Agenda Item	**7.1**
Report No	**PLS/64/26**

HIGHLAND COUNCIL

Committee: South Planning Applications Committee

Date: 02 December 2026

Report Title: 25/01748/S36: Galileo 05 Limited

Land 2000M SW of Lynemore, Moy, Tomatin

Report By: Area Planning Manager – South

Purpose/Executive Summary

Description: Lynemore Wind Farm - Erection and operation of a wind farm for a period of 50 years, comprising up to 12 wind turbines with a maximum blade tip height of 200m, battery energy storage system (BESS), access tracks, borrow pit, substation, control building, and ancillary infrastructure.

Ward: 19 - Inverness South

Development category: National Development (Section 36 Application)

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

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

Recommendation

Members are asked to agree the recommendation to maintain the Council's **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 Lynemore Wind Farm with Battery Energy Storage System (BESS) and associated infrastructure. The indicative generating capacity of the wind farm is 86.4 Megawatts (MW) while the indicative storage capacity of the BESS facility is 50MW.

1.2 The proposed development, as amended, comprises:

- 12 wind turbines, all with a maximum blade tip height of up to 200 m;
- Visible aviation warning lights fitted to the hubs of 6 turbines; the remaining turbines having infrared lights;
- Battery Energy Storage System (BESS) with a capacity up to 50MW, 50 m x 75 m and would be housed within the substation compound;
- 10.26 km of new access tracks;
- 4 watercourse crossings;
- Transformers and underground cables to connect the turbines to the onsite substation;
- Hardstanding areas at the base of each turbine, 100 m x 35 m;
- Substation / control building with parking and welfare facilities, compound structure will be 150 m x 100 m;
- Telecommunications equipment;
- Temporary construction compound and laydown area, 30m x 50m; and
- Borrow pit search area between approximately 0.9 ha to 15. ha.

1.3 0.74 ha of tree felling is anticipated to be required to accommodate the proposed development.

1.4 The applicants submitted a Grid Connection Appraisal document in April 2026 (AIR-2). This outlines that the applicant has a NESO (National Energy System Operator) Grid Connection Contract and through this, has an understanding of the likely grid connection route. Currently, the grid connection would comprise a new 132 kilovolt (kV) continuous overhead line (OHL) between the proposed Lynemore Wind Farm Substation and Glen Kyllachy Substation located to the south (Grid Connection Appraisal Fig 1a). The OHL is currently envisaged to be supported on a single circuit 'Trident' wood poles and underground cables. The grid connection does not form part of the wind farm's description of development for consent and requires a separate consenting process to be followed. This will determine the specific configuration of the grid connection.

1.5 Access to the site will be from the A9 with the port of entry for Abnormal Indivisible Load (AIL) components proposed to be Inverness Harbour. The applicant anticipates that the construction period would be 24 months with consent being sought to operate the wind farm for 50 years. Following this, the wind farm would be

decommissioned, subject to any future re-powering proposal and subsequent consent.

1.6 The applicant has carried out pre-application consultation, including with community councils at the EIA Scoping stage. In-person consultation events were held in March and October 2024 at The Strathdearn Hub and Farr Community Hall, having been publicised in local newspapers, via web posters, maildrop, via the community councils, invites for local Councillors, MSPs and the Local MP. Further community council events were held in November 2024 and March 2025. Further details are provided within the submitted Pre-Application Consultation (PAC) Report.

1.7 The applicant did not undertake formal pre-application consultation with the Planning Authority, having not utilised the Council's Major Pre-Application Service.

1.8 The application is accompanied by an Environmental Impact Assessment Report (EIAR), dated March 2025. The contents of which has been informed through EIA Scoping (albeit for a 10-turbine scheme, two fewer than the amended scheme). The EIAR includes technical environmental chapters on: Landscape and Visual Impact; Archaeology and Cultural Heritage; Ecology and Biodiversity; Ornithology; Hydrology, Geology Hydrogeology and Peat; Noise and Vibration; Traffic and Transport; and Socio-economics, Land Use, Tourism and Recreation. The application is also accompanied by a schedule of mitigation, EIA technical appendices, figures and visualisations; a Pre-Application Consultation Report (PAC), an EIA Non-Technical Summary (NTS), and a Planning Statement.

1.9 Since the application's submission, the proposal has been amended through the submission of Further Environmental Information. Where relevant, the original EIAR chapters have been updated to reflect the revised layout proposed in the Additional Information Report (AIR-1), submitted in January 2026. An addendum to the Planning Statement and the Non-Technical Summary was also submitted at that time. Additional information (AIR-2) comprising a Grid Connection Appraisal Report (AIR-2) was also submitted in April 2026. This provides details of any likely significant cumulative effects with the wind farm's likely grid connection.

1.10 Since the application was originally made the scheme has been revised as follows:

- Reduction in the number of turbines from 14 to 12 (removal of Turbines T4 and T5);
- Relocation of 6 Turbines: T2, T6, T7, T11, T12 and T13, plus the rotation of the hardstanding for T3. The relocations are 44m to 85m from the turbine's initial EIA layout location;
- Re-design of the associated access tracks;
- Reduction in the number of site construction compounds from two to one.
- The remaining compound will be relocated and moved closer to neighbouring residential receptors with the setback reducing from 485m to 240m; and
- The site's access routing from the A9 has been moved to the southeast, resulting in a reduction in the access track length, number of watercourse crossings, and reduced forestry removal, as well as an increased separation distance from around 35m to 80m between the track and the closest nearby properties.

Determination Procedure

1.11 Due to the consultation response date set by the ECU, there was insufficient time to allow the case officer to report the application to the South Planning Applications Committee (SPAC). In order for the Council to maintain its right to partake in any further procedure such as a public local inquiry in the event of an objection not being withdrawn, the chair and vice chair of the South Planning Applications Committee agreed that the Council should raise objection to the proposal. This was sent to the ECU on 19 August 2026. The objection was based on the following reasons:

1. The application does not accord with the provisions of Section 36 of the Electricity Act 1989 by virtue of not demonstrating sufficient regard to the desirability of, and failing to reasonably mitigate effects detrimental to, conserving flora and physiographical features of special interest by virtue of failing to demonstrate compliance with National Planning Framework 4 Policy 11 (Energy) and Highland-wide Local Development Plan Policies 67 (Renewable Energy Developments) and 28 (Sustainable Design) as the development would have a significantly detrimental landscape and visual impact, including cumulative effects.

2. The proposed development would have significant adverse visual effects, and it would have a significant adverse effect on receptors on surrounding routes and locations. This is contrary to National Planning Framework 4 Policies 11 (Energy) and 4 (Natural Places) and Highland-wide Local Development Plan Policies 67 (Renewable Energy Developments), 57 (Natural, Built and Cultural Heritage) and 61 (Landscape); and the location, siting, scale, massing and design of the proposed development is considered to be contrary to Highland-wide Local Development Plan Policy 29 (Design Quality and Place Making).

3. None of these concerns are outweighed by the economic benefits of this development or the contribution towards the country's net zero targets.

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

1.12 The application has since been referred to the Planning and Environmental Appeals Division (DPEA) (ref: WIN-270-30). If the Council maintain its objection, an appointed Reporter will confirm the need for any further procedure, which could include a Public Local Inquiry (PLI) to be held, amongst other options. The inquiry / further procedure programme and associated deadlines will be set by the Reporter and provide only limited opportunity for matters arising to be referred to Committee.

1.13 The concern here is the limited opportunity for the Council to consider any further environmental information submitted by the applicant and, where necessary, report that information through the Council's committee process before relevant inquiry / further procedure deadlines are reached. Delaying the Council's response pending further Committee consideration could therefore result in the inquiry proceeding, or determination of the application, without the Council's position being fully presented.

This is further complicated by the number of related electricity transmission and generation proposals progressing through separate consenting and inquiry processes, the Area Committee's finite capacity to consider this caseload, as well as the potential for further information arising through those processes to have implications for the cumulative assessment, and the presentation of the Council's case.

1.14 In recognition of these constraints, a wider suite of delegated powers is sought to enable Officers to manage the Council's effective participation in PLI / further procedures, including responding to further information and evidence, making necessary procedural submissions, refining or supplementing the Council's case and taking such other steps as may reasonably be required to protect the Council's interests. Any exercise of these delegated powers would remain consistent with the substantive position and grounds established by Committee and would be informed, where appropriate, by specialist legal advice provided by our Legal Counsel. Following PLI or any other further procedure, the application will be determined by Scottish Ministers.

2. SITE DESCRIPTION

2.1 The 781.5ha application site is located within the Lynemore Estate, some 2 km to the west of the A9 at Moy. It is 4 km to the east of Farr, 6 km to the northwest of Tomatin and 10 km to the south of Inverness. The site is mostly open moorland, managed for stalking and grouse shooting. The site is primarily situated on the northeastern slopes of Beinn nan Cailleach, Carn na h-Easgainn, and Carn na Loinne.

2.2 The landscape consists of a mix of stepped hillsides and consistently steeper slopes, with elevations ranging from 616m AOD at Carn na h-Easgainn in the south to 290m AOD near the northeastern site boundary along the A9 Trunk Road. The site generally slopes moderately from south to north, featuring a series of plateaus on the stepped hillsides in the west, transitioning to steeper gradients in the central and eastern areas before levelling out near the A9, which serves as the access point. Areas of open deciduous woodland and commercial plantation lie to the north / northeast of the site. There is one existing track on site which appears to be in poor condition and is relatively steep, this will not be used as part of this development.

2.3 Seven residential properties have been scoped into the noise assessment and six have been scoped into the Residential Visual Amenity Assessment. These residential properties are all located within northeast area of the site (although four properties are within the application site boundary) with the closest property, Lynemore Cottage, located boundary. These are set back approximately 1.46 km northeast from the nearest turbine. The remaining properties are located between 1.5 km and 2 km northeast of the site. The A9 which is noted by the Council as a key route connecting the Cairngorms National Park and Inverness is located approximately 1.38 km north of the nearest turbine whilst the Highland Main Line is located approximately 1.85 km northeast of the nearest turbine. The settlement of Moy is located approximately 2.1 km northeast, Tomatin is located approximately 4.6 km southeast and the City of Inverness is located approximately 9 km northwest of the site.

2.4 The Inverness to Perth railway line via the Cairngorms National Park is within 15km of the proposed development. As the railway line crosses near the site, the turbines would be approximately 3.5km away.

Environmental Designations and Habitats

2.5 The site does not form part of any statutory designated site for ecological interests. There are designated sites within 10 km and are summarised below (EIAR Figure 6.1). There are no non-statutory designated sites with ecological interests located within 2 km of the site.

Statutory Designation	Distance to Site Boundary	Qualifying Interests
Carn nan Tri-tighearnan Special Area of Conservation (SAC)	4.8 km northeast	Blanket bogs (if active)
Carn nan Tri-tighearnan Site of Special Scientific Interest (SSSI)	6.3 km northeast	Blanket bog Subalpine dry heath
Slochd SAC	8.0 km southeast	European dry heaths
Loch Ruthven SSSI	9.3 km northwest	Mesotrophic loch
Loch Ruthven SAC	9.4 km southwest	Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or of the Isoëto-Nanojuncetea Otter
Loch Ruthven Ramsar	9.4 km southwest	Two nationally scarce species of orchid

2.6 There are no statutory designations with ornithological features within the site (EIAR Figure 7.3). The following designations with qualifying ornithological interests are located within 10km. Internationally designated sites with migratory geese as a qualifying feature within 20km are also detailed.

Statutory Designation	Distance to Site Boundary	Qualifying Interests
International		
Loch Ashie Special Protection Area (SPA)	8.7 km northwest	Slavonian grebe (passage (post-breeding))
Loch Ruthven Ramsar	9.4 km southwest	Slavonian grebe (breeding)

Inner Moray Firth SPA	11.9 km north	Breeding • Common tern; and • Osprey. Non-breeding • Waterfowl assemblage; • Bar-tailed godwit; • Cormorant; • Curlew; • Goldeneye; • Goosander; • Greylag goose; • Oystercatcher; • Red-breasted merganser; • Redshank; • Scaup; • Teal; and • Wigeon.
Inner Moray Firth Ramsar Site	11.9 km north	Non-breeding • Waterfowl assemblage; • Greylag goose; • Redshank; • Red-breasted merganser; and • Bar-tailed godwit.
National		
Loch Ashie SSSI	8.7 km northwest	Slavonian grebe (passage (post-breeding))
Loch Ruthven SSSI	9.4 km southwest	Slavonian grebe (breeding) Breeding bird assemblage (15 species including: curlew, little grebe, oystercatcher, red-breasted merganser, snipe, tufted duck and wigeon).
Non- Statutory		
Loch Ruthven RSPB Reserve	9.4 km southwest	Breeding Slavonian grebe and red-throated diver, woodland bird assemblage.

2.7 Habitats within the survey area, include heathland habitats, grassland and bog. The majority of the woodland present within the site boundary is upland birchwood with smaller areas of juniper scrub. Several areas of extant woodland are listed on the Ancient Woodland Inventory Scotland (EIAR Figure 13.4). In addition, the site and surrounds have been surveyed for breeding and transient birds, of which effects upon golden plover, curlew, dunlin, golden eagles, red kite, white-tailed eagle and short-eared owl were taken forward and assessed further.

2.8 The NatureScot Carbon and Peatland (2016) Map classifies the peat deposits on site as Class, 1 (National Importance), Class 2 and Class 5. The peat survey recorded depths of between 0m (no peat) and >6m across the survey area.

2.9 The EIAR outlines that the majority of the site drains to the north-east via four watercourses and their tributaries, which discharge to Loch Moy either directly or via its tributary Allt Creag Bheithin. Loch Moy flows to Funtack Burn, which joins the River Findhorn 4km to the east of the site near Milton of Moy. A very small area in the west of the site drains north-west to Allt na Fuar-ghlaic, which in turn drains to the River Nairn 5km north-west of the site. There is a Surface Water Drinking Water Protection Area (DWPA) 4.4 km south-east of the site boundary.

2.10 Seven properties were originally identified that could have Private Water Supplies (PWS) potentially linked to the site. Five have since been confirmed to now have a public water supply. Two PWS are considered further in the assessment.

Landscape Designations, Wild Land and Landscape Character

2.11 The site itself is not covered by any statutory international, national, regional, or local landscape-related designation. However, there are several designations within the 45 km Study Area (EIAR Figure 5.9).

2.12 The Cairngorms National Park is located 10 km from the site boundary. There also two National Scenic Areas (NSA) within the study area. EIAR Chapter 4 however details limited areas of long-distance visibility (in excess of 32 km), or no theoretical visibility of the proposed development. NSAs have therefore been scoped out of further assessment as agreed by NatureScot.

2.13 There are six Special Landscape Areas (SLAs) located within the 45km study area, three of which where the proposal would have most potential influence have been taken forward to full assessment:

- The Loch Ness and Duntelchaig SLA, 8.2 km southwest;
- The Drynachan, Lochindorb and Dava Moors SLA, 5 km northeast; and
- Sutors of Cromarty, Rosemarkie and Fort George SLA, 21 km north.

2.14 There are six Wild Land Areas (WLA) in the study area. Based on limited visibility and distance, NatureScot agreed that that these designations could be scoped out of further assessment.

2.15 The application site is situated within the LCT 221: Rolling Uplands – Inverness Landscape Character Types (LCT). In addition, 10 LCTs are located within 15 km of the site; the host LCT and five further LCTs have been taken forward by the applicant for detailed assessment.

2.16 The proposed development is located within the Monadhliath ridge and tops, Rolling Uplands Landscape Character Area (LN6), as defined by the Loch Ness Strategic Capacity Study contained within the Councils Onshore Wind Energy Supplementary Guidance (OSWEG). The site is also located within the Dava Moor, Nairn and Monadhliath Area Wind Energy Landscape Sensitivity Pilot Study (2021). The

proposal is situated within the Rolling Uplands (The Monadhliath) Landscape Assessment Unit (AU) as defined by this pilot study.

Built Heritage

2.17 There are no designated heritage assets within the site, but there are eight non-designated heritage assets (AI Figure 9.1). Within the 2 km there are 17 non-designated assets. Within 2-5 km there are nine scheduled monuments, one Category A Listed Building and seven Category B Listed Buildings. Within 5-10 km there is one Garden and Designed Landscape and an associated Category A Listed Building, 32 Scheduled Monuments, and one Conservation Area. Finally, within 10-20 km there are six Inventory Garden and Designed Landscapes, 91 Scheduled Monuments, 31 Category A Listed Buildings, two Conservation Areas, and one Inventory Battlefield.

Cumulative Development

2.18 Appendix 1 of this report provides details of operational, consented / under construction, and in planning wind farm projects within 45 km of the application site. Since the original baseline 31st Jan 2025 cut-off date in the EIAR, the cumulative wind energy picture has evolved. The AIR (submitted to the ECU in Jan 2026) identifies the following changes within 15 km of the site, these are detailed in AI Figure 5.12. Previous projects at pre-planning / scoping have now been submitted and are at the application stage pending consideration:

- Kyllachy Wind Farm (25/03511/S36): 4.5 km south, 13 turbines, 180 m to blade tip;
- Clune Wind Farm (25/00847/S36): 9.5 km south, 26 turbines, 200 m to tip;
- Balnespick Wind Farm (25/00629/S36): 10.2 km east, 9 turbines, 200 m to blade tip; and
- Highland Wind Farm (25/01355/S36): 14.7 km south, 19 turbines, 230 m / 200 m to blade tip.

3. PLANNING HISTORY

3.1	06.08.2024	24/01633/SCOP: Lynemore Wind Farm - Erection and operation of a wind farm comprising up to 10 wind turbines with a maximum blade tip height of 200m, battery energy storage facility and ancillary infrastructure	Scoping Opinion Issued by Scottish Ministers
3.2	15.06.2023	22/04298/FUL: Construction of tracks, resurfacing of tracks. Tracks to serve to the Lynemore Estate.	Planning Permission Granted
3.3	28.02.2008	08/00146/AGRIN: Extend Access Track	Application Withdrawn

4. PUBLIC PARTICIPATION

4.1 Advertised: Section 36 Application and EIA Development

Date Advertised:

- EIAR - Edinburgh Gazette 2nd May 2025, The Herald 3rd May 2025, The Strathspey and Badenoch Herald 8th and 15th May 2025, and the Inverness Courier 2nd and 9th May 2025.
- Additional Information (AIR-1): The Edinburgh Gazette and The Inverness Courier 30th January 2026.
- Additional Information (AIR-2): Grid Connection Appraisal: The Edinburgh Gazette and The Inverness Courier 28th April 2026.

Representations Received by The Highland Council: 0

Representations Received by The Energy Consents Unit: 155 objections / 6 support

4.2 Material considerations raised in objections are summarised as follows:

- Landscape and visual effects, cumulative effects with existing and proposed schemes. Development is intrusive in scale, inappropriately sited, out of character and the density of turbines in the area is too high. The landscape and visual effects will be experienced over a wide area and will affect designated landscapes;
- Not in accordance with the Development Plan;
- Incompatibility with the OWESG;
- Incompatibility with The Dava Moor, Nairn and Monadhliath Area Wind Energy Landscape Sensitivity Pilot Study (2021);
- Light pollution, aviation lighting and impacts upon dark skies (including the Monadliath Mountains, Black Isle and Cairngorm National Park);
- Impact on residential amenity for individual properties and residential areas such as Moy, Farr and Strathnairn;
- Impacts upon health, such as noise (including cumulative effects), shadow flicker and vibration;
- BESS – limited information about this aspect, possible contamination, noise, visual effects, limited storage capacity;
- Ecological and ornithological effects and loss of habitat (including peat), loss of woodland and impacts on biodiversity. Aviation lighting will affect birds, bats and insects;
- Impacts on tourism, recreation (including mountains, hills and walking routes and cycle routes) and local businesses;
- Effects on climate;
- Impacts upon cultural heritage (including Culloden Battlefield), aviation lighting is not considered in the heritage assessment;
- CO2 emissions from the development, including the release of carbon from the peat;
- Lack of clarity regarding decommissioning (financial guarantee, bond etc);
- Waste at the end of the operational period, environmental damage;
- Impacts from construction traffic (including cumulative); road condition and congestion concerns on local and Trunk roads, including cumulative with upgrades to the A9(T); impacts upon emergency services; crossing the A9

carriageway presents safety, traffic and logistical concerns; safety concerns for local road users, cyclists, pedestrians and school and residents of Farr village;
- Contamination of the ground and watercourses;
- Inadequate assessment of ornithology (including collision risk modelling) and cumulative environmental effects;
- Aviation safety;
- Lack of local job creation; consider the socio-economic assessment to be flawed;
- Inadequate consultation with local residents; and
- Grid connection's impact on habitat and ecology.

4.3 Material considerations raised in support are summarised as follows:

- Sited next to an already industrialised road;
- Located in an area where there is existing light pollution;
- Environment of the wider area already degraded by estate activities, farming, industrial forestry and quarries; existing wind farms stop the burning of hillsides and can result in the preservation of peatland;
- Unlikely to result in additional effects on raptors;
- Good community engagement;
- Contribution towards renewable energy targets; and
- Supports the economy and local job creation.

4.4 Non-Material considerations raised in objections:

- Spoil the view from residential properties;
- Better to locate turbines offshore;
- Reduction in house prices;
- De-population;
- Foreign company;
- Lack of community benefit;
- Security risk from hostile powers;
- Oversupply of renewable energy generation in the area;
- Constraint payments and industry mis-management;
- Lack of grid capacity; and
- BESS – risk of fire / thermal runaway.

4.5 Non-Material considerations raised in support:

- Community benefit

4.6 Those representations received by the Scottish Government's Energy Consents Unit can be accessed via www.energyconsents.scot.

5. CONSULTATIONS

Consultations Undertaken by The Highland Council

5.1 **Strathdearn Community Council (host) object**. They consider that Strathdearn has already contributed significantly to renewable energy targets and that Lynemore Wind Farm would exacerbate cumulative adverse effects on landscape,

communities, peatland, wildlife and tourism. If consent is granted, the Commjunity Council seeks mitigation including removal of the four turbines closest to homes, revised ecological and tourism assessments and a dark-sky lighting strategy.

5.2 **Strathnairn Community Council object**. They consider the proposal gives rise to significant and irreversible impacts on the receiving landscape and environment, tourism and related industries, loss of biodiversity, dark sky visibility, light pollution and consequent harm to sensitive local ecology. The proposal conflicts with policy, as although the supporting information sets out the proposed development would address climate change, this is at the expense of further biodiversity loss. Proposal adequately addresses cumulative visual impacts in combination with existing wind farms and other developments in the vicinity.

5.3 **Access Team** do not object. Recommends an Outdoor Access Plan to be secured via condition. The recreation assessment flawed because it fails to recognise General Wade's Military Road as a public right of way and overlooks some recreational interests, potentially underestimating impacts in the EIA. This route must be reinstated if used during construction as per legal requirements under the Land Reform (Scotland) Act 2003 and recommend early engagement with the access authority. Following submission of further information in 2026, this gives rise to no significant changes to the proposals for access and recreation.

5.4 **Development Plans Team** do not object. Advises on the policy context and developer contribution requirements.

5.5 **Ecology Team object** given concerns regarding the proposed peatland restoration strategy and habitat enhancement. Following the submission of additional information by the applicant, the Ecology Team has confirmed that sufficient ornithological data has now been provided and has consequently withdrawn its objection on survey grounds. They consider that the proposed development does not comply with NPF4 Policy 3 given the location of off-site restoration is yet to be secured. In addition, conditions are requested requiring an Environmental Clerk of Works (EnvCOW), Habitat Management Plan (HMP), Construction Environmental Management Plan (CEMP), pre-construction surveys, nesting birds, and for GIS shapefiles of key enhancement and compensatory planting areas to be supplied.

5.6 **Environmental Health Team** do not object, subject to conditions restricting operational noise limits, a construction noise mitigation scheme and a dust mitigation scheme.

5.7 **Flood Risk Management Team (FRM)** do not object and confirm they have no further comment.

5.8 **Forestry Team** do not object, subject to conditions to secure tree protection, compensatory planting plan and woodland enhancement plan.

5.9 **Historic Environment Team – Archaeology** do not object, subject to a condition to secure a programme of archaeological works, inclusive of a written scheme of investigation (WSI) and, if required, a post-excavation research design.

5.10 **Historic Environment Team – Conservation** do not object. They note the proposed wind farm would affect the setting of the Category A listed Aultnaslanach Viaduct on the oustkirts of Moy but concludes that the effect would be limited and not significant. The bridge derives its heritage value primarily from its distinctive engineering design and railway function rather than its wider landscape setting. As the structure is only experienced by rail passengers and was not designed to relate to surrounding views, the wind farm would not materially alter its understanding or appreciation. Consequently, despite the omission of a specific setting assessment by the applicant, HET – Conservation raises no objection to the proposal.

5.11 **Landscape Consultant (Ironside Farrar)** advises that there are strong grounds for objection. The Council's externally appointed landscape consultant advises that the affected landscapes are generally undesignated and not of the highest sensitivity. Nevertheless, the proposed development would result in significant adverse landscape character effects, particularly within the Strathdearn area and along the A9 corridor. The development is inconsistent with strategic landscape guidance because it creates a new wind farm cluster, occupies prominent enclosing hills, and fails to respect the established pattern of wind energy development. Further, the siting and design of the proposed development would result in high levels of visual impact from the A9 corridor, affecting areas of settlement and recreation/ visitor interest. Significant effects on designated landscapes are not anticipated, however, the identified significant adverse impacts on landscape character and visual amenity weigh against the overall acceptability of the proposal.

5.12 **Transport Planning Team** do not object, subject to conditions to secure a Construction Traffic Management Plan (CTMP), and an Abnormal Load Plan.

Consultations Undertaken by The Scottish Government's Energy Consents Unit

5.13 **British Horse Society** do not object and provide advice on outdoor access relating to equestrian users. The British Horse Society requests that the OCTMP provided include measures to protect vulnerable road users, particularly equestrians, cyclists and pedestrians, given the likelihood of interactions with construction traffic.

5.14 **British Telecom (BT)** do not object and confirm the proposal should not cause interference to BT's current and presently planned radio network.

5.15 **Findhorn District Salmon Fishery Board object**. Whilst the inclusion of a fish and water quality monitoring plan resolves their initial concern, they retain concerns regarding peatland, hydrology and cumulative effects.

5.16 **Fisheries Management Scotland** do not object. They provide general advice and set out their remit to alert the relevant local district salmon fishery board/trust to any proposal.

5.17 **Health and Safety Executive (HSE)** do not object and confirm they have no further comment.

5.18 **Highlands and Islands Airport Ltd (HIAL)** do not object, subject to conditions to secure an Instrument Flight Procedures Assessment and Primary Surveillance Radar Assessment.

5.19 **Historic Environment Scotland (HES)** do not object, however, find that the proposed development would have adverse impacts on the setting of the Isle of Moy, fortified island and laird's house (SM11446). The impacts on this Scheduled Monument have been under-assessed in the EIAR; however, the impacts do not raise issues of national importance for their interests.

5.20 **Ironside Farrar** do not object. They considered the additional peat survey information and updated risk modelling submitted adequately addresses peat landslide risks. The revised Peat Landslide Hazard Risk Assessment (PLHRA) was considered acceptable, with no outstanding objections and no requirement for further information from the developer. Only minor advisory comments remained regarding future presentation of geomorphological mapping and clarification of turbine numbering on figures.

5.21 **Joint Radio Committee (JRC)** do not object and does not foresee any potential problems based on known interference scenarios.

5.22 **Ministry of Defence (MOD)** do not object, subject to conditions for aviation lighting, and aviation charting and safety management being secured.

5.23 **Moray Council** do not object and confirm they have no further comment.

5.24 **National Air Traffic Services Safeguarding (NATS)** do not object and confirm the proposal does not conflict with safeguarding criteria.

5.25 **NatureScot** do not object, following the submission of further information regarding White-Tailed Eagles. Their initial response provided an appraisal of designated sites, which concluded the proposed development would not have a likely significant effect on the Inner Moray Firth Special Protection Area (SPA) and Ramsar site, and therefore an appropriate assessment under the Habitats Regulations is not required. The applicant's assessment of peatland impacts is agreed, and it recommends a minimum area of peatland restoration to be delivered.

5.26 **Royal Society for the Protection of Birds (RSPB)** do not object and confirmed they have no further comment.

5.27 **Scottish Water** do not object and provides advice on drinking water protected areas, surface water, and asset impact assessment.

5.28 **ScotWays** do not object and recommended conditions regarding access routes within the site, the submission of an Access Management Plan which covers diversions, inclusion of gates to manage non-vehicular public access and deer management, erection of signs, materials to be used for wind farm tracks, and siting of turbines from defined access routes within the site.

5.29 **SEPA** do not object, following the submission of additional information regarding peat. This is subject to conditions for micro-siting, enabling works, geotechnical clerk

of works, borrow pits scheme of works, forestry, peat and carbon-rich soils, and decommissioning restoration and aftercare.

5.30 **Transport Scotland** do not object, subject to conditions for access to the trunk road, abnormal loads, any additional temporary traffic control measures, and a Construction Traffic Management Plan.

6. DEVELOPMENT PLAN POLICY

6.1 Appendix 2 of this report provides details of the documents that comprise the adopted Development Plan, including details of pertinent planning policies as well as adopted supplementary guidance, and other material policy considerations which are relevant to the assessment of the application.

7. PLANNING APPRAISAL

7.1 This application has been submitted to the Scottish Government under Section 36 of the Electricity Act 1989 (as amended). Should Ministers approve the development, it will receive deemed planning permission under Section 57(2) of the Town and Country Planning (Scotland) Act 1997 (as amended). Although not a planning application, the Council processes S36 applications in a similar manner given that planning permission may be deemed to be granted.

7.2 Schedule 9 of The Electricity Act 1989 contains considerations in relation to the impact of proposals on amenity and fisheries. These considerations mean the developer requires to:

- have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and
- reasonably mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.

7.3 It should be noted that for applications under the Electricity Act 1989 that the Development Plan is just one of several considerations, and therefore Section 25 of the Town and Country Planning (Scotland) Act 1997 which requires planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise, is not engaged. That said, the application still requires to be assessed against all policies of the Development Plan relevant to the application, all national and local policy guidance and all other material considerations relevant to the application.

Planning Considerations

7.4 The key considerations in this case are:

a) Compliance with the Development Plan / Other Government Policy;

b) Energy and Economic Benefit;

c) Construction Impact;

d) Siting, Layout and Design;
e) Landscape and Visual Impact;
f) Roads, Transport and Access;
g) Hydrology, Geology, Hydrogeology, and Peat;
h) Natural Heritage (including ornithology);
i) Built and Cultural Heritage;
j) Noise and Shadow Flicker;
k) Aviation, Radar and Telecommunications; and
l) Other Material Considerations

Compliance with the Development Plan/ Other Government policy

7.5 Appendix 3 of this report provides an assessment of compliance with the Development Plan / Other Government Policy Considerations. In summary, the Development Plan comprises National Planning Framework 4 (NPF4), the adopted Highland-wide Local Development Plan (HwLDP), the adopted Inner Moray Firth Local Development Plan 2 (IMFLDP2), and all statutorily adopted supplementary guidance, including the Onshore Wind Energy Supplementary Guidance (OWESG).

7.6 The principle of wind farm development is established by the previous consent and national policy. NPF4 considers that Strategic Renewable Electricity Generation and Transmission Infrastructure will assist in the delivery of the Spatial Strategy and Spatial Priorities for the north of Scotland, and that Highland can continue to make a strong contribution toward meeting Scotland's ambition for net zero. Alongside these ambitions, the strategy for Highland aims to protect environmental assets as well as to stimulate investment in natural and engineered solutions to address climate change. This aim is not new and will clearly require a balancing exercise to be undertaken, which is reflected throughout NPF4.

7.7 This is also reflected within other material policy considerations, with Government policy giving significant weight to the importance of achieving net zero through the deployment of onshore wind at pace. Government legislation and policy maintain the commitment to attaining net zero by 2045, with the Onshore Wind Policy Statement requirement for 20 GW of onshore wind to be deployed by 2030, and the Climate Change Committee Report to UK Parliament (July 2024) explaining that onshore wind installations will need to double by 2030. The UK Government Clean Power Action Plan has also recently set a more ambitious target of 27-29 GW of onshore wind by 2030. When determining renewable energy proposals, the ability to meet these targets therefore demands substantial weight when undertaking the planning balance exercise.

7.8 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 4 provides an assessment against Landscape and Visual Assessment Criteria contained within Section 4 of the Onshore Wind Energy Supplementary Guidance.

Energy and Economic Benefits

7.9 The Council continues to respond positively to the Government's renewable energy agenda. A substantial number of onshore wind farm applications are pending consideration at present.

7.10 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 86.4MW of installed capacity, in addition to 50 MW of batter energy storage capacity. Based on a typical capacity factor, the development is likely to generate enough renewable electricity to power the equivalent of 54,061 homes each year.

7.11 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 peat, are present and potentially impacted by the development, often termed "carbon balance".

7.12 The applicant has submitted an updated Carbon Balance Assessment (AIR-1 Volume 4 Technical Appendix 13.1). This assesses the GHG emissions and uses carbon dioxide equivalent (tCO2e) where equivalence means having the same warming effect as CO2 over 100 years. The revised proposal is predicted to deliver total emissions savings of 3,735,686 tCO2e over its 50-year operational lifetime against a fossil fuel mix of electricity, and 1,682,692 tCO2e against a grid-mix of electricity. GHG emissions are predicted to be offset 3.4 years, based on a fossil fuel mix of electricity, and 7 years against a grid-mix of electricity.

7.13 The applicant anticipates a construction period of 24 months and an operational lifetime of 50 years. There are likely to be 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.

7.14 During the construction phase it is estimated that the revised scheme could generate up to £29.8 million Gross Value Added (GVA) and 462.9 job years across Scotland, with approximately £9.4 million and 157.8 job years of this within the Highlands and £1.6 million GVA and 16.7 job years in the Inner Moray Firth area.

7.15 Over the operational lifetime, operation and maintenance costs could generate up to £107.1 million GVA and 1506.3 job years for Scotland, of which £77 million GVA

and 1060 job years will be within the Highlands economy and £28.2 million GVA and 386.9 job years for Inner Moray Firth area.

7.16 If consented, it would be appropriate to secure a Local Employment Scheme by condition to accord with NPF4 Policy 11c).

7.17 In terms of the grid connection (AIR-2), the applicant outlines that the workforce for the construction phase will be small and employed by SSEN. It is unlikely that the employment created will materially affect local employment levels, although there will be some local spending by construction workers.

7.18 The Council published its Social Value Charter for Renewables Investment in June 2024. 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 (AIR-1 Chapter 12, Paragraphs 12.4.10 – 12.4.16). Whilst this information is signposted to provide context, Members will be aware that community benefits are not material to this planning assessment.

Construction Impact

7.19 There are likely to be some adverse impacts caused by construction traffic and disruption, particularly during the construction phase when abnormal loads are being delivered to site. The construction period is anticipated to last for 24 months from mobilisation to completion. A Construction Traffic Management Plan (CTMP) would be in place to manage the impacts upon the local road network throughout the construction period. It is considered that the CTMP should be reviewed throughout the works and informed by feedback from ongoing engagement with the community, through a Community Liaison Group (CLG). This will ensure that the community council and other stakeholders are kept up to date and consulted before and during the construction period.

7.20 The revised layout has reduced the number of construction compounds from two to one, and watercourse crossing reduced from seven to four. The EIAR includes a schedule of commitments and best practice, which includes that all construction works would be conducted in accordance with a project Construction Environmental Management Plan (CEMP). Compliance with the CEMP will be overseen by a suitably qualified and experienced Environmental/Ecological Clerk of Works (ECoW).

7.21 A micrositing allowance of up to 50 m is proposed for turbines and associated infrastructure. This flexibility is intended to allow minor adjustments during detailed design and construction in response to ground conditions identified through pre-construction site investigations. Where environmentally sensitive features are present, the extent of any micrositing would be reduced as necessary to avoid adverse effects. This would be managed on site by an Environmental Clerk of Works (ECoW) to ensure compliance with environmental commitments and mitigation measures. This can be controlled by condition should consent be granted.

7.22 EIAR / AIR-1 Chapter 11 considers the effects of noise and vibration from construction impacts. The grid connection appraisal (AIR-2) also included consideration of the impacts of the grid connection construction as part of the proposed development. The assessment has been undertaken in accordance with the methodologies set out in British Standard BS 5228-1:2009 ('Code of practice for noise and vibration control on construction and open sites'). The methodology set out in Calculation of Road Traffic Noise (CRTN) has been used to calculate changes in predicted noise levels on existing roads.

7.23 It is noted in the EIAR that due to the nature of most of the works and the distances involved in the construction of the proposed development, that risk of significant effects from ground-borne vibration is low, however this excludes blasting from borrow pits. Further details can be secured by condition. Given the separation distances between turbines and noise sensitive receptors, construction noise at the turbine sites is not likely to be significant.

7.24 Whilst the proposed route of the new/upgraded access track has been moved it is in very close proximity to residential properties. AIR-1 Chapter 11 notes the track has been relocated east of the residence cluster and is now approximately 80 m from the nearest residential property, identified as Lynebeg (Foresters House). This is an increase from approximately 35 m separation for the initial 14 turbine scheme. As such there remains some potential for disturbance to residents from noise and dust from access track works and construction traffic. The revised scheme is supported by an updated construction noise assessment.

7.25 Construction compound and forestry operations would result in noise levels at or below 65 dB(A), corresponding to negligible to minor impacts. Site track and verge works exceed 65 dB(A) but are short-duration activities (less than four weeks at the closest locations) and remain below the 75 dB(A) threshold for short-term works.

7.26 Environmental Health note that predicted noise levels will meet recognised standards although levels will be at the high end of the acceptable range at times. The predictions are worst case scenarios, and the noise will reduce as the access track works progress away from properties. Environmental Health do not object but expect that the developer/contractor will employ the best practicable means (BPM) to always reduce the impact of noise and vibration from construction activities. As part of a Construction Environment Management Plan (CEMP) or similar document, the applicant will be required to submit a scheme demonstrating how BPM will be implemented prior to commencement of the development.

7.27 The applicant outlines that working hours will be 6 days per week, between 07.00 to 19.00 hours Monday to Friday, and 07.00 to 13.00 hours on Saturdays, with no Sunday working hours proposed. However, the applicant notes that delivery of materials and abnormal loads may take place out with these hours, to reduce traffic disturbance on the road network. Environmental Health have states that given the proximity of the access track to houses this they advise that for any work which is audible at the boundary of any noise sensitive receptor, the hours of operation should be restricted to 8am to 7pm Monday to Friday and 8am to 1pm on Saturdays including HGV movements. Operations which are inaudible could still be carried out out-with these times. Planning conditions are not typically used to control

construction noise as other powers are available under the Control of Pollution Act 1974.

7.28 In relation to dust, Environmental Health requires a dust suppression scheme to be secured by condition. This will include details of how the best practicable means will be implemented to control the impact of dust on receptors.

7.29 The applicant has undertaken a private water supply risk assessment which has confirmed there are no supplies which are likely to be hydrologically connected to the development.

7.30 Once the turbines have been installed, the access tracks, substation, and hardstanding areas around the turbines would remain in place for the operational lifetime of the development. The construction compound areas, and other temporary construction areas will be restored, and this can be secured by a condition. In addition, the Council will require the applicant to provide a financial bond regarding final site restoration (restoration bond) in the event of non-operation.

7.31 In terms of the proposed grid connection (AIR-2), the indicative route passes through a remote environment and would be approximately 2km or more from the nearest noise-sensitive receptors. The applicant has indicated the construction works associated with the grid connection would be linear in their extent, and of short duration at any one location. Temporary noise that could be created is likely to be minimal and concentrated in small areas. Noise from construction traffic for the grid connection is expected to be minimal due to the limited number of vehicles this part of the project would generate. At this stage no significant effects are anticipated.

Grid Connection

7.32 During the course of the application, the ECU has required the applicant to provide Additional Information in relation to the grid connection. This is to ensure that the Environmental Impact Assessment (EIA) considers and assesses the whole Lynemore Wind Farm project for Significant environmental effects. This request was in response to the recent Raeshaw Farms Ltd v Scottish Ministers [2026] CSIH 10 Judicial Review decision, which clarified that, unless otherwise fully justified, then EIA must consider the environmental effects of the 'whole project' including the grid connection.

7.33 The Judicial Review decision clarifies the direction of Regulation 4 of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (hereafter referred to as the EIA Regs) at Section (2) that: 'The environmental impact assessment must identify, describe and assess in an appropriate manner, in light of the circumstances relating to the proposed development, the direct and indirect significant effects of the proposed development (including, where the proposed development will have operational effects, such operational effects) […] and the interaction between those factors'.

