Agenda Item	6.10
Report No	PLS 063/19

HIGHLAND COUNCIL

Committee: South Planning Applications Committee

Date: 7 August 2019

Report Title: 18/05996/S36: Clash Gour Holdings Limited

Clash Gour Wind Farm, South of Forres

Report By: Area Planning Manager – South

Purpose/Executive Summary

Description: Construction of Clash Gour Wind Farm - comprised of 48 turbines with a ground to blade tip height of between 136m and 176m, with an installed capacity in excess of 50MW.

Ward: Within Moray Council Area – adjacent to Wards 18 and 20.

Development category: Application under Section 36 of the Electricity Act

Reason referred to Committee: Scheme of Delegation.

Recommendation

Members are asked to agree to **Raise an Objection** to the application and submit this to the Scottish Government's Energy Consent and Development Unit to 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 and Deployment Unit on an application made under Section 36 of the Electricity Act 1989 (as amended) for the construction and operation of a wind farm and associated infrastructure – Clash Gour wind farm. The Highland Council were consulted as a neighbouring planning authority. The purpose of this report is to provide a response which considers the impact the development is likely to have on The Highland Council area.

1.2 The proposed development is for a wind farm for 30 years within the Moray Council area, close to The Highland Council boundary east of the Dava Moor. It is expected that each wind turbine would be rated at between 3.3MW and 6MW giving a total installed capacity of between 164.2MW and 225MW, potentially more given current improvement rates in wind technology.

1.3 The application contains two alternative approaches to the development referred to as Scenario A and Scenario B. The layout is largely similar between the two scenarios with 48 turbines proposed, however the turbine scales are different. Both Scenario A and Scenario B utilise a "horseshoe" layout with a northern, eastern and western array of turbines around the existing Berry Burn development wind farm. The two Scenarios are included in the application due to the potential impact of the wind farm on aviation interests.

Scenario A:

- 48 wind turbines (with a potential installed capacity between 3.3MW and 6MW each) measuring between 130m and 176m tip height;
    - Northern group – 7 turbines (2 at 149.5m tip height, 1 at 143m tip height, 2 at 130m tip height, 2 at 136.6m tip height);
    - Eastern group – 20 turbines at 176m tip height;
    - Western group –16 turbines at 149.5m tip height;
- Turbine foundations with associated hardstanding areas for cranes;
- Road improvement works to the Mundole Junction, Half Davoch Road and access junction to the site;
- Site access tracks including 33.59km of new access tracks, 17.20km of upgraded access tracks and 26 watercourse crossings;
- Drainage works;
- Forestry works and compensatory planting;
- Up to 11 temporary borrow pits;
- A site entrance compound with up to 5 temporary site construction compounds;
- 3 internal substations and control buildings linking to the grid line north west of the site;
- Conversion of Johnstripe into a project office and Rochlun into a study centre;
- A network of buried power cables;
- 5 temporary construction compounds, including parking, and welfare facilities;
- Up to 11 borrow pits;

- Up to 6 permanent anemometer masts.
- 50MW battery storage;

Scenario B:

As above with the exception of:

- 48 wind turbines (with a potential installed capacity between 3.3MW and 6MW each) measuring between 130m and 149.5m tip height;
    - Northern group – 7 turbines (2 at 149.5m tip height, 1 at 143m tip height, 2 at 130m tip height, 2 at 136.6m tip height);
    - Eastern group – 20 turbines at 149.5m tip height;
    - Western group –16 turbines at 149.5m tip height;

1.4 The applicant would prefer to deliver Scenario A. The reason for the Scenario B is to reduce the requirement for visible aviation lighting as this is only required for turbines below 150m to blade tip.

1.5 The proposed development would also require forest restructuring works to enable construction and operation of the wind farm; and the forestry plan incorporates a network of paths within the site to enhance access.

1.6 Turbines would be delivered by ship to Inverness Harbour then transported via the local road network to the A96 Trunk Road. From there turbine components will travel along the A940 through Forres to the Half Davoch Road. Construction access to the site will be by the Half Davoch Road. There would need to be some work to accommodate the delivery of turbines to the site. A separate access for the forestry works is proposed to the east of the site.

