tourists on the NC500) – <i>High susceptibility and High-medium value</i>	<u>High</u>	<u>Major</u> (road users including tourists on the NC500)	Significant	<u>High</u>	<u>Major</u>	<u>Significant</u>

			Proposed Development			Cumulative Assessment (Scenarios 1, 2 and 3)		
Viewpoint	App / THC	Sensitivity of Receptor (Susceptibility of receptor to change / value of the view)	Magnitude of change (Size or Scale / geographic extent) (Duration / reversibility maybe stated separately)	Level of Effect (Sensitivity of receptor / Magnitude of change)	Significance (Major & Major-Moderate are Significant). Moderate may be Significant or Not Significant.	Magnitude of Change (Size or Scale / geographic extent) (Duration maybe stated separately)	Level of Effect (Magnitude of change / Sensitivity of receptor)	Significance
VP26 A832, Strath Bran Distance 20.13km Looking E	App	High-medium (road users including tourists on the NC500) – <i>High susceptibility and Medium value</i>	Medium-low	Moderate	Not Significant	No relevant cumulative sites visible and the cumulative effect arising from the addition of the proposed development would be Not Significant.		
	THC	<u>High</u> (road users including tourists on the NC500) – <i>High susceptibility and High-medium value</i>	Medium-low	Moderate	<u>Significant</u>			
The applicant's assessment is reported in paragraphs 7.12.418-429 of the LVIA, Chapter 7 of the EIAR. The applicant's assessment of sensitivity of High-medium for users of the A832 including tourists on the nationally promoted NC500 is disputed due to an under assessment of the value of the view. Whilst the Landscape Officer assessed a High value for this view in their consultation response, a re-assessment by officers considers that the value of the view as High-medium based on the reasons below. Nevertheless, officers consider that the sensitivity of receptors at this viewpoint would be High. It is not accepted that the lack of formal recognition of this location as a viewpoint or the absence of a designation moderates the value of the view. It is a section of the road where there are clear views available for eastbound users in the direction of travel. The landscape in the view appears to be of a higher scenic quality with forested slopes and a variety of open moorland hills and mountains visible to the east (Beinn a' Ghuilbhein, Meall Ruighe an Fhirich and Little Wyvis) and south (Sgùrr a' Mhuilinn, Sgurr a Ghlas Leathaid and Sgurr a Choire-rainich). The view also looks across the Ben Wyvis SLA to the east and Strathconon, Monar and Mullardoch SLA to the south. All this contributes to a high-medium value and therefore High sensitivity for these receptors taking account of the high susceptibility of the receptors. It is considered that the recreational users of the NC500 that are following the route intentionally to experience the landscape to be particularly sensitive receptors. All nine proposed turbine hubs would be visible on the skyline to the east, occupying approximately 6° of the horizontal FoV. Many of the turbine towers would be visible, increasing their vertical influence within the view. The turbines would be partly back clothed by landform and partly on the skyline, which would increase their visual prominence and draw attention. The turbines would be apparent within the direction of travel in this channelled view along the strath, particularly for eastbound road users, including tourists travelling along the NC500. The contained nature of the view would increase the prominence of the turbines, particularly along this straight section of route where open views are available in the direction of travel before further eastward views								

			Proposed Development			Cumulative Assessment (Scenarios 1, 2 and 3)		
Viewpoint	App / THC	Sensitivity of Receptor (Susceptibility of receptor to change / value of the view)	Magnitude of change (Size or Scale / geographic extent) (Duration / reversibility maybe stated separately)	Level of Effect (Sensitivity of receptor / Magnitude of change)	Significance (Major & Major- Moderate are Significant). Moderate may be Significant or Not Significant.	Magnitude of Change (Size or Scale / geographic extent) (Duration maybe stated separately)	Level of Effect (Magnitude of change / Sensitivity of receptor)	Significance
		become screened by tree cover. The stacking and overlapping of turbines within the layout would create a discordant composition at this location, with the scale, movement and arrangement of the turbines drawing attention within the view. From this direction and distance, the Ben Wyvis Massif would be less prominent; however, the turbines would still form a noticeable skyline feature due to their scale, movement and extent of visibility. Whilst this is a transient view experienced over a distance of approximately 20km and includes some existing scale indicators, the contained nature of the view and the turbines' position on the skyline would result in them remaining apparent within the view. The applicant's assessment of a Medium-low magnitude of change is therefore disputed, as it underestimates the influence of the turbines within this channelled and directional view. The visual effect is therefore assessed as Moderate and Significant. No other cumulative wind farms would be visible from this location. The cumulative assessment for all Scenarios is therefore agreed as Not Significant.						
VP27 A832, Lochluichart Distance 9.06km Looking E	App	High (residents) – <i>High susceptibility and Medium value</i> High-medium (tourists on the NC500 and layby users) – <i>High susceptibility and Medium value</i> Medium (railway users, other road users) – <i>Medium susceptibility and Medium value</i>	Medium (residents, railway users, tourists on the NC500) Medium-low (other road users)	Major-moderate (residents) Moderate (tourists on the NC500 and railway users) Moderate (other road users)	Significant (residents, tourists on the NC500 and railway users) Not Significant (other road users)	No relevant cumulative sites visible and the cumulative effect arising from the addition of the proposed development would be Not Significant.		
	THC	High (residents) – <i>High susceptibility and High-medium value</i> <u>High</u> (tourists on the NC500 and layby users) – <i>High susceptibility and High-medium value</i>	Medium (<u>all receptors</u>)	Major-moderate (residents, <u>tourists on the NC500</u>) Moderate (other road)	Significant (<u>all receptors</u>)			