7.34 The ECU consider both the proposed Wind Farm, and its grid connection comprise a single project for the purpose of EIA. This is due to the interconnected nature of these developments. The gird connection will also only serve Lynemore Wind Farm and therefore neither development could function without the other. Functional

interdependence between developments is one of several relevant considerations in deciding whether they form a single project for EIA purposes, and the fact that each development is applied for and determined independently of the others is not, by itself, decisive. Whether interdependence, or any other factor, is treated as determinative depends on a fact-specific evaluation by the decision maker in the circumstances of the particular case.

7.35 To cover the grid connection, the applicant submitted a Grid Connection Appraisal document in April 2026. This outlines that the applicant has a NESO (National Energy System Operator) Grid Connection Contract and through this contract has an understanding of the likely grid connection route. Currently, the grid connection would comprise a new 132 kilovolt (kV) continuous overhead line (OHL) between the proposed Lynemore Wind Farm Substation and Glen Kyllachy Substation located to the south (Grid Connection Appraisal Fig 1a). The OHL is currently envisaged to be supported on a single circuit 'Trident' wood poles and underground cables.

7.36 However, the grid connection does not form part of the wind farm's description of development for consent and requires a separate consenting process to be followed. This will determine the specific configuration of the grid connection. If any of the grid connection is above ground, a separate consent under Section 37 of the Electricity Act 1989 would be required. If the entirety of the grid connection is undergrounded, the proposal may be determined under the Town and Country Planning (Scotland) Act 1997 (as amended).

7.37 The purpose of the Grid Connection Appraisal at this stage is to identify and assess the prospect of any significant environmental effects arising from the likely grid connection's form and routing. Where the decision maker, in this instance the Scottish Ministers, consider that the likely significant effects are not fully identifiable at the time of determination, Paragraph 6 of Regulation 4 provides for the decision maker to lawfully apply a multistage condition to the Section 36 consent. This paragraph applies where the Scottish Ministers consider that the likely significant effects of the development on the environment are not fully identifiable at the time of the application's determination and are minded to grant Electricity Act consent for EIA development.

Siting, Layout and Design

7.38 EIAR Volume 1 - Chapter 2 The Proposed Development describes the scheme's evolution through several design and layout iterations informed by environmental surveys and consultation. Turbines were repositioned, removed and redesigned to avoid peat, ecological and heritage constraints, increase separation from nearby properties, reduce visual effects and improve integration with the existing wind farm landscape. Following further consultation, the submitted scheme was subsequently reduced from 14 to 12 turbines through the AIR-1 process with the height remaining 200 m throughout the various iterations proposed. The reasons given for the site's selection are that it combines a strong wind resource, good access from the A9, suitable upland topography and a location adjacent to existing wind farm development, whilst avoiding major environmental designations.

7.39 The applicant sets out that the design of the wind farm has followed a constraints based approach in order that mitigation on environmental effects is embedded within the design, with key constraints including: landscape character and visual amenity; ground conditions, topography and peat; noise sensitive receptors; watercourses, private water supplies and related infrastructure; protected habitats and species; ornithology; trees and forestry and cultural heritage features.

7.40 It is also 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 future baseline conditions. In this instance, the application does not relate to any operational wind farm, being its own standalone development with some separation from existing and approved schemes, although with landscape, visual, and environmental linkages with schemes in the wider area.

7.41 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 Landscape Character Types; 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 such as the enjoyment of the view qualities, amongst others, are key in the assessment of cumulative landscape and visual effects.

7.42 EIAR Chapter 2 notes that the visual composition and layout design has been guided by the following considerations:

- "the scale and topography of the Site, including the patterns of the landscape such as watercourses, field boundaries, and woodland;
- reducing the vertical extent of the wind farm by micro-siting turbines to lower elevations, away from the summits and ridgeline of Beinn nan Cailleach and Carn na h-Easgainn;
- reducing effects on the landscape character and landform visible from the A9;
- reducing visual amenity effects from Culloden battlefield and Visitor centre;
- reducing effects on views from settlements, visitor attractions, and local residents of the area around the Site, whose visual amenity may be affected by the proposed development, such as Lynemore Cottage; and
- reaching a balanced fit in the already existing pattern of wind energy development, particularly when viewed from the closest part (northern edge) of the Cairngorms National Park."

7.43 EIAR Chapter 2 also notes that the final layout design of the proposed development took into account, as far as practical, the following general design principles:

- "Reduced the vertical extent of the wind farm by micro-siting turbines to lower elevations, away from prominent summits and ridgelines.
- Reduced turbine overlap as far as possible and cluttering.

- Presented a balanced composition with limited opportunities for turbines to be viewed as ‘outliers’.
- Reflected the existing pattern of wind energy development viewed from the northern edge of the Cairngorms National Park.
- Increased the distance between the proposed turbines and the closest residential property, Lynemore Cottage, as far as possible. T12 is the closest proposed turbine to Lynemore Cottage, located approximately 1,545m south of the property.
- Reduced sequential visibility for road users of the A9.”

7.44 Whilst the proposed development may appear to be situated within a more upland landscape, as illustrated in some of the visualisations, the overly prominent turbines positioned along the outer edges of the Strathdearn strath, particularly on its outward-facing slopes and summits, would nevertheless give rise to significant landscape and visual effects. Visualisations at some VPs (e.g. VP 1: General Wades Road – Moy to Inverness, VP2: B9154 northwest of Moy and VP3: A9, north of Tomatin) do not indicate a scheme which would be of ‘minor vertical scale’ relative to the landforms with which it would be seen (NatureScot Siting and Design of Wind Farms in the Landscape guidance para.3.32).

7.45 For landscape and visual receptors in the surrounding area, the design of the development, its relationship with the surrounding landscape and features and consequently, the nature of its landscape and visual impacts, may be demonstrated by representative visuals from:

- Southeast – VP6: Sustrans NCR1 at Tomatin, including those receptors near Tomatin, where the proposed turbines would appear as a relatively compact array. As this is a location of higher visual receptor sensitivity, the compact layout helps to limit the overall extent of visibility, particularly the horizontal spread. However, the proposed development would appear overly prominent given their siting on the outer facing slopes and summits of Carn na h-Easgainn and Carn na Loinne in particular, and it is considered turbines would not being sufficiently set back from these hills. A number of turbines would appear over-scaled and disproportionate to the relative landform resulting in a poor composition;
- North / Northeast - VP1: General Wades Road – Moy to Inverness and VP2: B9154 northwest of Moy, the wind farm presents as a much more extended array of turbines seen at different heights, with it clearly more challenging to design a coherent turbine arrangement given site constraints. As a result of the above and that the turbines are located on the outer facing slopes and summits of the hills including Carn na h-Easgainn and Carn na Loinne and are not sufficiently set back from these hills enclosing Strathdearn, the turbines would form a dominant new feature on the skyline over a broad horizontal extent and would substantially alter the character of the view;
- Southwest - VP4: B861 between Balnafoich and Inveramie, Whilst the proposed development would appear as a compact layout, the front turbines would appear overly prominent, particularly T3 and T6 which would not

appear of a scale relative to the landform and landscape. This is due to the turbines not sufficiently set back from the hills enclosing Strathnairn; and

- Northwest – VP7: A9 near Daviot. T3 and T6 appear stark, incongruous and very prominent in the landscape, spilling beyond the outer hill facing slopes and summits of Carn na h-Easgainn and Beinn nan Cailleach, directly ahead in the direction of travel. This leads to a perception that wind energy development would no longer be contained within the upland interior.

7.46 Overall, the proposed development does not correspond to strategic and general wind farm siting and design guidance because of the siting of turbines on prominent landforms and their outer facing slopes providing the enclosure and skyline to parts of Strathdearn (and Strathnairn) and the scale of the proposed turbines in relation to the hills on which they would be situated.

7.47 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. Individual wind farm design should therefore take into account the baseline and potential future baseline conditions of wind energy in its wider context. While consideration of how the siting, layout, and design of developments relate to each other and the cohesiveness of their relationship to their surroundings from fixed viewpoints is important, it is also important to assess how wind farms relate to each other in terms of their frequency when moving through the landscape.

7.48 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.

7.49 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 impacts. 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.

7.50 Not only is consideration of how the siting and 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.

7.51 These considerations are of particular salience given the high pressure for wind energy development across the wider area. The landscape of the site currently provides some relief from wind energy development. Across the immediate LVIA study area there are several distinctive groups of wind farms following a rough northeast to the southwest layout across the Monadhliath mountain range crossing the A9 to the north/northwest of the River Findhorn. These are made up of the existing Moy, Farr, Glen Kyllachy, Dunmaglass, Stronelairg and Corriegarth Wind Farms which are all operational. Aberarder is currently under construction. Within this grouping are also a number of wind farm applications currently in various stages in the planning process including Farr Extension (in Scoping), Kyllachy (pending consideration), Carn Na Saobhaidh (in Scoping), Corriegarth 2 (approved), Glenmarkie (in Scoping), Cloiche (approved) and Dell 2 (pending determination by Scottish Ministers). These range in sizes from 110-149.9 m to blade tip for operational and approved schemes, and 180-250 m to blade tip for those either pending consideration or at scoping.

7.52 A further grouping of wind farms following a rough northeast to the southwest layout crossing the A9 to the south/southeast of the River Findhorn is a more recent addition, marginally behind the existing built grouping noted above, with only Tom na Clach being operational. Within this grouping are also a number of applications currently in various stages in the planning process including Tom nan Clach extension (approved), Glenkirk (in Scoping), Balnespick (pending consideration), Clune (pending consideration) and Highland (pending consideration) wind farms. These range in sizes from 125-149.9 m to blade tip for operational and approved schemes, and 200 / 230 m to blade tip for those either pending consideration or at scoping.

7.53 The applicant considers the submitted design has a degree of coherence with the pattern of wind farms in the surrounding area. This is disputed. The proposed wind farm encroaches into views experienced by receptors, particularly road users travelling along one of the Council's listed key route, the A9. This is owing to the lack of setback from the route and therefore Lynemore appearing overly prominent and incongruous in views. The proposed wind farm site fills an existing gap between Moy and Farr Wind Farms either side of the A9, with the proposed turbines being the closest wind farm to this key route and gateway into Highland to date. One would need to travel as far north as Causeymire in Caithness to experience a similar setback. The turbines in Caithness are however of a previous generation, and incomparable in scale to those proposed in this application at 200 m to blade tip, the nearest of which has been positioned to achieve a setback of around 1.38 km from the A9 carriageway. For this section of the route where one travels between the Cairngorms National Park and Inverness, this is in comparison to Moy Wind Farm's setback of some 2.6 km, and Farr Wind Farm's setback of around 4.7 km.

7.54 The proposed development is located a little over 2 km from Farr Wind Farm, and from where Farr and Glen Kyllachy are visible, it would be clearly perceived as a separate development (refer to VP8: Càrn a' Choire Mhoir). This is because of the

visual separation and the disparity of turbine size (almost twice the height of Farr and Glen Kyllachy), and rather than extending an existing wind farm cluster, they would be creating a new one. By way of comparison, Farr Wind Farm occupies a central location on the higher landform between the remote Glen Kyllachy and the A9 corridor and benefitting from topographic containment to the northeast, while Glen Kyllachy Wind Farm has pushed turbines towards somewhat more sensitive outer slopes towards Glen Kyllachy and Strathdearn. Turbines of the proposed development would be close to the highest landforms of this area and close to the Fiona summit of Carn na h-Easgainn (618 m AOD), which as demonstrated by viewpoint visualisations appear very prominently on its outer facing slopes as viewed from the northeastern parts of Strathdearn, with the effect that wind energy would no longer appear contained in this direction, as seen in:

- VP1: General Wades Road - Moy to Inverness;
- VP2: B9154 northwest of Moy;
- VP3: A9 north of Tomatin;
- VP6: Sustrans NCR1 at Tomatin;
- VP7: A9 at Daviot; and
- VP8: Cà rn a' Choire Mhoir.

7.55 The largest proposed turbines under consideration within the 45 km EIAR study area are those within 20 km of the proposed development including Highland Wind Farm with 19 turbines ranging from 200 m to 230 m, Clune Wind Farm with 26 turbines up to 200 m, Kyllachy Wind Farm with 13 turbines up to 180 m and Balnespick Wind Farm with 9 turbines at 200 m. Consequently, understanding the visual effects resulting from the interaction of Lynemore with various turbines sizes of schemes in planning is also key to the assessment.

7.56 There are also a number of schemes at Scoping including Glenmarkie Wind Farm, with up to 65 turbines up to 250 m, and Carn na Saobhaidh Wind Farm with 29 turbines up to 200 m. However, given their uncertainty at this stage, they are not considered any further in this report.

7.57 When viewed from surrounding locations, particularly when travelling on roads and recreational routes, the additional turbines will be viewed in the context of other wind energy in the wider surrounding area with the Moy cluster and Farr/Glen Kyllachy cluster particularly apparent, albeit with an element of separation between these schemes and the proposed development. As such, care and attention is required regarding design, siting and location to avoid detrimental visual impacts. To date, previous wind farm decisions and the pattern of wind farm development has purposefully maintained a greater setback from the A9, with wind farms in this area generally being restricted to clusters in less prominent locations with a further setback from this key route.

7.58 Key considerations in coming to a judgement on the scheme are also derived from The Loch Ness Landscape Sensitivity study contained within the Onshore Wind Energy Supplementary Guidance (OWESG). This study identifies that any remaining capacity for larger scale development should be focused around existing clusters that are generally found in rolling uplands, rugged massif and rocky moorland Landscape Character Types (LCT). A key consideration in the consented pattern and design of wind energy development in the area has been managing the impacts

upon the popular and accessible summit of Meall Fuar-mhonaidh (VP20), particularly in south westward views, away from this development, where the striking V shape of the Great Glen can be fully appreciated. Given the proposed wind farm's location and setback from this hill, at just under 30 km from the closest proposed turbine, receptors at this location would not be significantly affected.

7.59 A further relevant material consideration is the Dava Moor, Nairn and Monadhliath Area Wind Energy Landscape Sensitivity Study (2021). This pilot study was commissioned by NatureScot to test the methodology set out in its updated landscape sensitivity assessment guidance and is available on the Council's website. The applicant has referred to this study, however, the proposed development, particularly in terms of its design and siting, does not adequately respond to the identified landscape constraints or potential effects. In particular, it would intensify sequential cumulative effects along the A9 on the approach to and departure from Inverness, dominate the scale of the narrow strath and contribute to cumulative effects on views from both the A9 and the railway. These effects would be exacerbated by the development's location on a prominent landform. Receptors travelling along the A9, both north and south of the proposed development, would experience the turbines directly ahead in their field of view, in the direction of travel. The turbines would therefore appear particularly overly prominent, resulting in a significant change to the character and experience of this area.

7.60 Officers have also continuously sought to minimise impacts from visible aviation lighting which is required for turbines over 150 m to blade tip. These lights extend landscape and visual impacts into hours of darkness. This is important given the popularity of the wider surrounding area for overnight camping. The applicant's aviation lighting strategy includes a reduced lighting scheme agreed in principle with the CAA, with visible hub lighting proposed on six cardinal turbines (T1, T3, T6, T12, T13 and T14).

7.61 In reviewing the siting, design, and layout of the proposal, whilst there have been amendments made resulting in a reduced scheme from 14 to 12 turbines, the development remains to the detriment of the landscape and visual receptors in this area. The wind farm is not sensitively sited. It is also not of appropriate scale, with its overall design appearing to disregard the Council's OWESG, The Loch Ness Landscape Sensitivity study and the Pilot Study, which have collectively assisted in facilitating a considerable amount of onshore wind development within its study area. The proposal would also not correspond to the guidance provided by NatureScot relating to the scale of turbines relative to the landforms with which they would be seen. Overall, the proposals clearly deviate from the existing and consented pattern of wind energy development and do not align with guidance.

Ancillary Infrastructure

7.62 The proposed development includes ancillary infrastructure such as a Battery Energy Storage System (BESS), transformers, switchgear, underground electrical and communications cables, telecommunications equipment, substation and control building with parking and welfare facilities.

7.63 The final layouts, component designs and external material finishes, together with the compounds and perimeter fencing can be secured by condition. For the BESS

facility, a condition should be imposed to secure the proposal is reasonably sited to demonstrate compliance with Health and Safety Guidance for Grid Scale Electrical Energy Storage Systems, National Fire Chiefs Council's Guidance - Guidance on Grid Scale Battery Energy Storage System Planning, and Draft Guidance National Fire Chiefs Council on Grid Scale Battery Energy Storage Systems and/or any or any superseding guidance prevailing at the time.

7.64 It should be noted however that fire safety and fire risk management are covered by other legislation and therefore are not matters for the Planning Authority. That said, design and layout elements such as water supply, drainage including segregation, containment, and safe disposal of expended fire suppression agent and / or water from the water environment are relevant to the consideration of the BESS facilities and as such, details of these matters should also be secured by condition.

7.65 In terms of design of the infrastructure on the site including the substation, BESS, access tracks, borrow pit search area and temporary compounds, these appear to have been generally 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 parts of the A9 (VP1: General Wades Road - Moy to Inverness) and Tomatin (VP6: Sustrans NCR 7 at Tomatin) where the substation would also be visible. The most significant visibility of the access track from low-lying receptors would be from the east including those on the B9154 around Moy which also overlaps with the NCR 7 (VP2: B9154, northeast of Moy). Some of these components would also be visible from higher ground including surrounding hill summits to the northeast, southeast and south.

7.66 In terms of the proposed grid connection, the applicant submitted AI Grid Connection Appraisal along with supporting information outlining the indicative route and constraints in April 2026 to assess the likely environmental effects. As the grid connection will be consented separately by SSEN Transmission under Section 37 of the Electricity Act, the assessment provides a high-level appraisal of likely effects and identifies any potential significant constraints.

7.67 The wind farm is anticipated to connect to Glen Kyllachy substation to the southwest via a new 132kV OHL, extending south from the proposed wind farm substation across open moorland for approximately 5.5 km. The connection is expected to comprise primarily wooden trident poles approximately 11 m to 15 m high (up to 18 m locally) with some sections potentially undergrounded. Pole spans would typically be around 100 m apart. Connection to the grid will be the subject of a separate application and consenting process, the implications of which, are more thoroughly discussed in the later ‘Other Material Considerations’ section of this report.

Grid Connection

7.68 During the course of the application, the ECU has required the applicant to provide Additional Information in relation to the grid connection. This is to ensure that the Environmental Impact Assessment (EIA) considers and assesses the whole Lynemore Wind Farm project for Significant environmental effects. This request was in response to the recent Raeshaw Farms Ltd v Scottish Ministers [2026] CSIH 10 Judicial Review decision, which clarified that, unless otherwise fully justified, then

EIA must consider the environmental effects of the 'whole project' including the grid connection.

7.69 The Judicial Review decision clarifies the direction of Regulation 4 of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (hereafter referred to as the EIA Regs) at Section (2) that: 'The environmental impact assessment must identify, describe and assess in an appropriate manner, in light of the circumstances relating to the proposed development, the direct and indirect significant effects of the proposed development (including, where the proposed development will have operational effects, such operational effects) […] and the interaction between those factors'.

7.70 The ECU consider both the proposed Wind Farm, and its grid connection comprise a single project for the purpose of EIA. This is due to the interconnected nature of these developments. The gird connection will also only serve Lynemore Wind Farm and therefore neither development could function without the other. Functional interdependence between developments is one of several relevant considerations in deciding whether they form a single project for EIA purposes, and the fact that each development is applied for and determined independently of the others is not, by itself, decisive. Whether interdependence, or any other factor, is treated as determinative depends on a fact-specific evaluation by the decision maker in the circumstances of the particular case.

7.71 To cover the grid connection, the applicant submitted a Grid Connection Appraisal document in April 2026. This outlines that the applicant has a NESO (National Energy System Operator) Grid Connection Contract and through this contract has an understanding of the likely grid connection route. Currently, the grid connection would comprise a new 132 kilovolt (kV) continuous overhead line (OHL) between the proposed Lynemore Wind Farm Substation and Glen Kyllachy Substation located to the south (Grid Connection Appraisal Fig 1a). The OHL is currently envisaged to be supported on a single circuit 'Trident' wood poles and underground cables.

7.72 However, the grid connection does not form part of the wind farm's description of development for consent and requires a separate consenting process to be followed. This will determine the specific configuration of the grid connection. If any of the grid connection is above ground, a separate consent under Section 37 of the Electricity Act 1989 would be required. If the entirety of the grid connection is undergrounded, the proposal may be determined under the Town and Country Planning (Scotland) Act 1997 (as amended).

7.73 The purpose of the Grid Connection Appraisal at this stage is to identify and assess the prospect of any significant environmental effects arising from the likely grid connection's form and routing. Where the decision maker, in this instance the Scottish Ministers, consider that the likely significant effects are not fully identifiable at the time of determination, Paragraph 6 of Regulation 4 provides for the decision maker to lawfully apply a multistage condition to the Section 36 consent. This paragraph applies where the Scottish Ministers consider that the likely significant effects of the development on the environment are not fully identifiable at the time of

the application's determination and are minded to grant Electricity Act consent for EIA development.

Landscape and Visual Impact Assessment

7.74 The applicant has presented a number of submissions to illustrate the landscape and visual impact of the development both singularly and cumulatively with existing and consented wind farm developments. The cumulative information included with the original submission is however now out of date with Bunloinn, Cloiche, Corriegarth 2 wind farms having been consented in the intervening period since submission, with the Tomchrasky Variation application now also pending consideration. The AIR-1 provided the cumulative context and also now includes other schemes such as Clune, Highland and Balnespick which were not initially assessed. However, the Ballach Wind Farm which is under consideration, the Carn Fearna Wind Farm which is currently subject to PLI, and the recently submitted Novar Repower Wind Farm (which would replace the existing Novar Wind Farm) has not been included in the AIR-1 although the Council acknowledges that these schemes are over 25-40 km distance from the proposed development.

7.75 In this regard the applicant has tabled:

- design iterations following input from pre-planning considerations;
- maps highlighting the Zone of Theoretical Visibility (ZTVs) in isolation and in combination with other wind farms;
- 21 representative viewpoints across a study area of 45 km;
- assessment against Landscape Character Types, Special Landscape Area Citations, Wild Land Areas and Cairngorms National Park;
- EIAR Volume 1 Chapter 5 Landscape and Visual Impact is supplemented by:
    - Technical Appendix 5.1 – Landscape and Visual Methodology;
    - Technical Appendix 5.2 – ZTV and Visualisation Information;
    - Technical Appendix 5.3 Residential Visual Amenity Assessment (RVAA);
    - Technical Appendix 5.4 Night-time Lighting Assessment and Technical Appendix 5.5 Appraisal against THC's Onshore Wind Energy Supplementary Guidance (OWESG) Landscape Criteria;
    - Further Environmental Information (FEI) submitted in January 2026 covers the amended EIAR Volume 1 Chapter 5 and Report on AI Technical Appendix Light Propagation from the Aviation Warning Lights; and
    - AIR-2 Grid Connection Appraisal was also submitted in April 2026.

7.76 The 21 viewpoints, all within 31 km from the development, are representative of a range of receptors including residents at settlements, recreational users of the outdoors and road users with photomontages and wirelines contained within the EIAR Volume 2 to Highland Council and NatureScot's standards. AIR-1 submitted in January 2026 covers a number of viewpoint visualisations with the amended 12 turbine scheme: VP1, VP4, VP7, VP10, VP12, VP15 and VP16, but not all 21 viewpoints, however, comparative wirelines have been included for all viewpoints. The expected bare earth visibility of the development can be appreciated from the AIR-1 Figure 5.4a – Updated Detailed Blade Tip ZTV, AIR-1 Figure 5.4b – Updated Detailed Blade Tip ZTV with forestry excluded and AIR-1 Figure 5.2a – Comparative

Blade Tip ZTV showing the original and revised layouts. Additionally, AIR-1 Figure 5.41 and AIR-1 Figure 5.42 show the cumulative blade tip and hub height respectively for Lynemore alongside Kyllachy and Balnespick Wind Farms. Likewise, AIR-1 Figure 5.43 and AIR-1 Figure 5.44 show the cumulative blade tip and hub height respectively for Lynemore alongside Clune and Highland Wind Farms.

7.77 The methodology for the Landscape and Visual Impact Assessment generally follows that set out in Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3). EIAR Volume 3 Chapter 5 - Technical Appendix 5.1 - Methodology and Glossary sets out the indicative level of effect diagrams which the applicant has used to attribute Significant effects. The applicant has applied a threshold of Moderate to Minor impacts for not significant effects, and a threshold of Major to Moderate impacts for significant effects. Substantial, Substantial to Major, Major and Major to Moderate impacts are assessed as significant whilst Moderate to Minor, Minor and Negligible impacts are assessed as not significant. Moderate impacts can be either significant or not significant. It is agreed that moderate impacts can be significant but this needs to be considered on a case-by-case basis using professional judgement.

7.78 Officers have also undertaken their own viewpoint appraisal in Appendix 5 Viewpoint Assessment Appraisal of this report. The applicant has considered the sensitivity of the landscape and receptor from each viewpoint between medium, medium-high and high with reference to who the receptor is likely to be. The study area is well used by tourists, hill walkers, recreational walkers, cyclists and those partaking in various other recreational activities therefore the sensitivity of some viewpoints is considered higher than reported by the applicant.

7.79 Following a review of the LVIA, sufficient information has been provided to enable an assessment. Overall, the photomontages are considered to have been produced to a good standard. The visualisation for VP3: A9 north of Tomatin, should have however been updated as part of the AIR-1 to take account of the dualling works of the A9, which is likely to result in significant changes to the baseline conditions and may increase the visibility of the proposed development, given substantial tree felling has already taken place.

7.80 In the assessment of each viewpoint the applicant has come to a judgement as to whether the effect is significant or not. This is undertaken on a viewpoint by viewpoint and case by case basis. In assessing visual impacts in particular, it is important to consider that the viewpoint is representative of particular receptors i.e. people who would be at that point and experiencing that view of the landscape not just in that single view but in taking in their entire surroundings.

7.81 A key consideration in the effects on receptors of wind energy development is the sequential effect when travelling through and area on the surrounding road network both by individuals who live and work in the area and tourists. Those travelling on scenic routes, whether designated as such or not, have a higher sensitivity to views. While a driver of a vehicle is likely to be concentrated on the view immediately in front, passengers have a greater scope for looking at their surroundings. In addition,

the wider area is regularly frequented by cyclists. As such it is considered that road users are usually higher sensitivity receptors.

Landscape Impacts

7.82 There are several aspects to consider in determining whether this development represents an acceptable degree of impact on landscape character, including:

- Impacts on the Landscape Character Type (LCT) as a whole and on neighbouring LCTs; and
- Direct impacts on landscape designations and impacts on surrounding landscape designations.

Impacts on Landscape Character Types

7.83 The proposed development will be located within Rolling Uplands – Inverness Landscape Character Type (LCT). LCT 221 is a large-scale rolling upland plateau landscape of the Monadhliath Mountains which lies to the south and east of the Great Glen with the proposals towards the northeastern “edge” of this mountain range. The detailed assessment in the EIAR also included other LCTs within the 15 km study area including LCT 223 Flat Moorland Plateau with Woodland, LCT 224 Farmed and Wooded Foothills, LCT 227 Farmed Strath – Inverness, LCT 228 Rolling Farmland and Woodland and LCT 284 Coastal Farmlands – Moray and Nairn. These six LCTs were included because they were overlapped by the blade tip ZTV and had the potential to experience landscape effects from the proposed wind farm. However, in the AIR-1, the applicant only includes an assessment on the host Rolling Uplands – Inverness LCT and Farmed Strath – Inverness LCT: Stratherrick, Strathnairn LCA.

7.84 The applicant also identified several other LCTs within 15 km but excluded them from detailed assessment in the EIAR because they were either outside the ZTV or had only very limited visibility and were considered unlikely to experience significant effects. These include LCT 128 Forested Upland Fringe, LCT 225 Broad Steep-Sided Glen. LCT 291 Open Rolling Upland, LCT 294 Upland Valleys and LCT 345 Farmed and Forested Slopes. This approach is not contested.

7.85 The applicant assessed Landscape Character Areas (LCAs) derived from the Highland Council's landscape capacity and sensitivity studies, rather than relying solely on the national NatureScot LCT framework. The proposed development is located within LN6 Monadhliath Ridge and Tops, Rolling Uplands. The LVIA identifies several Landscape Character Areas (LCAs) within the study area requiring detailed assessment including LN7 Enclosed Farmed Landscapes, LN8 Forested Hills and Ridges, LN10 Farmed Straths and LN13 Loch Ness.

7.86 The turbines will be located within the Monadhliath ridge and tops, Rolling Uplands, with the specific Landscape Character Area (LCA) unit, which encompasses land set back from Loch Ness extending from the A82, beyond Fort Augustus, across the Monadhliath and over the A9 on the outskirts of Inverness over a distance approximately 60km. Several operational, approved, and proposed wind farms are contained within this LCA as noted previously.

7.87 While the siting of these wind farms within the wider LCA demonstrates that the general LCTs and specific LCA have been accepted as having capacity to host wind

energy development, it is salient to the assessment that these wind farms are all located some distance from the A9. Also, salient is that these developments are noticeably on higher ground, located within upland bowl landforms where the developments appear relatively contained, whereas Lynemore would appear in views at a lower elevation albeit on a prominent landform which is the highest hill (618m AOD and is a Fiona) forming the southerly enclosure to Strathdearn along the A9 corridor.

7.88 The proposed development is located within Landscape Character Area (LCA) 6 - Monadhliath ridge and tops, Rolling Uplands. LCA 6 is the most extensive landscape in the Study Area. External views are mostly from elevated viewpoints north of Loch Ness where it presents a multi-layered receding landscape, giving an impression of vast extent. Views are varied in character according to elevation from within the LCA. Key views are from:

- Loch Ness West (most of LCA is obscured by intervening LCAs and topography, but southern end sweeps down to meet the Broad, Steep Sided Glen LCA and frames the central portion of long views).
- Great Glen from Meall Fuar-Mhonaidh (forms a sweeping receding landscape to the south).

7.89 LCA 6 is generally visible from either within the LCA or from more distant elevated vantage points. The height of existing schemes means that development on the ground may be visible where the ground level itself is not, making distinctions between developments unclear. Therefore, maintaining space between developments is important to prevent coalescence.

7.90 Generally, the LCT has a lower sensitivity, this LCA is rated at 2 – 3 (4 being least sensitive to change), in recognition of existing density of development. People at key viewpoints, visitors/tourists, cyclists and walkers are the visual receptors with the highest sensitivity. Key routes within LCA 6 include the A9 and B862.

7.91 As identified in the Loch Ness Sensitivity Appraisal, current wind farm development consists broadly of:

- Large windfarms set 2.5 km – 3 km back from Rolling Uplands Boundary with Farmed Straths LCAs.
- Generally, the layout is deeper in the axis perpendicular to the Great Glen than the parallel axis.
- Tend to be contained within shallow “bowls” in the landscape which are visible from within the LCA but not in more distant views.
- Earlier developments appear at a regular spacing of 7 km – 10 km edge to edge. More recent applications/scoping reduce this spacing.

7.92 Whilst there is potential for extension to existing large scale wind farms, care is needed to ensure that:

- Mitigation established by current schemes is not undone and that the landscape setting of each scheme is maintained.

- Skylining and coalescence is avoided with current positioning, spacing and scale of turbine respected.
- Commentary on these matters are contained elsewhere in the report.

7.93 It is noted within the Sensitivity Appraisal that turbines should:

- Be set back from Key Routes (such as the A9).
- Preserve mitigation established by current schemes.
- Maintain the landscape setting of each existing scheme.
- Avoid coalescence with current positioning.
- Respect spacing and scale of existing development pattern.

7.94 Landscape character is the distinctive and identifiable pattern of elements that occur consistently in a particular type of landscape and the way that this pattern is perceived. Effects on landscape character occur both on the site, where the pattern of elements that characterise the landscape would be directly altered by the addition of the proposed development to the landform and outwith the site in the wider study area, where visibility of the proposed development may alter the way in which this pattern of elements is perceived.

7.95 The Rolling Uplands – Inverness LCT is a vast upland area but is occasionally bisected by straths including that of Strathdearn, which mostly follows a southwest to northeast alignment containing the River Findhorn. At its northern end, Strathdearn forms a pass within LCT 221 Rolling Uplands connecting Speyside to Strathnairn including the only main transport corridor through this upland landscape containing the A9, railway and NCN7. Strathdearn includes some of the few areas of settlement within the LCT, including the village of Tomatin at the bridging point of the A9 and River Findhorn, along with enclosed farmland around Loch Moy and elsewhere in the valley bottom with some forestry to the valley sides.

7.96 Whilst not identified as a landscape type/area within the 2019 NatureScot landscape character assessment, or included in the OWESG, Strathdearn is identified as a distinct area of landscape character within the publication Dava Moor, Nairn and Monadhliath Area Wind Energy Landscape Sensitivity Study (2021, Carol Anderson Associates), referred to hereafter as the Pilot Study. The Pilot Study was commissioned by NatureScot to test the methodology of their updated sensitivity assessment guidance and is available on THC's website.

7.97 The LCA of Strathdearn is referred to in the Sensitivity Pilot Study as Strath in Rolling Uplands (Strathdearn) and turbines of the proposed development are around 0.5km from the boundary of this LCA. This is the only LCA identified in that study additional to those of the 2019 NatureScot landscape character assessment and provides up to date assessments and guidance for the Monadhliath area. This study is acknowledged and referenced by the LVIA.

Rolling Uplands - Inverness (LCT 221)

7.98 The NatureScot 2019 Landscape Character Assessment describes the key characteristics of LCT 221 Rolling Uplands – Inverness as follows:

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

7.99 The landscape is largely remote and uninhabited, with settlement confined to a few steep-sided straths where isolated farms, inbye pasture and small areas of woodland occur. The interior remains inaccessible to vehicles and retains a strong sense of remoteness. The area contains extensive archaeological and historical features, including prehistoric hut circles, medieval shielings and townships, abandoned 19th century settlements, and sections of military roads such as the Corrieyairack Pass.

7.100 Infrastructure is limited, with few single-track roads and a network of hill tracks associated with estate management, albeit the A9 passes through the northeastern portion of LCT 221. Some tracks and power lines locally detract from the landscape by introducing visible linear features. Wind farms in the southern and western Monadhliath margins are prominent modern developments, while hydroelectric infrastructure is generally less conspicuous. Despite these influences, the vast scale and openness of the plateau mean there are few reference points, creating a strong sense of wildness and making distances and size difficult to judge.

7.101 The part of the landscape including the proposed development includes no landscape designation. The external Landscape Architect from Ironside Farrar is not clear if the LVIA assesses its landscape value to be Medium-Low (as noted in EIAR Volume 1, Chapter 5 Landscape and Visual, Table 5.11) or Medium (as noted in EIAR Volume 1, Chapter 5 Landscape and Visual, paragraph 5.12.29). On the basis of formal designations alone, the landscape value appears relatively low, however, there is a clear community and some wider value to this landscape evidenced by Strathdearn Community Council publications owing to the use of the area for

walking/cycling, including Carn na h-Easgainn (a Fiona) which lies within the site boundary and is a relatively popular hill summit accessed from near Moy. On that basis the Landscape Architect considers the landscape value to be at least Medium.

7.102 Table 5.11 provides a comparative assessment of susceptibility between that of the wider Rolling Uplands LCA as set out in the Pilot Study, noted as High-Medium, and the area of the site, including Strathdearn, assessed as Medium by the applicant, with the LVIA assessing a lower susceptibility rating against most criteria. Whilst the Landscape Architect does not consider this an unreasonably low assessment, and noting that strategic sensitivity assessments do not always correspond those for a specific development in a particular location, there are sensitivities associated with this part of the Rolling Uplands specifically highlighted in the Pilot Study, these include:

- Views from the A9/railway corridor and from settlement in the Strathdearn area – there are few views of wind farms from the A9/railway between Perth and Inverness. Sequential cumulative effects could occur with the Farr, Moy and Tom na Clach wind farms with an intensification of development potentially affecting the approach to Inverness (as noted in Pilot Study paragraph 17.2.1).
- The smaller hills which border Strathdearn where large turbines could dominate the scale of this narrow strath and cumulatively affect views from the A9/railway in the Tomatin/Moy area (as noted in Pilot Study paragraph 17.2.2).

7.103 The Sensitivity and Guidance section of the Pilot Study states that turbines should be:

Set back from the small hills which contain the settled and smaller scale Strathdearn in order to avoid a dominant effect on nearby skylines and minimise effects on views from the A9/railway in the Moy area including cumulative effects with the operational Moy and Tom na Clach Wind Farms (as noted in Pilot Study paragraph 17.3.1 Guidance).

7.104 The LVIA does not provide a separate assessment of effects to the Strathdearn landscape unit identified in the Pilot Study, with it being included with the wider Rolling Uplands assessment. In the vicinity of the A9 corridor the Strathdearn LCA is characterised by plantation forestry, major transport infrastructure and the broadness of the strath mean landscape character sensitivity here is lower than the more remote part of the strath containing the upper reaches of the River Findhorn. That is not to say, however, that there are not visual sensitivities associated with the A9 corridor, but these are not addressed as part of this review.

7.105 The LVIA states that the proposals are set back from the smaller hills containing Strathdearn (as noted in EIAR Volume 1, Chapter 5 Landscape and Visual, paragraph 5.12.37), but viewpoints from within and around Strathdearn suggest otherwise (such as VP1, VP2, VP3, VP6 and VP10) along the A9 corridor. The LVIA assesses Significant effects to landscape character within 3 km, including to the A9 corridor (as do the AIR-1 submissions). On the basis of effects illustrated at VP2 and VP3 the Landscape Architect considers Significant effects may extend further, to approximately 5 km.

7.106 Cumulatively, the LVIA identifies some Significant cumulative effects with operational, consented and wind farms currently pending consideration, and the Landscape Architect agrees that the proposed development would result in a notable increase in the intensity of wind energy development in the locality of the site when considering the presence of the operational Farr, Glen Kyllachy, and Moy Wind Farms. However, as seen from viewpoints within Strathdearn, existing and consented wind farms have a relatively limited influence on its character and therefore cumulative effects appear of lesser concern to landscape character than the standalone effects that the proposals would introduce.

Farmed Strath - Inverness (LCT 227)

7.107 The Farmed Strath - Inverness (LCT 227) occurs in two locations at Strathnairn/Stratherrick, closest to the northwest of the site, and Strathglass further beyond where it forms a linear to sinuous channel through the surrounding upland landscape. The straths run southwest to northeast and open to the farmed and wooded slopes and plains around Inverness. The straths are characterised by mainly open farmed valley floors and a central meandering river contained within steep, mainly forested and wooded slopes. Strathglass is narrower, more enclosed and less settled than Strathnairn.

7.108 The NatureScot 2019 Landscape Character Assessment describes the key characteristics of LCT 227 as Farmed Strath - Inverness follows:

- “Linear to sinuous channels cut through uplands, with a central meandering river located in a flat or gently undulating strath floor, edged by the steep, rocky, side slopes.
- Pronounced and dynamic river meanders of Strathglass, emphasised by riparian trees, oxbow lakes and curved wetland features.
- Small scale broadleaf woodlands and small blocks of conifer forest within Strathnairn/Stratherrick strath floor which do not override openness of the strath.
- A few small settlements located on the strath floor or sides and infrequent small farms, crofts, estate buildings or groups of houses.
- Roads which generally relate well to landform, with a limited number of river crossing points.
- Many archaeological sites in Strathnairn dating from a range of periods.
- Contrast between the open, inhabited and agricultural landscape of the straths, the side slopes cloaked in alternating broadleaf woodlands, conifer forests and heather moorland, and the setting of adjacent rugged, remote uplands.
- Diversity of colour and texture added by river meanders, wetlands, damp pastures and thin bands of woodland.
- An overall sense of linear enclosure, which directs distant views along the strath and allows uninterrupted views of the flanking hill slopes.”

7.109 The straths contain sparse rural settlement, with Strathnairn comprising dispersed farms, crofts and houses. Settlement patterns reflect local topography, drainage and shelter, with buildings typically located on the valley floor or lower slopes. The landscape has a rich historic and cultural legacy, with the nationally significant Battle of Culloden battlefield located within LCT 227, with its cultural importance reinforced by surviving archaeological remains, monuments and a strong sense of place. Additionally, prehistoric hut circles, field systems, burial monuments and abandoned settlements are found across the locale. Notable features include the Clava Cairns ritual landscape and sections of General Wade's military road. Later historic influences include 19th and early 20th century sporting estates, country houses and estate buildings.