1.7 The application contains a package of mitigation, this is summarised in Chapter 17 of the Environmental Impact Assessment Report. The mitigation includes a Habitat Management Plan that promotes a prescription for the habitats on site to ensure protected species are protected and habitats are enhanced during the operation of the development. The HMP takes into consideration ongoing habitat management associated with the adjacent Berry Burn Wind Farm to avoid conflicting management practices. The key habitats to be addressed are blanket bog, wet heath and dry heath and key bird species are hen harrier and red-throated diver, although management will benefit other species such as merlin, black grouse and curlew.

1.8 The development is situated within an extensive area of commercial forestry, referred to as, Rochuln, Dallas and Redcraigs woodlands. The area of woodland within the application boundary extends to 1,715ha. However 377.63ha of conifer woodland would be felled in order to allow construction of the proposed development and associated infrastructure. 299.57ha of this area would be replanted, primarily with commercial conifers, and an internal network of broad leaved woodland, resulting in a requirement for 78.06ha of compensatory planting to be delivered through a Compensatory Planting Plan.

1.9 Supporting Information: Design and Access Statement, Planning Statement, Pre-Application Consultation Report, Environmental Impact Assessment Report which addresses the following topics:

- Site description and design evolution
- Description of development
- Renewable energy and planning policy
- Landscape and visual amenity
- Ecology
- Ornithology
- Soils, geology and the water environment
- Cultural heritage and archaeology
- Noise and vibration
- Site access, traffic and transport
- Socio-economics, tourism, recreation and land use
- Aviation
- Other environmental issues

1.10 No variations have been made to the application since The Highland Council were consulted.

2. SITE DESCRIPTION

2.1 The development is proposed upon the Dunphail Estate, Altyre Estate and Dallas Forest. The site is currently managed as upland heath and grassland with areas of recently felled commercial forestry and commercial forestry in the north and east. Parts of the site are used for shooting activities.

2.2 The site is located approximately 9km south of Forres and 17km south west of Elgin. There are a number of scattered residential properties located in proximity to the site, particularly to the west and along the Half Davoch Road, which would be used to access the site.

2.3 There are no residential properties within 1km of the proposed turbines and a small number of individual residential properties within 2km in Moray. The closest property is the Ribreck Forest Lodge within Moray located 1.2km from the nearest turbine. The closest settlements and rural groupings to the site are Dallas approximately 5km to the north, Upper Knockando 6km to the south east, Logie 5km to the north west all within Moray. Within Highland the nearest group of residential development is at Dava 5km to the south west iof the turbine envelope,

2.4 The site lies within the catchment of the River Lossie and tributaries of the River Findhorn. A large number of small watercourses flow through the site many of which have sources originating from the summits within the site boundary. Loch Dallas and three other small lochans are located within the northern part of the site and Loch an Salich and one of the Lochs of Little Benshalag are located within the eastern part of the site.

2.5 The A940 is located 2km to the west of the site and runs from north to south. A local road is located to the east of the site connecting the B9010 at Dallas to the B9102 at Upper Knockando. The Dava Way, a recreational long distance route used by walkers, cyclists and horses, linking Forres to Grantown-on-Spey, is located approximately 2km to the west of the site and also crosses the Half Davoch Road access route via an underpass.

2.6 The general elevation across the site ranges from the lowest point in the north west of the site at 217m Above Ordinance Datum (AOD) to 483m AOD in the south of the site. There are a number of summits within the site boundary.

2.7 There are no known landscape, ecological or cultural heritage designations within the site boundary. The current landscape character of the proposed development consists largely of conifer plantation in the northern and eastern areas and open heather moorland in the southern area. The closest part of the boundary of the Cairngorms National Park Authority (CNPA) is located approximately 5km to the south of the site. Between the CNPA and the site lies the eastern portion of Highland Council's Drynachan, Lochindorb and Dava Special Landscape Area (SLA). The Cromarty, Rosemarkie and Fort George SLA lies to the north west.