			Proposed Development			Cumulative Assessment (Scenarios 1, 2 and 3)		
Viewpoint	App / THC	Sensitivity of Receptor (Susceptibility of receptor to change / value of the view)	Magnitude of change (Size or Scale / geographic extent) (Duration / reversibility maybe stated separately)	Level of Effect (Sensitivity of receptor / Magnitude of change)	Significance (Major & Major- Moderate are Significant). Moderate may be Significant or Not Significant.	Magnitude of Change (Size or Scale / geographic extent) (Duration maybe stated separately)	Level of Effect (Magnitude of change / Sensitivity of receptor)	Significance
	a prominent skyline associated with distinctive landform features and located directly within the direction of travel for eastbound users. The existing mast on Meall Ruighe an Fhirich would also be visible on the skyline; however, it would appear at a substantially lower elevation and scale than the proposed turbines. Turbines T1, T2, T6, T7 and T8 would be the most prominent within the view and would draw attention due to their scale and movement, while T5 and T9 would be visible as blades on the skyline and would also introduce movement within the view. Turbine T1, in particular, could be perceived as encroaching towards the distinctive landform of Little Wyvis. During clear evening conditions, the turbines would be front lit by the low evening sun, increasing their contrast against the landform backdrop and further reinforcing their prominence. Intervening landform would screen the lower sections of most turbine towers and low-lying components of the development, with the exception of a section of access track crossing the hillside. However, the visible turbine elements would remain prominent due to their scale, movement, skyline position and relationship with the surrounding landform. The magnitude of change is therefore assessed as High. The applicant's assessment of High-medium magnitude is disputed. The addition of the turbines would result in a large-scale change in the view and would have a high degree of contrast with the existing landscape features including the distinctive landform of Little Wyvis in this short to medium range view and would be visible straight ahead in the direction of travel. It would significantly alter the skyline of the view. This would result in a High magnitude of change and the effect would be Major and Significant. The cumulative assessment for all Scenarios is agreed as Not Significant.							
VP29 Sgùrr a' Mhuilinn Distance 17.08km Looking NE	App	High (hillwalkers) – <i>High susceptibility and High-medium value</i>	Low	Moderate-minor	Not Significant	Medium-low	Moderate	Not Significant
	THC	High (hillwalkers) – <i>High susceptibility and High value</i>	<u>Medium-low</u>	<u>Moderate</u>	<u>Significant</u>	Medium-low	Moderate	<u>Significant</u>
The applicant's assessment is reported in paragraphs 7.12.466-482 of the LVIA, Chapter 7 of the EIAR. The weather conditions in the applicant's viewpoint photography in the direction of the proposed development (east / northeast) are poor and on a clear day there is excellent visibility in this direction including views of the Black Isle, the sea and the Sutors of Cromarty. The full extent of the Ben Wyvis Massif is also partially obscured by low cloud in the baseline photograph. Whilst the applicant's assessment of sensitivity for walkers as High is agreed, it has underassessed the value of the view at this viewpoint. Officers consider the value of the view to be High. Whilst it is not marked as a specific viewpoint on an OS map, it is a Corbett. There are, however, signs regarding access								

			Proposed Development			Cumulative Assessment (Scenarios 1, 2 and 3)		
Viewpoint	App / THC	Sensitivity of Receptor (Susceptibility of receptor to change / value of the view)	Magnitude of change (Size or Scale / geographic extent) (Duration / reversibility maybe stated separately)	Level of Effect (Sensitivity of receptor / Magnitude of change)	Significance (Major & Major- Moderate are Significant). Moderate may be Significant or Not Significant.	Magnitude of Change (Size or Scale / geographic extent) (Duration maybe stated separately)	Level of Effect (Magnitude of change / Sensitivity of receptor)	Significance
	and hill walking at the grassy car park. The Strava Global Heatmap² identifies this route to be well used and is normally walked with its neighbour Corbett, Meallan nan Uan. The viewpoint is also located within and overlooks the Strathconon, Monar and Mullardoch SLA as well as overlooking the Ben Wyvis SLA and WLA. It also has value in the scenic and panoramic views that are available from the summit. All this contributes to the high value of the view. All nine proposed turbine hubs would be visible to the northeast on the lower slopes of Little Wyvis and would be largely back clothed by landform, occupying approximately 7° of the horizontal FoV. The turbines would remain apparent at a distance of over 17km, with their scale, movement and location attracting attention within the view. During clear evening conditions, the turbines would be illuminated by the low evening sun, increasing their contrast and visual prominence within the setting of the Ben Wyvis Massif. The turbines would be visible at full height, with low-lying components also potentially visible, although these would be more difficult to discern at this distance. The proposed development would appear at a higher elevation than other baseline wind farm developments, which are located separately and lower within the view. This elevated position, together with the close visual relationship with the Massif, would increase the prominence of the turbines. It is therefore not accepted that the Massif would reduce the perceived scale or influence of the proposed development as suggested by the applicant. The view towards the proposed development is also important beyond its relationship with the Massif, as it is the only direction from this location that incorporates maritime and coastal views, including views towards the Black Isle and the Sutors of Cromarty. The proposed development would introduce a new vertical and moving element into this outlook, detracting from the appreciation of the wider panoramic view. The magnitude of change is assessed as Medium-low. The applicant's assessment of a Low magnitude of change for hillwalkers is disputed. Whilst the Landscape Officer previously identified a Low magnitude of change at this viewpoint in their consultation response, a further assessment by officers concludes that the magnitude would be Medium-low, taking account of the turbines' scale, elevation, movement, lighting conditions and relationship with the Ben Wyvis Massif and wider coastal outlook. The visual effect is therefore assessed as Moderate and Significant. The cumulative assessment for all Scenarios is agreed as Medium-low magnitude; however, officers consider that the cumulative effect would be Moderate and Significant. This is largely due to the addition of the proposed development at a higher elevation in comparison to other wind farms located at a lower elevation which would draw more attention to than the other developments.							
VP30 Beinn a' Bha'ach Ard	App	High (hillwalkers) – <i>High susceptibility and High-medium value</i>	Low	Moderate-minor	Not Significant	Medium-low	Moderate	Not Significant