7.110 The LVIA identified a localised Significant effect to LCT 227 at Strathnairn, an effect which is illustrated at VP4 B861 between Balnafoich and Inverarnie. This has been downgraded to not significant following the amended 12 turbine scheme (as noted in AIR-1 Volume 2, Chapter 5 Landscape and Visual, Table 5.4). The Landscape Architect and Officers consider that the effects as illustrated at VP4 remain significant (Moderate) but would be localised. It is not agreed that the 'intensity' of the effect is reduced due to the reduced number of turbines and their visual composition, rather it would continue to have a Significant effect on landscape character in this area. Officers do not consider cumulative effects are likely to be significant because of the limited influence of other wind energy developments, either operational, consented or pending consideration.

Impacts on Designated Landscapes

7.111 The proposed development is located outwith designated landscapes. Though there are various nationally important designations within the 45 km study area including Cairngorms National Park and National Scenic Areas, as well as Wild Land Areas. These are however all relatively distant from the site, where visibility of Lynemore would be limited and significant effects on their special qualities are not anticipated.

7.112 The closest turbine is approximately 10 km from the Cairngorms National Park. Although visible from the National Park boundary (VP11: Carn na Làir, northern boundary of CNP and VP14: Carn Loisgte, northern boundary of CNP) the outlook is away from the National Park and is already affected by wind energy development to some extent. The description of Special Landscape Qualities (SLQs) makes no reference to views to the Monadhliath Mountains. As such, the Landscape Architect agreed with the applicant's conclusion that the proposed development would have no effect on the SLQs of the National Park. However, Officers consider that the proposed development would appear noticeably larger than other existing and approved schemes as seen in these views.

7.113 The closest turbine is approximately 22 km from Cairngorm Mountains NSA to the southeast and 34 km from Glen Strathfarrar NSA to the northwest.

7.114 The closest turbine is approximately 9.5 km from Monadhliath Wild Land Area (WLA 20) to the south and 29 km from Cairngorms WLA (WLA 15) to the southeast.

7.115 The closest regionally important landscape designations are Drynachan, Lochindorb and Dava Moors Special Landscape Area (SLA) approximately 5 km to the

northeast/east and Loch Ness and Duntelchaig SLA approximately 7 km to the northwest/west. The scope of the LVIA was agreed through consultation with The Highland Council and NatureScot. As a result, detailed assessment was limited to the two nearest SLAs.

Designated Landscapes - Special Landscape Areas (SLAs)

7.116 The Landscape and Visual Impact Assessment in Chapter 5 of the EIAR gives an overview of the impacts and effects of the proposed development on landscape designations within the study area. The applicant considered there would be no Significant effects to the Drynachan, Lochindorb and Dava Moors SLA and Loch Ness and Duntelchaig SLA. The Council's appointed Landscape Architect does not contest the applicant's findings with regards to the impacts on these SLAs and this is generally agreed by Officers.

Drynachan, Lochindorb and Dava Moors SLA

7.117 The Council has designated Drynachan, Lochindorb and Dava Moors as an SLA. The Assessment of Highland Special Landscape Areas (2011) identifies the Special Qualities of the SLA as the sense of solitude, views over heather moorland, and big skies with further detailed summary provided on these aspects.

7.118 This area covers most of the higher moorland which separates the Cawdor-Ferness-Beachans area of Nairn district from Strathspey to the south and the route of the A9 to the west. It incorporates the continuous moors of Drynachan, Lochindorb and Dava and extends from Carn nan Tri-tighearnan in the west to Lang Hill and Carn Kitty in the east. The western part of the SLA is characterised by the existing wind energy developments at Moy and Tom na Clach, with other wind energy development in the general direction of the proposed development on the opposite side of the A9 corridor.

7.119 The SLA is characterised by a vast expanse of upland moorland, rolling plateaux, broad ridges, peatlands, lochs and straths that together create a distinctive landscape of openness, simplicity and remoteness. The area is noted for its sweeping panoramas, expansive skies, strong sense of tranquillity and limited modern development, extensive heather moorland and a rich concentration of archaeological and historic features contributing to its sense of place.

7.120 The citations set out that the landscape is sensitive to change including by development which may break up the composition of the expansive horizons and affect the sense of isolation, extensive panoramas and impression of wildness. The citations go on to set out that a key priority should be to protect the landscape in the area from" fragmentation and encroachment by unsympathetic forms of development which could disrupt the wide and uncluttered horizontal views". Additionally, it is noted that the long, fairly straight routes through this landscape allow an easy appreciation of the openness and simplicity of the landscape and where broad panoramas across open, rolling moorland and vast skies instil a boundless sense of scale and space.

7.121 Many receptors that experience the special qualities of the SLA are those using the area for recreation, including tourists, particularly road users travelling along the

A939, A940 and B9007 routes along with walkers on the Dava Way, other established paths and surrounding upland areas. The nationally important Lochindorb Castle (Scheduled Monument SM1231) is a key attraction given its unique setting and backstory. A key visual characteristic of the SLA are long vistas of grand proportions.

7.122 The nearest proposed turbine is approximately 6.1km from the northeastern edge of the SLA boundary. The ZTV shows sustained visibility within the western and northwestern portion of the SLA up to 10km radius, very little visibility between 10km and 20km radius, then some intermittent patches around the Moray boundary beyond the 20km radius.

7.123 Views would be available from within and on the edge of the SLA boundary (VP8: Cà rn a' Choire Mhoir, VP10: Carn nan Tri-tighearnan and VP14: Carn Loisgte, northern boundary of CNP), however, the Landscape Architect does not consider that landscape impacts would result in any material effects to SLQs of the SLA. The western part of the SLA is characterised by existing wind farms at Moy and Tom na Clach, with other wind energy development in the general direction of the proposed development on the opposite side of the A9 corridor. Views towards the Monadhliath Mountains are not mentioned in the SLA citation as a contributor to special qualities, therefore, it is agreed there would be no significant landscape effect to the SLA or its SLQs.

Loch Ness and Duntelchaig SLA

7.124 The Council has designated Loch Ness and Duntelchaig as an SLA. The Assessment of Highland Special Landscape Areas (2011) identifies the Special Qualities of the SLA as the dramatic Great Glen, contrasting intimate plateau and historic landscape with further detailed summary provided on these aspects.

7.125 Noted for its ever-changing compositions, this area is dominated by the vast linear feature of Loch Ness and its dramatic landform trench, flanked by steep, towering wooded slopes that lead to undulating moorland ridges and a contrasting remote interior plateau of upland lochs, small woods and rocky knolls. The SLA is particularly sensitive to additional large features upon the side slopes or ridge lines of the glen. This is because these may contrast with the distinct linear form of the glen, the characteristic concentration of built elements along the shore or over flatter adjacent areas, interrupt the sequential experience travelling along the glen, affect the perception of its scale, and change the open nature of views passing between the shore and the surrounding slopes. Both sides of Loch Ness are sensitive to the introduction of built development which would intrude on views up and down the loch and also across the loch. Combinations of developments which would result in a series of linear or point features may distract from the sequential experience when travelling along the loch. The addition of some developments may introduce levels of activity which would disturb the tranquillity experienced during still weather conditions.

7.126 The nearest proposed turbine is approximately 4.8 km from the western edge of the SLA boundary. The ZTV shows sustained visibility within the northeastern portion of the SLA in the 10km radius, but also from sections of the northwestern Loch Ness shoreline set back from the water’s edge between 10km and 30km radius. Visibility

is much more dispersed beyond the opposite shoreline. There is no visibility from on Loch Ness itself.

7.127 Views would be available from within and on the edge of the SLA boundary (VP9: B851 at Croachy, VP15: B862 Ashie Moor and VP20: Meal Fuar-mhonaidh), however, the Landscape Architect does not consider that landscape impacts would result in any material effects to SLQs of the SLA, including from Meal Fuar-mhonaidh, from where wind energy developments within the Monadhliath Mountains are a feature of the view, to which the proposals would add relatively little.

7.128 Many receptors that experience the special qualities of the SLA are those using the area for recreation, including tourists, particularly along the upland landscapes above both the east and west shore including the South Loch Ness trail, Great Glen Way and Meall Fuar-mhonaidh along with those on the loch itself travelling on various watercraft for leisure. Meall Fuar-mhonaidh is regarded as a "Key Location" in the Council's OSWEG. A key visual characteristic of the SLA are long vistas of grand proportions. The striking, linear landform of the loch creates a dramatic sequence of landscape elements along its length. The water's surface combines with adjacent steep slopes to create a simple and distinctive profile of contrasting planes and edges. The skyline is generally horizontal; however, there are occasional features such as hill peaks, pylons, telecommunications mast and views of wind turbines.

7.129 Whilst it is important to recognise that the proposed development sits outwith the SLA, many receptors that experience the special qualities of the SLA are those who use the area for recreation. The visual impact on these receptors from upland locations, represented by VP20 Meall Fuar-mhonaidh summit, would not be adversely affected as a result of this development. It is generally agreed that the proposed turbines are sufficiently distant that they would form only a small and relatively minor component of a panoramic view already containing wind energy development in the outlook.

7.130 Whilst the Highland Council agree the proposed development would not warrant an objection in landscape terms the visual impact is of significant concern and is discussed further below.

Visual Impacts

7.131 The applicant's assessment draws upon the supportive elements of how the proposal could be viewed within the landscape. For substantial turbines at 200 m to blade tip visibility is relatively well contained with the proposed development mostly shielded from more distant views beyond 20 km to the east, southeast, south and southwest, with portions of visibility from higher ground in these directions up to the 45 km study area boundary. To the west, northwest, north and northeast, visibility is more prevalent between 10 km and 45 km beyond the northwestern Loch Ness shoreline, along key routes like the A9 and A835 through the Black Isle and the Moray Firth coastline. The ZTV however demonstrates that the scheme will be extensively visible within a 10 km radius with more sporadic patches to the south and southwest, with near constant theoretical visibility along the portion of the A9 within this inner 10 km of the study area.

7.132 When considering the additional visibility of turbines beyond that experienced as a result of the consented and operational wind farms in the study area the proposed development will introduce some new areas of visibility where turbines are not currently theoretically visible, such as a long stretch of the A9 between Daviot and Meall Mor, for example. Where the proposed development will be experienced in combination with operational and consented wind farms, while not adding new areas of visibility, it will increase the intensity of turbine visibility, particularly from the A9, Highland Main Line, Walk Wheel Cycle (formerly Sustrans) NCR 1 and surrounding hilltops.

7.133 Whilst the proposed development will introduce additional visibility of turbines seen in isolation it will also be seen in conjunction with operational wind farms over a larger range generally to the northwest, north and northeast, particularly within 20 km. The proposed development would extend the theoretical visibility of turbines beyond that already experienced as a result of the operational/consented wind farms in the area.

7.134 These views are largely experienced by road users travelling on transport routes such as the A9, B9154, B861, NCR 7, recreational receptors climbing surrounding summits like Càrn a' Choire Mhoir, Carn nan Tri-tighearnan (located within the site and is a popular Fiona), Carn na Làir, Meall Fuar-mhonaidh (landmark hill within the Loch Ness and Duntelchaig SLA, and long distance routes like the Great Glen Way along with tourist attractions such as Culloden Battlefield and Channory Point, although the views from Culloden Battlefield would be very limited. The proposed development would also appear dominant from the Fiona summit of Càrn na h-Easgainn, located within the application site boundary, where it would be the most prominent wind farm in comparison to other developments situated further afield. Visual effects on recreational receptors at this summit and those climbing it were not assessed by the applicant.

7.135 The EIAR and AIR-1 includes a visual impact assessment from 21 viewpoints provided, with most viewpoints considered by the applicant to be used by receptors between Medium and High sensitivity and susceptibility to wind energy development. Unsurprisingly, there is some difference between the applicant's assessment and the appraisal undertaken by Council 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 6 of this report and in the main text below.

7.136 Whilst a large-scale wind energy scheme would be expected to result in Significant visual effects, the Council, through the OWESG, also acknowledges that Significant effects does not automatically translate to unacceptable effects.

7.137 It is agreed with the applicant's assessment that there will be Significant visual impacts at the following locations, extending up to 10.5 km from the nearest turbine:

- VP1 General Wade's Road, Moy to Inverness (recreational receptors and road users incl tourists);
- VP2 B9154 northeast of Moy (cyclists and road users including tourists);
- VP3 A9 North of Tomatin (road users including tourists);
- VP4 B861 Balnafoich and Inverarnie (residents);

- VP6 Sustrans NCR 7 at Tomatin (residents, cyclists and road users);
- VP8 Càrn a' Choire Mhoir (recreational receptors);
- VP10 Carn nan Tri-tighearnan (recreational receptors);
- VP11 Carn na Làir (near CNP boundary) (recreational receptors) extending to 10.5km from the nearest turbine.

7.138 Critically, Officers also assess Significant effects at the following locations, extending the geographical extent of Significant visual effects to at least 14.3 km:

- VP4: B861 – Balnafoich and Inverarnie (road users);
- VP7: A9 Daviot (road users including tourists); and
- VP16: Leachkin, Inverness (residents and recreational receptors).

7.139 The applicant has also under-assessed the level of effect at the following locations, although it is agreed that the effect is Significant at these locations:

- VP1: General Wades Road – Moy to Inverness (road users including tourists, recreational receptors);
- VP3: A9, north of Tomatin (road users including tourists) and
- VP6: Sustrans NCR 7, Tomatin (residents, cyclists and road users).

7.140 Further, the applicant has also under-assessed the level of effect at the following locations, although it is agreed that the effect is not significant at these locations:

- VP15: B862 Ashie Moor, west of Loch Duntelchaig;
- VP17: A9, Kessock Bridge; and
- VP19: Chanonry Point.

7.141 Two receptors have not been assessed by the applicant, the Fiona summit of Càrn na h-Easgainn (616m AOD) located within the application site boundary, and Inverness Castle which are considered to be significantly affected by the proposed development. These are discussed in the visual receptor group sections further below.

7.142 Significant adverse visual effects would occur on views from residential properties around Balnafoich in Strathnairn, those at Lynebeg in Strathdearn, and southwestern parts of the City of Inverness (Leachkin); from sections of the A9, B9154, B861, Highland Main Line, Walk Wheel Cycle (formerly Sustrans) NCR 7, Great Glen Way / Loch Ness 360 Trail at Leachkin, Core Paths at Tomatin, Leachkin and Kinmylies, three Heritage Paths / Rights of Way, a number of surrounding hill summits, including one within the site boundary, and from Inverness Castle. These significant visual effects are exacerbated in views by the overly prominent turbines located on the outer facing slopes and summits of the hills enclosing Strathdearn and Strathnairn and not sufficiently set back from them. The proposed development also deviates from the operational and consented pattern of wind farm development.

7.143 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 its siting and scale. The proposed development would also have the greater effect in the cumulative

picture at many locations, particularly those at a lower level and some high-level locations, while increasing the prominence and presence of turbines to receptors.

7.144 Receptors include large numbers of residents, road users, tourists, rail users and those engaged in outdoor recreational activities. Due to the extent of significant visual effects on such a wide range of visual receptors, it is not considered that they can sensibly be considered localised. Nor do officers consider that the proposed development's significant effects have been appropriately mitigated.

Impacts on Recreational Users of the Outdoors

7.145 Owing to the site location, the majority of selected viewpoints, 16 from 21, are representative of views obtained from recreational users of the outdoors.

7.146 The applicant assessed recreational routes within 45 km for national routes and within 15 km for local routes. Routes with little or no visibility, or where effects were considered not significant, were scoped out by the applicant. The following recreational routes were included in the applicant's assessment:

- Walk Wheel Cycle (formerly Sustrans) National Cycle Route 7 (partially overlapped with Core Path IN27.01);
- Walk Wheel Cycle (formerly Sustrans) National Cycle Route 1 (partially overlapping with the North Coast 500 tourist route);
- Great Glen Way (overlapping with the Loch Ness 360 Trail);
- Core Path IN27.02 (Distillery Wood);
- Core Paths IN19.44 (Leachkin), IN19.08 and IN19.09 (Kinmylies);
- Core Paths around Culloden;
- Core Paths east of Invernesss along the A96, Heritage Path HP1 – General Wade's Military Road (Moy to Inverness);
- Heritage Path HP1 – General Wade's Military Road, Moy to Inverness;
- Heritage Path HP2 – Old Road to Forres (overlapping with Scottish Hill Track 229); and
- Heritage Path HP3 – Slochd Military Road (overlapping with Scottish Hill Track 230).

7.147 In terms of surrounding hills and summits, there are no Munros or Corbetts within 15 km of the site, so the applicant assessed 14 Munros and 11 Corbetts with theoretical visibility of the proposed development across the wider 45 km study area. These are concentrated within the Cairngorm Mountains, Monadhliath Mountains, and the Ben Wyvis area, representing the key upland recreational receptors where walkers could experience views of the proposed development. It is agreed with the applicant's assessment that there will be no Significant effect from these hill summits. However, the applicant did not assess the Fiona summit of Càrn na h-Easgainn, located within the site boundary which would experience Significant effects.

7.148 The applicant also assessed recreational and visitor attractions within 45 km that were overlapped by the blade tip ZTV including Loch Duntelchaig (represented by VP15 - B862 Ashie Moor, west of Loch Duntelchaig), Auchnahillin Holiday Park (located on Sustrans National Cycle Route 7), Culloden Battlefield (represented by VP12 - Culloden Visitor Centre), Loch Ruthven Nature Reserve and Culloden Moor Caravan and Motorhome Club (on the eastern edge of Newlands of Culloden). It is

agreed with the applicant's assessment that there will be no significant effect from these visitor attractions. However, the applicant did not assess Inverness Castle which would experience Significant effects by tourists and residents.

7.149 The LVIA concludes that recreational users are among the most sensitive receptors because walkers, cyclists and visitors are generally focused on the landscape and their surroundings. Significant effects are concentrated within approximately 10.5 km of the proposed turbines, particularly around Moy, Tomatin, the A9 corridor and parts of Strathnairn. More distant recreational routes, attractions and hill summits are generally assessed as experiencing moderate or minor effects that are not significant.

7.150 It is considered that the applicant has understated the extent of Significant effects along recreational routes, for example, these would continue to the Great Glen Way on the higher ground beyond VP16 - Leachkin, Inverness past the 14.3 km for this viewpoint. It is considered that Significant effects (Moderate) would remain along this section of the Great Glen Way at Leachkin / Loch Ness 360 Trail and the Core Paths around Leachkin and Kinmylies including IN19.44, IN19.08 and IN19.09 which would have a similar view to VP16: Leachkin, Inverness. The turbines will appear prominent on the skyline from the Great Glen Way above, and descending through Leachkin. The majority of towers, hubs and blades skylining above the rolling hills landform and distant upland skyline beyond Strathnairn in views to the southeast beyond 14 km. As such, the effect is still considered Significant following the amendments. This is further described in the Viewpoint Appraisal in Appendix 5 of this report.

7.151 Walk Wheel Cycle (formerly Sustrans) National Cycle Route 7 (NCR 7) passes close to the proposed development in the Tomatin, Moy, Dalmagarry area where turbines will appear as an overly prominent feature. The route follows local roads including parts of the B9154. Unlike road users, cyclists travel more slowly and are more likely to be focused on the surrounding landscape. The applicant considers Significant effects (Substantial to Major) occur over approximately 8.1 km of the route, reducing to around 2.3 km when forestry screening is accounted for. Whilst generally agreed with the applicant's assessment, as noted, the baseline for screening vegetation and forestry is constantly shifting in this area around Tomatin given the ongoing A9 dualling works.

7.152 Whilst the applicant notes cyclists on NCR 7 already experience views of existing wind farms, particularly, Farr Wind Farm, Glen Kyllachy Wind Farm along with other more distant wind farms. As noted previously, the effects of these are different to the proposed development given the scale of turbines and proximity to the NCR 7 route.

7.153 Heritage Path HP1 - General Wade's Military Road (Moy to Inverness) passes north and west of the proposed development. As a recreational walking route receptors are likely to be focused on the surrounding landscape and are of High sensitivity. Significant effects (Substantial to Major) are assessed by the applicant extending for approximately 6.8 km, reducing to 4.5 km where forestry screening is considered. The most significant visual effects occur between Scatraig and Lynemore, where walkers would experience sustained and relatively close-range views of the turbine array appearing overly prominent along with access tracks and associated infrastructure. This is generally agreed, however, as noted in Appendix 5 of this

report (VP1: General Wades Road – Moy to Inverness), the applicant has under-assessed the level of effect from this route and is considered to experience Substantial and Significant effects. As above, Farr Wind Farm and Glen Kyllachy Wind Farm will be seen in the outlook from parts of the route.

7.154 Core Path IN27.02 (Distillery Wood, Tomatin) runs through the Raigbeg and Tomatin area alongside the River Findhorn. It sits near the A9 corridor, Findhorn Viaduct, and the C1121 Tomatin Road. This route would experience Significant effects (Major) over a stretch of approximately 1.2km, with the applicant making the assumption that forestry has been felled as part of forestry management within Distillery Wood. Large areas have been felled, creating open views towards the proposed development that would not normally be available within a mature forest setting. As a result, walkers using the path would obtain direct views of the turbine array across the intervening landscape. Up to nine hubs and four blade tips would be seen in the outlook. Turbines would occupy a notable proportion of the available outlook and become a dominant focus of attention for users of the path. It is considered that the applicant has understated the extent of Significant effects along this route and is considered that the magnitude would be at least High-Medium resulting in a Substantial to Major and Significant effect.

7.155 Heritage Path HP3/Scottish Hill Track 230 (Slochd Military Road) route traverses a largely open moorland landscape with relatively limited enclosure from forestry compared to lower-lying routes. The route follows the historic military road across elevated ground in the Slochd Pass area, southeast of the proposed development. Recreational users are likely to be engaged in walking, hillwalking and heritage-related recreation, with an expectation of wideranging views across the surrounding landscape. Consequently, users are considered to be of High sensitivity. Unlike many routes around the proposed development where vegetation or built development restricts views, this route occupies elevated ground from which the proposed development would be readily apparent. Significant visual effects (Major) are assessed over approximately 1.3 km of route on the elevated section north of Creag an Tuim Bhig, where the route emerges onto open ground and broad views are available towards the proposed development. From here the majority of the proposed turbine array would be visible, turbine towers, hubs and blade movement would be clearly discernible and occupy a noticeable part of the skyline being overly prominent. Because walkers are travelling slowly and often stopping to appreciate the landscape, the proposed development would remain in view for an extended period and become an important component of the visual experience. It is considered that the applicant has understated the extent of Significant effects along this route and is considered that the magnitude would be High to High-Medium resulting in a Substantial / Substantial to Major and Significant effect.

7.156 Heritage Path HP2/Scottish Hill Track 229 (Old Road to Forres) passes the proposed development at 3.7 km from the closest turbine. A short 200 m stretch of the route would experience Significant visual effects (Substantial to Major) with turbines and access tracks form prominent features in views. The remainder of the route is screened by woodland and topography. It is considered that the applicant has understated the extent of Significant effects along this route and is considered that the magnitude would be High resulting in a Substantial and Significant effect.

7.157 It is agreed that the Core Paths around Culloden would experience no significant effects given the limited extent of visibility of the proposed development.

7.158 In terms of hills and summits, the LVIA concludes that effects are highly variable and largely dependent on distance from the proposed development. While the wind farm would be theoretically visible from many upland locations across the study area, Significant visual effects are largely confined to local hills within approximately 10.5 km of the site, represented by VP11 Carn na Làir. More distant Munros and Corbetts generally experience non-significant effects because the turbines form only a small component of extensive panoramic views, this is generally agreed. A number of the summits reviewed show the turbines appearing prominently located on the outer facing slopes and summits of the hills above Strathdearn, a key area of concern regarding the acceptability of the principle of the location of the proposed development.

7.159 Carn a' Choire Mhoir hill summit (VP8) would experience Significant visual effects identified in the assessment. Views are orientated generally northwest towards the proposed development across the uplands of Strathdearn and the Monadhliath with the nearest turbine located approximately 8.8 km from the viewpoint. All 12 turbines would be visible within the outlook clustered in the centre of the view. They would be seen on the ridgeline north of the Monadhliath mountains along with associated infrastructure including access tracks and the substation. Given the panoramic nature of the view, the large scale of the landscape and the presence of existing wind farms, the applicant considers the proposed development is reasonably well accommodated within the landscape. However, as with other hill summits, the location of the wind farm on the outer facing slopes and summits of the hills above Strathdearn leads to an increased prominence of turbines. The turbine layout is poorly composed, with overlapping turbines, isolated outliers (particularly T13) and variations in turbine height. Combined with their larger scale, these factors accentuate their prominence and create a visually discordant and conspicuous feature on the skyline. The applicant assesses the magnitude of change as Medium, this results in a Major and Significant effect. This is generally agreed with turbines prominently located on the outer slopes of the hills above Strathdearn.

7.160 Carn nan Tri-tighearnan hill summit (VP10) is an upland summit within Drynachan, Lochindorb and Dava Moors SLA on the northern edge of the Cairngorms National Park. Views are orientated generally southwest towards the proposed development across the Monadhliath uplands and Strathdearn with the nearest turbine approximately 9.1 km from the viewpoint. The proposed development would be a prominent and very noticeable feature in the view with all 12 turbines visible set within a broad upland panorama already influenced by wind energy development. Access tracks serving the western turbines and the substation would also be visible including the main access track off the A9 will be very noticeable across the hillside. The applicant considers the proposed turbines would appear reasonably well accommodated within the view given the panoramic landscape, cohesive turbine layout, intervening distance, along with the presence of existing wind farms. Even so, the applicant assesses the magnitude of change as Medium, this results in a Major and Significant effect. Whilst the overall effect is generally agreed, the turbines would remain particularly prominent at this distance due to their large scale. Furthermore, the layout composition continues to be characterised by overlapping

turbines and variations in turbine height, which further accentuate their visual prominence and contribute to a poorly composed skyline.

7.161 Carn na Làir (VP11) is similarly affected due to its elevated and open outlook towards the site. The summit is close to the boundary of the Cairngorms National Park. Views are orientated generally northwest towards the proposed development across the rolling uplands of the Monadhliath and Strathdearn with the nearest turbine approximately 10.5 km from the viewpoint. The proposed development would be clearly visible with all 12 turbines seen in the outlook. The applicant considers that the turbines would appear balanced and reasonably well integrated within a landscape already influenced by wind farm development, aided by the large scale of the receiving landscape, the cohesive turbine layout, and the intervening distance. Even so, the magnitude of change is assessed as Medium, this results in a Major and Significant effect. Whilst the overall effect is generally agreed, the turbines would remain prominent at this distance due to their large scale. Furthermore, the layout composition continues to be characterised by overlapping turbines, outliers (T6 and T12), uneven gaps and variations in turbine height, which further accentuate their visual prominence and contribute to a poorly composed skyline.

7.162 A number of Monadhliath Mountain summits were assessed including Geal Chàrn, Carn Dearg, A' Chailleach, Meall Chuaich, Càrn Sgulain along with Corbetts such as Càrn an Fhreiceadain and Geal-charn Mòr. Although the proposed development would often be visible from these hills, it would be experienced within very broad upland panoramas which already contain existing wind farm development. Distances are generally sufficient to reduce turbine prominence, and effects are predominantly assessed as not significant. This is agreed.

7.163 The assessment considered several major Cairngorm summits including Ben Macdui, Braeriach, Cairn Gorm, Bynack More, Sgòr Gaoith, Beinn Bhrotain and Mullach Clach a' Bhlàir. From these mountains, the wind farm would be viewed at distances exceeding 20 km and often much further. Although theoretically visible, the turbines would occupy only a very small part of expansive mountain panoramas and would generally be seen within the context of existing wind farm development. Consequently, effects are assessed as not significant. This is agreed.

7.164 The assessment also included Ben Wyvis, Little Wyvis, Sgòrr na Diollaid, Beinn a' Bha'ach Ard. While these summits provide extensive views across the Highlands, the proposed development would be seen at considerable distance. The turbines would form a small element of much wider panoramas and would not become a dominant visual feature. Effects are therefore assessed as not significant. This is agreed.

7.165 As mentioned previously, the applicant has not assessed the Fiona summit of Càrn na h-Easgainn (616m AOD) located within the application site boundary. Fionas are mountains in Scotland between 610 and 762 m high, with at least 150 m of descent on all sides. These hills sit below Corbetts and were formerly known as the Grahams before that list was trademarked and redefined to include hills below 610 m. This summit is accessed from near Moy[1] but can also be accessed from the minor road

[1] https://www.walkhighlands.co.uk/lochness/carn-na-h-easgainn.shtml

between Farr and Strathdearn which is a longer walk. The Strava Global Heatmap[2] identifies this route and hill summit to be reasonably popular and well used by recreational users. The proposed turbines would appear dominant given their very close distance to the summit and would significantly detract from views on the route to the summit and the hill summit itself. There would be a particular sense of encirclement of wind farm development with the proposed turbines immediately to the north, northeast and east, with Moy in the distance, and Farr and Glen Kyllachy wind farms further to the southwest. The recreational amenity for receptors using either route and at the summit would be significantly affected due to overwhelming views to the nearby turbines. The magnitude of change would be High and the level of effect would be Substantial and Significant.

7.166 In relation to visitor attractions, as noted previously, it is agreed that there would be no significant effects from Loch Duntelchaig, Culloden Battlefield and Loch Ruthven Nature Reserve. However, it is considered that there would be significant effects from Inverness Castle which has not been assessed by the applicant. A visualisation was requested given this is now a well visited viewpoint within the centre of Inverness. The applicant declined to produce any further supporting material which is disappointing. The applicant considered that there was no request for a viewpoint at this location in the Scoping Opinion and a viewpoint at Inverness Castle was scoped out. The Scoping Opinion was issued in 2024, long before the Castle was opened to the public. The applicant considers that the visual effects will be minimal given the intervening distance from the proposed development. This is disputed.

7.167 Officers have undertaken their appraisal 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 when the Castle opened in February 2026. The sensitivity of tourists and residents visiting the Castle is assessed as High taking account of their high susceptibility and high value of the view. It should also be noted that the Great Glen Way, John o'Groats Trail and Loch Ness 360° Trail start or end at Inverness Castle, and receptors walking any of these trails may also visit the Castle at this time.

7.168 Visualisations for an unrelated wind farm (Ceislein Wind Farm, currently under consideration, Reference: ECU00005174) shows substantial visibility of Lynemore (EIAR layout of 14 turbines) in views southeast from the North Tower (VP22) as they requested special permission to undertake the photography. Additionally, the interpretation boards on the publicly accessible South Tower draw attention to the Fiona summit of Carn na h-Easgainn in the outlook to the southeast, amongst other key features in the panorama, with the proposed development located on the outer facing slopes and summit at approximately 13 km from Inverness Castle. Based on the above visualisation and Officers own appraisal, all 12 turbines would be visible prominently on the skyline appearing adjacent to the summit of Carn na h-Easgainn, and would be the most visible wind farm from either tower within the whole 360° view and would draw the eye to the skyline in this direction. The turbines would remain prominent at this distance due to their large scale. Furthermore, the layout composition continues to be characterised by overlapping turbines, uneven gaps and variations in turbine height, which further accentuate their visual prominence

[2] https://www.strava.com/maps/global-heatmap

and contribute to a poorly composed skyline. The magnitude of change would be Low and the level of effect would be Moderate and Significant.

Impacts on Road Users

7.169 In terms of road users, the applicant assessed “A” class transport routes and Minor “B” roads within 15 km of the proposed development and overlapped by the blade tip ZTV including the A9, A82 and A96 along with the B851, B9154, B861, B862, B9006 and B9177. There would be no visibility of the proposed development from the A8082, A862 and B865 due to intervening built form and they have been excluded from the assessment.

7.170 In terms of the A9, it is the main transport route in the study area. Although this section of the A9 is not a designated or promoted tourist route, it does connect between Cairngorms National Park and Inverness and is listed as a ‘Key Route’ within the OWESG. Tourists travel daily along this section of the route connecting from the National Park to the Highlands. The ZTV shows almost uninterrupted theoretical visibility for approximately 16 km along the route from south of the Slochd to Milton of Leys. This is unparalleled for any other wind farm in the area. Forestry does line the A9 and beyond, which if retained would minimise visibility for large stretches. This route is however being reconstructed, and intervening forestry will come and go on a cyclical basis; such screening effects cannot therefore be relied upon. When travelling north from the Cairngorms National Park towards Inverness, the applicant considers views of the proposed turbines are generally intermittent and heavily influenced by forestry, roadside vegetation and landform. They consider that significant effects are limited to four short sections of road totalling around 2.9 km, equivalent to about 2 minutes of travel at 60mph. However, given the ongoing and proposed works as part of the A9 dualling project the baseline for roadside forestry/vegetation and landform is constantly shifting. In this regard, it is noted that the majority of the photography used for the Sequential Route Assessment of the A9 (Figure 5.17-18) was taken in September 2024. It is also noted in the Officer’s Viewpoint Appraisal that the photography of VP3: A9 north of Tomatin is out of date given the substantial tree felling that has already taken place which would increase visibility of the proposed development.

7.171 From Slochd to Tomatin there is largely no view or at least heavily filtered visibility due to woodland and landform screening the proposed development, although there is the likelihood that the proposed development may appear directly ahead along this section. Around Findhorn Bridge, brief views of the turbines will be seen above the trees and directly ahead whilst crossing the bridge over Strathdearn, but effects remain not significant because visibility is limited and filtered by forestry. If roadside forestry were removed, visibility would increase potentially resulting in Significant effects.

7.172 After crossing the Findhorn and approaching Tomatin, views of the proposed development open up and would be directly ahead for northbound users. For approximately 1 km north of Tomatin, up to 12 turbines would be visible and form an overly prominent feature in the direction of travel. This section of the A9 is represented by VP3: A9 north of Tomatin, approximately 4.3 km from the nearest

turbine. The effect would be Significant as noted in the Viewpoint Appraisal in Appendix 5 of this report.

7.173 Visibility then declines between Dalmagarry to Moy junction before views of the proposed development appear again around Dalmagarry. Over approximately 600 m, the turbines are clearly visible at around 2.6 km setback distance. As such, the development becomes an overly prominent feature viewed obliquely from the road leading to a Significant effect.

7.174 The most pronounced views occur where the A9 passes closest to the site near Lynemore between approximately 1.7 km and 1.9 km from the closest turbines, and up to Meall Mor after which the proposed development would be behind the direction of travel. The overly prominent turbines would become a dominant feature of the roadside outlook with open views of the towers, hubs and blades of the 200 m turbines along with associated infrastructure including access tracks, substation and BESS in places. The effects are Significant.

7.175 Southbound travellers on the A9 will experience the proposed development somewhat differently because the site lies directly ahead and to the south for parts of the journey. The applicant considers Significant effects occur over approximately 3.9 km of the route (reducing to around 2.6 km where forestry screening is retained), equating to roughly 2 ½ minutes of travel time at 60mph.

7.176 Leaving Inverness, views are largely screened by urban development, roadside woodland and Drummossie Moor forestry. As such, the proposed turbines are generally not visible or only visible as occasional blade tips. The first meaningful views occur on the northern outskirts of Daviot with two turbines the first to be seen prominently on the skyline beyond Strathnairn appearing stark and incongruous, represented by VP7: A9 at Daviot. The applicant notes that effects are Significant for approximately 600 m of this stretch of road in the sequential assessment but following the removal of turbines T4 and T5 they also state that they consider that VP7 is no longer significant in their updated Viewpoint Assessment. Either way, it is considered there will be a Significant effect for this length of road.

7.177 As the route descends toward Moy, increasing numbers of turbines become theoretically visible but existing forestry provides screening. However, if this forestry were removed, an additional section of approximately 1.3 km would experience Significant effects.

7.178 Between Meall Mòr and Lynemore will also have sustained visibility of up to all 12 turbines appearing on the skyline. Passing to the north of the scheme, turbines, access tracks and associated infrastructure will be seen viewed in the outlook. The set back from the closest turbines are only approximately 1.38 km from the A9 at this point with the 200 m structures appearing overly prominent and highly conspicuous. As such, Significant effects will occur for approximately 2 km of this portion of the A9.

7.179 South of the site, visibility substantially diminishes as road users pass the site, which for the most part between Lynemore and Slochd would be to the rear of drivers. Additionally, forestry, landform and alignment of the road increasingly screen the turbines.

7.180 In addition to tourists who travel daily on this route, even for those accustomed to driving south from Inverness to Slochd summit on the A9 regularly, and beyond into the Cairngoms National Park, the route provides a fast, dramatic shift from urban Inverness, followed by rural settlements then into expansive Highland scenery representing a transitional experience through this landscape. The road climbs steadily out of the Moray Firth basin and crosses the open, windswept moorland of the Slochd Summit before dropping into Strathspey with the Cairngorm Mountains dominating the horizon beyond Carrbridge towards Aviemore. Whilst the applicant's sequential assessment is generally agreed, it is considered that condensing the impact to binary distance/time elements as opposed to a sense of gateway to wilderness that the route from Inverness to the northern edge of Cairngorms National Park offers receptors that travel the route. Give the scale, location and proximity to the A9 this sense of gateway will be diminished along a "Key Route" within the OSWESG. In summary, significant intermittent and sustained adverse visual effects would be experienced along this transitional section of the route between Inverness and the Cairngorms National Park, where the turbines would be viewed largely directly ahead in the direction of travel. The turbines would appear overly prominent on the outward facing slopes and summits of the hills surrounding Strathdearn, with insufficient separation from the road to provide an appropriate sense of visual containment or setback. Their prominent positioning would result in a substantial change to the existing views and visual experience along this section of the route.

7.181 In terms of visual effects to other "A" roads, the A82 experiences relatively limited and intermittent views of the proposed development due to distance, landform and vegetation screening resulting in Minor and not significant effects. These are agreed.

7.182 Visual effects on the A96 are more limited due to greater separation distances and screening from roadside vegetation, woodland and built development resulting in Negligible and not significant effects. These are agreed.

7.183 With regards to visual effects to "B" roads, in comparison with the A9, these routes will not experience the same combination of proximity, turbine scale and duration of exposure. The B9154 is the most impacted and the closest equivalent in terms of visual influence.

7.184 For much of the route, the proposed development would be seen within an upland moorland context and against the backdrop of the Monadhliath hills. As motorists travel between Daviot, Dalmagarry and Tomatin, the turbines would frequently become a prominent feature in views, particularly where the road occupies higher ground and where roadside vegetation is sparse. The applicant considers around 5.6 km of the route would experience Significant effects (Substantial). This is generally agreed. If roadside vegetation were to be removed Significant effects would become more extensive.

7.185 The route has several characteristics that increase the visual sensitivity including open, rural landscape with relatively expansive views, frequent visibility of skylines and surrounding uplands and a lower traffic environment where road users are more likely to appreciate the wider landscape. Additionally, there will be long periods where the turbines remain visible ahead or obliquely to the direction of travel with the most significant visual effects as the route runs parallel where the road is closest

to the development and views open directly towards the turbine array. From this section of the B9154 the majority or all turbines would be visible, with hubs clearly distinguishable, forming an overly prominent new man-made feature within an otherwise largely rural landscape. The development occupies a notable proportion of the view here often seen across the foreground moorland and forestry mosaics, giving the turbines considerable visual presence.

7.186 The B851 links Daviot, Strathnairn, Farr and Croachy, passing to the northwest of the proposed development. For much of the route, views alternate between enclosed sections screened by woodland, landform and roadside vegetation and open elevated sections where long views are available across Strathnairn towards the proposed site. Whilst the applicant notes the proposed turbines are generally viewed within the context of a landscape where existing wind farms, including Farr and Glen Kyllachy, are already present in some views, these turbines are at a vastly smaller scale at 110 m in comparison to the 200 m proposed. The applicant considers that there would be no significant effects for users along this route assessing them as Moderate and not significant. This is generally agreed. If roadside vegetation were to be removed, there is potential for extensive sections of Significant effects.

7.187 The B862 west of Daviot and around Loch Duntelchaig which links Dores, Whitebridge and Fort Augustus along the eastern side of Loch Ness, experiences intermittent but often open views towards the development. The most notable section of visibility is along a 2.6 km section between Achnabat and Kindrummond, similar to the view at VP15: B862 Ashie Moor where effects are agreed as not significant.

7.188 The B861 runs southwest of Inverness through Dores, following the eastern side of Loch Ness between Inverness and Fort Augustus. It passes through settlements such as Dores, Inverfarigaig and Foyers. It is not agreed that the effects on this road are reduced to non-significant levels through the amended scheme. As noted in the Officers Viewpoint Appraisal in Appendix 5 of this report, VP4: B861 between Balnafoich and Inverarnie is considered to experience Significant effects by road users affecting approximately 1.5 km of the route.

7.189 It is agreed that there would be no Significant effects on the B9006 and B9177.

Impacts on Rail Users

7.190 The Inverness to Perth railway line (Highland Main Line) via the Cairngorms National Park is within 15 km of the proposed development. The Inverness to Aberdeen railway line via Nairn is beyond the 15 km study area and has been excluded from the assessment as the applicant considers significant visual effects are unlikely which is agreed.