2.8 The closest designated site is the Moidach More Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSS1), which lies adjacent to the southern part of the site on the western side of the River Divie, designated for its blanket bog.

2.9 There is an existing wind farm, Berry Burn (29 turbines each at 100m to blade tip), which lies central to the proposed development (approximately 500m from the nearest turbine). The proposed development wraps around the existing Berry Burn Wind Farm on its western, northern and eastern sides in a horseshoe formation. The Hill of Glaschyle Wind Farm (12 turbines each at 99.91m to blade tip) lies approximately 1.6km to the north west of the site, and Pauls Hill Wind Farm (28 turbines each at 99.5m to blade tip) approximately 2.1km to south east.

2.10 Other wind farm developments operate in the surrounding area including Rothes I and Rothes II Wind Farms (40 turbines between 100m and 125m to blade tip) approximately 5km to 6.2km east of the site. Three consented wind farms are also located within 10km of the site including Meikle Hill Wind Farm (six turbines at 126.5m to blade tip) approximately 4.5km to the north east; and Kellas Wind Farm (four turbines at 110m to blade tip) approximately 6.9km to the north east.

2.11 Within Highland Council area the following wind farms are constructed/under construction in the wider area including Tom Nan Clach, Moy, Farr and Glen Kyllachy. Cairn Dhuie Wind Farm consented within the Highland Council area in proximity of this site but not constructed..

4. PUBLIC PARTICIPATION

4.1 Advertised: Forres Gazette; Northern Scot; Press and Journal, Scotsman and Edinburgh Gaztette

Date Advertised: Dates ranging between 19 and 28 December 2018

Representation deadline: 11 February 2019

Representations: ECDU web site highlights 487 representations in total.

No representations were received direct by the Highland Council.

4.2 Material considerations raised in objection are summarised as follows:

a) Visual impact individually and cumulatively including impact on: tourist routes (B9102, A95, A96, A941, A939, A940 and recreational interests - Dava Way, upland locations, Lochindorb);
b) Design of the wind farm – increase in blade tip height beyond the existing development in the
c) Adverse landscape impact including impact on Special Landscape Areas
d) Open Uplands/sensitive landscape transition
e) Impact on tourism
f) Impact on built and cultural heritage;
g) Adverse visual impact of aviation lighting;

4.3 Material considerations raised in support of the application:

- Local economic benefits;
- Climate change.

4.4 All letters of representation are available for inspection via the Council's eplanning portal which can be accessed through the internet www.wam.highland.gov.uk/wam.

5. CONSULTATIONS

Consultations undertaken by Highland Council

5.1 **Landscape Officer** has no objection to the application. While the development will affect the landscape character within the site itself, the landscape and visual effects as perceived from within Highland Council area are limited and would not result in a significant detriment to the experience of the landscape or visual resource. The qualities of the Special Landscape Area, are not likely to be significantly impacted though there will be localised effects on perception of scale of some aspects of the landscape outwith the SLA, these will be comparatively limited considering the overall scope of the development.

Consultations undertaken by Scottish Ministers

5.2 **Moray Council** objects to the application. Its concerns relate to conflict with Moray Local Development Plan Policy, given the size and position of turbines they will dominate the sensitive settled landscapes, particularly the upland fringes in the upper Lossie and Divie valleys and the Upper Knockando area. It considers the proposal is inappropriate due to the significant adverse impacts on landscapes and views within Moray, particularly varying distances from Ben Rinnes, the A95 south of Aberlour and the Dava Way diminishing the recreational and visitor experience with the countryside overly populated with windfarm developments. The proposal would increase the influence of wind energy development in views north from a limited area within the Spey Valley Area of Great Landscape Value (AGLV) near Upper Knockando with contrasts of scale evident and the landscape detrimentally affected. The proposed windfarm would result in complex and unacceptable cumulative views of wind energy development (in combination, successive and sequential views) from varied locations within Moray with no distinct separation. Hill of Glaschyle, Berry Burn and Pauls Hill are largely discernible from each other at present but the proposed windfarm would see almost continual wind turbines

from the Altyre Estate south to the Spey Valley. This would result in significant adverse cumulative effects upon the landscape and upon visual amenity resulting in the creation of a "windfarm landscape". Whilst the cumulative impact for Scenario B would be slightly lessened by a reduction in turbine heights it would still result in significant adverse cumulative effects as described above.