² <https://www.strava.com/maps/global-heatmap>

Viewpoint	App / THC	Sensitivity of Receptor (Susceptibility of receptor to change / value of the view)	Proposed Development			Cumulative Assessment (Scenarios 1, 2 and 3)		
			Magnitude of change (Size or Scale / geographic extent) (Duration / reversibility maybe stated separately)	Level of Effect (Sensitivity of receptor / Magnitude of change)	Significance (Major & Major- Moderate are Significant). Moderate may be Significant or Not Significant.	Magnitude of Change (Size or Scale / geographic extent) (Duration maybe stated separately)	Level of Effect (Magnitude of change / Sensitivity of receptor)	Significance
Distance 19.54 Looking N/NE								
	THC	High (hillwalkers) – <i>High susceptibility and High value</i>	Low	Moderate-minor	Not Significant	Medium-low	Moderate	Not Significant
The applicant's assessment is reported in paragraphs 7.12.483-499 of the LVIA, Chapter 7 of the EIAR. The weather conditions in the applicant's viewpoint photography are poor given the low cloud, overcast and hazy conditions and on a clear day there is excellent visibility in all directions particularly to the northeast / east. Whilst the applicant's assessment of sensitivity for walkers as High is agreed, it has underassessed the value of the view at this viewpoint. Officers consider the value of the view to be High. Whilst it is not marked as a specific viewpoint on an OS map, it is a Corbett and has its own car park at Inchmore in Glen Strathfarrar. The Strava Global Heatmap³ identifies this route to be well used for this circular route. The viewpoint is also located within and overlooks the Strathconon, Monar and Mullardoch SLA and Central Highlands WLA as well as overlooking the Ben Wyvis SLA and WLA. It also has value in the scenic and panoramic views that are available from the summit. All this contributes to the high value of the view. All of the proposed turbines (all nine hubs) would be seen to the north / northeast below the summits of Little Wyvis and Ben Wyvis and would be back clothed by landform affecting approximately 6° of the horizontal FoV. The turbines would, however, be slightly noticeable at over 19km given their position in front of Little Wyvis. However, the foreground landform of Sgurr a' Phollain foreshortens the view towards the proposed development and reduces the prominence of the Ben Wyvis Massif and the perceived scale of the turbines. Magnitude is judged to be Low. The applicant's assessment of Low magnitude of change and Moderate-minor for hillwalkers is agreed. The cumulative assessment for all Scenarios is agreed as Medium-low magnitude and Moderate and Not Significant.								
VP31 An Coileachan Distance 18.52km Looking E / SE	App	High (hillwalkers) – <i>High susceptibility and High-medium value</i>	Low	Moderate-minor	Not Significant	Low	Moderate-minor	Not Significant
	THC	High (hillwalkers) – <i>High susceptibility and High value</i>	<u>Medium-low</u>	<u>Moderate</u>	Not Significant	Low	Moderate-minor	Not Significant

³ <https://www.strava.com/maps/global-heatmap>

			Proposed Development			Cumulative Assessment (Scenarios 1, 2 and 3)		
Viewpoint	App / THC	Sensitivity of Receptor (Susceptibility of receptor to change / value of the view)	Magnitude of change (Size or Scale / geographic extent) (Duration / reversibility maybe stated separately)	Level of Effect (Sensitivity of receptor / Magnitude of change)	Significance (Major & Major-Moderate are Significant). Moderate may be Significant or Not Significant.	Magnitude of Change (Size or Scale / geographic extent) (Duration maybe stated separately)	Level of Effect (Magnitude of change / Sensitivity of receptor)	Significance
	The applicant's assessment is reported in paragraphs 7.12.500-513 of the LVIA, Chapter 7 of the EIAR. The weather conditions in the applicant's viewpoint photography are poor and on a clear day there is excellent visibility in all directions, particularly to the east / southeast where would include views of the Black Isle, the sea and the Sutors of Cromarty. Whilst the applicant's assessment of sensitivity for walkers as High is agreed, it has underassessed the value of the view at this viewpoint. Officers consider the value of the view to be High. Whilst it is not marked as a scenic viewpoint on an OS map, it is a Munro. There is a small car park just north of Torrandhu bridge on the A835 with a signpost to the start of this walk which this Munro is walked as part of the Eastern Fannichs, taking in four Munros. Strava Global Heatmap⁴ identifies this route to be well used. The viewpoint is also located within and overlooks the Fannichs, Beinn Dearg and Glen Calvie SLA and Fisherfield – Letterewe – Fannichs WLA as well as overlooking other designations including the Ben Wyvis SLA and WLA. It also has value in the scenic and panoramic views that are available from the summit. All this contributes to the high value of the view. All nine proposed turbine hubs would be visible to the east/southeast on the lower slopes of Little Wyvis, with the turbines partially back clothed by intervening landform and partially on the skyline. They would occupy approximately 6° of the horizontal FoV. The turbines would remain noticeable at a distance of over 18.5km, with their scale, movement and location drawing attention within the view. During clear evening conditions, the turbines would be illuminated by the low evening sun, increasing their contrast and visual prominence within the setting of the Ben Wyvis Massif, including Little Wyvis. The turbines would be visible at full height, with some low-lying components also potentially visible, although these elements would be more difficult to discern at this distance. The proposed development would be broadly located above the existing Lochluichart and Corriemoillie Wind Farm cluster and would not result in a notable increase in the horizontal extent of wind farm development within the view. The magnitude of change is assessed as Medium-low. The applicant's assessment of a Low magnitude of change for hillwalkers is disputed. Officers consider that the scale, movement, elevation and relationship of the turbines with the Ben Wyvis Massif and Little Wyvis would result in a Medium-low magnitude of change. However, given the proposed development's location directly above the existing wind farm cluster, it would not substantially extend the existing influence of wind energy development within this view. The visual effect is therefore assessed as Moderate and Not Significant. The cumulative assessment for all Scenarios is agreed as low magnitude and Moderate-minor and Not Significant effect.							
VP32 Am Faochagach	App	High (hillwalkers) – <i>High susceptibility and High-medium value</i>	Low	Moderate-minor	Not Significant	Low	Moderate-minor	Not Significant