7.191 It is considered that an 800 m stretch of the Highland Main Line near the site would be experience Significant effects (Major) given the close proximity to the site and open views with the applicant noting this equates to less than one minute of travel time for passengers. The most affected section is northeast of Moy, where the railway passes closest to the proposed development. Here, passengers on the west side of the train would intermittently see all turbine hubs, several blade tips along with the main access from Lynemore along with the internal access tracks. The

turbines would appear overly prominent on the outer facing slopes and summits of the hills enclosing Strathdearn. The closest turbines would be approximately 3.5 km from the passengers at this point. It is considered that the effect would be Substantial and Significant as receptors on the railway line are also likely to be tourists of High sensitivity whose attention would be on the surrounding views and who will be experiencing this transitional landscape between Inverness and the Cairngorms National Park.

7.192 As with the A9 when travelling south, the railway line is a transitional gateway from Inverness to the Cairngorms National Park and the effect is even more appreciated by receptors when travelling by train and are more focussed on the changing landscape outside the carriages.

Impacts on Residential Receptors

7.193 The applicant assessed a number of settlements, as defined within HwLDP, within 15 km of the proposed development and overlapped by the blade tip ZTV, including Tomatin, Inverness (along with the wider conurbation at Westhill, Smithton and Culloden), Newlands of Culloden (classified as a Smaller Settlement along the A96 Corridor) and Farr and Inverarnie (classified as a Growing Settlement). The applicant considered other settlements beyond 15 km are either outwith ZTV coverage or have very limited visibility of the proposed development and have excluded from the assessment.

7.194 There are no residential properties within 1.4 km of the revised turbine layout. The Residential Visual Amenity Assessment (RVAA) submitted considered six groups residential properties within 2 km of the proposed development at Lynebeg and Moy. Whilst the amended 12 turbine scheme did not change the significance of effects previously identified, the applicant noted that the new access arrangement would increase separation distances from several properties and reduce localised construction effects.

7.195 The closest residential properties are located at Lynebeg, northeast of the site, set back approximately 1.5 km to 1.7 km from the nearest turbine. The applicant identifies Significant visual effects at two receptor groups once the proposed development is operational, Keeper's Cottage and 1 to 4 Forestry Houses. These properties experience close-range views towards the proposed turbines which will appear prominent at this distance, resulting in Substantial to Major effects in winter and Major to Moderate effects in summer given vegetation cover. No significant cumulative effects are predicted. This is generally agreed.

7.196 Other nearby properties would experience limited or no effects given surrounding mature vegetation cover and landform screening turbines from view. Lynemore Cottage would have filtered views through existing vegetation, resulting in moderate but not significant effects. Forester's House would experience minor and not significant during operation, although temporary Significant effects could occur during construction of the access track to the north. Moybeg Cottage and Suilven/Moy Halt Cottage would have no view of the proposed development due to intervening landform and mature forestry and no Significant effects on residential amenity.

7.197 The applicant concludes that, although Significant visual effects would occur at Keeper's Cottage and 1 to 4 Forestry Houses, no property would experience effects so severe as to become overbearing, dominant or overwhelming. The RVAA confirms that the Residential Visual Amenity Threshold would not be reached at any property and no dwelling would become an unattractive place to live as a consequence of the proposal. This is agreed. Embedded mitigation, including turbine set-backs, screening by vegetation and landform, and the absence of properties within 1.4 km of the turbines, are key factors in the conclusion reached by the applicant.

7.198 In the wider area, the applicant notes Significant visual effects on residential receptors are largely confined to some properties at Balnafoich on the western side of Strathnairn, represented by VP4 - B861 between Balnafoich and Inverarnie, approximately 5.1 km from the nearest turbine. It is considered that these Significant effects are under-stated and is reported in the Viewpoint Appraisal in Appendix 5 of this report. Elsewhere, including Inverness/Leachkin, Farr, Inverarnie, Tomatin and Croachy, visual effects on residential receptors are assessed as moderate or lower and not significant. With the exception of Inverness / Leackin which is noted below, effects on Farr, Inverarnie, Tomatin, Culloden and Croachy are agreed as not significant. The views from Moy at just over 2 km from the proposed turbines are well screened by mature roadside vegetation, although there may be Significant visual effects from the adjacent Moy estate buildings at approximately 3 km distance, viewing across open areas.

7.199 The proposed development will lead to Significant visual effects (Moderate) to residents in the elevated parts of Westercraigs and Leachkin in southwest Inverness, as seen inVP16 - Leachkin, Inverness which is located approximately 14.3 km from the nearest turbine. Whilst VP16 shows the outlook of recreational receptors from the Great Glen Way in proximity to Great Glen House it is also representative of surrounding residential receptors that are at least at a similar or even higher elevation than VP16. All 12 turbines would be seen as prominent features skylining above the rolling hills beyond Inverness with the majority of towers, hubs and blades visible. The turbine layout composition continues to be characterised by overlapping turbines, uneven gaps, outliers (T6) and variations in turbine height, which contribute to a poorly composed skyline. As such, the magnitude is agreed as Low but the effect is considered Significant. Other parts of the city would not experience significant effects due to intervening built form and cited at a lower elevation however, as noted previously, Significant effects would be experienced from Inverness Castle located in the centre of the city.

7.200 By way of comparison, it is also noteworthy that, beyond the City of Glasgow which is the largest city in Scotland, where Significant visual effects associated with other wind farm developments have been identified (for example, Whitelee and Vale of Leven), the proposed development would be unusual in giving rise to Significant visual effects from within a small Scottish city, albeit affecting only part of the city in this instance. Although Inverness has an established urban centre, it retains a strong relationship with its surrounding rural Highland landscape. Its distinctive setting, framed by agricultural and wooded hills, open countryside and wider upland landscapes, forms an important part of its visual character and sense of place. The

effect of the proposed development would represent a notable departure from the visual experience typically associated with other Scottish cities and urban areas.

Cumulative Landscape and Visual Impacts

7.201 In addition to the above, it is important to consider the context of the development in combination with other wind farm developments and assess the likely cumulative effects. Of particular importance is how wind energy developments relate to each other in design and relationship to their surroundings, their frequency when moving through the landscape and their visual separation to allow experience of the character of the landscape in between.

7.202 The cumulative assessment considers the proposed development in combination with operational, consented and (in the updated AI Chapter 5 Landscape and Visual) application-stage wind farms including Farr, Glen Kyllachy, Moy, Tom nan Clach, Kyllachy, Balnespick, Clune and Highland Wind Farm.

7.203 The applicant's principal conclusion is that the proposed development would form part of an already established wind farm cluster centred on Farr and Glen Kyllachy. This is disputed. While cumulative effects occur, they consider the site is generally described as an extension to an existing pattern of development rather than creating a new wind farm landscape. Most significant cumulative effects are confined to the host upland landscape around the site, a limited number of nearby viewpoints, principally hill summits and some recreational routes along with localised transport and recreation receptors within approximately 10.5 km. As noted previously, this has been understated with Significant cumulative effects extending to the higher ground beyond Leachkin, northwest Inverness shown by VP16 - Leachkin, Inverness.

7.204 It is considered the proposed development would form a separate wind farm cluster rather than an extension of or cluster with the existing Farr Wind Farm and Glen Kyllachy Wind Farm group. The proposed turbines would remain visually distinct from the operational schemes due to their physical separation, substantially larger turbine scale and differing landscape position.

7.205 A key distinction is that Farr and Glen Kyllachy are generally contained within the upland interior, whereas the proposed development would be located on the prominent landform of and around Carn na h-Easgainn, occupying outer facing slopes and skylines overlooking Strathdearn and Strathnairn. As a result, the proposed development would have a much greater influence on views from Strathdearn and the A9 corridor than either existing wind farms, appearing overly prominent in views. Additionally, the proposed development would conflict with strategic landscape guidance which seeks to maintain clear separation between wind farm clusters and avoid development on the hills enclosing Strathdearn. The proposed development would expand wind energy development into a new landscape area and increase the intensity of wind farms in the locality of the proposed development, reducing the distinction between clusters rather than consolidating the established Farr/Glen Kyllachy pattern. Consequently, the proposed development should be regarded as a new, independently perceived cluster of turbines rather than a logical extension of the existing Farr/Glen Kyllachy wind farm cluster.

7.206 This is reflected in the assessment against OWESG Criteria with non-compliance with the following Criterion 6 - Existing Pattern of Wind Energy Development, Criterion 7 - Separation Between Clusters and Criterion 9 - Landscape Setting of Nearby Wind Farms.

7.207 Cumulative effects are most pronounced from the three surrounding hill summits between approximately 8.8 km and 10.5 km for the proposed development. Receptors at VP8 – Càrn a' Choire Mhoir will see the proposed development alongside Tom na Clach, Tom na Clach Extension, Clune, Kyllachy and Balnespick. Receptors at VP10 – Carn nan Tri-tighearnan will see the proposed development alongside Moy, Tom na Clach, Tom na Clach Extension, Kyllachy, Clune and Balnespick. Receptors at VP11 – Carn na Làir (northern Cairngorms boundary) will see the proposed development alongside Clune, Kyllachy and Balnespick. The cumulative visual effects at all these viewpoints are Substantial and Significant, this is agreed. Significant combined cumulative effects are also agreed at the hill summits of VP13 – Carn Dubh and VP14 – Carn Loisgte. Whilst not assessed, it is also considered there will be Substantial and Significant cumulative effects from the Fiona summit of Carn na-h Easgainn where the proposed development being the most contributing development in the views.

7.208 In addition to these upland locations, receptors at VP16 - Leachkin, Inverness and the higher elevation beyond this section of the Great Glen Way over 14.3 km from the proposed development, will see the proposed development alongside Moy, Farr, Glen Kyllachy Dunmaglass, Corriegarth, Aberarder, Tom na Clach Extension, Corriegarth 2, Balnespick and Highland. Other receptors experiencing Significant cumulative effects would include the A9, B861, B9154, Highland Main Line, Walk Wheel Cycle NCR 7, a number of recreational routes and Inverness Castle.

Aviation Lighting (Hours of Darkness)

7.209 There is a statutory requirement to provide visible aviation lighting on turbines over 150 m in height. Given the environment of the area, light pollution raises concerns. Rather than lighting every turbine, the proposed strategy is to light only the six "cardinal" turbines around the perimeter of the wind farm, turbines T1, T3, T6, T12, T13 and T14 which has been agreed by the CAA. All 12 turbines would carry MOD infrared lighting, which is only visible to aircraft but not visible to the general public. The six visible lights would comprise medium intensity ‘steady’ red aviation warning lights (2000 candela) with no tower lights. The lighting strategy also includes implementation of intensity reduction mitigation and vertical directional intensity mitigation.

7.210 The lighting system would normally operate at 200 candela during good visibility, increasing to 2000 candela only when visibility falls below 5 km. Visibility sensors would be installed on the lit turbines to automatically control light intensity. The Report on Light Propagation from the Aviation Warning Lights (AI Technical Appendix 5.6) estimates that visibility conditions requiring the higher 2000 candela setting are likely to occur less than 10% of the time, with data from Inverness Airport suggesting visibility below 5 km occurs around 4% of the time. The report concludes that lights may technically be detectable by fully dark-adapted observers out to approximately 30 km to 40 km, and potentially 40 km to 60 km under ideal dark-sky

conditions. However, it notes that visual prominence decreases rapidly with distance.

7.211 The applicant assesses Significant and cumulative effects on part of the host Rolling Uplands – Inverness LCT during the hours of darkness. These are agreed.

7.212 The applicant considers the most noticeable effects were predicted within approximately 5 km to 10 km of the proposed development, particularly from nearby roads and recreational routes. VP1 General Wade's Road, VP2 B9154 north-east of Moy, VP4 B861 between Balnafoich and Inverarnie, VP6 National Cycle Route 7 near Tomatin and VP7 A9 at Daviot would experience the greatest hours of darkness effects. The lighting would be a noticeable feature for road users travelling on these and other routes in the immediate surrounding area given the sustained stretches of visibility of turbines noted previously. However, it is agreed that effects on road users during the hours of darkness would not be significant, reflecting their lower sensitivity and the presence of vehicle headlights and other moving sources of light from traffic, which would serve to reduce the relative visibility and intensity of the aviation lighting. There is however likely to be Significant effects from other low-lying receptors including residents at Balnafoich and Lynebeg, part of the Highland Main Line and several Core Paths in the immediate surrounding area, although it is recognised that there would be fewer recreational receptors on Core Paths during the hours of darkness.

7.213 Among upland receptors, between approximately 8.8 km and 12.5 km, aviation lights would also be apparent from VP8 Càrn a' Choire Mhòir, VP10 Carn nan Tri-tighearnan, VP11 Carn na Làir, VP13 Carn Dubh and VP14 Carn Loisgte. These hill summits are at elevations similar to the turbine hubs therefore benefit less from the vertical light suppression technology incorporated into the lighting design. It is considered that there is likely to be Significant effects including cumulative effects from receptors at these hill summits recognising that there would be a lower number of receptors affected during this time in comparison to daytime.

7.214 Hours of darkness visualisations have been produced for a number of viewpoints noted previously. The four viewpoints are N2 B9154 northeast of Moy, N4 B861 between Balnafoich and Inverarniem N6 Sustrans Nationa Cycle Route 7 (NCR7) at Tomatin and N7 A9 at Daviot. These correspond with the daytime visualisations and are located approximately 2.4 km and 6.7 km from the nearest turbines. From N2 all six aviation lights would be visible, from N4 three lights would be visible, from N6 four lights would be visible and from N7 two lights would be visible. It is agreed that there would be no Significant effects from N2 and N7, however, it is considered that residents at N4 and recreational receptors on the NCR 7 would experience some Significant effects.

7.215 Aviation lighting will disrupt the sense of remoteness experienced during hours of darkness from several locations across the area. While during the day one’s eye would be drawn to the moving blades of the turbines, in hours of darkness one’s eye would be drawn toward the red aviation lighting, which can flatten a sense of distance in the darker landscape. Depending on the position of the receptor to the lighting, the lights may appear to flash as a result of the turning of the turbine blades, passing between the light and the viewer. This may be a visually confusing effect for the

receptor unless aware of the reason for the lights, while in hours of darkness one does not have the benefit of being able to relate the lighting to a landform.

7.216 The presence of any visible aviation lighting is of concern, particularly when this is seen intermittently due to passing blades, with these additional visual impacts having been effectively designed out by the consented wind farm schemes in the locality which has very limited sources of light pollution. The minimisation and mitigation measures proposed are noted and planning conditions could control such measures should the application be granted consent.

Proposed Grid Connection

7.217 The indicative 132Kv grid connection route covering approximately 5.5 km lies almost entirely within the Rolling Uplands – Inverness Landscape Character Area. AIR-2 Grid Connection Appraisal submitted in April 2026 notes that the landscape has a simple, open character with broad landform and relatively limited landscape structure, existing wind turbines already form a defining element within many views, the OHL would utilise relatively slender timber poles typically 11 m to 15 m high. Additionally, the applicant considers the route broadly follows a direct alignment between the two substations, limiting unnecessary landscape intrusion.

7.218 As a result, the OHL is not considered to introduce a new or defining landscape feature and would not materially alter the overall character of the upland landscape. Landscape character effects are therefore assessed as not significant. This is generally agreed.

7.219 The applicant's visual appraisal focuses on likely receptors with access to the OHL route corridor, particularly recreational users. The OHL would appear to be most notable from viewpoints to the southeast and southwest such as VP3 A9 north of Tomatin, VP6 Sustrans NCR 7 at Tomatin, VP9 B851 at Croachy VP11 Crna na Lari, northern boundary of CNP, VP13 Carn Dubh Ic an Deoir. However, there would likely be partial or intermittent visibility due to landform screening and distance from these viewpoints. Additionally, the applicant notes an existing hill track running between the Lynemore area and Farr Wind Farm that would likely have uninterrupted views of the OHL given the proximity of the route. Along this hill track walkers would experience close-range views of the OHL, the track would cross the OHL corridor on several occasions, the OHL would be visible either directly ahead, crossing the route, or running alongside it. Visual effects would be experienced continuously over a section of approximately 1.5 km.

7.220 Because of the proximity of the poles to users of the track, and the repeated interaction between the route and the OHL alignment, the appraisal identifies the potential for significant visual effects on recreational users over this section. This is identified as the main visual constraint associated with the grid connection.

7.221 In terms of cumulative landscape and visual effects the proposed OHL would be viewed in combination with Farr Wind Farm, Glen Kyllachy Wind Farm, the proposed Lynemore Wind Farm, existing wind farm access tracks and associated infrastructure. In most locations, the appraisal concludes the cumulative influence would remain limited because the OHL is subordinate in scale to the wind farms, the route is short and the poles are visually lightweight compared with turbines.

However, cumulative visual effects could become significant along the same hill track where users would simultaneously experience turbines, tracks and OHL infrastructure within a relatively concentrated corridor.

Roads, Transport and Access

7.222 EIAR/ AIR-1 Chapter 10 assesses the expected impact of this development on the road network, particularly during the construction phase. The applicant is committed to using a Construction Traffic Management Plan (CTMP) to manage the traffic impacts associated with the development. An outline CTMP is provided in EIAR Technical Appendix 10.2. The study area is detailed in EIAR Figure 10.1 and includes the A9(T) and the A95(T) between the A95(T)/B9152 junction and A9(T)/A95(T) junction. Construction is currently projected to commence in 2030 and will last for 24 months. Third parties and Strathdearn Community Council have raised concerns about road safety and congestion, especially around Farr Primary School and A9 junctions. Concerns also relate to damage to the roads.

7.223 The proposed access arrangement on the A9 is detailed on Figure 10.3a and Figure 10.3b. The revised scheme moved the site access track to increase the distance from the nearest property. This was due to the prohibition of right-turns at the proposed site access by virtue of the A9 Moy to Tomatin dualling scheme design for the Lynebeg junction at this location. The following arrangements are detailed in the EIAR:

- Southbound arrivals (Inverness) of HGVs, cars and LGVs will travel south on the A9 past the site and turn at Aviemore to head northbound on the A9 to access the site via a left turn in. Southbound departures will egress the site with a left turn to the north on the A9, then turn at the junction with B9177 and travel south on the A9 to Aviemore; and
- Northbound arrivals (Aviemore) will travel north on the A9 and access the site via left turn in. Northbound departures will egress the site with a left turn north on the A9.

The dualling scheme from Moy to Tomatin is scheduled to be completed in Spring 2028, so before construction is proposed to commence.

7.224 Transport Scotland confirm that requirements for the installation of a demountable vehicle restraint system within the central reserve at the Lynebeg LILO junction location have been incorporated in the A9 Dualling Tomatin to Moy contract. This means that the access proposed by this application can be accommodated for in the future, and that Transport Scotland are satisfied with this approach. Final details of the access are to be secured by condition. Transport Planning have no objection but consider that the A9 works need to be completed before work starts on the wind farm. This will avoid any potential increase in non-trunk road traffic.

7.225 Abnormal Indivisible Load (AIL) vehicles will be required for the transportation of cranes and turbine components to the site. The likely port of entry will be Inverness. Vehicles will then turn onto Stadium Road and join the A9(T) at the Longman Roundabout. In order to avoid AIL vehicles travelling a significant distance to the south of the site in order to perform a U-turn, AILs will enter the site via the proposed Lynebeg junction improvement in a contra-flow movement via left turn out. EIAR Technical Appendix 10.1 details the Abnormal Load Route Assessment (ALRA).

This highlights route constraints and mitigation measures to enable the component parts to the delivered. This includes the need for street furniture to be removed and replaced and that loads will over-sail the carriageway.

7.226 Transport Scotland have no objection but state that any works within the trunk road boundary will require further approval. It also requests that the final abnormal load route and any accommodation measures required for the abnormal loads are secured by condition. Transport Planning have no objection subject to an AIL Plan which includes any alignment improvements to Stadium Road and Longmans Drive for AIL access.

7.227 In terms of the trip generation rates, the EIA has assumed that:

- 80% of cars/light vehicles will arrive from Inverness and the remaining 20% from Aviemore. 10% will access Aviemore via the northern end (A95). The other 10% will access Aviemore via the southern end (B9152).
- The largest number of vehicle movements are associated with the import of materials associated with construction of new access tracks, substation and BESS foundations and crane hardstandings. 99% of total two-way HGV movements are associated with quarry materials.
- Under a worst-case scenario 50% of the aggregate will be imported from a quarry in Aviemore (17.7miles from the site), the remaining will be won from the on-site borrow pit. However, as noted in the Borrow Pit Assessment (EIAR Technical Appendix 8.8) in reality it is likely that majority of stone material could be sourced from the borrow pit.

7.228 The EIA reports that the proposed development would lead to a temporary increase in traffic volumes on the road network during the construction phase. However, the effects are not constant with traffic volumes decreasing outside the peak period of construction. The peak traffic movements associated with the original 14 turbine scheme were predicted to occur in months 12, 13 and 14. With 90 two-way car/LGV movements, 34 two-way HGV movements, 4 AIL one-way movements, which will then return from site classified as HGVs.

7.229 As identified in EIAR Chapter 10, Table 10.15, the total traffic movements are not predicted to increase by more than 1.49% (A9 approximately 4.8km north of A9/A96 Junction) across any of the survey locations within the study area. In terms of HGVs the highest impact is on the A95/ B9152 to access the quarry where a 6.4% increase in HGVs is anticipated. These levels are well within the 30% threshold outlined in the IEMA Environmental Assessment of Traffic and Movement guidelines.

7.230 As such the applicant considers that the road network is capable of accommodating the traffic generated by the proposal. Overall, the EIA reports negligible (not significant) effects on users of the A9, minor/negligible (not significant) effects on users of the A95 and negligible (not significant) effects on residents in Inverness and Aviemore.

7.231 Transport Scotland is satisfied that no further detailed assessment of potential impacts is required, but request that a finalised CTMP is secured by condition. Transport Planning consider that while the temporary increase in 6.4% will be noticed by existing users will not add to congestion and do not consider it to be severe. However, it is requested that construction traffic does not travel into

Aviemore as vehicles could access the town from B9152. It also requires a CTMP to be secured by condition. The Council will also require the developer to enter into a Section 96 (Roads Act Scotland) agreement. This will both monitor and secure repairs if needed along the affected road network. Works within the road boundary will also require a separate Section 56 agreement under the Roads Act Scotland.

7.232 AIR-1 Chapter 10 outlines any potential change to traffic and road effects for the revised scheme, over those reported in the EIAR. The applicant has not included a revised breakdown in the peak traffic movements identified above. Instead, it notes that the revised scheme is likely to result in an 18% reduction in the amount of construction material required. As a consequence, the predicted HGV traffic movements will reduce by 1.87% across the study area. This decrease in traffic volume compared to the baseline it not considered to change the conclusions and level of effects presented in the EIAR and summarised above. Effects remain not significant in EIA terms. Neither Transport Planning nor Transport Scotland object to the revised scheme, subject to the conditions previously outlined.

7.233 In terms of cumulative effects, the applicant has identified several consents which are close to the application site and within the same study area (EIAR Chapter 10, Table 10.17). However, the applicant only identifies the consented Tom na Clach Wind Farm extension as using the same roads network as this development and similar implementation timescale. Total traffic movements are not predicted to increase by more than 2% across any of the survey locations within the study area. In terms of HGVs the highest impact is again on the A95/ B9152 where a 12.6% increase in HGVs is anticipated. The EIAR concludes that the predicted effects were substantially below the 30% IEMA threshold.

7.234 In relation to the revised scheme the AIR-1 Report states that the reduction in construction vehicle movements does not materially change the conclusion outlined in the EIAR. Neither Transport Planning nor Transport Scotland object to the revised scheme, subject to the conditions previously outlined.

7.235 Notwithstanding the above, Officers note that there are several Wind Farm developments which are currently in planning (identified at scoping stage in the application), which may use sections of the proposed access route. This includes Clune Wind Farm (25/00847/S36), Balnespick Wind Farm (25/00629/S36), Highland Wind Farm (25/01355/S36) and Kyllachy Wind Farm (25/03511/S36). The majority of the effects are likely to be on the A9(T). However, there may be some cumulative pressures on Council roads. Further consideration my need to be given at the Public Local Inquiry stage to alleviating pressures through co-ordination with surrounding developers. This could include staggering peak construction traffic flows and AIL movements. The appointment of a traffic management coordinator to oversee the construction phase could also be secured through a CTMP condition.

7.236 In relation to the grid connection (AIR-2). Vehicle movements at any one overhead pole location are envisaged to be limited to three - four visits per day over the course of the construction period. The assessment considers that this will not lead to noticeable increases in traffic volumes on the surrounding road network and would not be substantial enough to change the conclusions of the EIA for the Wind Farm. A Construction Traffic Management Plan (CTMP) will also be implemented for the grid connection to manage traffic movements on the surrounding public road

network. Transport Scotland are satisfied that grid connection is feasible and that the construction and operation of the proposed grid connection would be unlikely to result in significant environmental effects. Transport Planning have raised no concerns.

7.237 In terms of wider public access, the revised design now avoids a section of the General Wade's Military Road (GWMR). The Councils Access Officer does not object but considers that the following should have been included in the assessment.

- Carn na h-Easgainn, a Fiona, promoted route (Walkhighlands), walked and cycled as a circuit (Strava Global Heatmap) which is in the site, and which uses tracks that may be used and which are crossed and obstructed by the proposal's own tracks and turbine sites;
- Walking and cycling to and on the existing tracks of the neighbouring windfarm;
- Wider access rights over the site in general; and
- Potential benefits of an extended track network on completion and during the operational phase of the development.

If consent is granted, then the Access Officer recommends that a separate Recreational Outdoor Access Plan is secured by condition.

7.238 ScotWays do not object and welcome the applicant's commitment to manage public safety over the site during the construction phase. A condition is recommended to ensure that all defined access routes within the site are so far as is reasonably practicable, kept free from obstruction or encroachment during all phases of the development. It also notes the proposed turbines are to be situated well away from HI43 and HP 'Moy to Inverness Military Road' and, in excess of the maximum blade tip height away from the defined route to Carn na h-Easgainn. However, it requests that a condition is used to ensure that turbines are sited no closer than minimum topple distance from any obvious, defined access routes within the site, inclusive of any micro-siting allowance.

7.239 Conditions are also requested to secure an Access Management Plan, details of any diversions (if required), any gates shall be designed to permit access by all users, signage and that turbine access tracks should be blinded with whin dust, to encourage safe use by equestrians.

Hydrology, Geology, Hydrogeology and Peat

7.240 Chapter 7 of the EIAR/ AIR-1 sets out that embedded mitigation by design has been used as far as practical to reduce potential adverse effects. This includes buffer zones from watercourses, minimising effects on peat, reducing the number of watercourses and the use of floating tracks. As detailed above a Construction Environmental Management Plan (CEMP) will be in place, which will ensure that potential sources of pollution on site can be effectively managed throughout construction and in turn during operation; albeit there will be fewer sources of pollution during operation. In addition, an ECoW and Geotechnical Engineer will be present on site during the construction period.

7.241 With the exception of watercourse crossings, infrastructure, including the BESS will be located outside of mapped flood zones. The indicative grid connection route (AIR-

2) also does not encroach on any SEPA mapped river flood zones. The assessment identifies that SuDS measures will prevent any increase in flood risk. SEPA nor the Councils Flood Risk Management Team have raised concerns.

7.242 The revised design identifies four new watercourse crossings; this is a reduction from the seven originally proposed (AIR-1 Appendix 8.5 Watercourse Crossing Inventory. The crossings will be designed to allow the conveyance of a 0.5% AP (Annual Probability 200 year) flow event plus an allowance for climate change and freeboard. Additionally, mitigation will be put in place to control and attenuate runoff during all phases of the development and crossings will be regularly checked and maintained during operation. Where required, designs appropriate for fish migration and otter passage will be used. SEPA have no objection, but details of watercourse crossings should be secured through an enabling works condition. An EASR (Environmental Authorisations (Scotland) Regulations) permit administered by SEPA will also be required.

7.243 In relation to the BESS, third party comments have raised concerns regarding fire, safety and potential contamination. Fire safety is not typically a material consideration in planning decision making, however, fire safety considerations relating to matters such as site layout, emergency access or appearance are material planning considerations. The application does not detail the proposed means of fire suppression or firefighting methods. Therefore, as detailed in the LVI section water supply details and measures to ensure that no fire suppressant or polluted water run-off enters watercourses/ causes land contamination will need to be secured by condition, if consent is granted.

7.244 Scottish Water have confirmed that there are no drinking water catchments or water abstraction sources, which are designated as Drinking Water Protected Areas (DWPA) under the Water Framework Directive, in the area that may be affected by the proposed activity. The Grid Connection Report (AIR-2) highlights that the indicative route does not encroach on a surface water DWPA. At this stage the applicant does not envisage any significant effects in relation to the grid connection.

7.245 Two Private Water Supplies (PWS) (Lynemore Cottage and Foresters House - EIAR Appendix 8.6) were identified in the EIAR but were not hydrologically connected to the footprint of the development. The AIR-1 confirms that the revised layout is also not hydrologically connected to these PWS. However, the assessment notes that due to a change to the access track layout the groundwater spring supplying Lynemore Cottage will need to be accurately located and protected from any impact of construction activities. The applicant details that although it's located over 250m from the revised access track a precautionary approach should be adopted and some additional protection or monitoring may be required. In addition, the applicant does not envisage any significant effects in relation to the grid connection. Neither SEPA nor Environmental Health has raised any concerns with this aspect of the proposal.

7.246 SEPA originally objected in relation to impacts upon peat and non-compliance with the mitigation hierarchy outlined in NPF4 Policy 5 (Soils). Findhorn Fishery Board also objected on the basis development on deep peatland. It also questions some

of the restoration techniques proposed upstream of sensitive habitat for fish populations.

7.247 To support the revised scheme, additional peat probing has been undertaken (AIR-1 Technical Appendix 8.2: Peat Survey Report. The peat survey recorded depths of between 0m (no peat) and >6m across the survey area. There was no peat (0 – 0.5 m depth) at 35.7% of the surveyed area, peat (0.5 – 1.0 m depth) at 22.0% of the surveyed area and peat >1.0 m depth at 42.4% of the surveyed area. Peat depth distribution across the site is detailed on AIR-1 Figure 8.9.

7.248 The total volume of peat excavated for the original development was 269,830 m3 which represented 3.1% of the total peat volume within the survey area. For the revised scheme this has reduced to 248,903 m3 or 2.89% of the survey area. Some of the peat will be reused within the temporary infrastructure area. The remaining will be used to created bunded peat cells in four areas and for peat restoration (EIAR Appendix 6.5 and AIR-1 Figure 8.11). Overall, a surplus of peat is not expected to be generated by the revised scheme, the AI reports minor (not significant) effects.

7.249 SEPA have removed its objection. However, this is on basis that the reinstatement volumes identified in the Outline Peat Management Plan do not result in reinstated peat depths of more than 2m. This can be secured through a finalised Peat Management Plan. SEPA also request that as the track between T12 and T13 traverses habitat which is categorised as “modified with near natural features” it should be conditioned to be a floating track. Furthermore, any micro-allowance condition should ensure that the infrastructure does not move onto peat any deeper than currently shown in the application. Peat Management measures should also be included within an enabling works condition. Matters relating to peatland restoration is outlined in the Natural Heritage section of this Report of Handling.

7.250 The Grid Connection Appraisal (AIR-2) outlines that 3.15km crosses an area of Class 1 peatland. The applicant outlines that this will be key design and routeing consideration to avoid the loss and disturbance of peatlands of high conservation value. Peat survey work will be undertaken to inform this. SEPA have not raised any concerns at this stage.

7.251 A Peat Landslide Hazard and Risk Assessment (PLHRA) has been submitted with the application. The assessment concludes that the risks are calculated to be low or negligible across most of the site and site-specific mitigation measures are outlined. Ironside Farrar, the Government’s advisor on the issue of peat risk, requested further information/clarification to which the applicant has responded. Ironside Farrar has confirmed that the Stage 2 PLHRA (which included the revised layout) is acceptable.

7.252 In terms of Groundwater Dependent Terrestrial Ecosystems (GWDTEs). The AIR-1 identifies that there be no effect on any GWDTE as the habitats are either not groundwater dependent or they are not hydrologically connected to the revised layout. SEPA have raised no concerns.

7.253 In addition to the conditions identified above, SEPA also request a condition securing a borrow pit restoration scheme and adherence to the interim Decommissioning and Restoration Plan. Overall, with the embedded design mitigation, adherence to good

practice and the implementation of the outlined mitigation, no significant residual adverse effects are anticipated.

Natural Heritage (including Ornithology)

7.254 The applicant's assessment is outlined in the EIAR/ AIR-1 Chapters 6 and 7. The AI Report provides an update to the ecological impact assessment where the level of impact to important ecological features may now differ from the original EIAR due to the design changes presented in the AI. The AI also provides an updated outline Habitat Enhancement and Management Plan (OHMEP) The AI also includes an appraisal of the proposed grid connection; this included an appraisal of impacts on ecology and ornithology. It is considered in the AIR-2 that due to the nature of the grid connection development, and its limited footprint, impacts to important ecological and ornithological features will be localised. There would be flexibility during the route section process to address key constraints and required species-specific mitigation could be incorporated through design.

7.255 **Designated Sites:** The proposed development is not located within any statutory sites designated for its ornithological or ecological interest, but there are numerous in the study area as noted in section two.

7.256 The proposal could affect the Inner Moray Firth Special Protection Area (SPA), designated for its internationally important populations of breeding Osprey, Common Tern, and a range of over wintering waterbirds. The site's status as a SPA means the requirements of the Conservation (Natural Habitats, and c.) Regulations 1994, or for reserved matters The Conservation of Habitats and Species Regulations 2017 ('The Habitats Regulations) would apply. Consequently, the Energy Consents Unit is required to consider the effects of the proposal on the SPA before it can be consented. The applicant has submitted information as part of the EIAR to inform the HRA process. However, NatureScot advise in their response to the EIA consultation it is unlikely the proposal will have a significant effect on any qualifying interests of the SPA either directly or indirectly; therefore, an Appropriate Assessment under the Habitats Regulations is not required. This conclusion is due to the majority of the qualifying interests for the SPA are associated with coastal, inter-tidal, or estuarine habitats, and have core foraging ranges less than the distance between the SPA and the proposal. Due to the distance and foraging ranges of the qualifying interests, there is no route to impact for several species, and the habitat present within the proposed development site does not offer suitable foraging habitat for goose species. NatureScot similarly advise no likely significant effects or need for an Appropriate Assessment in terms of the qualifying interests of the Inner Moray Firth Ramsar Site.

7.257 **Ornithology:** The EIA has been informed by a desk study of existing ornithological records and designated sites with ornithological qualifying interests. Baseline surveys have also been undertaken, this includes vantage point flight surveys, moorland breeding bird surveys, breeding Schedule 1 raptor searches, and black grouse searches. Potential collision risk modelling has also been undertaken.

7.258 The applicant reports negligible adverse impacts in relation to collision mortality and disturbance for all 'Important Ornithological Features' (IOFs), and no likely significant effects are concluded as a result of the proposed development and cumulatively with

other wind farm developments noted in the EIAR. As such, no mitigation measures are required in addition to embedded mitigation measures, which would be required to comply with legal and standard protections. The AI submission includes an updated assessment of impacts on IOFs which concludes for most ornithological features there would be a reduction in predicted impacts when compared with the EIA proposed development. For golden eagle and red kite, cumulative collision risk has increased as a result of including additional projects in the assessment, this is despite the impacts of the revised proposed development having reduced due to removal of two turbines and would contribute to a small proportion of the cumulative risk. For these species, the conclusion in the AI remains small adverse magnitude, and not significant.

7.259 NatureScot initially objected to the proposal due to insufficient information in the EIAR to allow an accurate assessment of the collision risk impacts on White-Tailed Eagle, and more widely the impact this could have on the national population of this reintroduced protected species.

7.260 To ensure all reasonable precautions are taken to avoid impacts on birds during construction and decommissioning, the Applicant will appoint a suitably qualified Ecological Clerk of Works (ECoW) prior to the commencement of construction and decommissioning and they will advise the Applicant and the Principal Contractor on all ornithological matters (with the assistance of a suitably qualified/licenced ornithologist if required). The ECoW will be required to be present on Site during the construction and decommissioning periods and will carry out monitoring of works and briefings with regards to any ornithological sensitivities on the Site to the relevant staff within the Principal Contractor and subcontractors; and a Breeding Bird Protection Plan (BBPP) will be implemented during construction of the Proposed Development. The BBPP will detail measures to ensure legal compliance and safeguard breeding birds known to be in the area and will include species-specific guidance. The BBPP shall include pre-construction surveys and good practice measures during construction. Pre- and during-construction surveys will be undertaken to check for any new breeding bird activity in the vicinity of the construction works. The ECoW will oversee the implementation of the above measures. It considered these measures can be secured by suitably worded planning conditions if consent is granted. It is noted in the AI that the mitigation and enhancement measures remain unchanged from those set out in the EIAR.

7.261 The applicant has submitted an Outline Habitat Management and Enhancement Plan (OHMEP) to improve peatland habitat and deliver biodiversity enhancement, and an updated one was submitted as part of the AI/Revised Layout. If the restoration is successful, there could be long-term benefits for breeding wader species and passerines that have been recorded across the site. The OHMEP and biodiversity enhancement are discussed in further detail in below.

7.262 **Protected Species and Habitats:** The application is supported by numerous surveys including a Phase 1 and NVC habitats survey; terrestrial mammals including red squirrel, badger, pine marten, wildcat, otter, water vole, bat roost and activity and fish habitat. The survey effort is accepted as sufficient to assess impacts on species and habitats across the site, however it is noted that two (2no.) small areas within the site boundary have not been surveyed.

7.263 Ecological surveys were undertaken to inform the baseline for the EIA. Results indicated presence of terrestrial mammals across the site, including otter, red squirrel and water vole; deer are also present on site. No evidence of pine marten or mountain hare were found, however desk-based research indicated suitable habitat for these species was present on site. It is recommended pre-construction surveys are undertaken to cover the whole of the site and follow guidance on buffer sizes.

7.264 Four species of bat were recorded on site including Common and Soprano Pipistrelles, Brown Long Eared and Myotis, via survey effort to inform the EIA. Roost habitat surveys were conducted, with eleven (11no.) static detectors deployed between May and September 2023. The Council's Ecology Officer has raised concern about the methodology and autumn survey results. Despite this concern, due to the low activity recorded during summer months, autumn surveys are not required as the site has been assessed as overall low risk to bats. Design changes associated with the revised layout submitted as part of the AI has meant T2 is now within 200m of a dead standing birch tree which was initially identified as a possible roost site. However, the AI concluded this represented no greater than a negligible to low potential to be used by individual or low bat numbers, and in any case it is proposed by the applicant that the dead wood would be checked as part of pre-construction surveys, and included in a Species Protection Plan (SPP) to detect presence/absence of bat species and ultimately prevent risk to a European protected species. The Council's Ecology Officer does not object to the revised proposal regarding impacts on bats.

7.265 The applicant has committed to embedded mitigation including Species Protection Plans (SPPs) and pre-construction surveys of trees identified for felling (or where disturbance to roosting bats could potentially result from felling) will be drafted post-consent via the CEMP and implemented in full before any tree felling or construction commences, to prevent breaches of legislation pertaining to bat roosts. Furthermore, construction would mainly take place during daylight hours during the season when bats are active (April to October, inclusive). Embedded 'stand-off' distances from habitat features in accordance with the NatureScot guidance, is considered adequate mitigation to avoid potentially significant operational mortality risks to bats at most low-risk locations due to bat collision risk and barotrauma mortality during the operational phase.

7.266 **Habitats:** The site and its wider surroundings are characterised by open moorland habitats, with areas of deciduous woodland and commercial plantation to the north of the site. Windfarms Farr and Glen Kyllachy are located approximately 2km southwest of the site. The EIAR includes a technical appendix about habitats and vegetation which sets out the coverage of habitats across the site and identifies priority- and Annex-listed habitats. Across the site that are areas of ancient woodland of semi-natural origin, and the site access includes areas of Long-Established woodland of Plantation Origin (LEPO). There are other Annex 1 habitats present across the site, including Juniper scrub, dry acid heath, wet heath and blanket bog. The blanket bog on site is almost entirely modified and/or actively eroding, with grazing pressure, historic burning, conifer regeneration and drainage all factors affecting the condition of the blanket bog. Peat depth surveys across the site returned

maximum depths up to 6m, however a depth of <2m was found across areas where infrastructure is planned to be sited.