5.3 **Speyside Community Council** objects to the application. Its concerns relate to conflict with Development Plan Policy, incompatible with tourism and recreational interests and unacceptable impact in terms of visual appearance and landscape character, including unacceptable cumulative impact. It highlights amongst several factors the Highland Tourist Route A939 and A940 to Dava and the Dava scenic gateway to Moray. There are likely to be visual and cumulative effects to both the Speyside Way and the Dava Way - both popular long distance walks, attracting tourists all year round.

5.4 **Cairngorm National Park Authority** do not object to the application subject to the reduced height of turbines outlined in Scenario B reducing the impact on the dark skies special landscape quality of the Cairngorms National Park. If Scenario A is to be considered mitigation is required to minimise the intensity and frequency of use of aviation lighting safeguarding the dark skies special landscape quality.

5.5 **Scottish Natural Heritage** do not object to the application subject to appropriate mitigation. Lighting on the turbines would result in significant adverse impacts on the Dark Skies Special Landscape Quality of the Cairngorms National Park by either reducing the turbine height below 150m or utilizing proximity activated lighting. There is no connectivity with the River Spey Special Area of Conservation (SAC) but there is potential connectivity with Moidach More SAC and Lower Findhorn Woods SAC but the proposed mitigation within the Environmental Impact Assessment Report (EIAR) will avoid any potential impact. Craigmore Wood SPA, Anagach Woods SPA and Darnaway and Lethen SPA are designated for breeding capercaillie and are located approximately 17km, 12km and 6km respectively from the proposed site. Whilst impacts on individual birds are unlikely positive conservation practices are encouraged regarding forestry and fencing. The Moray and Nairn Coast SPA is within 20km of Clash Gour, wintering grey geese and breeding osprey are qualifying interests of the SPA. Collision risk modelling indicates that the risk to grey geese and osprey is low and will not impact adversely on the SPA populations. Significant effects on landscape character are identified, but confined to the parts of the Strathdearn Hills Landscape Character type. Significant adverse visual effects are predicted on the boundary uplands to the north of the Park. It is recognised that there would be an increase in magnitude of change contributing to significance of cumulative effects on the collective appreciation of special landscape qualities (SLQs) but that these would not affect the integrity of the Park. SNH are aware of a recent wildfire at the location and their advice is based on the information presented prior to this event.

5.6 **Scottish Environmental Protection Agency** object to the application on account of a lack of information on peat management; borrow pits; groundwater dependent terrestrial ecosystems; and forestry. It has highlighted a request for planning conditions on a range of matters should the application be supported.

5.7 **Scottish Water** do not object to the application. It highlights however that the site is located within the River Lossie drinking water catchment area and would supply the Glenlatterach Works (WTW). It would be essential that water quality and water quantity in the area are protected.

5.8 **RSPB** do not object. It raises serious concerns on the impact of Annex 1 bird species including hen harrier, red throated diver and golden plover. Curlew, which are Red listed Birds of Conservation Concern are also at risk of displacement and collision with the development. It recommends the southern turbine array is reduced to decrease the collision risk and displacement of hen harrier, goshawk golden plover and curlew and avoid areas of deep peat. Turbines 43, 46 and 48 in particular are located on areas of deep peat and should be removed. Compensatory planting should be relocated to ensure it does not impact on waders or other sensitive open ground species. The Berry Burn wind farm turbine layout should be displayed to due to the close proximity to the proposal and to fully consider potential impacts. RSPB advise the proposed scheme (including mitigation proposals) should be revised to address these concerns.