⁴ <https://www.strava.com/maps/global-heatmap>

Viewpoint	App / THC	Sensitivity of Receptor (Susceptibility of receptor to change / value of the view)	Proposed Development			Cumulative Assessment (Scenarios 1, 2 and 3)		
			Magnitude of change (Size or Scale / geographic extent) (Duration / reversibility maybe stated separately)	Level of Effect (Sensitivity of receptor / Magnitude of change)	Significance (Major & Major- Moderate are Significant). Moderate may be Significant or Not Significant.	Magnitude of Change (Size or Scale / geographic extent) (Duration maybe stated separately)	Level of Effect (Magnitude of change / Sensitivity of receptor)	Significance
Distance 19.78km Looking SE								
	THC	High (hillwalkers) – <i>High susceptibility and High value</i>	<u>Medium-low</u>	<u>Moderate</u>	<u>Significant</u>	<u>Medium-low</u>	<u>Moderate</u>	<u>Significant</u>
The applicant's assessment is reported in paragraphs 7.12.514-528 of the LVIA, Chapter 7 of the EIAR. Whilst the applicant's assessment of sensitivity for walkers as High is agreed, it has underassessed the value of the view at this viewpoint. Officers consider the value of the view to be High. Whilst it is not marked as a specific viewpoint on an OS map, it is a Munro. There is a small car park just north of Torrandhu bridge on the A835 with a signpost to the start of this walk across the road via a stile. Strava Global Heatmap⁵ identifies this route to be well used. The viewpoint is also located within and overlooks the Fannichs, Beinn Dearg and Glen Calvie SLA and Rhiddoroch - Beinn Dearg - Ben Wyvis WLA as well as overlooking other designations including the Ben Wyvis SLA and WLA. It also has value in the scenic and panoramic views that are available from the summit. All this contributes to the high value of the view. All nine proposed turbine hubs would be visible to the southeast on the lower slopes of Little Wyvis and would be back clothed by distant landform, occupying approximately 4° of the horizontal FoV. The turbines would remain apparent at a distance of over 19.7km, with their scale, movement and location drawing attention within the view. Many of the turbines would be visible at full height, with some low-lying components also partially visible, although these would be more difficult to discern at this distance. The form of the Ben Wyvis Massif is relatively distinct within this view. This viewpoint is also important in illustrating the contrast between the east and west, and the variety of landscapes experienced within a relatively short geographical extent, contributing to a complex and valued composition. It is not accepted that the Massif would reduce the perceived scale or prominence of the turbines, as suggested by the applicant. Instead, the proposed development would detract from the appreciation of the wider setting of the Massif, through its scale, movement and visual relationship with this distinctive landform. The overlapping and stacking of turbines within the layout would contribute to a less coherent composition and would increase their visual prominence within the view. Existing wind farm developments are located lower in the landscape and more separated from the Massif, reducing their influence from this elevated viewpoint. The magnitude of change is assessed as Medium-low. The applicant's assessment of a Low magnitude of change for hillwalkers is disputed. Whilst the Landscape Officer previously identified a Low magnitude of change at this viewpoint in their consultation response, a further assessment by officers concludes that the magnitude would be Medium-low, taking account of the turbines' scale, movement, layout, and relationship with the distinctive form and wider setting of the Ben Wyvis Massif. The visual effect is therefore assessed as Moderate and Significant. The cumulative assessment for all Scenarios is disputed with the applicant. In all three Scenarios, the addition of the proposed development would result in a Medium-low cumulative magnitude of change. It is not accepted that the cumulative magnitude of change will be moderated to a lower magnitude due								

⁵ <https://www.strava.com/maps/global-heatmap>

			Proposed Development			Cumulative Assessment (Scenarios 1, 2 and 3)		
Viewpoint	App / THC	Sensitivity of Receptor (Susceptibility of receptor to change / value of the view)	Magnitude of change (Size or Scale / geographic extent) (Duration / reversibility maybe stated separately)	Level of Effect (Sensitivity of receptor / Magnitude of change)	Significance (Major & Major- Moderate are Significant). Moderate may be Significant or Not Significant.	Magnitude of Change (Size or Scale / geographic extent) (Duration maybe stated separately)	Level of Effect (Magnitude of change / Sensitivity of receptor)	Significance
			to the presence of other wind farms. The proposed development is at a higher elevation than other wind farms and given its scale, design, and location, the addition of this development with other wind farms would remain as a Medium-low cumulative magnitude of change resulting in a Moderate and Significant cumulative effect for walkers.					
VP33 Cnoc Fyrish Monument Distance 18.71km Looking W/SW	App	High (recreational users) – <i>High susceptibility and High value</i>	Negligible	Minor	Not Significant	The cumulative magnitude of change would be negligible due to the negligible visibility of the proposed development, and the cumulative effect would be Not Significant.		
	THC	High (recreational users) – <i>High susceptibility and High value</i>	Negligible	Minor	Not Significant			
The applicant's assessment is reported in paragraphs 7.12.529-537 of the LVIA, Chapter 7 of the EIAR. The applicant's assessment of sensitivity as High is agreed with a high susceptibility and high value. Six of the proposed turbines (five hubs and one blade) would be visible on the skyline to the west / southwest just below the skyline and back clothed by distant landform affecting approximately 3° of the horizontal FoV. The towers and low-lying components would be screened by intervening vegetation. Magnitude is judged to be Negligible given the overall limited visibility of the turbines in this wide view with primary view from the Monument to the south unaffected by the proposed development. The applicant's assessment of negligible magnitude of change and Minor and Not Significant is agreed. The cumulative assessment for all Scenarios is agreed as Not Significant.								