7.267 Impacts to blanket bog habitats are assessed as moderate adverse and significant, and as such, mitigation has been proposed. Chapter 6 of the AI Report sets outs details of permanent and temporary direct and indirect loss of habitats which are Important Ecological Features (IEFs). Predicted losses are set out in the OHMEP submitted as part of the AI and are as follows:

- 0.005ha direct loss of and 0.005ha indirect loss of semi-natural broadleaved woodland habitats
- 24.895ha direct loss and 18.634ha indirect loss of blanket bog habitats;
- 0.265ha direct loss and 0.124ha indirect loss of dry dwarf shrub heath habitats
- 0.291ha direct loss and 0.193ha indirect loss of flush habitat.

All other Important Ecological Features (IEFs) are assessed as negligible or minor adverse and not significant, with mitigation proposed alongside good practice.

7.268 To avoid and mitigate impacts on habitats and species due to direct loss of habitats from the construction of infrastructure, the applicant has committed to best practice and embedded mitigation measures, such as complying with best practice, micro siting provisions, provision of biodiversity management and enhancement measures, presence of an ECoW during works, and adherence to a detailed CEMP and SPP.

7.269 In terms of freshwater ecology, a fish habitat survey was completed in September 2023 of all watercourses within the study area, except for the burn to the south of proposed turbine T14. The upper sections of the nine surveyed watercourses were found to provide no functional fish habitat. Mid and lower sections of these watercourses were on steep gradients, with small areas offering potential spawning habitat for Brown Trout and juvenile salmonid habitat. There was no suitable habitat for spawning Salmon or Lamprey, and no Freshwater Pearl Mussel has been identified in the study area.

7.270 The River Findhorn Fishery Board objected to the initial EIA application and maintained their objection upon receipt of the AIR-1. However, the AIR-1 included the proposed implementation of a fish and water quality monitoring plan which was welcomed by the Fishery Board; however, a number of their other concerns were not adequately addressed. The applicant has adopted embedded mitigation measures through design of the scheme and proposes implementation of buffer distances from water courses; this would avoid or further minimise potentially adverse impacts on aquatic species and the environments they require, and a construction environmental management plan (CEMP) is also proposed, to be secured via condition. It is considered a fish and water quality monitoring plan could be an element of the CEMP, secured as a planning condition should consent be granted.

7.271 Species Protection Plans (SPPs), pre-construction surveys, presence of an Environmental Clerk of Works (ECOW), and species-specific measures are mitigations to be delivered via a Construction Environment Management Plan (CEMP) to be secured by planning condition if consent is granted. The applicant has also proposed a Deer Management Strategy; and Outline Habitat Management and Enhancement Plan (OHMEP) to provide mitigation, compensation and

enhancement for habitats and species present across the site, with a focus on peatland restoration. Overall, notwithstanding the Council's objection to the proposed development regarding other matters, and further discussion below in relation to biodiversity enhancement delivery via the OHMEP, the proposed mitigation measures can be considered acceptable to mitigate impacts of the development on important ecological features identified in the EIAR.

7.272 **Biodiversity Enhancement**: As part of the EIA submission, the applicant has provided an Outline Habitat Management and Enhancement Plan (OHMEP) which focuses on peatland restoration. The Plan identifies approximately 599ha of blanket bog, including mosaic habitats, comprising predominantly degraded priority peatland. Following the revised layout, including the reduction in turbine numbers from 14 to 12, permanent loss of priority peatland has been reduced from 33.83ha to 29.34ha. The Council's Ecology Team accepts the applicant's use of a 10m buffer in calculating indirect peatland effects, reflecting the degraded nature of the habitat. The applicant has committed to applying NatureScot's 1:10 mitigation ratio, requiring 293.4ha of peatland restoration, together with a further 10% enhancement in accordance with NPF4 Policy 3 and the Council's Biodiversity Enhancement Guidance, resulting in a total restoration requirement of 322.74ha.

7.273 The revised OHMEP proposes 220ha of peatland restoration and enhancement within the application site. The Council's Ecology Team advises that a further 102.74ha of restoration is therefore required to achieve the necessary mitigation and enhancement objectives. Should sufficient restoration not be achievable within the site boundary, additional off-site peatland restoration and biodiversity enhancement would be required as close to the development as possible. In accordance with Developing with Nature guidance, any off-site measures should provide a level of enhancement greater than the identified deficit and all off-site compensation and enhancement measures would require to be secured to the satisfaction of the Planning Authority prior to determination. The Ecology Team therefore maintains an objection on the grounds that the required peatland restoration and biodiversity enhancement provision has not yet been fully secured and the proposal does not currently demonstrate compliance with NPF4 Policy 3.

7.274 Following further discussion between the applicant and the Council's Ecology Officer regarding the use of a 10m buffer to calculate areas of indirect peatland loss, this buffer has been accepted. However, an objection from Ecology remains as the applicant has not stated an intention for off-site peatland restoration but if it is necessary, as per NS Developing with Nature guidance, the deficit in on-site enhancement should be 'over-compensated' for by delivering a greater level of off-site enhancement, the scale of which should increase the further from the development site that off-site measures are delivered. All off-site offsetting/enhancement measures will need to have been secured to the satisfaction of the planning authority, prior to the determination of a planning application.

7.275 In reviewing this matter, officers also note the contents of the recent letter from the Chief Planner and Minister Letter (April 2025) which states that:

> "Whilst proposals for much of the large-scale infrastructure required to achieve net zero will be considered by the Scottish Government's Energy Consents Unit under the Electricity Act, applications for standalone substations are made to planning authorities under the Planning Act. The use

of suspensive conditions to secure the submission and implementation of schemes such as compensatory planting and other biodiversity measures can be appropriate. Careful thought should be given to the wording of such conditions to ensure that they are proportionate and do not unduly delay development, whilst still meeting the tests for conditions set out in Circular 4/1998. For example, it is worth considering whether it would be reasonable for a condition to require a scheme to be agreed before the development can come into operation, rather than before any development can commence.

The tests governing the use of planning obligations are contained in Circular 3/2012; the Circular underlines that planning obligations should not be used to address issues that can be resolved in another way, such as through a planning condition or the use of an alternative legal agreement".

Based on the advice from the Chief Planner and the advancement of the minute of agreement with the Council, it is considered that a formal legal agreement securing the off-site compensatory measure is not required but instead can be dealt with by condition.

7.276 NatureScot state they disagree with the applicant's proposed restoration technique of open bare ground and bare gullies, as they are not aware of any use of excavated peat which will result in successful restoration of peatland habitat. Findhorn Fishery Board have also raised concern regarding the proposed techniques, and without evidence of successful restoration using the same techniques elsewhere in Scotland, experimentation of this method at the scale proposed is concerning given its location upstream of sensitive habitats for important fish populations.

7.277 The applicant has committed to establishing a Habitat Management Steering Group (HMSG), and the monitoring of enhancement measures, and associated species throughout the operational lifetime of the development. Notwithstanding the Council's concern that the area of offsite enhancement has not yet been identified, the Council supports the establishment of a HMSG if consent is granted and can be secured via condition alongside the HMEP.

Forestry

7.278 Chapter 13 ('Other Issues') of the EIAR/ AIR-1 covers forestry. None of the proposed turbines are to be located within areas of forestry. However, the original access route required the removal of 4.29ha, with 0.0613ha of ancient woodland, comprising upland birch and juniper woodland species. The EIAR concluded this would not be considered a significant loss in terms of overall forest resource. However, the Forestry Officer objected to the scheme, requested further information and considered the proposed development did not accord with NPF4 policy 6a) and 6d). Their initial objection was on the basis that the assessment was inadequate with regards to woodland loss, impacts on areas covered by the historic Moy Birchwoods Woodland Grant Scheme, potential effects on Ancient Woodland along with of compensatory planting and woodland enhancement measures.

7.279 The revised layout has reduced the amount of felling from 4.29ha to 0.74ha of felling. The AI also states that approximately six trees mapped in areas of ancient woodland would be affected by the installation of the track infrastructure. The applicant has

confirmed in correspondence with the Council's forestry officer that it would be possible for a further adjusted layout to avoid the track passing through an area of Ancient Woodland by utilising the 50m micro-siting allowance. The Forestry Officer considered this an acceptable approach to avoid impacts on ancient woodland.

7.280 To compensate for woodland removal, the Forestry Officer requires a minimum of 1.93 ha of compensatory planting in accordance with the Scottish Government's Control of Woodland Removal Policy. The area proposed for compensatory planting exceeds the amount of proposed woodland removal, and therefore, the proposal would meet NPF4 Policy 6c) and HwLDP Policy 52. No details of woodland enhancement have been included in the AI submission. If consent is granted conditions covering protection of retained trees during construction, Compensatory Planting Plan and Woodland Enhancement Plan are to be attached.

7.281 In their initial objection to the EIA, the Council's forestry officer stated the proposal does not appear to be enhancement/expansion/improvement of woodland cover integrated into the design, with only compensatory planting proposed.

7.282 The applicant has committed to embedded mitigation and best practice to ensure impacts on trees are avoided and mitigated. The method of felling and utilisation would be based on whole tree utilisation. All the timber and branch wood would be removed from site so there would minimal arisings left on site. Felling areas and timber volume to be removed is detailed in the EIAR. Given the negligible quantities of forestry waste likely to be produced from the proposed felling, these impacts have not been considered. However, all waste materials will be managed in accordance with SEPA's guidance notes – Land Use Planning System, SEPA Guidance Note LUPS-GU27 – Use of Trees Cleared to Facilitate Development on Afforested Land and the SEPA (2017) Guidance WST-G-027 version 3 Management of Forestry Waste.

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

Cultural Heritage

7.284 EIAR / AIR-1 Chapter 9 considers the archaeological and historic environment value of the site and assesses the potential both for direct and setting effects on archaeological features and heritage assets. The assessment is supported by a walkover survey, wireframes and visualisations (EIAR Vol 2c Figures 9.3-9.16 – these have not been updated for the revised layout). Community Councils and third parties have raised concerns with regards to effects on heritage assets, this includes Culloden Battlefield.

7.285 **Direct effects:** AIR-1 Figure 9.1 shows the known heritage assets within the application boundary. The EAIR reported direct physical effects during the construction phase on a non-designated section of General Wade's Military Road (GWMR). However, as reported in the AI, due to the alteration to the route of the access track the revised scheme now avoids the GWMR.

7.286 There is one known heritage asset within the site boundary that lies within the proposed 50 m micro-siting allowance. The EIA reports that there is potential for a

direct construction impact on this heritage asset as a result of micro-siting or accidental impact. This is identified as a modern memorial cairn (HA2) and is located 35 m south of the cutting for the proposed Turbine 1 crane pad. Suitable measures to protect the cairn are proposed to be agreed within a CEMP.

7.287 The EIAR reports negligible potential negligible for important archaeological remains. This is due to the elevated nature of the site, topography and the soils which makes it less suitable for settlement. However, impacts on unexpected archaeological remains may occur during the construction phase. The applicant acknowledges that preservation by record through archaeological monitoring is likely to be required. The Council's Historic Environment Team (HET) (Archaeology) is content subject to a condition securing a programme of archaeological works which would include a written scheme of investigation (WSI) and, if required, a post-excavation research design. This shall also include the requirements for a palaeo-environmental survey to complete the baseline recording of this area.

7.288 The Grid Connection Appraisal (AIR-2) does not identify any designation of non-designated heritage assets within the indicative grid connection route. The applicant further states that in line with good practice, a professionally qualified Archaeological Contractor would be appointed to act as an Archaeological Clerk of Works (ACoW) for the duration of the construction phase. The activities of the ACoW would be carried out according to the scope of work and terms specified under a Written Scheme of Investigation (WSI) approved by the Council. At this stage, no significant direct physical impacts upon known heritage assets as a result of the grid connection are anticipated. No consultees have raised concerns.

7.289 **Indirect effects** can occur when the development results in a change to the setting of a heritage feature. EIAR Figure 9.2 details the location of the Cultural Heritage Viewpoints (CHVPs) within the Outer Study Area (OSA) and the Zone of Theoretical Visibility (ZTV). The assessment only considered the operational effects phase of the development this was agreed with Historic Environment Scotland (HES) through scoping. Furthermore, HES agreed at scoping that the focus of the assessment should be on the following assets:

- Scheduled Monument SM11550 Milton of Tordarroch, Fort 800 m S of;
- Scheduled Monument SM11446 Isle of Moy, Fortified Island and Laird's House, including consideration of views towards Category B Listed Building LB14889 Moy Obelisk from the site of the Moy Estate NRHE 14102 Non-designated heritage asset;
- Inventory Garden and Designed Landscape and Category A Listed Building GDL00264 / LB8053 Leys Castle; and
- Scheduled Monument SM967 Culloden Battlefield, Graves of the Clans, Cairn and Well of the Dead, Inventory Battlefield BTL6 Battle of Culloden, CA667 Culloden Muir Conservation Area.

No significant effects (cumulatively) are reported in the EIAR/AIR-1.

7.290 **Culloden Battlefield, Graves of the Clans, Cairn and Well of the Dead (SM967)** The scheduled monument comprises 18th and 19th century cairns and structures commemorating the battle of Culloden in 1746. The monument sits within the heart of the Culloden Inventory Battlefield BTL6. The AIR-1 notes that the nearest turbine

(T4) has been removed from the revised layout. The nearest turbine of in the revised layout is 100 m further away from SM967 (now 11.76km from the nearest turbine). There are also two fewer turbines now visible from assessment viewpoints. Photomontages are shown at CHVP04 – CHVP07 and CHVP09, detailed in EIAR Vol 2c Figures 9.6 – 9.9 and 9.11. These have not been updated for the revised scheme. The EIA/AIR-1 reports minor (adverse) but not significant effects.

7.291 HES consider that the EIA under-assessed the contribution that an appreciation and experience of 'sense of place' makes to both the setting of the scheduled monument and the character of the battlefield landscape. However, HES are content that as demonstrated by the photomontages there is only a limited number of viewpoints within the battlefield that the proposed turbines would have the potential to draw the eye and detract from an appreciation and experience of the southern skyline as part of the battlefield landscape. HES concurs that the impacts on setting are not significant in EIA terms. HES maintains this position in relation to the revised layout.

7.292 **Scheduled Monument SM11446 Isle of Moy, fortified island and laird's house** Is located 2.59km from the nearest turbine in the revised. It comprises a largely artificial island in Loch Moy which was fortified, probably during the Middle Ages, and which, by the 17th century, supported a laird's house along with a number of service buildings. The AIR-1 notes that the nearest turbine (T12) is now 90 m closer to SM11446 but at a lower elevation. There are also two fewer turbines visible from assessment viewpoints. Photomontages are detailed in CHVP01, CHVP02, CHVP14 EIAR Vol 2c Figure 9.3, 9.4 and 9.16 these have not been updated for the revised scheme. The EIA/AIR-1 reports minor (adverse) but not significant effects.

7.293 HES consider that the proposed turbines would be visually dominant in selected views across the loch towards Isle of Moy, fortified island and laird's house (SM11446) from the east and would detract from an ability to appreciate and experience not only the defensive characteristic of the monument's setting, but also the secluded characteristic of the monument's setting as its sense of isolation would become challenged. HES consider that this impact is adverse and has been under-assessed within the EIAR. However, HES further contend that the turbines are peripheral to key inward views towards the monument from the south and north and west. In these locations the proposed turbines would detract from the character of the monument's setting but would not significantly adversely impact its integrity. Consequently, HES do not object to this application. HES have not altered this position in relation to the revised layout.

7.294 HES are satisfied that the proposal would not have a significant adverse impact on the setting of Leys Castle (LB8053) and its associated GDL (GDL264).

7.295 Whilst not objecting the Councils Historic Environment Team - Conservation consider that the setting of the Category A listed Aultnaslanach Viaduct on the outskirts of Moy should have been included in the applicant's assessment. HET - Conservation identifies that its heritage value is derived from its method of construction. As such the principle setting of the bridge is in its functional relationship to the railway itself and not in relation to the landscape or views within it. So, whilst there will be views of the Wind Farm from the bridge, the structure is only experienced by rail passengers and was not designed to relate to surrounding views, the wind farm would not materially alter its understanding or appreciation.

Consequently, despite the omission HET – Conservation raises no objection to the proposal.

7.296 The Grid Connection Appraisal (AIR-2) identifies that theoretical intervisibility of the OHL with nearby heritage assets has been analysed. At this stage the applicant has not identified any designated or known non-designated assets within close proximity of the indicative route whose settings are likely to be changed as a result of the operational OHL. However, effects on the setting of cultural heritage assets will be reduced as far as possible through the detailed routeing and design process. As part of the detailed assessment stage, further survey work will be required and consultation with HES and HET. No consultees have raised concerns at this stage.

Operational Noise and Shadow Flicker

7.297 EIAR / AIR-1 chapter 11 outlines the applicant's assessment in relation to the potential noise and vibration effects on nearby residential receptors. Numerous third-party objections have cited concerns regarding noise and shadow flicker.

7.298 Seven noise sensitive receptors were identified (AIR-1 Figure 11.1). The EIAR noise impact for the original scheme demonstrates that predicted levels from the development alone will meet the simplified ETSU limit of 35dB LA90 at all receptors except Lynemore Cottage which is 36.1dB. In relation to the revised scheme, the noise impact assessment demonstrates that predicted levels are generally the same as identified in the EIAR with negligible changes of 0.3dB or less at some receptors. Lynemore Cottage is still reported as 36.1dB. Environmental Health have no objection as the cumulative effects are within range.

7.299 Cumulative effects were assessed in relation to Farr Wind Farm Glen Kyllachy Wind Farm and Moy Wind Farm. These are within 4.6km of the site. The cumulative assessment has been made against this Councils recommended limits of 35dB daytime; 38dB nighttime or up to 5dB above background and states that worst case predicted noise levels will meet the relevant limits albeit with no margin at one property. However, as noted by Environmental Health, this assessment assumes that receptors are downwind of all turbines which cannot happen in reality particularly, as Moy wind farm lies to the north-east of most receptors and Lynemore etc. are to the south-west. Therefore, actual cumulative noise levels are likely to be lower than predicted in the assessment.

7.300 Thirty party concerns have been raised in relation to noise from the BESS. However, due to the separation distance of more than 2 km, the operation of the BESS, control building and substation have been scoped out of the EIA. Environmental Health are content with this approach.

7.301 Environmental Health have no objection, subject to a planning condition securing the noise limits. However, it is noted that Kyllachy Wind Farm has not been included, as this was at the scoping stage but has since been submitted as an application. Environmental Health state that in the event that Kyllachy Wind Farm obtains consent before Lynemore Wind Farm, the applicant will be required to submit a revised noise assessment. This can be controlled by condition should the application be granted consent.

7.302 Since the application was first submitted new noise guidance has been issued by the UK Government - Assessment and Rating of Wind Turbine Noise (ARWTN) (June 2026), which replaces ETSU-R-97. The applicant has submitted a clarification statement which addresses the new guidance. The applicant outlines that the ARWTN justifies a choice when selecting an appropriate lower fixed noise limits based on power generation, number of noise-sensitive properties, and duration and level of exposure. The applicant further outlines that a cumulative limit in the mid-upper end of the 35-40 dB(A) range is strongly justified for the proposal given the significant generation capacity of the project and other site-specific considerations, such as the low number of residential properties in the area. ARWTN also sets the LLV for night-time to be 43 dB. However, the applicant argues that as the EIA and AIR-1 assessment show compliance with the more stringent lower fixed noise limited preferred by the Council. Therefore, the applicant concludes that the assessment is relatively precautionary and therefore consistent with the ARWTN guidance.

7.303 **Shadow flicker** can occur under certain combinations of geographical position and time of day, when the sun passes behind the rotors of a wind turbine and casts a shadow over neighbouring properties. These potential situations can only occur at locations 130º either side of north. The Scottish Government's guidance is that shadow flicker is generally only experienced within 10 rotor diameters of a wind farm, however, the Council consider that it is appropriate to extend this limit to 11 rotor diameters, due to the area's northerly latitude. Based on these Councils criteria, the zone of potential shadow flicker (ZPSF) is defined as a radius of 1,782 m from each turbine and limited to 130º either side of north (see EIAR/ AIR-1 Figure 13.7). Five properties are located within this area. Third parties and Strathnairn Community Councils have raised concerns about the impact of shadow flicker.

7.304 As noted by the applicant there is no formal guidance in the UK on the amount of shadow flicker that is considered the limit beyond which amenity effects are significant. The EIAR adopted a threshold of 30 hours per year or a maximum of 30 minutes on any given day as the thresholds for potential significant effects. This is justified on the basis of guidance from several European countries and the limit which has been used consistently in previous applications submitted to the ECU.

7.305 For the revised scheme the nearest turbine to receptors is T12, with the closest receptor (1) 1,470m from the turbine (AIR-1 Figure 13.7). Based on the 'theoretical' worst-case scenario, which does not take into consideration the physical intervening objects and/or weather conditions such as cloud cover which may prevent or reduce the duration of shadow flicker effects. Receptor 1 is predicted to experience shadow flicker effects above the threshold, previously it was Receptors 1 and 2. Receptor 1 is predicted to experience a maximum of 0.45 hours per day (0.35 mean hours per day) and 33.5 hours per year. This is a reduction in comparison to the original scheme which predicted 48.6 hours per year.

7.306 However, the applicant has also presented a 'realistic' worst-case scenario, which takes into account the amount of time when the correct meteorological conditions would be present for shadow flicker to occur. This is based on 30 years of Met Office data. This doesn't take into account the orientation of the turbine rotor, periods when turbine blades are not turning, and the presence of screening between the receptor and turbine. Based on this the AI reports that Receptor 1 will theoretically experience

0.10 mean hours per day and 9.4 hours per year. Due to the location of the Wind Farms, no cumulative effects are reported. Based on this the applicant reports no significant effects and states that no mitigation is required.

Aviation, Radar and Telecommunications

7.307 Chapter 13 of the EIAR/ AIR-1 assesses the possible effects of the proposal on existing communications infrastructure and aviation safeguarding facilities. Several third-party comments have raised concerns with regards to aviation safety and visible lighting. Lighting is covered in the LVI section of this Report on Handling. In terms of safety, there are no unresolved objections from consultees. The Ministry of Defence (MOD) requests a condition which secures the submission of an aviation safety lighting scheme which details how the development would be lit throughout its operational life to maintain aviation safety. In addition, aviation charting and safety management measures are requested to submitted to the MOD 14 days prior to commencement of works.

7.308 Highlands and Islands Airports Ltd (HIAL) assessment highlighted a potential conflict with the safeguarding criteria for Inverness Airport and objected to the scheme. Following further ongoing discussions with the developer, HIAL have withdrawn its objection subject to conditions securing an Instrument Flight Procedures (IFP) Assessment which demonstrates that an IFP Scheme is not required. If an IFP Scheme is required that this needs to be agreed with the Airport Operator and if requires the Civil Aviation Authority. In addition, a condition securing a Primary Surveillance Radar Assessment and mitigation scheme is required.

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

Other Material Considerations

7.310 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. An exception is any residual concrete hardstanding areas, which would require removal to a depth of 1m below the ground level and be graded with soil and replanted. Cables also 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 approximate pre-development condition, unless otherwise agreed with the Planning Authority.

7.311 The requirements to decommission at its end of life is relatively standard and straight forward, with any request for re-powering to be considered with the submission of a relevant future application. It is important to ensure that any approval of this project secures by condition a requirement to deliver a draft A finalised Decommissioning and Restoration Plan (DRP) for approval prior to the commencement of any

development and ensure an appropriate financial bond is put in place to secure these works.

7.312 The finalised DRP would be expected to be submitted to and approved in writing by the Planning Authority in consultation with SEPA no later than 12 months prior to the final decommissioning of the site. The detailed DRP would then be implemented within 18 months of the final decommissioning of the development unless otherwise agreed in writing with the Planning Authority.

7.313 Given the complexity of major developments, and to assist in discharge of conditions, the Planning Authority usually seeks that the developer employs a Planning Monitoring Officer (PMO). The role of the PMO, amongst other things, would include the monitoring of, and enforcement of compliance with, all conditions, agreements and obligations related to this permission (or any superseding or related permissions) and shall include the provision of a bi-monthly compliance report to the Planning Authority.

Non-Material Considerations

7.314 Non-material considerations raised in representations related to the lack of current grid capacity, and perceived oversupply of renewable energy generation in the area. Such matters are not material to the determination of this application, with the Scottish Government having declared a climate and nature crisis, and current grid capacity not being a determining matter as set out within NPF4. The principle of this type of development is established in national policy, with the proposed development being of national importance for the delivery of the National Spatial Strategy.

7.315 Similarly, in relation to community benefit, whilst this can aid the just transition towards net zero, this is currently a voluntary arrangement as previously explained in the socio-economic section of this report.

7.316 In relation to safety concerns for the BESS. The Governments new BESS guidance (2026) makes it clear that health and safety aspects including fire risk are not material planning considerations where this is covered by other legislation. This includes the Fire (Scotland) Act 2005 and the Health and Safety at Work Act 1974 which require that fire safety benchmarks are met and that reasonable measures used to ensure that employees /members of the public are not harmed. As detailed in para 5.2 of the Government BESS guidance (2026), the Health and Safety Executive is the UK regulator of health and safety matters. This includes process fire precautions which are special, technical or organisational measures required to prevent the risk of fire.

7.317 However, as detailed, matters which fire safety considerations relating to site layout, emergency access or appearance are material planning considerations. As such in the event that the scheme is approved, then conditions would need to be imposed to secure details of the siting, layout, access (for maintenance and emergency service vehicles) and the design of all external components. Details of the fire risk management system including fire suppression, water supply, drainage including containment and segregation of expended fire suppression agent and/or water from the water environment, as well as a Fire Risk Management Plan to include an Emergency Response Plan will be required.

7.318 The right to a view and a reduction in property prices are not material planning considerations.

8. Matters to be secured by Legal Agreement

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

9. CONCLUSION

9.1 The Scottish Government gives considerable commitment to renewable energy and encourages planning authorities to support the development of wind farms where they can operate successfully and be situated in appropriate locations. The project has potential to contribute to addressing the climate emergency through additional renewable energy generation. In this regard it is anticipated to contribute an additional 86.4MW while the indicative storage capacity of the BESS facility is 50MW of installed capacity, plus up to 50MW of battery storage, and make a meaningful contribution toward addressing climate change on the road to net zero. As with all applications, a balancing exercise must be undertaken. The benefits of the proposal must be weighed against potential drawbacks and then considered in the round, taking account of the relevant policies of the Development Plan, which includes NPF4, as well as all other material planning considerations.

9.2 Notwithstanding the nature and scale of the proposal, there has been significant public interest in the proposed development. Both the host Strathdearn Community Council and Strathnairn Community Council object to the proposed development, citing concerns over significant cumulative landscape and visual impacts, adverse effects on local communities, tourism, peatlands, biodiversity and the natural environment. The Community Councils consider that the area has already accommodated substantial wind energy development and the proposed development would result in unacceptable environmental and visual harm, including impacts on dark skies and increased light pollution. Strathdearn Community Council also requests mitigation measures should consent be granted, including the removal of the four turbines closest to residential properties, further ecological and tourism assessment along with a dark-sky lighting strategy.

9.3 Whilst the Council's Ecology Team objection is noted, given the lack of detail with regards to off-site restoration and enhancement measures yet to be secured and concerns around compliance with NPF4 Policy 3, it is considered that this can be dealt with through a pre-commencement condition. Additionally, Findhorn District Salmon Fishery Board regarding the impact on peatland, hydrology and cumulative effects.

9.4 The external Landscape Advisor from Ironside Farrar considers there are strong grounds for objection give the landscape and visual concerns noted. Given the 200 m scale of turbines to blade tip there is no doubt the proposed development will increase the presence and visibility of wind energy development in the immediate and wider surrounding area. Significant visual impacts are expected from wind farm developments, however, in this case, these are considered to extend beyond localised range. The applicant has provided a comprehensive Landscape and Visual Impact Assessment and its findings that visual effects are localised and acceptable

is contested. Whilst it is agreed that there will be Significant effects on receptors at representative viewpoints VP1 General Wade's Road, Moy to Inverness, VP2 B9154 northeast of Moy, VP3 A9 North of Tomatin, VP6 Sustrans NCR 7 at Tomatin, VP8 Càrn a' Choire Mhoir, VP10 Carn nan Tri-tighearnan, VP11 Carn na Làir (near CNP boundary) extending to 10.5 km from the nearest turbine it is considered the applicant has understated the visual impacts from VP7 A9 at Daviot and VP16 Leachkin, Inverness extending the geographical extent of Significant effects to at least 14.3 km from the nearest turbine.

9.5 The proposal would result in significant landscape effects within around 5 km, particularly in Strathdearn along the A9 corridor, where turbines would appear overly prominent on the southern hillsides. Although the area is not nationally designated and has moderate sensitivity, the development would form a distinct wind farm rather than read as part of the existing Farr and Glen Kyllachy cluster, due to its separation and larger turbine scale (almost twice the height of the existing cluster).

9.6 Additionally, the applicant considers that, on balance, the proposed development meets all of the relevant OWESG criterion. The case officer disagrees and considers that the proposed development does not comply with 6 of the criteria, with 4 criteria being met from the 10. Even allowing for subjective judgement it is considered the applicant has understated the detrimental impacts of the proposed development.

9.7 Overall, the proposed development represents a notable departure from the established and consented pattern of wind energy development in the area. Its siting and scale would result in substantial visual impacts from the A9 corridor and on nearby settlements, Highland Main Line, recreational routes, hill summits and visitor destinations including Inverness Castle. While the most affected landscapes are not considered to be of the highest sensitivity or value, the significant adverse effects on landscape character and visual amenity are considered sufficiently harmful to weigh materially against the proposal and its overall acceptability.

9.8 Whilst the applicant's sequential route assessment along the A9 is generally accepted, it is considered to understate the experiential value of this section of the route, which provides a distinctive transition from urban Inverness through Strathdearn to the expansive upland landscapes of the Cairngorms National Park. This journey is experienced by residents, commuters and visitors alike as an important gateway to the Highlands and the National Park. Due to the scale, location and proximity of the turbines to the A9 corridor, the development would diminish this gateway experience.

9.9 The application has been assessed against the policies set out in NPF4 and the Development Plan, including Policy 67 of the Highland wide Local Development Plan with its 10 tests which are expanded upon with the OWESG. This policy also reflects policy tests of other policies in the plan, for example Policy 28. Whilst the proposal can be considered to benefit from an in-principle support given the contribution the development would make towards tackling climate change, this is outweighed by the significant landscape and visual effects both in isolation and cumulatively with surrounding wind farms.

9.10 Schedule 9 of the Electricity Act sets out what an applicant shall do in relation of the preservation of amenity. It is considered that the proposal has not had regard to the

desirability of preserving natural beauty and the significant detrimental effects cannot be mitigated. This is by virtue of the location, setting, scale and design of the wind farm, resulting in landscape and visual impacts, in isolation and cumulatively, which cannot be accommodated.

9.11 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 there are no material considerations which would lead to a different conclusion.

9.12 The Scottish Government gives considerable commitment to renewable energy and encourages planning authorities to support the development of wind farms where they can operate successfully and be situated in appropriate locations. The project has potential to contribute to addressing the climate emergency through additional renewable energy generation. In this regard it is anticipated to contribute an additional 86.4MW, with up to is 50MW of installed storage capacity at the associated BESS facility and make a meaningful contribution toward addressing climate change on the road to net zero. As with all applications, a balancing exercise must be undertaken. The benefits of the proposal must be weighed against potential drawbacks and then considered in the round, taking account of the relevant policies of the Development Plan, which includes NPF4, as well as all other material planning considerations.

10. IMPLICATIONS

10.1 Resource: Significant staff and financial resources from participation in a Public Local Inquiry.

10.2 Legal: If an objection is maintained to the proposal, the application will be subject to a Public Local Inquiry.

10.3 Community (Equality, Poverty and Rural): Not applicable

10.4 Climate Change/Carbon Clever: The proposal has the ability to make a meaningful contribution toward the production of renewable energy.

10.5 Risk: Not applicable

10.6 Gaelic: Not applicable

11. RECOMMENDATION

Action required before consultation response being issued to Scottish Ministers: None

It is recommended to maintain the Council's **OBJECTION** to the application subject to Part A and for the reasons set out in Part B, below:

Part A – Delegated Authority

1. The Committee grants delegated authority to the Area Planning Manager to respond to the Scottish Government's Energy Consents Unit / Scottish

Minsters, regarding any future Further / Supplementary Environmental Information, where that information does not materially reduce the scale of the proposed development.

Part 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, conserving flora and physiographical features of special interest by virtue of failing to demonstrate compliance with NPF4 Policies 11 (Energy) and 4 (Natural Places), and HwLDP Policies 67 (Renewable Energy Developments), 57 (Natural, Built and Cultural Heritage), 61 (Landscape and 28 (Sustainable Design) and the Onshore Wind Energy Supplementary Guidance as the development would have a significantly detrimental visual impact, particularly as viewed by road users, residents, rail users, recreational users of the outdoors, and visitors to Inverness Castle, in the wider vicinity of the site as represented by viewpoints:

   VP1 General Wade's Road, Moy to Inverness;
   VP2 B9154 northeast of Moy;
   VP3 A9 North of Tomatin;
   VP4 B861 between Balnafoich & Inverarnie;
   VP6 Sustrans NCR 7 at Tomatin;
   VP7 A9 at Daviot;
   VP8 Càrn a' Choire Mhoir;
   VP10 Carn nan Tri-tighearnan;
   VP11 Carn na Làir (near CNP boundary); and
   VP16 Leachkin, Inverness.

   This is by virtue of the siting, design and location of the proposed development located on the outer facing slopes of the hills and summits surrounding Strathdearn, resulting in a significant change to the gateway experience between Inverness and the Cairngorms National Park, which would undo previously secured mitigation associated with the adjacent surrounding wind farms, and would have a significantly detrimental visual and cumulative impact.

Signature:	Bob Roberson
Designation:	Area Planning Manager – South
Authors:	Roddy Dowell – Principal Planner
	Alison Harvey – Planner
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Background Papers:	Documents referred to in report and in case file.
Relevant Plans:	Plan 1 - EIAR Figure 1.1 Site Boundary
	Plan 2 - AI Figure 2.5 Revised Layout Plan

Plan 3 - AI Figure 2.4 EIA and AI Layout Plan

Plan 4 - EIAR Figure 2.6 Typical Turbine Elevations

Plan 5 - EIAR Figure 2.13 Typical onsite substation and BESS layout

Appendices:

Appendix 1 - Cumulative Wind Farm Developments

Appendix 2 - Development Plan and Other Material Policy Considerations

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

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

Appendix 5 - Viewpoint Assessment Appraisal – Visual Impact

Appendix 1 – Cumulative Wind Farm Developments (within 40km)

A1.1 This list has been updated by Officers to reflect the most recent position as of **November 2026**. This excludes all refused applications and those at EIA Scoping stage.

Wind Farm Site Name	No. of Turbines	Max Tip Height (m)	Distance from Proposed Development
Operational Sites			
Farr	40	100	2.2km
Glen Kyllachy	20	110	3.8km
Moy	20	124.9	4.5km
Tom nan Clach	13	125	9.9km
Aberarder	12	130	13.6km
Dunmaglass	33	120	14.9km
Corriegarth	23	119	23.5km
Auchmore	2	80	29.5km
Hill of Glaschyle	12	99.5	Within 40km
Stronelairg	83	135	Within 40km
Berry Burn	29	99.5	Within 40km
Fairburn	20	100	Within 40km
Paul's Hill I	28	--	Within 40km
Bhlaraidh	36	135	Within 40km
Corrimony	5	100	Within 40km
Novar	32	60	Within 45km
Novar Extension	14	100	Within 45km
Rothes I and II	40	124.8	Within 45km
Consented / under construction			
Tom Na Clach Extension	7	149.9	10.4km
Corriegarth 2	14	149.9	23.2km
Cairn Duhie	16	149.9	23.5km
Ourack*	18	180	29.5km
Clash Gour	48	130-176	30.5km
Cloiche	29	149.9	Within 40km
Dell	14	115.5-130.5	Within 40km
Bhlaraidh Extension	15	180	Within 40km
Berry Burn Extension	9	149.9	Within 40km
Paul's Hill II	6	134-149.9m	Within 40km
Strathrory	7	149.9	Within 45km
Application / Appeal Sites			
Kyllachy**	13	180	4.5km

Clune**	26	200	9.5km
Balnespick**	9	200	10.2km
Highland**	38	200-230	14.7km
Loch Liath	13	180-200	Within 40km
Abhainn Dubh	9	149.9	Within 40km
Chrathaich	13	149.9	Within 40km
Kellas Drum	8	185	Within 45km
Ceislein**	11	250	Within 45km

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

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.

1 – Tackling the climate and nature crisis

2 – Climate mitigation and adaptation

3 – Biodiversity

4 – Natural places

5 – Soils

6 – Forestry, woodland and trees

7 – Historic assets and places

11 – Energy

13 – Sustainable transport

22 – Flood risk and water management

23 – Health and safety

25 – Community wealth benefits

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

52 – Principle of Development in Woodland

53 - Minerals

55 - Peat and Soils

56 - Travel

57 - Natural, Built and Cultural Heritage

58 - Protected Species

59 - Other important Species

60 - Other Importance Habitats

61 - Landscape

62 - Geodiversity

63 - Water Environment

64 - Flood Risk

66 - Surface Water Drainage

67 - Renewable Energy Developments

68 - Community Renewable Energy Developments

69 - Electricity Transmission Infrastructure

72 - Pollution

73 - Air Quality

74 - Green Networks

77 - Public Access

78 - Long Distance Routes

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

A2.3 Policy 2 - Nature Protection, Preservation and Enhancement. Developments proposals for national, major and EIA development will only be supported where it is demonstrated that the proposal will conserve and enhance biodiversity, including nature networks within and adjacent to the site, so that they are in a demonstrably better state than without intervention, including through future management.

A.2.4 This Plan identifies Settlement Development Areas (SDAs) which are delineated boundaries that reflect the built-up areas and allocated expansion areas for a main settlement. Of relevance to the proposed development is the Tomatin SDA, located to the south of the proposed development site. A number of place-making priorities have been identified for Tomatin to create a new mixed-use development close to the A9; new housing; active travel provision; explore options for installation of a rail halt; vehicle parking improvements and to preserve and enhance green networks within and around the settlement.

A2.5 IMFLDP2 also identifies other settlements nearby to the proposed development site. Farr and Inverarnie is located to the northwest of the proposed development site and is a growing settlement where proportionate and appropriate rural development can be supported where it is sustainable and well-connected and will not lead to further sporadic or ribbon development. A number of Placemaking Priorities are identified for Farr and Inverarnie, including future developments must only add to the existing clusters at Farr and Inverarnie; safeguarding of land for community/local retail use; delivery of new affordable housing; risk of flooding associated with the River Nairn and River Farnack will limit further development; safeguarding of areas of woodland from development; active travel; continued development of community and recreational facilities and enhancement of existing community-owned woodlands, and blue and green networks.

A2.6 The proposed development site also falls within areas covering two Local Place Plans (LPPs). Strathnairn LPP and Strathdearn LPP were registered with the Highland Council in August 2026. Strathdearn LPP covers rural parishes of Moy, Dalarossie and Tomatin and sets out a five-year vision for the community, with proposals for land-use in the Strathdearn area, for infrastructure, peatland restoration and community improvements. Strathnairn LPP covers rural settlements including Dunmaglass, Croachy, Brin, Farr, Castletown, Daviot, Nairnside and Leanach. Its objectives seek to enhance local liveability, support sustainable development, promote sustainable transport solutions, preserve heritage and environment, establish homes for future generations, and build climate resilience.

Onshore Wind Energy Supplementary Guidance (OWESG) (2016)

A2.7 The Onshore Wind Energy Supplementary Guidance (OWESG) provides additional guidance on the principles set out in HwLDP Policy 67 for renewable energy developments. The Guidance sets out the Council's agreed position on onshore wind energy matters, and, although reflective of Scottish Planning Policy at the time of its adoption prior to the adoption of NPF4, the document remains an extant part of the Development Plan and is therefore a material consideration in the determination of onshore wind energy planning applications. Nevertheless, the Spatial Framework included in the document is no longer relevant to the assessment of applications as in effect, the policies of NPF4 (specifically Policy 11, Energy) removes Group 2 Areas of significant protection from consideration by effectively making all land in Scotland either Group 1 Areas where wind farms will not be acceptable, or Group 3, Areas with potential for wind farm development.

A2.8 However, the document also contains the Landscape Sensitivity Appraisals which identifies Key Views, Key Routes and Gateways as well as Landscape Character Area sensitivities and guidance. This appraisal forms part of the statutorily adopted Onshore Wind Energy Supplementary Guidance. The turbine envelope lies within LN6 *Monadhliath ridge and tops, Rolling Uplands*.