5.9 **Scottish Forestry** do not object to the application. It has requested further information regarding the tree felling and restocking proposals. Concerns were raised regarding certain phases of the Long term Forest Plan (LTFP) and further clarification is required prior to the proposal being fully assessed.

5.10 **Marine Scotland** do not object to the application. The proposed development is located in an area drained by watercourses which support important salmon and trout populations. The proposed development site is largely drained by watercourses within the catchments of the River Lossie, Findhorn and Burn of Mosset; turbines in the east of the site could potentially impact waterbodies within the River Spey catchment which is a designated SAC; salmon and sea lamprey are qualifying features for this designation status. These watercourses are prone to flash flooding and have been subjected to impacts associated with conifer afforestation. Furthermore peat deposits are extensive across the site. A number of operational wind farms are adjacent to the proposed development site, along with other wind farms under construction and in the proposal stages. The proposed mitigation measures in addition to a robust integrated water quality, macroinvertebrate and fish population monitoring programme for Clash Gour wind farm should serve to ensure impacts on salmon and trout populations are minimised and/or avoided and Marine Scotland advises that this monitoring programme and mitigation measures (based on Marine Scotland guidelines) are stipulated in a planning condition should this development receive consent.

5.11 **Findhorn, Nairn and Lossie Fisheries Trust** do not object to the application. Rivers and burns within and surrounding the site support important populations of salmon and trout along with other species such as eel, lamprey, sticklebacks etc. Both the River Findhorn and River Lossie support a salmon and sea trout fishery. Fish access and egress is of particular importance and river crossings are key for the maintenance of good fish populations. In total 26 river crossings are currently proposed with 21 new and 5 upgraded existing crossings. It has requested the final design and location of river crossings is reviewed and agreed prior to construction. Timing of construction should be considered and it is best to avoid

spawning periods, (typically late October to early December), when the fish eggs are within the gravel (December to March) and during smolt migrations (April to mid May), leaving late May to early October as the optimum time for works.

5.12 **Visit Scotland** do not object to the application. It noted that scenery and the natural environment have become the two most important factors for visitors in recent years when choosing Scotland as a holiday location and strongly recommend any detrimental impact of the proposal (either visually, environmentally or economically) on tourism be identified and considered in full.

5.13 **Historic Environment Scotland** object to the application as it does not contain an adequate assessment of impacts on the setting of heritage assets in the vicinity of the development. It notes impacts on the setting of a number of nationally important heritage assets within the 10km study area are not considered within the Cultural Heritage and Archaeology Chapter of the EIA Report with the omission of Lochindorb Castle (Scheduled Monument, Index no. 1231) of particular concern as it may be subject to significant adverse impacts caused by the presence of turbines in key views along Lochindorb. It has requested further information regarding these impacts in order to reach a view on the proposal.

5.14 **BAA Aerodrome Safeguarding Aberdeen** has provided no comment as the proposal is outwith their consultation area.

5.15 **National Air Traffic Systems (NATS)** has no safeguarding objection to the application.

5.16 **Highland and Islands Airport Ltd** object to the application due to impacts on its radar system. This objection can be removed if a solution can be found to mitigate the effect on Inverness Airport's operation.

5.17 **Ministry of Defence** object to the application. It states that the turbines will be located between 24.9km and 30.5km from the ATC radar at RAF Lossiemouth with 23 turbines in line of sight to, and detectable by, radar for Scenario A and 12 in line of sight to, and detectable by, radar for Scenario B which will cause unacceptable interference. The proposed development will affect military low flying training activities that may be conducted in the area. If the developer can overcome the issues raised the turbines should be fitted with MOD accredited 25 candela omni-directional red lighting and infrared lighting with an optimised flash pattern of 60 flashes per minute of 200ms to 500ms duration at the highest practicable point. The remaining perimeter turbines should be fitted with 25 candela omnidirectional red lighting or infrared lighting to the same specification.