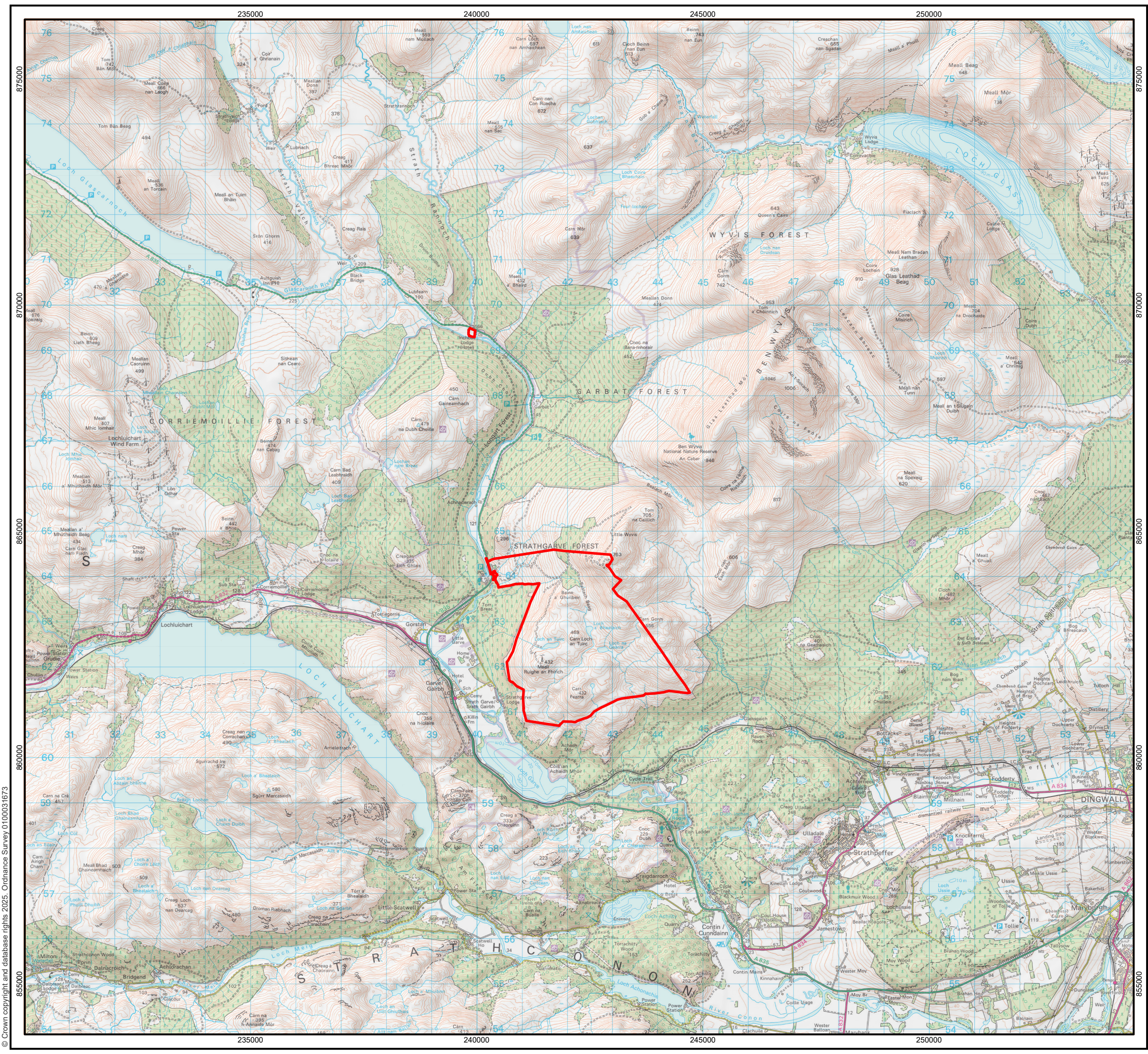
Appendix 6 - Assessment against Landscape and Visual Assessment Criteria contained within Section 4 of the Onshore Wind Energy Supplementary Guidance

1	Relationship between Settlements/Key locations and wider landscape respected.	Turbines are not visually prominent in the majority of views within or from settlements/Key Locations or from the majority of its access routes. ----- The proposal is within the setting of the Ben Wyvis Mountain Massif, bringing large-scale turbines closer to the natural landmark and impacting key views towards it from a large geographical area, and key outward views from summits and tracks within the setting and the SLA designation of the Massif. The threshold is not met in relation to the Ben Wyvis Massif
2	Key Gateway locations and routes are respected	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. ----- The Ben Wyvis Massif provides a pivotal landscape function of providing a dramatic spatial definition between the LCTs of the wilder west and dynamic settled LCTs of the east. The proposal would shift focus away from the natural landmark that heralds this transition towards a largescale industrial feature. Thus the Massif's status as the primary contributor to the sense of place across the wider Inner Moray Firth area and beyond to Wester Ross would be eroded with the proposal significantly detracting, and in parts overwhelming, the landscape characteristics that contribute to the distinctive transitional experienced found at the key gateway location, including along sections of the A835. The threshold is not met.