A2.9 The proposed application site is also located within the boundary of the Dava Moor, Nairn and Monadhliath Sensitivity Appraisal Area, hereafter referred to as the Pilot Study. The Pilot Study was commissioned by NatureScot to test the methodology of their updated sensitivity assessment guidance. To date the Pilot Study has not been subject to public consultation and does not form part of the adopted development plan. It is however a useful other material consideration as it provides useful context for the landscape sensitivities in the area.

A2.10 Other Highland Council Supplementary Guidance

- Biodiversity Enhancement Planning Guidance (May 2024)
- Developer Contributions (Mar 2018)
- Flood Risk and Drainage Impact Assessment (Jan 2013)
- Green Networks (Jan 2013)
- Highland Historic Environment Strategy (Jan 2013)
- Highland's Statutorily Protected Species (Mar 2013)
- Highland Renewable Energy Strategy and Planning Guidelines (May 2006)

- Physical Constraints (Mar 2013)
- Roads and Transport Guidelines for New Developments (May 2013)
- Special Landscape Area Citations (Jun 2011)
- Sustainable Design Guide (Jan 2013)
- Trees, woodland and development (Jan 2013)

OTHER MATERIAL POLICY CONSIDERATIONS

Emerging Highland Council Development Plan Documents and Planning Guidance

A2.11 The Highland-wide Local Development Plan is currently under review and is at Main Issues Report Stage. It is anticipated the Proposed Plan will be published following publication of secondary legislation post NPF4.

A2.12 In addition, the Council has further advice on delivery of major developments in a number of documents. This includes Construction Environmental Management Process for Large Scale Projects (Aug 2010) and The Highland Council Visualisation Standards for Wind Energy Developments (Jul 2016).

A2.13 The site is also located within the Dava Moor, Nairn and Monadhliath Area Wind Energy Landscape Sensitivity Pilot Study (2021). The proposal is situated within the Rolling Uplands (The Monadhliath) Landscape Assessment Unit (AU) as defined by this pilot study.

Other National Legislation, Policy and Guidance

A2.14
- Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 – interim and annual targets replaced by Climate Change (Emissions Reduction Targets) (Scotland) Bill in November 2024
- Climate Change Committee Report to UK Parliament (July 2024)
- UK Government Clean Power Action Plan (Dec 2024)
- Draft Energy Strategy and Just Transition Plan (2023)
- Onshore Wind Energy Policy Statement (2022)
- Scottish Energy Strategy (2017)
- 2020 Routemap for Renewable Energy (2011)
- Energy Efficient Scotland Route Map, Scottish Government (2018)
- Siting and Designing Wind Farms in the Landscape, SNH (2017)
- Assessing Impacts on Wild Land Areas, Technical Guidance, NatureScot (2020)
- Wind Farm Developments on Peat Lands, Scottish Government (2011)
- Historic Environment Policy for Scotland, HES (2019)
- PAN 1/2011 - Planning and Noise (2011)
- PAN 60 – Planning for Natural Heritage (2008)

- Circular 1/2017: Environmental Impact Assessment Regulations (2017)
- NatureScot: Guidance on Aviation Lighting Impact Assessment (2024)
- NatureScot: Advising on peatland, carbon-rich soils and priority peatland habitats in development management (2023)
- Scottish Government Planning Guidance Biodiversity (2025)
- Grid Scale Battery Energy Storage System Planning – Guidance for Fire and Rescue Service (Dec 2025)
- Planning Guidance: Battery Energy Storage Systems (March 2026)
- Planning Circular 4/1998: The Use of Conditions in Planning Permissions
- Department for Energy Security and Net Zero - Assessment and Rating of Wind Turbine Noise" (ARWTN) (2026).

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

National Policy

A3.1 National Planning Framework 4 (NPF4) forms part of the Development Plan and was adopted in February 2023. It comprises three parts:

- Part 1 – sets out an overarching spatial strategy for Scotland in the future. This includes spatial principles, national and regional spatial priorities, and action areas;
- Part 2 – sets out policies for the development and use of land to be applied in the preparation of local development plans; local place plans; masterplans and briefs; and for determining the range of planning consents. This part of the document should be taken as a whole in that all relevant policies should be applied to each application; and
- Part 3 – provides a series of annexes that give the rationale for the strategies and policies of NPF4, it outlines how the document should be used and sets out how the Scottish Government will implement the strategies and policies.

A3.2 **Part 1 - The Spatial Strategy** sets out that we are facing unprecedented challenges and that we need to reduce greenhouse gas emissions and adapt to future impacts of climate change. It sets out that that Scotland's environment is a national asset which supports out economy, identity, health and wellbeing. It sets out that choices need to be made about how we can make sustainable use of our natural assets in a way which benefits communities. The spatial strategy reflects legislation in setting out that decisions require to reflect the long-term public interest. However, in doing so it is clear that we will need to make the right choices about where development should be located ensuring clarity is provided over the types of infrastructure that needs to be provided and the assets that should be protected to ensure they continue to benefit future generations. The Spatial Priorities support the planning and delivery of sustainable places, where we reduce emissions, restore and better connect biodiversity; liveable places, where we can all live better, healthier lives; and productive places, where we have a greener, fairer and more inclusive wellbeing economy.

A3.3 At the national level, NPF4 considers that Strategic Renewable Electricity Generation and Transmission Infrastructure will assist in the delivery of the Spatial Strategy and Spatial Priorities for the north of Scotland, and that Highland can continue to make a strong contribution toward meeting Scotland's ambition for net zero. Alongside these ambitions, the strategy for Highland aims to protect environmental assets as well as to stimulate investment in natural and engineered solutions to address climate change. This aim is not new and will clearly require a balancing exercise to be undertaken, which is reflected throughout NPF4.

A3.4 The proposed development is of national importance for the delivery of the national Spatial Strategy, whereby in principle support for the development is established. As the proposed development would be capable of generating over

50 MW, it is of a type and scale that constitutes NPF4 National Development 3 - Strategic Renewable Electricity Generation and Transmission Infrastructure.

A3.5 Part 2 – Policies: sets out the National Planning Policy which cover three themes: Sustainable Places, Liveable Places, and Productive Places; within which there are a total of 33 policies and many of these consist of distinct sub-policies. These 33 national planning policies form part of the development plan and will be assessed along with the Council's LDP policies for development management decisions. Many of NPF4's policies are relevant to consideration of this proposal, but attention is particularly drawn here to the following key policies.

A3.6 **NPF4 Policies 1 (Tackling the climate and nature crises), 2 (Climate mitigation and adaption) and 3 (Biodiversity).** The aims of policy 1 is to encourage, promote and facilitate development that addresses the global climate emergency and nature crisis. When considering developments 'significant weight' is to be given to those crises in decision making. 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 Policy 3.

A3.7 A key component of responding to the climate crisis is securing renewable, low carbon and zero emission energy generation. Significant weight is equally to be given to the nature crisis, in parallel with the climate crisis. However, the policy does not require proposals to respond equally to both of these policy strands.

As detailed in the ‘Natural Heritage’ section, NatureScot have removed their objection regarding White Tailed Eagle impacts. At the time of writing, an area of off-site enhancement has not yet been identified and provided to meet the requirements of NPF4 Policy 3 and as such the Council’s Ecology Officer maintains its objection. Whilst their objection is noted it is considered that any off-site enhancement and restoration measures can be controlled by condition should consent be granted.

A3.8 **Policy 4 - Natural Places** aims to protect, restore and enhance natural assets making best use of nature-based solutions. It also seeks to protect European, National and International 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: the objectives of designation and the overall integrity of the areas will not be compromised; or any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.

A3.9 The site is not located within any natural heritage designations, and no significant effects are anticipated. No significant effects on the Cairngorms National Park are anticipated. No significant effects on NSAs are anticipated.

A3.10 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.

A3.11 The proposed development was assessed in relation to the two nearest designated landscapes, the Drynachan, Lochindorb and Dava Moors SLA and the Loch Ness and Duntelchaig SLA. Both the applicant and the Council's appointed Landscape Architect concluded that the proposal would not give rise to significant effects on the special qualities of either designation. This is agreed.

A3.12 Drynachan, Lochindorb and Dava Moors SLA is valued for its expansive moorland landscapes, panoramic views, sense of openness, remoteness and tranquillity. Although the proposed turbines would be visible from parts of the western and north-western sections of the SLA and from a number of viewpoints within and around its boundary, it is considered that the proposed development would not materially affect the Special Landscape Qualities of the designation. This is because the western part of the SLA is already influenced by existing wind energy developments, including Moy Wind Farm and Tom nan Clach Wind Farm, and views towards the Monadhliath Mountains are not identified within the SLA citation as contributing to its special qualities. Consequently, no significant landscape effects on the SLA or its special qualities are anticipated.

A3.13 Loch Ness and Duntelchaig SLA is valued for the dramatic landform of the Loch Ness corridor, its contrasting upland plateau landscapes, long vistas and strong sense of place. While the development would be visible from parts of the SLA, including upland viewpoints such as Meall Fuar-mhonaidh, it is considered that it would not materially affect the special qualities of the designation. The turbines would be viewed at considerable distance and would form only a limited component of wider panoramic views that already contain wind energy development within the Monadhliath Mountains. There would be no visibility from the surface of Loch Ness itself, and the proposal would not adversely affect the distinctive landscape characteristics, sequential experience or key vistas for which the SLA is designated.

A3.14 Overall, whilst the turbines would be visible from parts of both SLAs, it is concluded that the proposal would not result in significant effects on their special qualities or undermine the reasons for their designation. The landscape impacts on these designated areas are therefore not considered to provide grounds for objection.

A3.15 The most significant policy change for Natural Places introduced by NPF4 Policy 4 is with regard to Wild Land Areas (WLA). This policy now states that renewable energy developments that support national targets will be supported in WLAs and that buffer zones around WLAs will not be applied, so that effects of development outwith WLAs will not be a significant consideration. The site itself is not located within any WLAs.

A3.16 **Policy 5 (Soils)** intends to protect carbon-rich soils, restore peatlands and minimise disturbance to soils from development. It states that development proposals will only be supported if they are designed and constructed in accordance with the mitigation hierarchy.

A3.17 Under Criterion c) Development proposals on peatland, carbon-rich soils and priority peatland habitat will only be supported for:

i. Essential infrastructure and there is a specific locational need and no other suitable site;
ii. The generation of energy from renewable sources that optimises the contribution of the area to greenhouse gas emissions reductions targets;
iii. Small-scale development directly linked to a rural business, farm or croft;
iv. Supporting a fragile community in a rural or island area; or
v. Restoration of peatland habitats.

The proposed development is considered to benefit from support under criterion c) ii. The revised scheme has reduced the amount of peat disturbance. SEPA have withdrawn its objection subject to conditions outlined in this Report of Handling. Findhorn Fishery Board maintain its objection in relation to impacts upon peat and the peatland restoration techniques proposed. The Board also consider that the development has the potential to alter the hydrology of the Findhorn sub-catchment and effect this spate river.

A3.18 **NPF4 Policy 6 Forestry, woodland and trees**: part b) notes that "Development proposals will not be supported where they will result in: i. Any loss of ancient woodlands, ancient and veteran trees, or adverse impact on their ecological condition; ii. Adverse impacts on native woodlands, hedgerows and individual trees of high biodiversity value… iii. Fragmenting or severing woodland habitats, unless appropriate mitigation measures are identified and implemented in line with the mitigation hierarchy.

A3.19 The applicant has indicated that micro-siting of the access track could avoid areas of ancient woodland. The Council's Forestry Team has withdrawn its objection and request conditions to secure tree protection measures, woodland enhancement, and a compensatory planting plan.

A3.20 NPF4 Policy 6 c) notes that "Development proposals involving woodland removal will only be supported where they will achieve significant and clearly defined additional public benefits in accordance with relevant Scottish Government policy on woodland removal. Where woodland is removed, compensatory planting will most likely be expected to be delivered".

A3.21 The proposed layout submitted under the original EIA required 4.29ha of woodland removal; however, the revised layout submitted as part of the EIA AI will require 0.74ha. The applicant details that designated woodland can be avoided through micro-siting. Compensatory planting of a minimum of minimum of 1.93 ha is requested by the Council's Forestry Officer and is controlled by condition. There is no outstanding consultee objection regarding forestry and woodland, subject to conditions being secured for tree protection, woodland enhancement and compensatory planting plans.

A3.22 **Policy 11 (Energy)** aims 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. Consequentially, the proposed development receives in principle support under this policy.

A3.23 Criterion c) 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. These matters are addressed in the Energy and Economic Benefits section. If consent is granted, then a condition securing a Local Employment Scheme is recommended.

A3.24 Criterion e) sets out 13 areas, where project design and mitigation are required to demonstrate how impacts upon them have been addressed. However, it goes onto state that in considering these impacts, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets.

A3.25 **i) impacts on communities and individual dwellings, including, residential amenity, visual impact, noise and shadow flicker;**

There are no consultee objections in relation to noise (construction and operation) or shadow flicker. Significant adverse visual effects are predicted for a number of residential and community receptors, including properties at Lynebeg, Balnafoich and elevated parts of Leachkin in northwest Inverness.

A3.26 **ii) significant landscape and visual impacts, recognising that such impacts are to be expected for some forms of renewable energy. Where impacts are localised and/or appropriate design mitigation has been applied, they will generally be considered to be acceptable;**

Whilst significant landscape and visual impacts are recognised as an inherent consequence of renewable energy developments, the effects of the proposed development would extend beyond what could reasonably be regarded as localised or adequately mitigated through design.

A3.27 The proposal would give rise to significant effects on the character of parts of the Rolling Uplands – Inverness (LCT 221, particularly within the Strathdearn sub-unit and the A9 corridor, where the turbines would appear as highly prominent features on the enclosing hillsides. Significant visual effects are also predicted for nearby

residents, road users, recreational receptors and visitors, particularly along the A9, which is identified as a Key Route within the OWESG.

A3.28 The proposed development would not respect the existing pattern of wind energy development, would erode the separation between wind farm groups, and would fail to respect landscape scale and distance. The development is therefore considered contrary to several key OWESG criteria and broader strategic landscape guidance.

A3.29 **iii) public access, including impact on long distance walking and cycling routes and scenic routes;**

No objections from the Councils Access Officer or Scotways, subject to conditions. The effects to users of the A9 have been noted previously. Significant visual effects are predicted on several recreational assets, including General Wade's Military Road, Sustrans National Cycle Route 7, Core Path IN27.02, Great Glen Way and the Loch Ness 360 Trail, with the greatest effects on General Wade's Military Road and National Cycle Route 7 where turbines would form prominent features in views. While no significant effects are predicted from Munro or Corbett summits, the development would significantly affect the route to and summit of Càrn na h-Easgainn (a Fiona) where the turbines would dominate views and reduce recreational amenity.

A3.30 **iv) impacts on aviation and defence interests including seismological recording;**

No outstanding aviation consultee objections, subject to conditions.

A3.31 **v) impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised;**

No concerns have been raised.

A3.32 **vi) impacts on road traffic and on adjacent trunk roads, including during construction;**

Transport Planning and Transport Scotland do not object subject to conditions outlined in this Report of Handling.

A3.33 **vii) impacts on historic environment;**

No objection from Historic Environment Scotland or the Council's Historic Environment Team.

A3.34 **viii) effects on hydrology, the water environment and flood risk;**

Neither SEPA nor the Council's Flood Risk Management Team have objected to the application, subject to conditions outlined in this Report of Handling.

A3.35 **ix) biodiversity including impacts on birds;**

The Council's Ecology Team consider consider that the proposed development does not comply with NPF4 Policy 3 given the location of off-site restoration and enhancement measures are yet to be secured which has led to an objection. Whilst their concerns are noted it is considered that this can be controlled by a pre-commencement condition along with conditions requiring an Environmental Clerk of Works (EnvCOW), Habitat Management Plan (HMP), Construction Environmental Management Plan (CEMP), pre-construction surveys, nesting birds, and for GIS shapefiles of key enhancement and compensatory planting areas to be supplied.

A3.36 **x) impacts on trees, woods and forests;**

The effects on trees and woodland have been reduced with the revised scheme. The application details compensatory planting measures. Further enhancement measures can be secured by condition.

A3.37 **xi) proposals for the decommissioning of developments, including ancillary infrastructure, and site restoration;**

A decommissioning plan and site restoration, including a financial bond will be secured by condition.

A3.38 **xii) cumulative impacts.**

Where appropriate cumulative effects have taken into account and considered to be acceptable. It is considered the proposed development would not form part of the existing Farr and Glen Kyllachy Wind Farm cluster. Instead, the scheme will form a new and separate wind farm cluster due to its physical separation, larger turbine scale and prominent siting on Carn na h-Easgainn, resulting in greater influence on views from Strathdearn and the A9 corridor contrary to the noted criteria within OWESG relating to the existing pattern of development, separation between clusters and landscape setting of nearby wind farms.

A3.39 Significant cumulative effects are predicted from several surrounding hill summits as well as recreational receptors at the Great Glen Way and residential receptors at Leachkin, Inverness, where the development would be seen alongside numerous operational and proposed wind farms. Significant cumulative effects are also identified for users of the A9, other local roads and surrounding recreational routes.

A3.40 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.

A3.41 On that point it is noted that both legislation and planning law indicate that where there may be incompatibility between NPF4 and the Local Development Plan (LDP) (HwLDP, IMFLDP, and Highland Council Supplementary Guidance) published prior to NPF4, then the more recent document shall prevail. Notwithstanding however, in instances of incompatibility, this requirement may not eliminate the provisions of the LDP in their entirety whilst these documents remain an extant part of the adopted Development Plan. That means that the Council may wish to give more weight to the provisions of its LDP over national policies where there is strong justification for doing so, such as where it feels that LDP policy is better equipped to respond to local conditions for example. However, this matter is yet to be tested through the planning system

A3.42 It is considered the proposal is not in overall conformity with NPF4 Policy 11, particularly with regards to 11 e) ii. which requires the proposed development project design and mitigation will demonstrate how the following impacts are addressed:

- Significant landscape and visual impacts, recognising that such impacts are to be expected for some forms of renewable energy. Where impacts are localised and/or appropriate design mitigation has been applied, they will generally be considered to be acceptable;

A3.43 **Policy 25 (Community wealth building)** aims to encourage, promote and facilitate a new strategic approach to economic development that also provides a practical model for building a wellbeing economy at local, regional and national levels. While NPF4 considers national developments as a focus for delivery, they should also be exemplars of the community wealth building approach to economic development. If consented a Local Employment Scheme planning condition is recommended. Further measures out with the remit of planning can be developed in conjunction with the Councils Community Wealth Building Team.

A3.44 Additionally, whilst the generality of HwLDP's topic policies is superseded by those in NPF4, HwLDP policies that offer greater detail than NPF4 or that are tailored to Highland circumstance (and are not wholly incompatible with NPF4) are still relevant and applicable. In particular, Policy 67 Renewable Energy and its related Onshore Wind Energy Supplementary Guidance is relevant, the latter classifying the application site as principally within an "Area of Significant Protection". Also, Highland-wide Local Development Plan Policies 67 (Renewable Energy Developments), 57 (Natural, Built and Cultural Heritage) and 61 (Landscape); and the location, siting, scale, massing and design of the proposed development is considered to be contrary to Highland-wide Local Development Plan Policy 29 (Design Quality and Place Making)

A3.45 Policy 57 of HwLDP requires all development proposals be assessed considering the level of importance and type of heritage features, the form and scale of the development, and any impact on the feature and its setting. The following criteria will also apply:

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

A3.46 In terms of HwLDP Policy 67, whilst the proposed development would contribute towards meeting renewable energy generation targets and generally have a positive effect on the local and national economy the Council has to be satisfied that it is located, sited and designed not to be significantly detrimental overall, either individually or cumulatively with other developments, having regard in particular to any significant effects on the following:

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

A3.47 **Part 3: Annex B – National Developments Statements of Need.** National developments are significant developments of national importance. Appendix B identifies 18 types of national development which will support the delivery of the spatial strategy. The statements of need set out in the Appendix are a requirement of the Town and Country Planning (Scotland) Act 1997). Any project identified as national development is required to be considered at a project level to ensure all statutory tests are met. This project is classified as National Development under Annex B Section 3 which states National Development for renewable energy includes “Strategic Renewable Electricity Generation and Transmission Infrastructure” including: a) On and offshore electricity generation, including electricity storage, from renewables exceeding 50 megawatts capacity;

Highland wide Local Development Plan (HwLDP)

A3.48 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”.

A3.49 HwLDP Policy 67 - Renewable Energy sets out that “renewable energy development should be well related to the source of the primary renewable resource needed for operation”. It states that ‘The Council will consider the contribution of the proposed development in meeting renewable energy targets and positive/negative effects on the local and national economy as well as all other relevant policies of the Development Plan and other relevant guidance.’ The Council will support proposals where it is satisfied, they are located, sited and designed such as they will not be significantly detrimental overall, individually or cumulatively with other developments against eleven specified criteria (as listed in HwLDP Policy 67). Such an approach is consistent with the concept of Sustainable Design (HwLDP Policy 28) and the concept of supporting the right development in the right place at the right time.

A3.50 Policy 69 – Electricity Transmission Infrastructure states that ‘proposals for overground, underground or sub-sea electricity transmission infrastructure (including lines and cables, pylons/ poles and vaults, transformers, switches and other plant) will be considered having regard to their level of strategic significance in transmitting electricity from areas of generation to areas of consumption’. Subject to balancing with this consideration, and taking into account any proposed mitigation measures, the Council will support proposals which are assessed as not having an unacceptable significant impact on the environment, including natural, built and cultural heritage features.

A3.51 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.

A3.52 As noted earlier, it is considered the proposal is not in overall conformity with HwLDP Policy 57 and 67.

The Inner Moray Firth Local Development Plan 2 (IMFLDP2)

A3.53 Policy 2 Nature Protection, Restoration and Enhancement states that development proposals for national, major and EIA development will only be supported where it is demonstrated that the proposal will conserve and enhance biodiversity, including nature networks within and adjacent to the site, so that they are in a demonstrably better state than without intervention, including through future management. To inform this, proposals should:

- be based on an understanding of the existing characteristics of the site and its local, regional and national ecological context prior to development, including the presence of any irreplaceable habitats or species;
- wherever feasible, integrate and make best use of nature-based solutions, demonstrating how this has been achieved;
- be supported by an assessment of potential negative effects which should be fully mitigated in line with the mitigation hierarchy prior to identifying enhancements;
- provide significant biodiversity enhancements, in addition to any proposed mitigation. take into account the community benefit of biodiversity and nature networks.

A3.54 Biodiversity enhancements proposed through development will require to be delivered within an agreed timescale and should include supporting nature networks, linking to and strengthening habitat connectivity within and beyond the development, where appropriate. Any submission should include management arrangements for long-term retention and monitoring of the approved biodiversity enhancements, wherever appropriate.

Onshore Wind Energy Supplementary Guidance (OWESG)

A3.55 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

A3.56 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 4 of this report.

Landscape Sensitivity Study

A3.57 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. In relation to LN6 the guidance cautions against a coalescence of development through the maintenance of distinct turbine clusters, with earlier developments tending to be in shallow 'bowls' in the landscape. The emphasis of the guidance is the preservation of the setting to and views from Loch Ness, and the A9 is noted as a 'Key Route'.

Dava Moor, Nairn and Monadhliath Area Wind Energy Landscape Sensitivity Pilot Study (2021)

A3.58 The Pilot Study provides strategic guidance on the ability of the landscape to accommodate wind energy development noting the importance of maintaining the existing pattern of wind farm development, retaining separation between wind farm clusters, respecting landscape scale and distance, avoiding development on prominent landforms that enclose key straths and transport corridors. It also recognises the sensitivity of the Strathdearn area and the need to avoid developments that would become overly dominant in views from the A9 corridor and surrounding settled landscapes.

A3.59 The proposed development is not considered to align with the landscape strategy set out in the Pilot Study. While the site lies within a landscape character type generally capable of accommodating larger-scale wind energy development, the turbines are proposed on the prominent slopes of Carn na h-Easgainn, forming the southern enclosure of Strathdearn and creating a strong visual presence from the A9 corridor and surrounding areas. The development is considered to expand wind energy development into a new landscape area rather than consolidating the established pattern associated with the Farr and Glen Kyllachy Wind Farm clusters.

A3.60 The proposed development conflicts with key principles of the Pilot Study by failing to respect the existing pattern of wind energy development, reducing separation between wind farm clusters and adversely affecting perceptions of landscape scale and distance. These concerns are reflected in the lack of compliance with 6 of the 10 criteria noted within OWESG.

A3.61 The proposed development is considered to represent a departure from the landscape strategy for the Monadhliath and Strathdearn area and contributes to the conclusion that the proposal would result in unacceptable landscape and visual effects which weigh against the development.

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

A3.62 The Onshore Wind Energy Policy Statement (OWEP) 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.

A3.63 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.

A3.64 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.

A3.65 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.

A3.66 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.

A3.67 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 - Assessment against Landscape and Visual Assessment Criteria contained within Section 4 of the Onshore Wind Energy Supplementary Guidance

Criterion 1 is related to relationships between settlements/key locations and the wider landscape.

The nearest settlements are Moy approximately 2.1 km to the northeast and Tomatin approximately 4.6 km to the southeast. Along with Moy and Tomatin, the City of Inverness, Westhill, Smithton, Culloden, Newlands of Culloden, Farr and Inverarnie are all located within the wider surrounding area. Due to the site location and topography, the proposed development is either relatively screened from these settlements, or the intervening distance lessens visual effects. However, the exception to this is Leachkin in the northwest of Inverness where residential and recreational receptors will experience significant effects from over 14.3 km on the higher elevation in view southeast across the city.

Turbines would often be screened from view to some extent within Moy and Tomatin by built development often along with trees and woodland. While there is the potential for significant visual effects from the settlement, effects are not likely to be prominent in the majority of views.

Meall Fuar-mhonaidh is regarded as a "Key Location" relevant to the proposed development. It is agreed the visual effects from this iconic viewpoint would not be significant given the set back of almost 30 km from the proposed development.

The proposed development is considered to meet the threshold of Criterion 1.

Criterion 2 is related to the extent to which the proposal reduces or detracts from the transitional experience of key Gateway Locations and routes.

There are no Key Gateway Locations listed in the OWESG - Loch Ness Landscape Sensitivity applicable to this area. Key Routes noted in the Loch Ness Landscape Sensitivity specific to this LCA and overlapped by the ZTV include "gateway" or transitional experiences. The applicant considers the turbines, although substantial in scale, would appear set back from the A9 as viewed from the context of the A9 corridor. This is disputed by the Council who considers that the turbines would not be sufficiently set back from the key route and would appear overly prominent within at least 10 km of the proposed development. This section of the A9 is a key transitional experience between the Cairngorms National Park and Inverness where the proposed development would result in a significant change to the view between this part of the route and would detract from this key route.

In terms of other surrounding routes, the Great Glen Way – there would be significant visual effects looking from the edge of Inverness, as shown by VP16, but this is not a "key gateway" view or "transitional experience". The applicant considers woodland planting proposed as part of the proposed development would strengthen and enhance the local landscape by screening views of the proposed turbines along the A9 corridor closest to the site boundary.

The proposed development is not considered to meet the threshold of Criterion 2 in relation to the Key Route, A9.

Criterion 3 is related to the extent to which the proposal affects the fabric and setting of valued natural and cultural landmarks

The site does not lie within any area covered by the OWESG Landscape Sensitivity Appraisal, and no natural or cultural landmarks were identified as being significantly affected during consultation or assessment. The proposed development would not result in significant impacts on the landscape character or views associated with the Cairngorms National Park, National Scenic Areas, Special Landscape Areas, or Wild Land Areas.

However, a number of cultural landmarks will experience visual effects from the proposed development including the Isle of Moy, fortified island and laird's house Schedule Monumnet (SM11446), Culloden Battlefield (BTL6) and Culloden Battlefield, Graves of the Clans, Cairn and Well of the Dead Scheduled Monumnet (SM967) and Aultnaslanach Viaduct Category A Listed Building. While locations such as Culloden Battlefield were considered, they are not regarded as cultural landmarks in this context and significant effects on views from these areas were not identified.

Although HES does not object to the application, it considers that the effects on the setting of the Isle of Moy, fortified island and laird's house (SM11446) have been under-assessed. HES advise that turbines would be visually dominant in some views across Loch Moy and would detract from appreciation of the monument's secluded and defensive setting, although not to a degree that would justify objection. Similarly, they consider adverse effects on the setting of the Culloden Battlefield would be minor and not significant. Likewise, THC's HET – Conservation acknowledged that the proposed development would affect the setting of some heritage assets, including the Aultnaslanach Viaduct and parts of the wider historic environment, but concluded that these effects would not be significant.

The proposed development is considered to meet the threshold of Criterion 3.

Criterion 4 is related to the extent that the amenity of key recreational routes and ways is respected by the proposal.

The applicant concludes that this criterion is largely achieved. They consider Significant visual effects are predicted on a relatively small number of recreational routes and predominantly within limited sections of those routes. Whilst they note views of the proposed turbines would be noticeable, they would generally not be overwhelming or substantially diminish the overall recreational experience.

There will be significant visual effects along several recreational routes, including General Wade's Military Road (HP1), Sustrans National Cycle Route 7, Core Path IN27.02, HP2 / Old Road to Forres, HP3 / Slochd Military Road, sections of the Great Glen Way and Loch Ness 360 Trail. The most notable impacts are on General Wade's Military Road (HP1), where users would experience extensive and prolonged views of the turbines, and on Sustrans National Cycle Route 7, where the development would become a prominent feature over sections of the route. Significant effects are also recognised on other heritage paths, core paths and recreational trails used to experience the landscape of Strathdearn, Tomatin and the wider Inverness area.

The cumulative effect of introducing a large-scale wind farm into views experienced from these routes would erode the quality of recreational experiences that rely on appreciation of the surrounding landscape. While not every route would be significantly affected and effects

would vary along their length, the scale and extent of visual impacts on several key recreational assets are not considered acceptable.

The assessment concludes that no significant visual effects would occur from any Munro or Corbett summits, and that significant effects are generally confined to specific route sections rather than entire recreational assets. However, the proposed development would significantly detract from views experienced along the route to the Graham summit of Càrn na h-Easgainn, as well as from the summit itself, which is located within the application site boundary. The proximity and prominence of the proposed turbines would dominate the outlook, detracting from the surrounding landscape and significantly diminishing the recreational amenity experienced by recreational receptors.

The proposed development is not considered to meet the threshold of Criterion 4.

Criterion 5 is related to the extent to which the proposal affects the amenity and visual appeal of transport routes.

The applicant concludes that this criterion is largely achieved. They consider Significant visual effects are identified on a limited number of transport routes, but these effects are generally confined to relatively short sections of road or rail corridor and are not considered sufficient to overwhelm travellers or substantially detract from the overall journey experience.

The A9 corridor as a key transport gateway into the Highlands and identify significant adverse visual effects on road users travelling through the landscape between Moy, Tomatin and the surrounding area around the proposed development. The turbines would become a prominent and defining feature in views from sections of the A9 and would contribute to an increasing concentration of wind farm development experienced along this route along with National Cycle Route 7 and Inverness to Perth railway line. The proposed development would have a detrimental effect on the amenity of these through its substantial scale, prominence and influence on sequential views experienced by travellers. The report also considers these effects in combination with existing and consented wind farms, resulting in an increasingly developed wind energy landscape along an important transport corridor.

The proposed development is not considered to meet the threshold of Criterion 5.

Criterion 6 is related to respecting the existing pattern of development

The applicant concludes that this criterion is achieved, arguing that the proposed development would be viewed in the context of existing wind energy development around Moy, Tomatin and the wider A9 corridor, and that it would relate appropriately to the established wind farm pattern.

The proposed development would not read as a logical extension of the existing Farr Wind Farm and Glen Kyllachy Wind Farm group. Instead, the development would introduce a separate and visually distinct turbine cluster in the landscape, reducing the perception of clearly defined wind farm groupings and weakening the existing pattern of development that has become established in this part of the Highlands.

The scheme would occupy a location that is physically and visually detached from the existing Farr Wind Farm and Glen Kyllachy Wind Farm clusters. As a result, views from the

surrounding area, key transport routes and recreational receptors would increasingly present wind farms as a more continuous spread of development rather than as discrete, coherent clusters. This would erode the distinction between existing groups of turbines and alter the current landscape pattern. Additionally, the scheme would contribute to a perception of wind farm coalescence and expansion beyond the established cluster around Farr and Glen Kyllachy, creating a less coherent pattern of development across the landscape that is perceived separately.

The proposed development is not considered to meet the threshold of Criterion 6.

Criterion 7 relates to the extent to which the proposal maintains or affects the spaces between existing developments and/or clusters

The applicant concludes that Criterion 7 is achieved, arguing that the proposed development would maintain appropriate separation from surrounding wind farms and would integrate positively with the existing pattern of development across the Monadhliath uplands. The applicant considers that the spacing between the proposed turbines and the existing Farr Wind Farm, Glen Kyllachy Wind Farm and Moy Wind Farm would remain sufficient to avoid coalescence and preserve distinct wind farm groupings.

Considerable weight is placed on the guidance within the OWESG and the Dava Moor, Nairn and Monadhliath Landscape Sensitivity Study, both of which emphasise the importance of maintaining separation between wind farm clusters to avoid coalescence and preserve the pattern of development across the landscape. Rather than consolidating development around the established Farr Wind Farm and Glen Kyllachy Wind Farm cluster, it is considered that the proposed development would create a new and independently perceived cluster of turbines. Although physically close to the existing schemes, the development would remain visually distinct because of its separation, substantially larger turbine scale and its location on the outer-facing slopes and skylines around Carn na h-Easgainn.

The proposed development would effectively reduce the open gap between existing wind farm groups on either side of the A9 corridor and contribute to a greater spread of wind energy development across the landscape. Views from the A9, surrounding recreational routes and nearby hill summits would increasingly perceive wind farms as a more continuous pattern of development rather than as separate, coherent clusters. This would weaken the distinction between the established groups and undermine the strategic landscape approach that has previously maintained clear separation between developments. Additionally, the proposed development would increase cumulative visual effects from a number of receptors as it extends wind energy development onto prominent landforms closer to the Great Glen and A9 corridor than existing schemes, reducing the effectiveness of the landscape gaps that currently exist.

The proposed development is not considered to meet the threshold of Criterion 7.

Criterion 8 relates to the extent that the proposal maintains or affects receptors' existing perception of landscape scale and distance.

The applicant concludes that Criterion 8 is largely achieved, arguing that perceptions of landscape scale and distance would generally be maintained because the proposed development would be viewed within a large-scale upland landscape that already contains wind farm development. The applicant considers that turbine scale would appear

appropriate in relation to the wider Monadhliath landscape and that significant effects on perceptions of scale would be largely limited to close-range viewpoints.

It is considered that the proposal would materially alter how people perceive the scale of the surrounding landscape, particularly from the A9 corridor, the B9154, and recreational routes around Tomatin and Moy. The concern is that the 200m turbines would appear too large in relation to the hills on which they are sited and would not read as subordinate landscape features. Particular concern is noted in relation to viewpoints VP2 B9154 northeast of Moy, VP3 A9 north of Tomatin and VP6 National Cycle Route 7 at Tomatin as the turbines would occupy the outer-facing slopes and summits of hills such as Carn na h-Easgainn and Carn na Loinne, making them appear overly prominent within the landscape. Rather than appearing of a lesser scale than the enclosing landforms, the turbines would compete with and dominate them, reducing the apparent scale of the surrounding hills and altering perceptions of distance and enclosure within Strathdearn.

The OWESG states that wind farms should appear of "minor vertical scale" relative to the landforms with which they are seen. The proposed development fails this test because the turbines would be prominent skyline features whose scale is disproportionate to the surrounding landform. From a number of locations, particularly along the A9 corridor, the turbines would draw the eye, diminish the sense of landscape depth and distance, and create a visually dominant feature within views of the strath.

The proposed development is not considered to meet the threshold of Criterion 8.

Criterion 9 is related to the extent to which the landscape setting of nearby wind energy developments is affected by the proposal.

The applicant concludes that Criterion 9 is achieved, arguing that whilst the proposed development would contribute to cumulative landscape and visual effects when seen alongside existing and consented wind farms, it would not unacceptably affect the landscape setting of nearby wind energy developments.

It is acknowledged that the proposed development would be visible in conjunction with existing schemes including Farr Wind Farm, Glen Kyllachy Wind Farm and Moy Wind Farm, and that cumulative effects would arise from a number of viewpoints and routes. However, these effects are considered in terms of landscape character, visual amenity, cluster separation and landscape scale rather than any fundamental harm to the landscape setting of the existing wind farms themselves. Although the proposed development would not relate adequately to the established Farr Wind Farm and Glen Kyllachy Wind Farm cluster, creating what is perceived as a separate turbine group, this concern is addressed under Criteria 6 and 7, which relate to the pattern of development and the maintenance of separation between clusters. The scheme l would not adversely affect the landscape setting of existing wind energy developments to such an extent that Criterion 9 would fail.

The proposed development is considered to meet the threshold of Criterion 9.

Criterion 10 is related to distinctiveness of landscape character.

The applicant concludes that Criterion 10 is achieved, arguing that whilst the proposed development would introduce significant visual effects in some locations and contribute to

cumulative wind farm development within the wider area, it would not fundamentally undermine the distinctiveness of the landscape character types in which it is located.

The assessment recognises that the proposal would be situated within a landscape that already contains operational and consented wind energy developments, particularly around Moy, Tomatin and the wider Monadhliath uplands. The landscape character is therefore not considered pristine or undeveloped, and the introduction of additional turbines would not result in the loss of the key characteristics that define the broader landscape resource.

The proposed development is considered to meet the threshold of Criterion 10.

Appendix 5 – Viewpoint Assessment Appraisal – Visual Impact

			Proposed Development			Cumulative (Scenario 1 and Scenario 2)		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major, Major to Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major and Major to Moderate are Significant. Moderate may be significant)
VP1 - General Wade's Road, Moy to Inverness 2.044 km from nearest turbine View South/South East	App	High (walkers), Medium (road users)	High-Medium	Substantial to Major, Major to Moderate	**Significant, Significant**	No cumulative effect		
	THC	High (walkers and tourists), Medium (road users)	High	Substantial, Major	**Significant, Significant**	No cumulative effect		
	The baseline of the view is as described in Table 5.2.2 of the EIAR Volume 3, Technical Appendix 5.2 – Viewpoint Analysis. The viewpoint is located on the General Wade's Road Heritage Path between Moy and Inverness, east of Creagan Bad Each and close to the A9. Receptors comprise recreational walkers using the heritage route and road users on the A9. The route has recreational and cultural heritage value, resulting in High sensitivity for walkers and Medium sensitivity for road users. Tourists also travel along the A9 which is a key route, and who have a higher susceptibility and therefore a High sensitivity travelling between Inverness and Cairngorms National Park. Views are orientated southeast across the northern slopes of Beinn nan Cailleach. The landscape comprises rough grassland, heather moorland, rounded upland summits and areas of conifer forestry, with recent forestry felling in the foreground. Existing human influences include the A9 trunk road, commercial forestry and General Wade's Road itself. Construction activity would be screened to some extent by the sloping landform, although there is potential for cranes, along with other large-scale machinery to be seen from this viewpoint, in combination with a short section of access track near T8. All 12 turbines would be visible at a minimum distance of just over 2 km. All turbines would be visible at least at hub height with the vast majority presenting substantial tower visibility. The turbines would form an overly prominent and incongruous skyline feature, extending above and							

			Proposed Development			Cumulative (Scenario 1 and Scenario 2)		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major, Major to Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major and Major to Moderate are Significant. Moderate may be significant)
	beyond the rising landform. No other infrastructure components would be visible from this viewpoint. The applicant assesses the magnitude of change as High-Medium. They consider the resulting effect is Substantial to Major for walkers and Major to Moderate for road users with Significant effects for both groups of receptors. Over time, the applicant considers that restocking and maturation of recently felled foreground forestry would improve screening, particularly of turbines T3 to T7, reducing the assessed magnitude of change from High-Medium to Medium-Low during the operational life of the development and reducing the effect to not significant for road users but remaining significant for walkers. Whilst there is agreement with the applicant's assessment of Significant effects, it is considered they have been understated. The turbines would form a dominant new feature on the skyline over a broad horizontal extent and would substantially alter the character of the view experienced from this section of the heritage path and adjacent road. While the landscape already contains elements such as the A9 and commercial forestry, the scale, number and movement of turbines would introduce a much greater degree of visual change, resulting in a high magnitude and Substantial / Major significant adverse effects for walkers and road users including tourists. Even with restocked forestry naturing over time, the effect is still considered to be Significant longer term. It is considered that the turbines are located on the outer facing slopes and summit of Carn na h-Easgainn and Beinn nan Cailleach and are not sufficiently set back from the hillside thereby appearing overly prominent, contributing to significant effects on the character of Strathdearn. The turbines would not appear at a minor vertical scale relative to surrounding landforms with the proposed development showing as a more extended array of turbines at differing heights, making it difficult to achieve a coherent turbine arrangement. No cumulative effects are identified from this viewpoint. Existing, consented and application wind farms would not be visible from this location. During the hours of darkness, all six aviation lights would be visible.						
VP2 – B9154	App	High (cyclists), Medium (road users)	High	Substantial, Substantial to Major	**Significant, Significant**	No cumulative effect		

			Proposed Development			Cumulative (Scenario 1 and Scenario 2)		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major, Major to Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major and Major to Moderate are Significant. Moderate may be significant)
northeast of Moy 2.346 km from nearest turbine South West	THC	High (cyclists), Medium (road users)	High	Substantial, Substantial to Major	**Significant, Significant**	No cumulative effect		
	The baseline of the view is as described in Table 5.2.2 of the EIAR Volume 3, Technical Appendix 5.2 – Viewpoint Analysis. The viewpoint is located on the B9154 between Moy and Auchnahillin, west of Moy Hall, and is representative of users of Walk Wheel Cycle (formerly Sustrans) National Cycle Route 7 and road users on the B9154. Recreational cyclists are considered to have High sensitivity, while other road users are of Medium sensitivity. Views are orientated southwest across rough grassland and pasture towards the rounded upland skyline formed by Beinn nan Cailleach, Carn na h-Easgainn and Carn na Loinne. Conifer forestry occupies much of the lower slopes, with heather moorland and some muirburn on the upper hills. Existing human influences include the A9, overhead lines, forestry operations, existing access tracks and the railway bridge immediately to the northeast. Construction activity would be screened to some extent by the sloping landform, with the potential for cranes along with other large-scale machinery to be seen from this viewpoint, in combination with the access track which will appear very noticeable in the centre of the outlook across the undulating landform in the middle distance. The proposed development would be overly prominent from this location. All 12 turbines would be visible at a minimum distance of approximately 2.3 km. Most towers, hubs and rotor blades would be visible above the ridgeline, with turbines seen beyond the A9 and existing overhead line infrastructure. The main access track from Lynebeg and the access track serving T1 and T10 would also be visible and highly noticeable traversing across the hillside. The applicant assesses the magnitude of change as High, resulting in a Substantial effect for recreational cyclists and a Substantial-Major effect for other road users, both significant.						