5.18 **Transport Scotland** do not object to the application. It requests conditions to secure any accommodation measures required including the removal of street furniture, junction widening, traffic management and signage associated with deliveries and abnormal loads to the site.

5.19 **Network Rail** do not object to the application as the proposal will have no impact on railway infrastructure.

5.20 **National Grid** do not object to the application as they do not have any assets in the

vicinity of the development.

5.21 **Health and Safety Executive** has provided no comment as their advice focusses on the potential risks posed by major hazard sites and major accident hazard pipelines to a new development as opposed to the potential risks which a new development may pose.

5.22 **BT** do not object to the application as it will not cause interference with the presently planned radio network.

5.23 **Atkins** do not object to the application as it will have no impact on UHF Radio Scanning Telemetry communications used in the area.

5.24 **Joint Radio Company** do not object to the application as they do not foresee any potential problems based on known interference scenarios

5.25 **Mountaineering Scotland** do not object.

5.26 **Scottish Rights of Way and Access Society** object to the application. Concerns are raised due to the close proximity of a number of turbines to recorded rights of way, particularly turbines 1, 5, 8, 10 and 12 which are located less than the minimum distance from equestrian right of way GM4. Turbines 33, 34 and 35 appear to be beyond the minimum distance from right of way GM1. Any micrositing should not encroach on this minimum distance with regard to any of the rights of way recorded on the application site. The Society is concerned about the direct impacts on recreational amenity within the application site, especially the effect on right of way GM4 the Loan Road.

5.27 **Crown Estate** do not object to the application.

6. Material Policy Considerations

6.1 Whilst the application does not fall within the Highland Council area, the Council's consideration of this application will consider the impacts of the scheme within the Council area. The proposed development will be assessed against the Moray Local Development Plan by Moray Council as the relevant Planning Authority.

6.2 To inform the response of the Council, officers have considered the impactions of the scheme against all relevant planning policies and guidance. This includes the following:

- Highland-wide Local Development Plan (2012)
- Inner Moray Firth Local Development Plan (2015)
- Onshore Wind Energy Supplementary Guidance (November 2016)
- Flood Risk and Drainage Impact Assessment: Supplementary Guidance (January 2013)
- Highland Historic Environment Strategy: Supplementary Guidance (March 2013)
- Managing Waste in New Developments: Supplementary Guidance (March 2013)
- Sustainable Design Guide: Supplementary Guidance (January 2013)

- Trees, Woodlands and Development: Supplementary Guidance (January 2013)
- Highland Statutorily Protected Species: Supplementary Guidance (March 2014)
- Assessment of Special Landscape Areas (2011)
- Construction Environment Management Process for Large Scale Projects

7. Scottish Government Planning Policy and Guidance

7.1 Scottish Planning Policy (SPP) advances principal policies on Sustainability and Placemaking, and subject policies on A Successful, Sustainable Place; A Low Carbon Place; A Natural, Resilient Place; and A Connected Place. It also highlights that the Development Plan continues to be the starting point of decision making on planning applications. The content of the SPP is a material consideration that carries significant weight, but not more than the Development Plan, although it is for the decision maker to determine the appropriate weight to be afforded to it in each case.

7.2 SPP sets out continued support for onshore wind. It requires Planning Authorities to progress, as part of the Development Plan process, a spatial framework identifying areas that are most likely to be most appropriate for onshore wind farms as a guide for developers and communities. It also lists likely considerations to be taken into account relative to the scale of the proposal and area characteristics (Para. 169 of SPP).

7.3 Notwithstanding the overarching context of support, SPP recognises that the need for energy and the need to protect and enhance Scotland's natural and historic environment must be regarded as compatible goals. The planning system has a significant role in securing appropriate protection to the natural and historic environment without unreasonably restricting the potential for renewable energy. National policies highlight potential areas of conflict but also advise that detrimental effects can often be mitigated or effective planning conditions can be used to overcome potential objections to development.

7.4 Criteria outlined within SPP for the assessment of applications include landscape and visual impact; effects on heritage and historic environment; contribution to renewable energy targets; effect on the local and national economy and tourism and recreation interests; benefits and dis-benefits to communities; aviation and telecommunications; development with the peat environment, noise and shadow flicker; and cumulative impact.