3	Valued natural and cultural landmarks are respected	The development does not, by its presence, diminish the prominence of the landmark or disrupt its relationship to its setting. ----- The proposal would site large-scale turbines of up to 200m within the setting of a natural landmark, diminishing its prominence and disrupting its setting and relationship with the wider area including the Inner Moray Firth and eastern parts of Wester Ross. The threshold is not met.
4	The amenity of key recreational routes and ways is respected.	Wind Turbines or other infrastructure do not overwhelm or otherwise significantly detract from the visual appeal of key routes and ways. ---- The proposal would significantly detract from the recreational visual amenity of the Silverbridge to Little Wyvis Path where the threshold is not met. The proposal will result in significant visual impacts on multiple recreational routes, paths, and summits beyond 10km from the proposal site, the overall amenity of these resources would not be maintained. Overall, the threshold is met.
5	The amenity of transport routes is respected	Wind Turbines or other infrastructure do not overwhelm or otherwise significantly detract from the visual appeal of transport routes ----- There will be significant visual effects on, at times large, sections of transport routes including the A832, A835, the Kyle of Lochalsh Railway Line, and minor roads in the wider area. The

		proposal would contribute to an increasingly significant sequential cumulative effect on longer sections of transport routes however The threshold is largely met despite the above.
6	The existing pattern of Wind Energy Development is respected.	The degree to which the proposal fits with the existing pattern of nearby wind energy development, considerations include: • Turbine height and proportions, • density and spacing of turbines within developments, • density and spacing of developments, • typical relationship of development to the landscape, • previously instituted mitigation measures • Planning Authority stated aims for development of area ----- the proposal deviates from the established pattern of operational and consented wind farms which are largely associated with less sensitive and larger upland areas, set away from the 'dominant landmark' Massif. The threshold is not met.
7	The proposal contributes positively to existing pattern or objectives for development in the area.	The proposal maintains appropriate and effective separation between developments and/ or clusters ----- The threshold is met

8	The perception of landscape scale and distance is respected	The perception of landscape scale and distance is respected --- The proposal will reduce the perception of scale and distance from multiple locations in the wider area. The threshold is not met.
9	Landscape setting of nearby wind energy developments is respected	Proposal relates well to the existing landscape setting and does not increase the perceived visual prominence of surrounding wind turbines. --- The threshold is met.
10	Distinctiveness of Landscape character is respected	Integrity and variety of Landscape Character Areas are maintained. ----- The proposal would significantly change the character of the hosting LCT, which plays an important transitional role in linking a number of contrasting LCTs, including the lower Strath Garve and wooded glens to the south, west and east, and the rounded mountains and hills associated with the Ben Wyvis Massif. The proposal would significantly disrupt the relationships and interaction between and across these LCTs that contribute to the appreciation of this dramatic landscape and its valued natural landmark feature. The threshold is not met.





 Site Boundary

1:80,000 on A3

 Kilometres

0 1 2

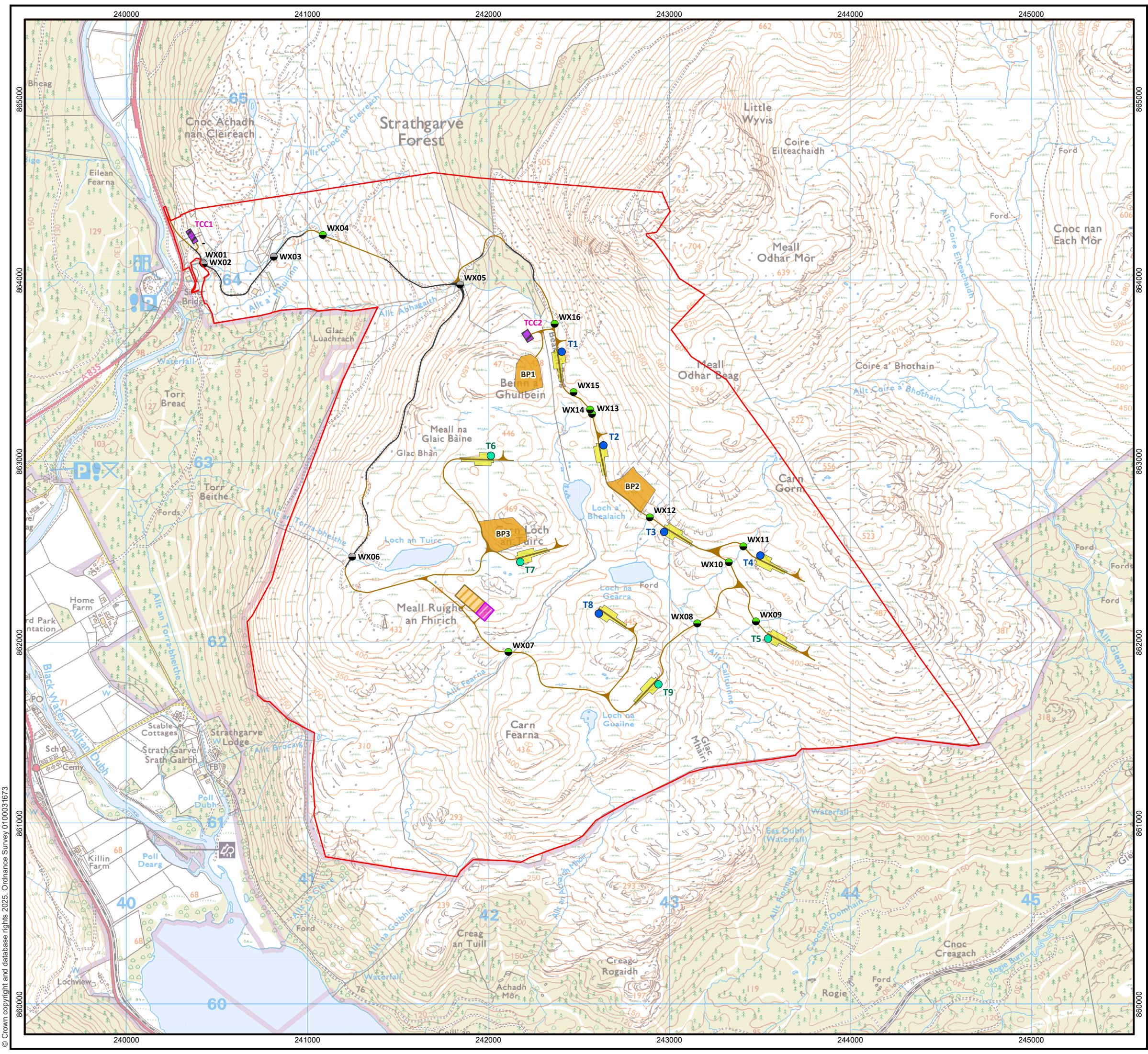
Produced By: RD	Version: 2
Checked By: JRS	Date: 28/03/2025