			Proposed Development			Cumulative (Scenario 1 and Scenario 2)		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major, Major to Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major and Major to Moderate are Significant. Moderate may be significant)
	There is agreement with the applicant's assessment. Whilst the landscape already contains infrastructure such as the A9, overhead lines and commercial forestry, the scale, extent and movement of the turbines would result in a significant adverse effect on visual amenity. It is further considered that the turbines are located on the outer facing slopes and summits of the hills enclosing Strathdearn including Carn na h-Easgainn and Carn na Loinne and are not sufficiently set back from these hills enclosing Strathdearn. The turbines would not appear at a minor vertical scale relative to surrounding landforms with the proposed development showing as a more extended array of turbines at differing heights, making it difficult to achieve a coherent turbine arrangement. No cumulative effects are identified from this viewpoint. Although Moy Wind Farm is theoretically visible to the northeast it is screened by landform, roadside vegetation and the railway embankment. No other existing, consented or application wind farms are visible from this viewpoint. During the hours of darkness all six aviation lights would be visible.							
VP3 – A9 North of Tomatin 4.299 km from nearest turbine View North West	App	Medium (road users)	Medium	Moderate	**Significant**	Medium	Moderate	**Significant**
	THC	Medium (road users), High (Tourists)	High	Major, Substantial	**Significant**	High	Major, Substantial	**Significant**
	The baseline of the view is as described in Table 5.2.2 of the EIAR Volume 3, Technical Appendix 5.2 – Viewpoint Analysis. It is disappointing that the applicant has not provided an updated visualisation from this viewpoint within the AIR-1 given the substantial tree felling in the foreground and mid-ground that has taken place as a result of the A9 dualling works. The viewpoint is located on the A9 between Tomatin and Moy, southeast of the Tomatin junction, and is representative of road users travelling on this section of the trunk road. The receptor sensitivity is assessed as Medium, reflecting the value of the route and the focus of road users on the route ahead. Tourists also travel on the A9 which is a key route, and who have a higher susceptibility and therefore a High sensitivity							

			Proposed Development			Cumulative (Scenario 1 and Scenario 2)		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major, Major to Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major and Major to Moderate are Significant. Moderate may be significant)
	travelling northbound from the Cairngorms National Park to Inverness with the proposed development directly forward facing in the direction of travel. Views are orientated northwest towards the proposed development across the A9 corridor with the nearest turbine located approximately 4.3km from the viewpoint. The foreground is characterised by roadside embankments, mature mixed woodland, conifer forestry and overhead line infrastructure. The rounded summits of Carn Moraig and Carn na Loinne form the skyline. Existing human influences in the view include the A9 itself, roadside infrastructure and overhead electricity lines along with the ongoing A9 upgrade works on the outskirts of Tomatin. Construction effects would be more limited, as ground-level works would generally be screened by landform and vegetation. Crane activity would be visible during construction. The applicant assesses the magnitude of change as Medium, increasing to High-Medium should vegetation be removed as part of future A9 dualling works. This results in a Moderate and Significant effect, increasing to Major to Moderate and Significant if vegetation is felled, however, as noted above the vegetation in the foreground and mid-ground has already been felled. The applicant's assessment of Medium magnitude is disputed given tree felling has already taken place which would increase the extent of visibility of the turbines where the turbines would form an overly prominent new feature on the skyline and become a focal element for those travelling along the A9. All 12 turbines would be visible, the towers of seven turbines and an additional two hubs most visible and T12 and T14 appearing particularly over-scaled and disproportionate. This would result in a High magnitude of change resulting in a Major significant adverse effect for road users increasing to Substantial for tourists travelling along this route. Details of any future roadside planting along this stretch of route is unclear, however, if there is any proposed planting, this would have a limited effect with the magnitude potentially reducing to High-Medium. It is further considered turbines would not appear subordinate to the surrounding hills given their siting on the outer facing slopes and summits of Carn Moraig and Carn na Loinne and are not sufficiently set back from these hills enclosing Strathdearn.							

			Proposed Development			Cumulative (Scenario 1 and Scenario 2)		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major, Major to Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major and Major to Moderate are Significant. Moderate may be significant)
	No operational or consented wind farms contribute to cumulative effects at this location. However, Kyllachy would have limited visibility beyond trees and road embankments. The combined and additional effect of the proposed development would remain Major and Substantial significant and adverse due to the proposed development. During the hours of darkness, four out of the six aviation lights would be visible.							
VP4 - B861 between Balnafoich and Inverarnie 5.1 km from nearest turbine South East	App	High (residents), Medium (road users)	Medium	Major, Moderate	**Significant,** not significant	Medium	Major, Moderate	**Significant**, not significant
	THC	High (residents), Medium (road users)	High-Medium	Substantial to Major, Major to Moderate	**Significant, Significant**	High-Medium	Substantial to Major, Major to Moderate	**Significant, Significant**
	The baseline of the view is as described in Table 5.2.2 of the EIAR Volume 3, Technical Appendix 5.2 – Viewpoint Analysis. The viewpoint is located on the B861 between Balnafoich and Inverarnie in Strathnairn and is representative of both road users travelling along this section of the route and residents at Balnafoich on the western side of the strath. Receptor sensitivity is assessed as High for residents and Medium for road users, reflecting the elevated position and open outlook across Strathnairn towards the proposed development. Views are orientated southeast towards the proposed development across Strathnairn from the B861 at a distance of approximately 5.1 km from the closest turbine. The foreground comprises agricultural fields, scattered properties, roadside vegetation and the River Nairn floodplain, with the upland moorland hills forming the backdrop. The proposed turbines would be seen on the skyline beyond the eastern side of the strath. Existing human influences include scattered settlements, forestry, roads, overhead line infrastructure and views of existing wind energy development within the wider area.							

			Proposed Development			Cumulative (Scenario 1 and Scenario 2)		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major, Major to Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major and Major to Moderate are Significant. Moderate may be significant)
	Construction effects appear relatively limited to mostly crane activity mostly, with most ground level infrastructure screened by landform. Following the amendments to a 12 turbine scheme, T4 and T5, two of the more prominent turbines from this viewpoint, have been removed from the array. However, even with the reduced scheme, six hubs, rotors and blade tips would be visible as moving features beyond the gently sloping ridgeline in the outlook. Associated works appear screened by landform. The applicant assesses the Magnitude of Change as Medium, this results in a Major and Significant effect for residents and a Moderate and not significant effect for road users. This has been reduced from High-Medium and Substantial-Major and Major-Moderate for both residents and road users respectively which led to a Significant effects for receptors for the 14 turbine scheme previously. This is not agreed as it is considered the applicant has understated their assessment. A reduction in the number of turbines, or a reduction in the prominence of some turbines, is not considered sufficient justification in this instance for reducing the assessed magnitude of change or level of effect. Whilst the removal of turbines T4 and T5 is noted, T3, T6 and T7 still appear prominent, particularly T3 and T6, beyond the skyline, along with T8 to a lesser extent. Given the scale, movement and skyline location of the turbines, a substantial stretch of the B861 would be affected, approximately 1.5 km, with the most notable views occurring near Mains of Gask and Balnafoich. As such, the magnitude of change is still considered High-Medium leading to a Substantial to Major Significant adverse effect for residents and Major to Moderate Significant adverse effect for road users. Existing and consented wind farms have a very limited effect from this location. The cumulative effect would remain Substantial to Major / Major to Moderate and Significant due to the proposed development under Scenario 1. No cumulative effect under Scenario 2. During the hours of darkness, three out of the six aviation lights would be visible.						
	App	High (residents/cyclists), Medium (road users)	Very Low to Zero	Minor to No View,	Not Significant,	No cumulative effect		

			Proposed Development			Cumulative (Scenario 1 and Scenario 2)		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major, Major to Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major and Major to Moderate are Significant. Moderate may be significant)
VP5 - B9154 at Meallmore 4.709 km from nearest turbine View South				Negligible to No View	Not Significant			
	THC	High (residents/cyclists), Medium (road users)	Very Low to Zero	Minor to No View, Negligible to No View	Not Significant, Not Significant	No cumulative effect		
	The baseline of the view is as described in Table 5.2.2 of the EIAR Volume 3, Technical Appendix 5.2 – Viewpoint Analysis. The viewpoint is located on the B9154 at Meallmore, northeast of Moy, and is representative of residents, cyclists using the route and road users travelling through this area. Receptor sensitivity is assessed as High for residents and recreational cyclists and Medium for other road users, reflecting the amenity value of the view and the recreational nature of the route. Construction effects would be limited, with the majority of construction activity screened by intervening forestry and landform. Views are orientated generally south towards the proposed development across a landscape of commercial forestry, woodland and rolling upland terrain with the nearest turbine located approximately 4.7 km from the viewpoint. The foreground is heavily influenced by conifer plantation woodland, which substantially restricts views towards the site. Beyond the forestry, the proposed development would be seen within the wider upland landscape associated with existing wind farm development. Existing human influences include the B9154, forestry operations, access tracks and established wind energy development within the surrounding area. The applicant assesses the magnitude of change as Very Low to Zero with effects for residents and recreational cyclists as Minor to Negligible and road users Negligible to No View. The assessment identifies no significant visual effects from this location because forestry cover substantially restricts visibility of the proposed turbines. The applicant notes that the forestry is programmed for felling between 2049 and 2053							

			Proposed Development			Cumulative (Scenario 1 and Scenario 2)		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major, Major to Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major and Major to Moderate are Significant. Moderate may be significant)
	under the Meall Mòr, Moy, and Farr Land Management Plan. If felling were to occur visibility of the development would increase and the magnitude of change could rise to Medium-Low for the remainder of the operational period. Even still, it is considered the effect would not be significant, therefore, there is general agreement with the applicant's assessment. No cumulative effects are identified at this viewpoint. No operational, consented or application wind farms contribute to cumulative effects at this location. During the hours of darkness, two aviation lights are theoretically visible but given the intervening forestry, the lights would be screened from view.							
VP6 - Sustrans NCR 7 at Tomatin 5.055 km from nearest turbine View North West	App	High (residents/cyclists), Medium (road users)	Medium	Major, Moderate	**Significant, Significant**	Medium	Major, Moderate	**Significant, Significant**
	THC	High (residents/cyclists), Medium (road users)	High-Medium	Substantial to Major, Major to Moderate	**Significant, Significant**	High-Medium	Substantial to Major, Major to Moderate	**Significant, Significant**
	The baseline is as described in Table 5.2.2 of the EIAR Volume 3, Technical Appendix 5.2 – Viewpoint Analysis. The viewpoint is located on Walk Wheel Cycle (formerly Sustrans) National Cycle Route 7 (NCR 7) at Tomatin and is representative of recreational cyclists and walkers using this nationally promoted long-distance route. Receptor sensitivity is assessed as High for residents and cyclists, reflecting the recreational nature of the route and the expectation of users to experience and appreciate surrounding landscape views, and Medium for other road users.							

			Proposed Development			Cumulative (Scenario 1 and Scenario 2)		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major, Major to Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major and Major to Moderate are Significant. Moderate may be significant)
	Views are orientated northwest towards the proposed development across a landscape of mixed woodland, commercial forestry, agricultural land and rolling upland terrain with the nearest turbine located approximately 5 km from the viewpoint. The foreground comprises local roads, roadside vegetation, scattered properties and pasture associated with the Tomatin area, while the surrounding uplands form the wider backdrop. Existing human influences include settlement at Tomatin, transport infrastructure associated with the A9 corridor, forestry operations, overhead line infrastructure and views of existing wind energy development within the wider landscape setting. Construction effects would be more limited, as ground-level works would generally be screened by landform and vegetation. Crane activity would be visible during construction. Nine of the 12 turbines will appear as towers, hubs and rotor blades visible above the ridgeline to the northwest between two hill summits, with blades visible rotating against the skyline, albeit visibility is intermittent given some taller coniferous forestry in the outlook when approaching Tomatin distillery. Associated infrastructure, including sections of access track and the substation, would be visible on the northwestern horizon. The applicant assesses the magnitude of change as Medium, this results in a Major and Moderate and Significant effect. The applicant's assessment is disputed. The turbines would appear overly prominent given their siting on the outer facing slopes and summits of Carn na h-Easgainn and Carn na Loinne in particular and not being sufficiently set back from these hills. A number of turbines would appear over-scaled and disproportionate to the relative landform resulting in a poor composition which would result in a High-Medium magnitude and Substantial to Major significant adverse effect for residents and cyclists, and Major to Moderate for other road users. No cumulative effects are identified at this viewpoint for Scenario 1. No operational or consented wind farms contribute to cumulative effects at this location. Kyllachy would be visible (Negligible) beyond trees and Clune would be partly visible (Negligible) beyond the viaduct for Scenario						

			Proposed Development			Cumulative (Scenario 1 and Scenario 2)		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major, Major to Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major and Major to Moderate are Significant. Moderate may be significant)
	2 with the proposed development being the most contributing wind farm from this location. The cumulative effect would therefore remain the same as above. During the hours of darkness, four out of six aviation lights would be visible.							
VP7 - A9 at Daviot 6.663 km from nearest turbine View South East	App	Medium (road users)	Medium-Low	Moderate to Minor	Not Significant	Medium-Low	Moderate to Minor	Not Significant
	THC	Medium (road users), High (tourists)	Medium	Moderate, Major	**Significant, Significant**	Medium	Moderate, Major	**Significant, Significant**
	The baseline of the view is as described in Table 5.2.2 of the EIAR Volume 3, Technical Appendix 5.2 – Viewpoint Analysis. The viewpoint is located on the A9 at Daviot, south of Inverness, and is representative of road users including tourists travelling along this section of the trunk road. Receptor sensitivity is assessed as Medium-Low, reflecting the transient nature of views experienced by motorists and the primary focus on travelling through the landscape. The nearest turbine would be located approximately 6.6 km from the viewpoint under the revised scheme. Tourists also travel on the A9 which is a key route, and who have a higher susceptibility and therefore a High sensitivity travelling southbound from Inverness to Cairngorms National Park where the proposed development would be directly forward facing in the direction of travel. Views are orientated southeast towards the proposed development across the broad landscape of Strathnairn and the surrounding uplands with the nearest turbine located approximately 6.7 km from the viewpoint. The foreground is characterised by the A9 corridor, roadside vegetation, forestry blocks and rolling farmland, while the proposed development would be seen on the distant upland skyline. Existing human influences include the A9 itself, associated transport infrastructure, commercial forestry, overhead lines and existing wind energy development							

			Proposed Development			Cumulative (Scenario 1 and Scenario 2)		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major, Major to Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major and Major to Moderate are Significant. Moderate may be significant)
	visible within the wider landscape setting. The viewpoint also lies within an area where views are influenced by woodland cover and the undulating nature of the surrounding landform. Construction effects have been reduced following the removal of turbines T4 and T5, however, T3 and T6 are still very prominent and crane activity would be visible during construction of these turbines. Other ground-level works would generally be screened by landform. Following the amendments to a 12-turbine scheme, the two clusters of two prominent turbines breaking the skyline, T4 and T5 and T3 and T6, have been reduced to one cluster south of Strathnairn comprising T3 and T6 which would appear very prominent and draw the eye of the viewer for southbound receptors. Six blades / blade tips would also be visible as moving features beyond the gently sloping ridgeline in the view east of Strathnarin for southbound road users travelling on the A9. Associated works appear screened by landform. The applicant assesses the magnitude of change as Medium-Low, this results in a Moderate to Minor and not significant effect. This has been reduced from Medium and Moderate Significant effect for the 14-turbine scheme previously in the EIAR. This is not agreed for the AIR-1 as it is considered the applicant has understated their assessment. A reduction in the number of turbines, or smaller horizontal extent, is not considered sufficient justification for reducing the assessed magnitude of change or level of effect in this instance. Whilst the removal of turbines T4 and T5 is noted, T3 and T6 appear stark, incongruous and very prominent on the skyline, spilling beyond the outer facing slopes of Carn na h-Easgainn and Beinn nan Cailleach. This leads to a perception that wind energy development would no longer be contained within the upland interior. As such, the magnitude of change is still considered Medium and Moderate leading to a Significant effect following the amendments. Cumulative views include Moy Wind Farm (6.3 km), with a Low Magnitude of Change, and Farr (9.5 km), Dunmaglass (21.3 km) and Aberarder (19.8 km, under construction) on the southern horizon, resulting in a Very Low Magnitude of Change. The consented Corriegarth 2 Wind Farm							

			Proposed Development			Cumulative (Scenario 1 and Scenario 2)		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major, Major to Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major and Major to Moderate are Significant. Moderate may be significant)
	would appear as a distant feature, with cumulative effects assessed as Very Low to Zero. This is generally agreed, however, the cumulative effects under Scenario 1 will be significant due to the proposed development. Balnespick would be visible (Negligible) beyond trees for Scenario 2, nevertheless, the cumulative effect will still be significant due to the proposed development. During the hours of darkness, two out of six aviation lights would be visible.							
VP8 - Càrn a' Choire Mhoir 8.760 km from nearest turbine View North West	App	High (walkers)	Medium	Major	**Significant**	Medium, High	Major, Substantial	**Significant, Significant**
	THC	High (walkers)	Medium	Major	**Significant**	Medium, High	Major, Substantial	**Significant, Significant**
	The baseline of the view is as described in Table 5.2.2 of the EIAR Volume 3, Technical Appendix 5.2 – Viewpoint Analysis. The viewpoint is located at Càrn a' Choire Mhoir, an upland summit within the Cairngorms National Park, and is representative of walkers and recreational users experiencing panoramic views from the higher ground. Receptor sensitivity is assessed as High, reflecting both the recreational nature of the location and its position within a nationally designated landscape where appreciation of expansive views is a key component of the visitor experience. Views are orientated generally northwest towards the proposed development across the uplands of Strathdearn and the Monadhliath with the nearest turbine located approximately 8.8 km from the viewpoint. The foreground and middle distance comprise open moorland, heather-covered slopes and extensive upland terrain, with long-distance views extending across a wide mountain panorama. Existing human influences include visible tracks, forestry in lower-lying areas and the presence of operational wind farms within the wider landscape context, including views towards Farr Wind Farm and Glen Kyllachy Wind Farm.							

			Proposed Development			Cumulative (Scenario 1 and Scenario 2)		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major, Major to Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major and Major to Moderate are Significant. Moderate may be significant)
		Construction effects would be limited largely to visibility of crane activity and turbine erection operations. All 12 turbines would be visible within the outlook clustered in the centre of the view. They would be seen on the ridgeline north of the Monadhliath mountains along with associated infrastructure including access tracks and the substation. Given the panoramic nature of the view, the large scale of the landscape and the presence of existing wind farms, the applicant considers the proposed development is reasonably well accommodated within the landscape. However, as with other viewpoints, the location of the wind farm on the outer facing slopes and summits of the hills above Strathdearn leads to an increased prominence of turbines. The turbine layout is poorly composed, with overlapping turbines, isolated outliers (particularly T13) and variations in turbine height. Combined with their larger scale, these factors accentuate their prominence and create a visually discordant and conspicuous feature on the skyline. The applicant assesses the magnitude of change as Medium, this results in a Major and Significant effect. This is generally agreed with turbines prominently located on the outer slopes of the hills above Strathdearn. Various existing, consented and proposed wind farms would be visible from this location, including Moy, Glen Kyllachy and Farr at distances of approximately 9 km to the northwest, with more distant views of Dunmaglass, Aberarder, Auchmore, Tom nan Clach, the consented Tom nan Clach Extension, Corriegarth 2 and Ourack to the west, southwest and east. Despite the presence of these developments, the applicant considers that cumulative views would remain dispersed across the panorama, and the cumulative magnitude of change is assessed as Medium-Low. This is disputed and it is considered the cumulative magnitude would remain Medium given the position and noticeable turbines of the proposed development appearing separate to other operational and consented wind farms. The cumulative effect would therefore remain Major and Significant. For Scenario 2 the combined cumulative effect would increase to Substantial and Significant (high magnitude) due to the visibility of Clune, Kallachy and Balnespick, although there would be no change to the contribution of proposed development.						

			Proposed Development			Cumulative (Scenario 1 and Scenario 2)		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major, Major to Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major and Major to Moderate are Significant. Moderate may be significant)
	In hours of darkness, all six aviation lights would be visible.							
VP9 - B851 at Croachy 9.452 km from nearest turbine View North East	App	High (residents), High-Medium (road users)	Very Low	Minor to No View, Minor to Negligible, to No View	Not Significant, Not Significant	Very Low	Minor-Negligible, Minor-Negligible	Not Significant, Not Significant
	THC	High (residents), High-Medium (road users)	Very Low	Minor to No View, Minor to Negligible, to No View	Not Significant, Not Significant	Very Low	Minor-Negligible, Minor-Negligible	Not Significant, Not Significant
	The baseline of the view is as described in Table 5.2.2 of the EIAR Volume 3, Technical Appendix 5.2 – Viewpoint Analysis. The viewpoint is located on the B851 at Croachy, west of Loch Ness, and is representative of road users travelling along this local route as well as nearby residents. Receptor sensitivity is assessed as High for residents and High-Medium for road users, reflecting the scenic rural character of the area and the elevated value attached to views across the surrounding landscape. Views are orientated generally east and northeast towards the proposed development across a landscape characterised by rolling farmland, scattered woodland, forestry and dispersed rural settlement with the nearest turbine approximately 9.5 km from the viewpoint. The foreground comprises the B851 corridor, agricultural fields, roadside vegetation and occasional properties, while the wider backdrop is formed by the uplands of Strathnairn and the Monadhliath. Existing human influences include local roads, farmsteads, commercial forestry, overhead line infrastructure and distant views of operational wind farms within the wider landscape context.							

			Proposed Development			Cumulative (Scenario 1 and Scenario 2)		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major, Major to Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major and Major to Moderate are Significant. Moderate may be significant)
	Construction effects would be limited largely to visibility of crane activity, particularly filtered views during winter, and turbine erection operations. Although up to five turbines may theoretically be visible (three hubs and two blade tips), views would be largely screened by mature vegetation within Strathnairn. In practice, only heavily filtered winter views of turbines are expected, with no visibility in summer and no associated infrastructure visible. The applicant assesses the magnitude of change as Very Low, this results in a Minor to Negligible and not significant effect. This is generally agreed. No cumulative effects are identified at this viewpoint. No operational, consented or application wind farms contribute to cumulative effects at this location. During the hours of darkness, two aviation lights are theoretically visible but given the intervening vegetation, they would be screened.							
VP10 - Carn nan Tri-tighearnan 9.060 km from nearest turbine	App	High (walkers)	Medium	Major	**Significant**	Medium, High-Medium	Major, Substantial to Major	**Significant, Significant**
	THC	High (walkers)	Medium	Major	**Significant**	Medium, High	Major, Substantial	**Significant, Significant**
	The baseline of the view is as described in Table 5.2.2 of the EIAR Volume 3, Technical Appendix 5.2 – Viewpoint Analysis. The viewpoint is located at Carn nan Tri-tighearnan, an upland summit close to the within Drynachan, Lochindorb and Dava Moors SLA. northern edge of the Cairngorms National Park, and is representative of walkers and other recreational users who experience extensive							

			Proposed Development			Cumulative (Scenario 1 and Scenario 2)		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major, Major to Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major and Major to Moderate are Significant. Moderate may be significant)
View South West	panoramic views from the higher ground. Receptor sensitivity is assessed as High, reflecting both the recreational nature of the viewpoint and its location in proximity to a nationally designated landscape where the appreciation of wide-ranging mountain views is a key part of the visitor experience. Views are orientated generally southwest towards the proposed development across the Monadhliath uplands and Strathdearn with the nearest turbine approximately 9.1 km from the viewpoint. The foreground and middle distance comprise open moorland, heather-covered slopes and expansive upland landforms, with long-distance views extending across a broad mountain panorama. Existing human influences include hill tracks, forestry in lower-lying areas and visible operational wind farms within the wider landscape context, notably Moy, Farr and Glen Kyllachy wind farms. The proposed development would be experienced as part of this established pattern of wind energy development across the Monadhliath uplands. Construction activity associated with the substation, turbines and access tracks would all be visible. Crane operations would also be highly visible during the construction phase. The proposed development would be a prominent and very noticeable feature in the view with all 12 turbines visible set within a broad upland panorama already influenced by wind energy development. Access tracks serving the western turbines and the substation would also be visible including the main access track off the A9 will be very noticeable across the hillside. The applicant considers the proposed turbines would appear reasonably well accommodated within the view given the panoramic landscape, cohesive turbine layout, intervening distance, along with the presence of existing wind farms. Even so, the applicant assesses the magnitude of change as Medium, this results in a Major and Significant effect. Whilst the overall effect is generally agreed, the turbines would remain particularly prominent at this distance due to their large scale. Furthermore, the layout composition continues to be characterised by overlapping turbines and variations in turbine height, which further accentuate their visual prominence and contribute to a poorly composed skyline.						

			Proposed Development			Cumulative (Scenario 1 and Scenario 2)		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major, Major to Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major and Major to Moderate are Significant. Moderate may be significant)
	The view already contains a number of existing and consented wind farms, including Moy, Farr, Glen Kyllachy, Dunmaglass, Corriegarth, Aberarder, Tom nan Clach, Tom na Clach Extension, Cairn Duhie and Ourack. While several of these developments would be visible in different directions, the applicant considers most would appear at Low to Very Low magnitude due to distance, with Tom nan Clach and its extension and Moy having a greater influence locally. Overall, the cumulative magnitude of change is assessed as Medium, this results in a Major and Significant effect, due to the combined influence of the proposed development with Glen Kyllachy and Farr Wind Farms. This is generally agreed. For Scenario 2 the combined cumulative effect including Tom na Clach and extension would increase due to the visibility of Clune, Kallachy and Balnespick, however, the contribution of the proposed development would also increase resulting in a Substantial and Significant cumulative effect. During the hours of darkness, all six aviation lights would be visible.							
VP11 - Carn na Làir (near CNP boundary) 10.468 km from nearest turbine View North West	App	High (walkers)	Medium	Major	**Significant**	Medium, High	Major, Substantial	**Significant, Significant**
	THC	High (walkers)	Medium	Major	**Significant**	Medium, High	Major, Substantial	**Significant, Significant**
	The baseline of the view is as described in Table 5.2.2 of the EIAR Volume 3, Technical Appendix 5.2 – Viewpoint Analysis. The viewpoint is located at Carn na Làir, close to the boundary of the Cairngorms National Park, and is representative of walkers and other recreational users experiencing expansive views from the higher ground. Receptor sensitivity is assessed as High, reflecting both the recreational nature of the viewpoint and the importance of panoramic landscape views to the experience of upland users. Views are orientated generally northwest towards the proposed development across the rolling uplands of the Monadhliath and Strathdearn with the nearest turbine approximately 10.5 km from the viewpoint. The foreground and middle distance comprise open moorland, heather-clad slopes and extensive upland landforms, with long-distance views extending across a wide mountain panorama. Existing human influences							

			Proposed Development			Cumulative (Scenario 1 and Scenario 2)		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major, Major to Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major and Major to Moderate are Significant. Moderate may be significant)
	include hill tracks, forestry in lower-lying areas and operational wind farms visible within the wider landscape setting. The proposed development would be seen within the context of existing wind energy development across the Monadhliath uplands, rather than as an isolated feature. The applicant considers the principal focus of views from this location is towards the surrounding upland landscape rather than the proposed development itself. Construction effects would be limited largely to visibility of crane activity and turbine erection operations with most ground-level construction works would either not be discernible or would comprise only a very minor component within the wider panorama. The proposed development would be clearly visible with all 12 turbines seen in the outlook. The applicant considers that the turbines would appear balanced and reasonably well integrated within a landscape already influenced by wind farm development, aided by the large scale of the receiving landscape, the cohesive turbine layout, and the intervening distance. Even so, the magnitude of change is assessed as Medium, this results in a Major and Significant effect. Whilst the overall effect is generally agreed, the turbines would remain prominent at this distance due to their large scale. Furthermore, the layout composition continues to be characterised by overlapping turbines, outliers (T6 and T12), uneven gaps and variations in turbine height, which further accentuate their visual prominence and contribute to a poorly composed skyline. In terms of existing and consented that form part of the surrounding view, Glen Kyllachy, Farr and Moy are visible in northwestern views, Tom nan Clach and the Tom na Clach Extension visible to the northeast, Dunmaglass along with Aberarder and Corriegarth 2 visible in south-westerly views. Overall, the cumulative magnitude of change is assessed as Medium-Low, this results in a Major and Significant effect, due to the combined influence of the proposed development with Glen Kyllachy and Farr Wind Farms. This is generally agreed. For Scenario 2 the combined cumulative effect would increase to Substantial and Significant due to the visibility of Clune, Kallachy and Balnespick, although there would be no change to the contribution of the proposed development which would remain Medium. During the hours of darkness, all six aviation lights would be visible.							

			Proposed Development			Cumulative (Scenario 1 and Scenario 2)		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major, Major to Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major and Major to Moderate are Significant. Moderate may be significant)
VP12 - Culloden Visitor Centre 11.667 km from nearest turbine View South	App	High (recreational users/walkers)	Very Low	Minor	Not Significant	Very Low	Minor	Not Significant
	THC	High (recreational users/walkers)	Very Low	Minor	Not Significant	Very Low	Minor	Not Significant
	The baseline of the view is as described in Table 5.2.2 of the EIAR Volume 3, Technical Appendix 5.2 – Viewpoint Analysis. The viewpoint is located at the Culloden Visitor Centre, east of Inverness, and is representative of visitors to this nationally important historic site as well as users of the surrounding footpath network. Receptor sensitivity is assessed as High, reflecting the heritage value of the location, its role as a visitor destination and the expectation of visitors to appreciate the historic landscape setting of the battlefield. Views are orientated generally south and southeast towards the distant uplands of the Monadhliath and Strathnairn with the nearest turbine approximately 11.7 km from the viewpoint. The foreground is characterised by the open and gently undulating battlefield landscape, agricultural land, hedgerows and scattered woodland, with more distant views extending towards upland horizons. Existing human influences include the visitor centre buildings, local roads, dispersed settlement, forestry and distant wind energy development visible within the wider landscape context. The proposed development would be seen as a distant feature within the wider upland backdrop rather than as a dominant component of the battlefield setting. Construction effects would be limited as all ground-based works would be screened by intervening landform, visibility would be restricted to crane operations during construction. Following the amendments to a 12-turbine scheme, the most prominent turbines, T4 and T5, have been removed. The proposed development would have limited visibility, with only up to four blades visible. However, in practice, intervening forestry would further reduce visibility with the rotor sweep of T3 and T6 perceptible on the southern horizon and no visible infrastructure. The applicant assesses the magnitude of change						

			Proposed Development			Cumulative (Scenario 1 and Scenario 2)		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major, Major to Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major and Major to Moderate are Significant. Moderate may be significant)
	as Very Low, this results in a Minor and not significant effect. This has been reduced from Low and Moderate leading to a not significant effect for the 14-turbine scheme previously. This is generally agreed. In terms of existing. consented and wind farm applications that form part of the surrounding view the outlook already contains several existing and consented wind farms, including Dunmaglass, Aberarder, Novar, Novar Extension, Corriegarth 2 and Strathrory, most of which would appear as distant or very distant features with Very Low visual influence. The overall cumulative magnitude of change is assessed as Very Low, this results in a Minor and not significant effect. This is generally agreed. During the hours of darkness, none of the six aviation lights would be visible due to intervening landform.							
VP13 – Càrn Dubh (Ic an Deòir) 12.151 km from nearest turbine View North West	App	High (walkers)	Low	Moderate	Not Significant	Low, High	Moderate, Substantial	**Significant**
	THC	High (walkers)	Low	Moderate	Not Significant	Low, High	Moderate, Substantial	**Significant**
	The baseline of the view is as described in Table 5.2.2 of the EIAR Volume 3, Technical Appendix 5.2 – Viewpoint Analysis. The viewpoint is located at Càrn Dubh (Ic an Deòir), an upland hill summit within the wider Monadhliath landscape, and is representative of walkers and other recreational users experiencing extensive panoramic views from higher ground. Receptor sensitivity is assessed as High, reflecting the recreational nature of the viewpoint and the importance of landscape appreciation to the experience of users accessing the summit. Views are orientated generally north and northwest towards the proposed development across an expansive upland landscape of open moorland, rounded hills and broad upland plateaux with the nearest turbine approximately 12.2 km from the viewpoint. The foreground and middle distance comprise heather moorland, rough grassland and exposed hill slopes, with long-distance views extending across the							

			Proposed Development			Cumulative (Scenario 1 and Scenario 2)		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major, Major to Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major and Major to Moderate are Significant. Moderate may be significant)
	Monadhliath and neighbouring uplands. Existing human influences include hill tracks, managed forestry in lower-lying areas and operational wind farms visible across parts of the wider landscape. The proposed development would be seen within this broad upland context and against a backdrop where wind energy development already forms part of the baseline landscape character. Construction effects would be limited as most ground-based works would be screened by intervening landform, visibility would be restricted to the substation and crane operations during construction. All 12 turbines are visible in the outlook. The turbines would appear partially backclothed by landform and viewed within a landscape already containing wind farm development, while key views towards Ben Wyvis would remain largely unaffected. The applicant considers that owing to the panoramic nature of the view, the simple turbine layout, intervening distance and large landscape scale, the development would appear reasonably well accommodated, with only distant visibility of access tracks and the substation. The magnitude of change is assessed as Low, this results in a Moderate and not significant effect resulting as it would be perceived alongside the existing Farr and Glen Kyllachy wind farms within the same field of view. This is generally agreed. Whilst the overall effect is generally agreed, the turbines would be more noticeable than Farr and Glen Kyllachy given their scale and partially breaking the skyline in comparison with the other wind farms sitting below the skyline. Furthermore, the layout composition continues to be characterised by overlapping turbines, uneven gaps and variations in turbine height, which contribute to a poorly composed skyline. In terms of existing and consented that form part of the surrounding view the outlook already contains numerous existing, consented and proposed wind farms, including Glen Kyllachy, Farr, Moy, Tom nan Clach, Dunmaglass, Corriegarth, Aberarder, Tom na Clach Extension, Cairn Duhie, Corriegarth 2 and Ourack. While several developments would be visible in different directions, most would appear at Low to Very Low magnitude due to distance. Overall, the cumulative magnitude of change is assessed as Low, this results in a Moderate and Significant effect, particularly due to Glen Kyllachy, Farr alongside the proposed development. This is generally agreed. For Scenario 2 the combined cumulative effect would increase to Substantial and Significant due to the visibility of Clune, Kallachy and Highland, although the additional effect of the proposed development would reduce to not significant.							

			Proposed Development			Cumulative (Scenario 1 and Scenario 2)		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major, Major to Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major and Major to Moderate are Significant. Moderate may be significant)
	During the hours of darkness, all six aviation lights would be visible.							
VP14 - Carn Loisgte (near CNP boundary) 12.515 km from nearest turbine View North West	App	High (walkers)	Low	Moderate	Not Significant	Low, High	Moderate, Substantial	Not Significant, **Significant**
	THC	High (walkers)	Low	Moderate	Not Significant	Low, High	Moderate, Substantial	Not Significant, **Significant**
	The baseline of the view is as described in Table 5.2.2 of the EIAR Volume 3, Technical Appendix 5.2 – Viewpoint Analysis. The viewpoint is located at the summit of Carn Loisgte, close to the northern boundary of the Cairngorms National Park within the Drynachan, Lochindorb and Dava Moors SLA, and is representative of hill walkers and other recreational users experiencing panoramic views from the upland landscape. Receptor sensitivity is assessed as High, reflecting the recreational value of the summit and the importance of landscape appreciation to the visitor experience. Views are orientated northwest towards the proposed development across the Monadhliath uplands with the nearest turbine approximately 12.2 km from the viewpoint. The foreground and middle distance comprise open moorland, rounded hills and extensive upland landform, with long-distance views extending across Strathdearn and the surrounding uplands. Existing human influences include estate tracks, occasional forestry in lower-lying areas and views of operational wind farms within the wider landscape. The proposed development would be experienced within a broad panoramic setting where wind energy development already forms part of the established landscape context. Construction effects would be limited, with ground-based works only distantly and partially visible in clear conditions due to intervening landform screening and distance. Crane operations would be visible during construction and decommissioning phases.							