Figure 1.1

Site Location

Carn Fearnna Wind Farm

Environmental Impact Assessment Report





Site Boundary

Proposed Turbine Location (180 m Blade Tip Height)

Proposed Turbine Location (200 m Blade Tip Height)

Proposed New Access Track

Proposed Upgraded Access Track

Proposed Permanent Hardstanding

Proposed Permanent Substation

Proposed Temporary Substation Compound

Proposed Temporary Construction Compound

Proposed Borrow Pit Search Area

Existing Watercourse Crossing

Proposed Watercourse Crossing

1:20,000 on A3

00.51

Kilometres

Produced By: RD

Version: 4

Checked By: AR

Date: 28/03/2025

Figure 3.1

Site Layout

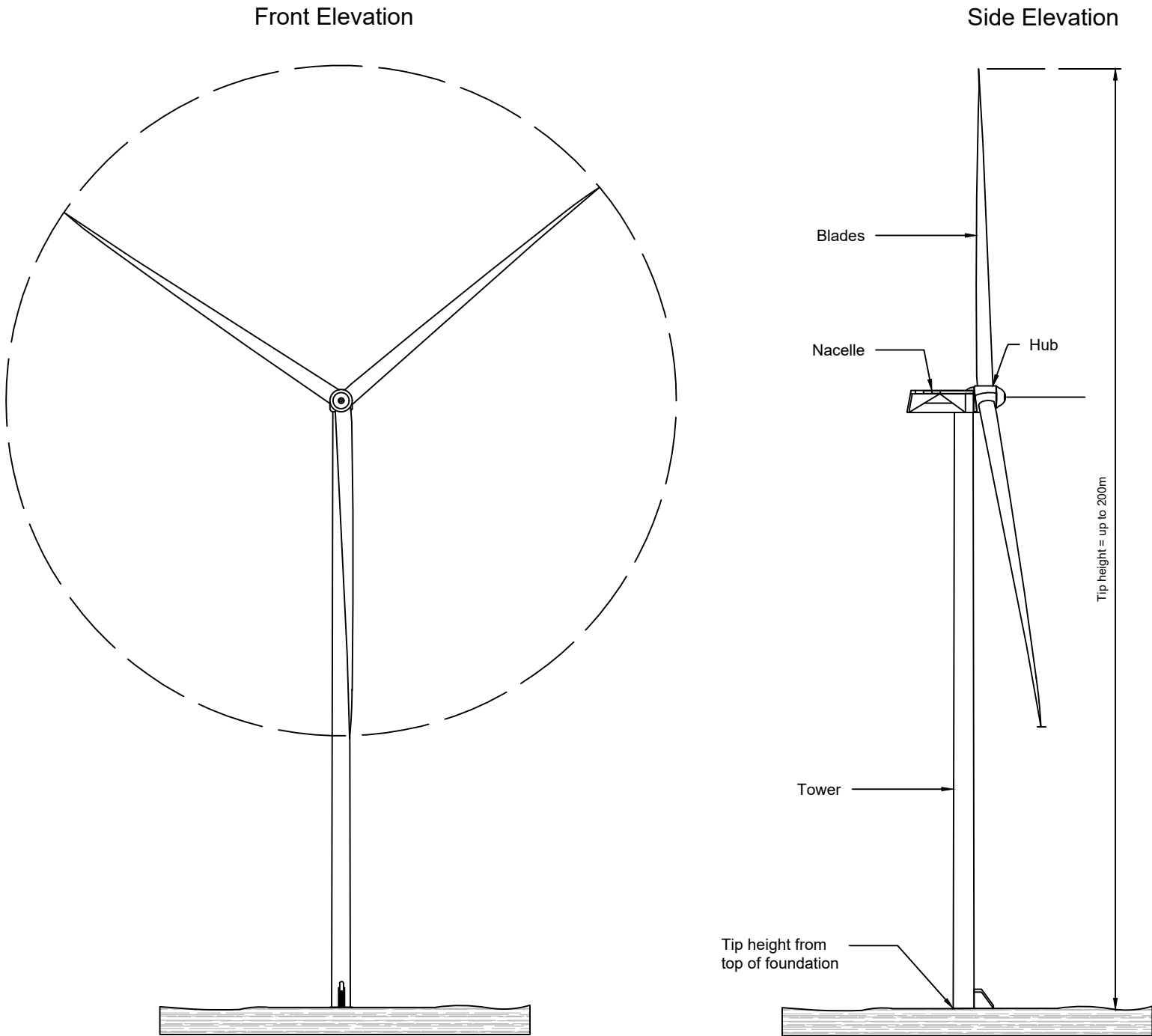
Carn Fearn Wind Farm

Environmental Impact Assessment Report

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12/02/2025

C:\Users\JGreen\Documents\Carn Fearn Wind Farm DWGS\402.064563.00001.0008 - CF - Figure 3.9 - Typical Turbine Elevation.dwg



Notes:

1. Subject to change through detailed design

2. Actual turbine design may differ in visual appearance

3. Tip height taken from top of foundation

4. Not to scale

Legend:

Rev	Amendments	Date	By	Chk	Auth



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Client



Project

CARN FEARN WIND FARM
ENVIRONMENTAL IMPACT ASSESSMENT
REPORT

Figure Title

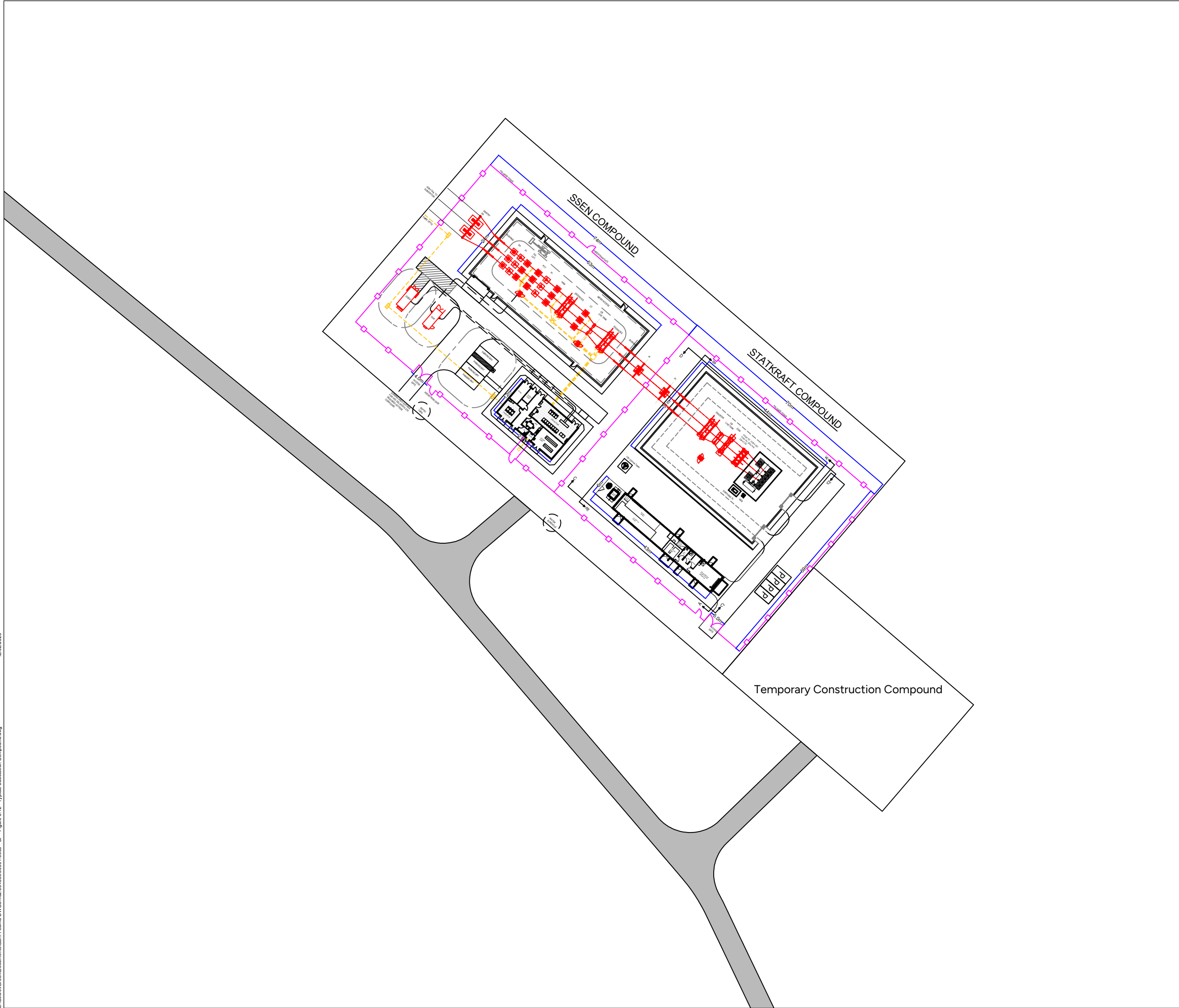
TYPICAL TURBINE ELEVATION

Scale		SLR Project No.	
NTS @ A3		402.064563.00001.0008	
Designed	Drawn	Checked	Authorised
	SRB	RA	DK
Date	Date	Date	Date
	06/12/24	06/12/24	06/12/24
Figure Number			Rev.
3.9			0

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12/02/2025

C:\Users\l\Green\Documents\Carn Fearna DWGS\402.064563.00001.0008 - CF - Figure 3.12 - Typical Substation Compound.dwg



- Notes:
1. Subject to change through detailed design.
 2. Not to scale

Legend:

Rev	Amendments	Date	By	Chk	Auth



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Project
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REPORT

Figure Title
TYPICAL SUBSTATION COMPOUND

Scale NTS @ A3		SLR Project No. 402.064563.00001.0008	
Designed SRB	Drawn SRB	Checked RA	Authorised DK
Date 10/12/24	Date 10/12/24	Date 10/12/24	Date 10/12/24
Figure Number 3.12			Rev. 0