			Proposed Development			Cumulative (Scenario 1 and Scenario 2)		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major, Major to Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major and Major to Moderate are Significant. Moderate may be significant)
	All 12 turbines will be visible in the outlook. The applicant considers the turbines would form a distinct and generally cohesive cluster within a landscape already influenced by existing wind farm development, appearing reasonably well accommodated due to the wide 360° views, intervening distance and large scale of the receiving landscape. Some ground-based infrastructure would be partially visible in clear conditions. The magnitude of change is assessed as Low, this results in a Moderate and Not Significant effect. This is generally agreed. Whilst the overall effect is generally agreed, the layout composition continues to be characterised by overlapping turbines, outliers (T13) and uneven gaps which contribute to a poorly composed skyline. The view already contains several existing and consented wind farms, including Glen Kyllachy, Farr, Dunmaglass, Corriegarth, Aberarder and the consented Corriegarth 2 development, most of which would appear as distant features with Very Low visual influence. The cumulative magnitude of change is assessed as Low, this results in a Moderate and not significant effect. For Scenario 2 the combined cumulative effect would increase to Substantial and Significant due to the visibility of Balnespick, and Clune although there would be no change to the contribution of proposed development which is not significant. This is generally agreed. During the hours of darkness, all six aviation lights would be visible.							
VP15 - B862 Ashie Moor, west of Loch Duntelchaig 13.776 km from	App	High-Medium (road users)	Low	Moderate to Minor	Not Significant	Low	Moderate to Minor	Not Significant
	THC	High-Medium (road users)	Low	Moderate	Not Significant	Low	Moderate	Not Significant
	The baseline of the view is as described in Table 5.2.2 of the EIAR Volume 3, Technical Appendix 5.2 – Viewpoint Analysis. The viewpoint is located on the B862 at Ashie Moor, west of Loch Duntelchaig, within the locally designated Loch Ness and Duntelchaig SLA, and is representative of road users travelling through this upland landscape as well as recreational users enjoying views across the moorland							

			Proposed Development			Cumulative (Scenario 1 and Scenario 2)		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major, Major to Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major and Major to Moderate are Significant. Moderate may be significant)
nearest turbine View East	and surrounding hills. Receptor sensitivity is assessed by the applicant as High-Medium, reflecting the scenic nature of the route within the SLA and the expectation of users to experience views across the surrounding landscape. Views are orientated generally east and northeast towards the proposed development across a broad upland landscape comprising open moorland, forestry, lochans and rolling hills. The foreground is characterised by roadside vegetation, rough grassland and moorland habitat, with more expansive views available across the wider landscape. Existing human influences include the B862, estate tracks, forestry operations, overhead line infrastructure and distant operational wind farms visible within the wider landscape setting. Construction effects would be limited as ground-based works would be screened by intervening landform, visibility would be confined to crane operations during construction. Following the amendments to a 12-turbine scheme, the most prominent turbines, T4 and T5, have been removed, leaving seven turbines in view with three as blade tips only. The applicant considers the proposed development would have a limited visual influence with the wind farm forming a generally cohesive cluster on the eastern skyline and be seen within a landscape already containing prominent man-made features, including overhead line infrastructure. Given the expansive panorama, intervening distance, compact layout and large scale of the receiving landscape, the turbines would appear reasonably well accommodated within the view. No ground-based infrastructure would be visible. The applicant assesses the magnitude of change as Low, this results in a Moderate to Minor and not significant effect, as it was for the 14-turbine scheme previously. This is disputed. It is considered that the effect would be Moderate as even with the reduction of two turbines, the remaining turbines particularly T3 and T6 would appear noticeable above the scenic Loch Duntelchaig in this setting. It is however agreed that the effect would be not significant. The view already contains several existing wind farms, including Moy, Dunmaglass and Aberarder, with the latter two exerting the greatest influence due to their relative proximity in the outlook to the south. No other consented or proposed wind farm developments would be visible							

			Proposed Development			Cumulative (Scenario 1 and Scenario 2)		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major, Major to Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major and Major to Moderate are Significant. Moderate may be significant)
	from this location. As a result, the overall cumulative magnitude of change is assessed as Low, this results in a Moderate to Minor and not significant effect. It is however considered that the cumulative effect would be Moderate and not significant for the reasons set out above. During the hours of darkness, three aviation lights would be visible.							
VP16 - Leachkin, Inverness 14.320 km from nearest turbine View South East	App	High (recreational users/residents)	Low	Moderate	Not Significant	Low	Moderate	Not Significant
	THC	High (recreational users/residents)	Low	Moderate	**Significant**	Low	Moderate	**Significant**
	The baseline of the view is as described in Table 5.2.2 of the EIAR Volume 3, Technical Appendix 5.2 – Viewpoint Analysis. The viewpoint is located at Leachkin on the Great Glen Way, as it passes the western edge of the Inverness, and is representative of residents, road users and recreational users experiencing views from the elevated ground overlooking Inverness and the Moray Firth. Receptor sensitivity is assessed as High for residents and recreational receptors and Medium for road users, reflecting the importance of the view from this elevated location and the value attached to local landscape character. Views are orientated generally south and southwest towards the proposed development across a varied landscape comprising urban development, agricultural land, woodland and more distant uplands. The foreground is characterised by residential development, local roads and areas of woodland in Inverness, while the middle distance includes rolling farmland and forestry. The proposed development would be seen on the distant upland skyline beyond Strathnairn. Existing human influences include the city of Inverness, transport infrastructure, overhead electricity infrastructure, commercial forestry and existing wind energy developments visible within the wider landscape setting. Construction effects would be limited primarily to visibility of crane activity. Given the separation distance of just over 14km between the viewpoint and the closest turbine, most ground-level construction works would be indistinct or not discernible.							

			Proposed Development			Cumulative (Scenario 1 and Scenario 2)		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major, Major to Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major and Major to Moderate are Significant. Moderate may be significant)
	Following the amendments to a 12-turbine scheme, T5 has been removed, which previously appeared as an outlier that did not relate well to the rest of the scheme from this viewpoint. All 12 turbines would be seen as prominent features skylining above the rolling hills beyond Inverness. Following the amendments, the applicant considers the proposed development would appear as a distinct and generally balanced turbine group within a landscape already influenced by wind energy development, although some turbine clustering would be evident. Turbines would be visible on the southeastern skyline above the horizon landform, with limited visibility of ground-based infrastructure. Whilst the removal of turbines T4 and T5 is noted, the amended 12-turbine scheme will still appear prominent in the landscape, with the majority of towers, hubs and blades skylining above the rolling hills landform. It is not agreed that the layout composition is improved due to the reduction in turbine numbers. Rather, the turbine layout composition continues to be characterised by overlapping turbines, uneven gaps, outliers (T6) and variations in turbine height, which contribute to a poorly composed skyline. As such, the effect is still considered Significant following the amendments. In terms of existing, consented and wind farm applications that form part of the surrounding view, existing wind farms at Moy, Farr and Glen Kyllachy would be visible to the southeast, Dunmaglass and Corriegarth would be visible to the southwest along with Aberarder which is currently under construction. The consented Tom na Clach Extension would be seen to the southeast and Corriegarth 2 would be seen to the southwest. Overall, the cumulative magnitude of change is assessed as Low, this results in a Moderate and not significant effect. This is not agreed. The cumulative effect under both Scenarios 1 and 2 would be Moderate and Significant due to the influence of the proposed development which would be the most contributing development in this view. During the hours of darkness, all six aviation lights would be visible.						
VP17 - A9 at Kessock Bridge	App	High (recreational users), Medium (road users)	Low-Very Low	Moderate to Minor, Minor	Not Significant, Not Significant	Low-Very Low	Moderate to Minor, Minor	Not Significant

			Proposed Development			Cumulative (Scenario 1 and Scenario 2)		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major, Major to Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major and Major to Moderate are Significant. Moderate may be significant)
15.758 km from nearest turbine View South East	THC	High (recreational users, tourists), Medium (road users)	Low	Moderate, Minor	Not Significant, Not Significant	Low	Moderate, Minor	Not Significant, Not Significant
	The baseline of the view is as described in Table 5.2.2 of the EIAR Volume 3, Technical Appendix 5.2 – Viewpoint Analysis. The viewpoint is located on the A9 at Kessock Bridge, north of Inverness, and is representative of road users travelling on this strategic section of the trunk road network. Receptor sensitivity is assessed as Medium for road users, reflecting the importance of the route whilst recognising that views are experienced primarily by travellers whose focus is on movement through the landscape. Tourists however travel on the bridge along the A9 who have a higher susceptibility and High sensitivity. The sensitivity is also greater for recreational users crossing the bridge and is assessed as High. Views are orientated generally south and southwest towards the distant uplands containing the proposed development. The foreground is dominated by the Kessock Bridge, the Beauly and Moray Firths, urban development associated with Inverness, transport infrastructure and harbour facilities. Beyond these urban and coastal influences, views extend towards rolling farmland, forestry and the more distant uplands of Strathnairn and the Monadhliath. Existing human influences are extensive and include the city of Inverness, major transport infrastructure, industrial development, overhead electricity infrastructure and existing wind energy developments visible within the wider landscape. Construction effects would be limited principally to visibility of crane activity and turbine erection operations. Ground-based construction activity would not be visible from this location due to intervening distance and partial screening by landform.							

			Proposed Development			Cumulative (Scenario 1 and Scenario 2)		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major, Major to Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major and Major to Moderate are Significant. Moderate may be significant)
	All 12 turbines would be visible breaking the skyline of the hills beyond Inverness. The applicant considers the proposed development would appear as a broadly linear and reasonably balanced group on the southern skyline, within a view already influenced by existing wind energy development. Owing to the panoramic nature of the view, intervening distance, industrial context and large scale of the landscape, the turbines would be fairly well accommodated. Receptors are likely to focus primarily on views east and west towards the Moray Firth and Beauly Firth, reducing the prominence of the development. No ground-based infrastructure would be visible. The applicant assesses the magnitude of change as Low-Very Low, this results in a Moderate to Minor/Minor and not significant effect. Whilst it is considered the applicant has understated some elements of their assessment, it is agreed that the effect will not be significant. In terms of existing, consented and wind farm applications that form part of the surrounding view, existing wind farms at Moy, Farr and Glen Kyllachy, Dunmaglass, Corriegarth would be visible to the south. Aberarder currently under construction, along with the consented Corriegarth 2 would appear as a distant feature in views south but would be visible in clear conditions. Overall, the cumulative magnitude of change is assessed as Low-Very Low, this results in a Moderate to Minor/Minor and not significant effect. As noted previously, it is considered the applicant has understated elements of their assessment, however, it is agreed that the cumulative effect will not be significant. It is surprising that the applicant has not acknowledged the visibility of the application Ballach Wind Farm which would be visible clearly in the west resulting in a Low magnitude. Nevertheless, the cumulative effect would remain not significant. During the hours of darkness, five out of six aviation lights would be visible.							
VP18 - Great Glen Way north of Blackfold	App	High (recreational users)	Low	Moderate	Not Significant	Low	Moderate	Not Significant
	THC	High (recreational users)	Low	Moderate	Not Significant	Low	Moderate	Not Significant
	The baseline of the view is as described in Table 5.2.2 of the EIAR Volume 3, Technical Appendix 5.2 – Viewpoint Analysis.							

			Proposed Development			Cumulative (Scenario 1 and Scenario 2)		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major, Major to Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major and Major to Moderate are Significant. Moderate may be significant)
16.787 km from nearest turbine View South East	The viewpoint is located on the Great Glen Way north of Blackfold, southwest of Inverness and north of Loch Ness, and is representative of walkers, cyclists and other recreational users of this nationally important long-distance route. Receptor sensitivity is assessed as High, reflecting the recreational value of the route and the expectation of users to experience and appreciate views of the surrounding landscape. Views are orientated generally east and southeast towards the proposed development across a varied landscape of forestry, open moorland, agricultural land and rolling uplands. The foreground comprises sections of the Great Glen Way, woodland edges, rough grazing and estate tracks, while the middle and far distance includes the uplands of Strathnairn and the Monadhliath. Existing human influences include commercial forestry, estate infrastructure, overhead electricity infrastructure and operational wind farms visible within the wider landscape setting. The proposed development would be seen within this broader upland context rather than as an isolated feature. Ground-based construction activity would be partially and distantly visible in clear conditions, with visibility reduced by intervening distance and landform screening. Crane operations would be visible during the construction phase. All 12 turbines will be visible with the majority seen with towers, hubs and blades in the outlook. The applicant considers the proposed development would appear as a distinct and reasonably balanced cluster on the eastern horizon within a landscape already influenced by existing wind farm development. Due to the expansive views, intervening distance, presence of other wind farms, the narrow extent of the development within the view and the large scale of the receiving landscape, the turbines would be reasonably well accommodated. Ground-based infrastructure would only be perceptible in clear conditions. The applicant assesses the magnitude of change as Low, this results in a Moderate and not significant effect. This is agreed.						

			Proposed Development			Cumulative (Scenario 1 and Scenario 2)		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major, Major to Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major and Major to Moderate are Significant. Moderate may be significant)
	In terms of existing, consented and wind farm applications that form part of the surrounding view, existing wind farms at Farr and Glen Kyllachy would be visible in easterly views, with Moy and Tom nan Clach beyond visible in clear conditions. The consented Tom na Clach Extension would be seen at even further distance. Overall, the cumulative magnitude of change is assessed as Low, this results in a Moderate and not significant effect. There would be a slight increase with Balnespick and Highland visible (Negligible) for Scenario 2 which would result in no further cumulative effects. During the hours of darkness, all six aviation lights would be visible.							
VP19 - Chanonry Point 22.428 km from nearest turbine View South	App	High (recreational users/walkers)	Low-Very Low	Moderate to Minor	Not Significant	Low-Very Low	Moderate to Minor	Not Significant
	THC	High (recreational users/walkers)	Low	Moderate	Not Significant	Low	Moderate	Not Significant
	The baseline of the view is as described in Table 5.2.2 of the EIAR Volume 3, Technical Appendix 5.2 – Viewpoint Analysis. The viewpoint is located at Chanonry Point on the Black Isle, within Sutors of Cromarty, Rosemarkie and Fort George SLA, and is representative of visitors, walkers and other recreational users attracted to this well-known coastal location. Receptor sensitivity is assessed as High, reflecting the recreational value of the viewpoint, its popularity as a visitor destination and the importance of open views across the Moray Firth and surrounding landscapes. Views are orientated generally south and southwest towards Inverness and the distant uplands containing the proposed development. The foreground is dominated by the coastal setting of Chanonry Point, the shoreline and the waters of the Moray Firth. The middle distance includes the urban edge of Inverness, transport infrastructure and areas of forestry and farmland, while the uplands of Strathnairn and the Monadhliath							

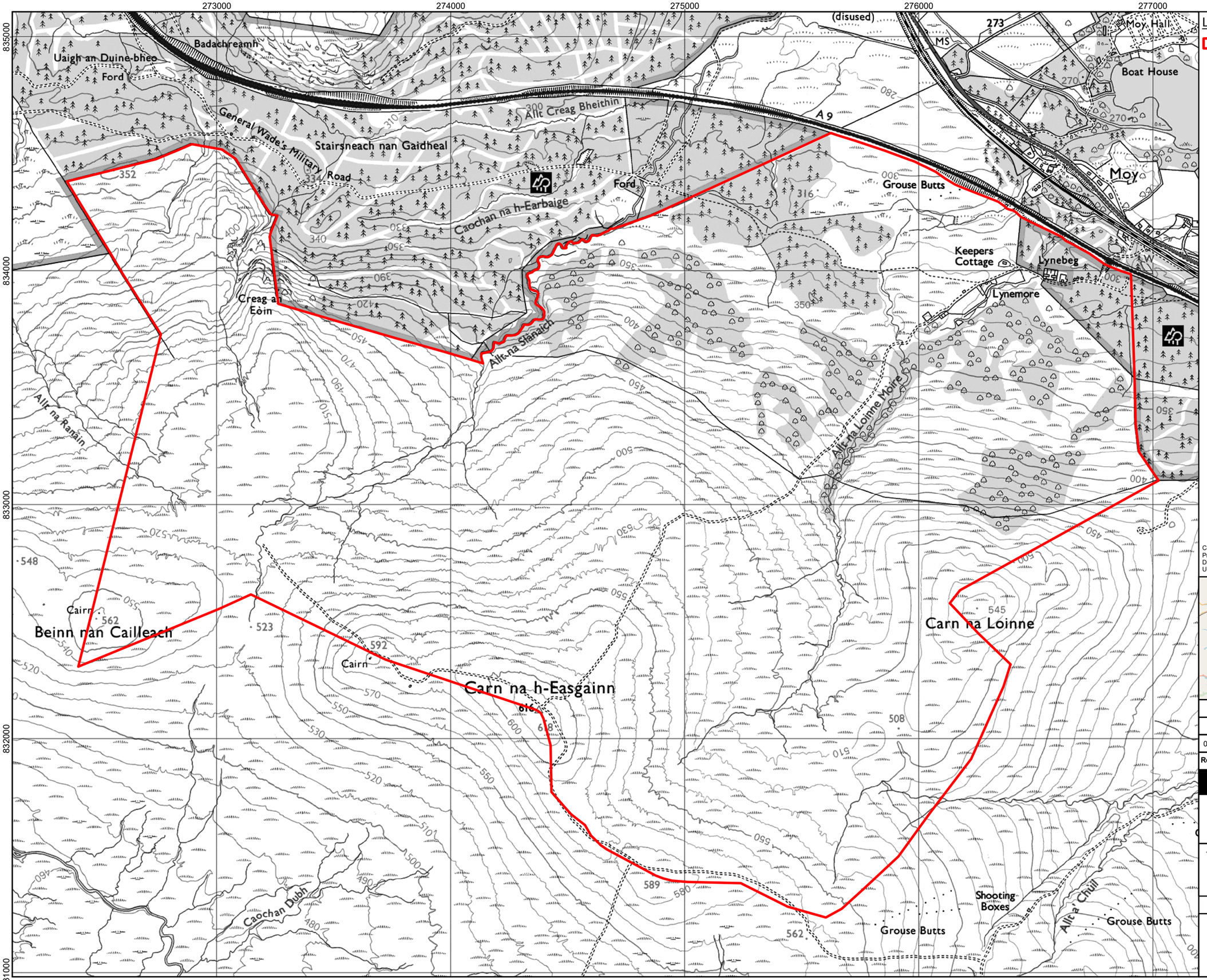
			Proposed Development			Cumulative (Scenario 1 and Scenario 2)		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major, Major to Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major and Major to Moderate are Significant. Moderate may be significant)
	form the distant backdrop. Existing human influences include settlements around the Moray Firth, harbour and transport infrastructure, overhead electricity infrastructure and existing wind energy developments visible within the wider landscape setting. Ground based construction activity would not be visible in this location due to distance and some screening by landform. Crane operations would be visible during the construction phase. All 12 turbines will be visible with the majority seen with towers, hubs and blades in the outlook. The applicant considers the proposed development would form a broadly linear group that affords respite space between groups, within a field of view influenced by existing wind energy development. The turbines would appear above the broad ridgeline of containing landform on the horizon to the south, within the same part of the view as air traffic using Inverness Airport. Due to the panoramic views, intervening distance, the large scale of the receiving landscape and the presence of other wind farms and existing human influences such as Inverness Airport, the turbines would appear reasonably well accommodated within the view. The primary focus of receptors in this location would be to the southeast and west, along the Moray Firth and across to Fort George, respectively, with these views unaffected by the proposed development. Ground-based infrastructure would not be visible. The applicant assesses the magnitude of change as Low-Very Low, this results in a Moderate to Minor and not significant effect. Whilst it is considered the applicant has understated some elements of their assessment, it is agreed that the effect will not be significant. In terms of existing, consented and wind farm applications that form part of the surrounding view, existing wind farms at Farr, Glen Kyllachy, Dunmaglass and Corriegarth would be visible in southerly views along with Aberarder which is currently under construction. The consented Corriegarth 2 and Cairn Duhie wind farms would be visible, although Corriegarth 2 would likely be barely perceptible due to distance. Additionally, the proposed Ourack Wind Farm would appear as a distant feature in easterly views in clear visibility. Overall, the cumulative magnitude of change is assessed as Low-Very Low, this results in a Moderate to Minor and not significant effect. As noted previously, it is considered the applicant has understated elements of their assessment, however, it is agreed that the cumulative effect will not be significant. It is surprising that the applicant has not acknowledged the visibility of the application Ballach Wind Farm which would be visible clearly in the west resulting in a Low-Very Low magnitude. Nevertheless, the cumulative effect would remain not significant.							

			Proposed Development			Cumulative (Scenario 1 and Scenario 2)		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major, Major to Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major and Major to Moderate are Significant. Moderate may be significant)
	During the hours of darkness, all six aviation lights would be visible.							
VP20 - Meall Fuar-mhonaidh summit 29.552 km from nearest turbine View North East	App	High (walkers)	Very Low	Minor	Not Significant	Low-Very Low	Moderate to Minor	Not Significant
	THC	High (walkers)	Very Low	Minor	Not Significant	Low-Very Low	Moderate to Minor	Not Significant
	The baseline of the view is as described in Table 5.2.2 of the EIAR Volume 3, Technical Appendix 5.2 – Viewpoint Analysis. The viewpoint is located at the Meall Fuar-mhonaidh summit, a prominent hill overlooking Loch Ness on the boundary of the Loch Ness and Duntlechaig SLA and is representative of walkers and other recreational users reaching this well-used upland summit. The viewpoint is popular with a mixture of walkers taking a detour from the Great Glen Way, visitors stopping for take in the scenic views and local residents utilising the easily accessed route from the nearby car park Grotaig. The summit of Meall Fuar-mhonaidh (699m AOD) is a relatively straightforward gradual climb from the car park. Receptor sensitivity is assessed as High, reflecting the recreational nature of the viewpoint, its panoramic qualities and the expectation of visitors to experience extensive views across the surrounding Highland landscape. The location is noted as a “Key Location” within the OSWESG. Panoramic views across much of Loch Ness are a key feature of the vista and more distant views across the mountainous Monadhliath uplands landscapes beyond form a dramatic backdrop. The foreground comprises open moorland, rocky outcrops and upland grassland, while the middle and far distance includes forestry, agricultural land, rolling uplands and more distant mountain horizons. Existing human influences include forestry plantations, estate tracks, overhead electricity infrastructure and operational wind farms visible within the wider landscape setting. The proposed development would be viewed as part of this wider upland landscape context.						

			Proposed Development			Cumulative (Scenario 1 and Scenario 2)		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major, Major to Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major and Major to Moderate are Significant. Moderate may be significant)
	Construction effects would be limited principally to visibility of crane activity during construction. Given the substantial distance between the viewpoint and the proposed development, ground-level construction activity would not generally be discernible. All 12 turbines would be visible, appearing as a distant, broadly linear group within an existing wind farm context. Due to the distance, the applicant considers the proposed development would form a minor feature on the skyline above the Monadhliath uplands in clear conditions. Ground-based infrastructure would not be visible. The applicant assesses the magnitude of change as Very Low, this results in a Minor and not significant effect. This is agreed. In terms of existing, consented and wind farm applications that form part of the surrounding view, existing wind farms at Dunmaglass and Aberarder would be visible in easterly views, with more distant wind farms at Glen Kyllachy, Farr, Moy and Tom nan Clach contributing to the existing wind energy context. Views to the south also include Corriegarth and the consented Corriegarth 2. The consented Tom na Clach Extension would be theoretically visible only in clear conditions. Ourack, at over 60 km would be barely perceptible. Whilst there are significant cumulative effects from other schemes set back from the northwestern shores of Loch Ness including Bhlaraidh, Bhlaraidh Extension and Loch Liath, these are unrelated to the proposed development. Overall, the cumulative magnitude of change is assessed as Low-Very Low, this results in a Moderate to Minor and not significant effect. There would be a slight increase with Kyllachy, Balnespick, Highland and Clune theoretically visible (Negligible) for Scenario 2 in addition to Corriegarth and the proposed development. It is agreed that the additional effect of the proposed development would remain Minor and not significant. During the hours of darkness, all six aviation lights would be visible, albeit at a substantial distance.						
VP21 - Meall a'	App	High (walkers)	Very Low	Minor	Not Significant	Very Low	Minor	Not Significant

			Proposed Development			Cumulative (Scenario 1 and Scenario 2)		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major, Major to Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major and Major to Moderate are Significant. Moderate may be significant)
Bhuachaille summit (CNP) 30.813 km from nearest turbine View North West	THC	High (walkers)	Very Low	Minor	Not Significant	Very Low	Minor	Not Significant
	The baseline of the view is as described in Table 5.2.2 of the EIAR Volume 3, Technical Appendix 5.2 – Viewpoint Analysis. The viewpoint is located at Meall a' Bhuachaille summit within the Cairngorms National Park and is representative of walkers and other recreational users experiencing extensive panoramic views from one of the most accessible and popular summits in the National Park. Receptor sensitivity is assessed as High, reflecting both the recreational value of the viewpoint and its location within a nationally designated landscape where appreciation of expansive mountain views is a key component of the visitor experience. Views are orientated generally north and northwest towards the proposed development across a broad panorama encompassing the Monadhliath, Strathdearn and the surrounding Highland uplands. The foreground comprises open moorland, rocky summit features and upland grassland, while the middle and far distance includes extensive mountain ranges, woodland, forestry and areas of existing wind energy development. Existing human influences include hill tracks, forestry plantations in lower lying areas and operational wind farms visible within the wider landscape setting. The proposed development would be seen within the context of this extensive upland panorama and alongside an established pattern of wind energy development within the Monadhliath. Construction effects would be limited principally to visibility of crane activity during construction. Ground-level construction activity would not be visible. All 12 turbines would be visible appearing as a distant, broadly linear group within a field of view influenced by existing wind energy development. Across a viewing distance in excess of 30 km, the turbines would form a relatively minor and outlying additional feature in the outlook. Ground-						

			Proposed Development			Cumulative (Scenario 1 and Scenario 2)		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major, Major to Moderate are Significant. Moderate may be significant)	Magnitude of Cumulative Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Substantial, Substantial to Major, Major and Major to Moderate are Significant. Moderate may be significant)
	based infrastructure would not be visible from this location due to distance. The applicant assesses the magnitude of change as Very Low, this results in a Minor and not significant effect. This is agreed. In terms of existing, consented and wind farm applications that form part of the surrounding view, existing wind farms would be seen at between 25km to 40km. Visible schemes include Tom nan Clach, Glen Kyllachy, Farr, Moy, Dunmaglass, Aberarder, Tom na Clach Extension, Corriegarth 2, Cairn Duhie and Ourack. Overall, the cumulative magnitude of change is assessed as Very Low, this results in a Minor and not significant effect. There would be a slight increase with Kyllachy, Balnespick, Highland and Clune theoretically visible (Negligible) for Scenario 2 in addition to the proposed development. The cumulative effect is agreed as Minor and not significant. During the hours of darkness, all six aviation lights would be visible, albeit at a substantial distance.						



Legend:

- Site Boundary

Coordinate System: British National Grid
Projection: Transverse Mercator
Datum: OSGB 1936
Units: Meter



Rev	Date	Description	Drn	Chk	App
00	14/02/2025	First Draft	DL	PA	RB

Lynemore Wind Farm

RSK GALILEO EMPOWER

TITLE: Figure 1.1
Site Boundary

ID:P663991_EIA_Site Boundary

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Kilometres
Scale: 1:15,000 @ A3

N W E S

REV 00

Path: C:\Users\DLewis\RSK Group\RSK Environment GIS Projects - 663991 - Lynemore Wind Farm\01 - GIS\P663991_EIA.aprx\Site Boundary

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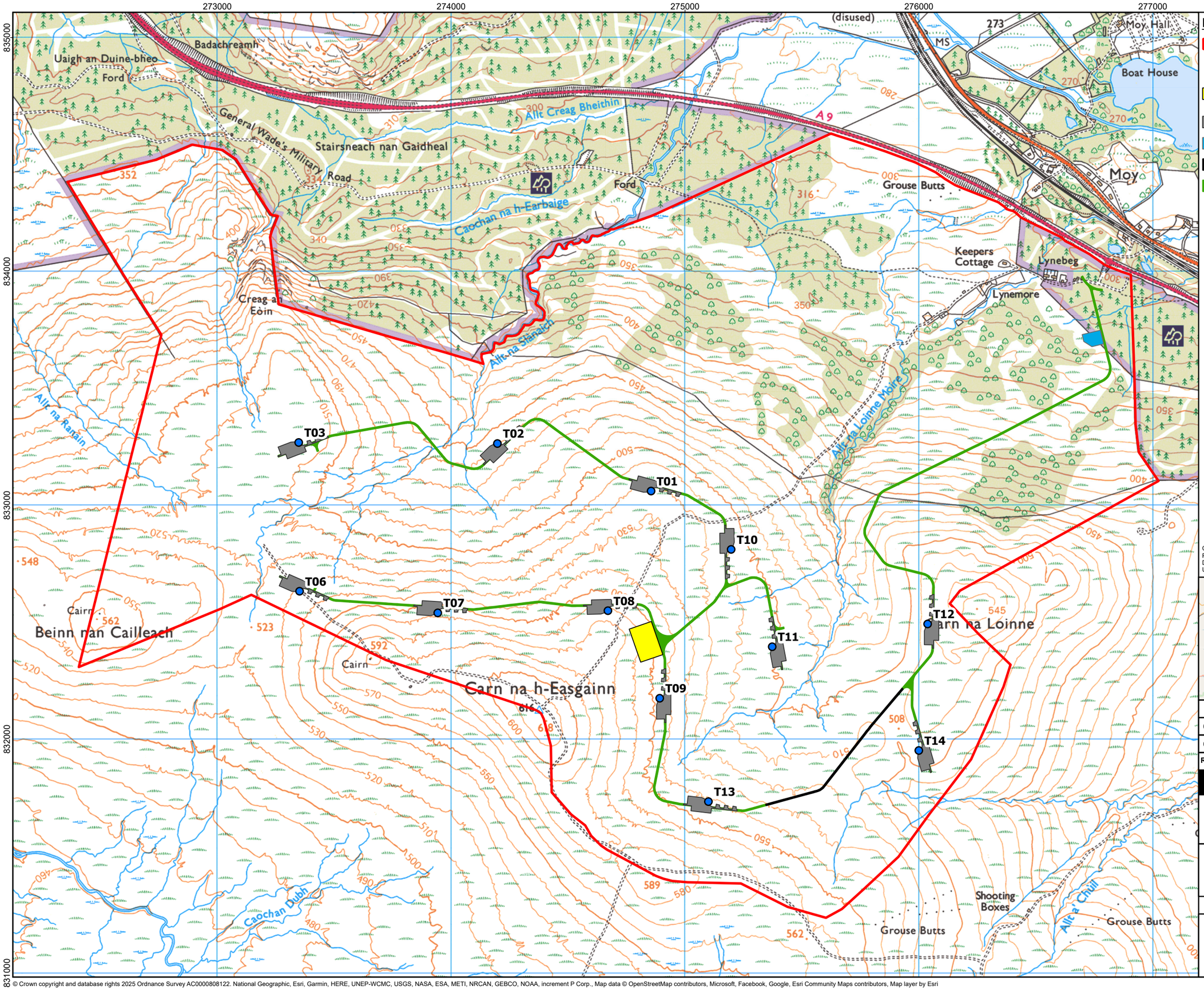

Legend:

- Application Boundary
- Proposed Turbine Location
- Indicative Borrow Pit/ Substation
- Crane Pads
- Construction Compound
- Floating Track
- Standard Track

Coordinate System: British National Grid
Projection: Transverse Mercator
Datum: OSGB 1936
Units: Meter



Rev	Date	Description	Drn	Chk	App
01	10/12/2025	Revised Site Layout	DL	PA	RB
00	09/12/2025	Revised Site Layout	DL	PA	RB

Lynemore Wind Farm

RSK GALILEO EMPOWER

TITLE: AI Figure 2.5
Lynemore Wind Farm Revised Layout

ID:P663991_AI_Revised_Site_Layout

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REV 01

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A - EIA Layout

B - Revised Layout

Legend:

- Application Boundary
- Proposed Turbine Location
- Indicative Borrow Pit/ Substation
- Crane Pads
- Construction Compound
- Floating Track
- Standard Track

Coordinate System: British National Grid
Projection: Transverse Mercator
Datum: OSGB 1936
Units: Meter



Rev	Date	Description	Drn	Chk	App
01	10/12/2025	Revised Layout	DL	SA	JS
00	09/12/2025	Design A-B	DL	PM	RB

Lynemore Wind Farm

RSK GALILEO EMPOWER

TITLE: AI Figure 2.4
Design Iterations

ID:P663991_AI_DesignIterations_AI

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Kilometres
Scale: 1:30,000 @ A3

REV 01

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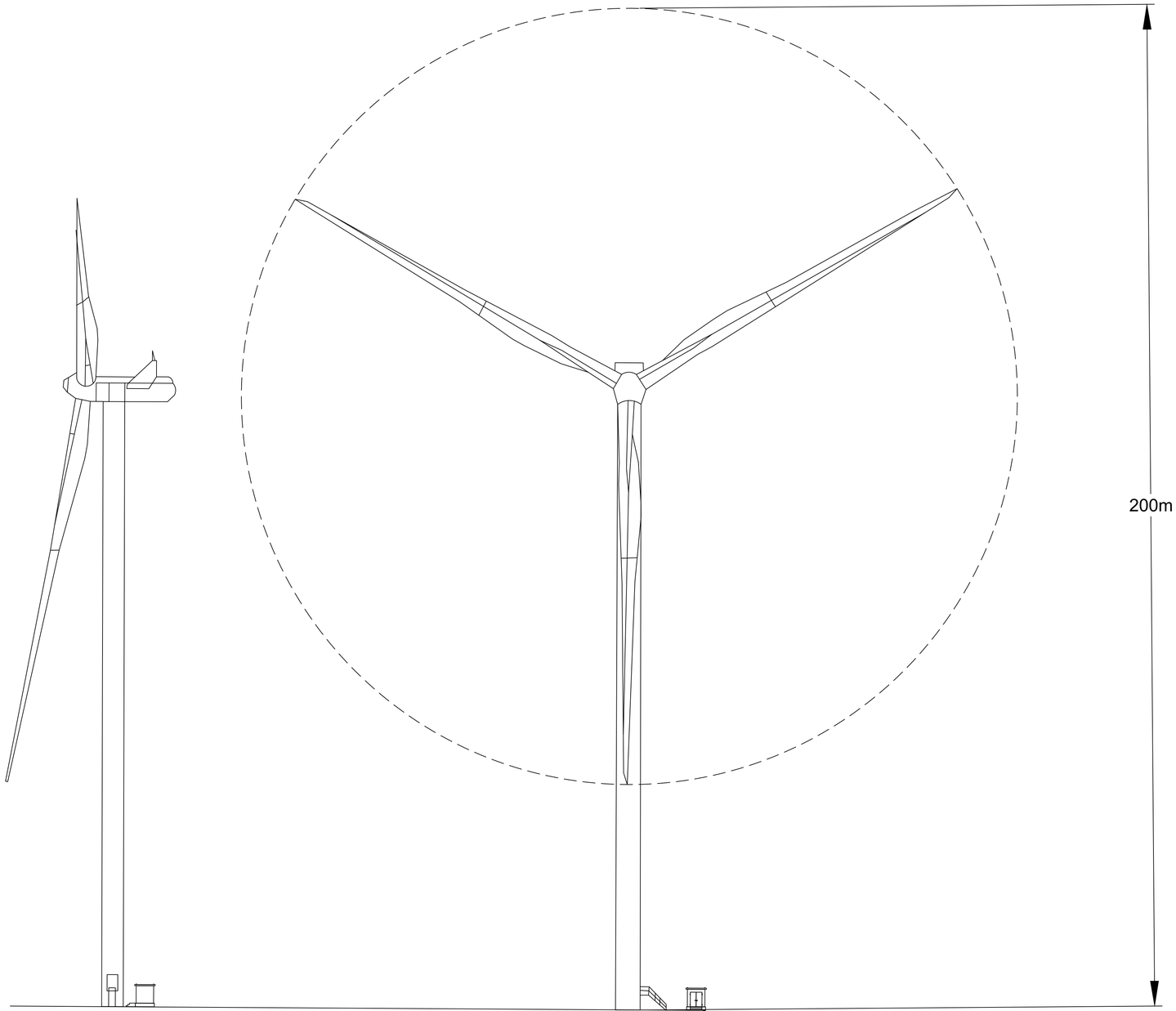

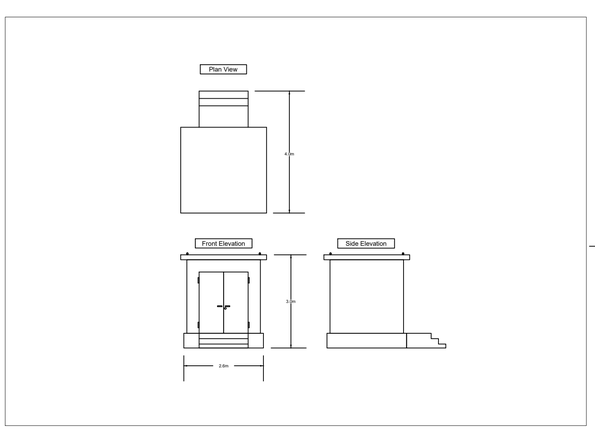

NOTE:

1. ALL DRAWINGS ARE TO BE READ IN CONJUNCTION WITH THE SPECIFICATION FOR HIGHWAY WORKS AND THE TURBINE MANUFACTURERS STANDARDS AND ALL RELEVANT DRAWINGS WITHIN THE PROJECT DESIGN PACKAGE.
2. ALL WORKS TO BE EXECUTED IN ACCORDANCE WITH THE DMRB, THE MANUAL OF CONTRACT DOCUMENTS FOR HIGHWAY WORKS, DESIGN MANUAL FOR ROADS AND BRIDGES, AND TRAFFIC SIGNS MANUAL.
3. ALL DIMENSIONS ARE IN METRES UNLESS STATED OTHERWISE. ALL LEVELS ARE IN METRES AND RELATE TO ORDNANCE DATUM.
4. DO NOT SCALE FROM ANY DRAWING. WORK TO FIGURED DIMENSIONS ONLY. ANY DISCREPANCIES IN DIMENSIONS ARE TO BE REFERRED TO THE DESIGNER BEFORE WORK IS PUT TO HAND.
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Client

GALILEO EMPOWER

RSK

Project

LYNEMORE WIND FARM

Drawing Title

TYPICAL TURBINE ELEVATIONS

	Name	Date	
			Scale NTS @ A1
Designed	JS	16.01.2025	File Lynemore Construction Details
Checked	SM	16.01.2025	Drawing Status DRAFT

Drawing No. FIGURE 2.6

Revision P1

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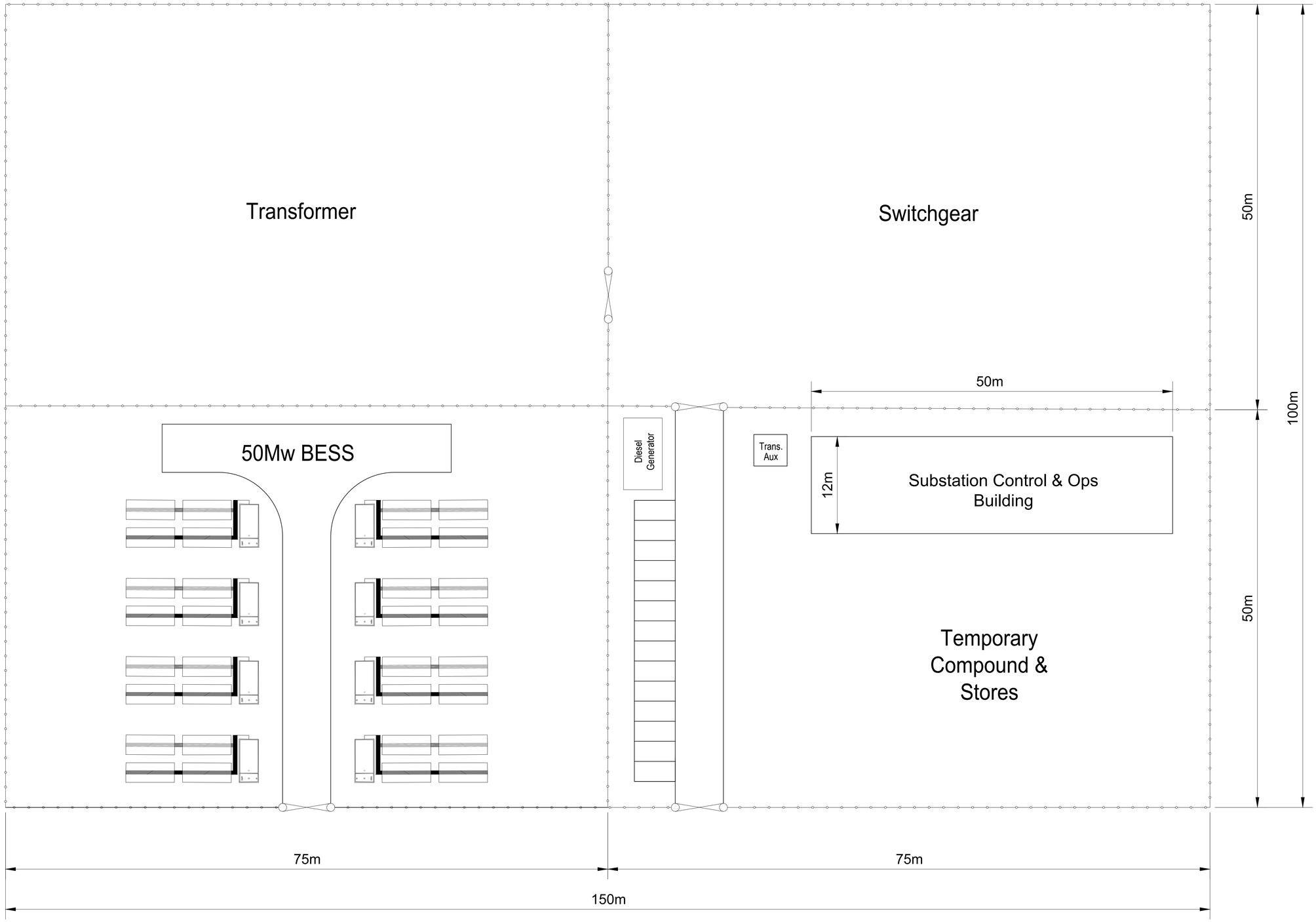

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Client

GALILEO EMPOWER RSK

Project

LYNEMORE WIND FARM

Drawing Title

TYPICAL ONSITE SUBSTATION & BESS LAYOUT

	Name	Date
Designed	JS	16.01.2025
Checked	SM	16.01.2025

Scale NTS @ A1
File Lynemore Construction Details
Drawing Status DRAFT
Drawing No. FIGURE 2.13
Revision P1

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