7.5 <u>Other Relevant National Guidance and Policy</u>

- National Planning Framework for Scotland 3 (June 2014);
- Scottish Energy Strategy (Dec 2017);
- Onshore Wind Energy (Statement) (Dec 2017);
- Plan 60 - Planning for Natural Heritage;
- 2020 Routemap for Renewable Energy;
- Onshore Wind Turbines;
- SNH Siting and Designing wind farms in the landscape;
- Wind Farm developments on Peat Lands

8. PLANNING APPRAISAL

8.1 As explained in Section 1.1 of this report, the application has been submitted to the Scottish Government for approval under Section 36 of the Electricity Act 1989 (as amended). Should Ministers approve the extension to the development, it will receive deemed planning permission under Section 57(2) of the Town and Country Planning (Scotland) Act 1997 (as amended). While not a planning application, the Council processes S36 applications in the same way as a planning application as a consent under the Electricity Act will carry with it deemed planning permission. Any deemed planning permission which may be granted would be managed by Moray Council.

8.2 Schedule 9 of The Electricity Act 1989 contains tests in relation to a proposals impact of proposals on amenity and fisheries. These tests are

- 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.

8.3 A response from The Highland Council to a consultation for development in a neighbouring planning authority means that the assessment needs to focus on the issues which are most relevant to the Council. The key considerations in this case are:

a) Compliance with the development plan and other planning policy;
b) National policy;
c) Design and Layout;
d) Landscape and Visual Impact;
e) Other material considerations.

<u>Development Plan and National Policy</u>

8.4 The general approach taken to the assessment of applications of this type is set out in the Council's own Development Plan and Scottish Planning Policy. Of most relevance to this proposal is Paragraph 169 of Scottish Planning Policy (SPP) and Policy 67 (Renewable Energy) of the Highland-wide Local Development Plan (HwLDP). Policy 67 of the HwLDP highlights that renewable energy development should be well related to the source of the primary renewable resource needed for operation, 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.

8.5 In that context 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.Such an approach is consistent with the concept of sustainable development as set out in paragraph 28 of SPP to achieve the right development in the right place but it is not to allow

development at any cost.

8.6 If the Council is satisfied that there will be no significant adverse impact from the proposals then the application can be supported.

8.7 Scotland's Third National Planning Framework (NPF3) was published by the Scottish Government on 26 June 2014. NPF3 considers that onshore wind has a role in meeting the Scottish Government's targets to achieve at least an 80% reduction in greenhouse gas emissions by 2050, and to meet at least 30% overall energy demand from renewables by 2020, including generating the equivalent of at least 100% of gross electricity consumption from renewables. This is not disputed and the Council do not consider these targets to be a cap.

8.8 In 2017 the Scottish Government published a number of further documents including the Scottish Energy Strategy and Onshore Wind Policy. The Scottish Energy Strategy, provides two additional targets:

- The equivalent of 50% of the energy for Scotland's heat, transport and electricity consumption should be supplied from renewable sources by 2030;
- The productivity of energy use across the Scottish economy should increase by 30%.

8.9 Scottish Planning Policy (SPP) as published by the Scottish Government is a material consideration which should be attributed some significant weight in the decision making process. The Council recognises a policy principle in favour of development that contributes to sustainable development requires to be balanced against the other environmental and social objectives of SPP. However, for the avoidance of any doubt the support from the Scottish Government towards renewable energy has not altered the continuity of its policies directed at environmental protection. The planning system has a significant role in securing appropriate protection to the natural and historic environment without unreasonably restricting the potential for renewable energy.

8.10 A number of publications related to national energy policy have been published by the Scottish Government. In short, none indicate a relevant distinct policy change from the position of Scottish Planning Policy. Most relevant to this application are as follows:

- Scottish Energy Strategy: The future of energy in Scotland, December 2017
- On-shore Wind Policy Statement, December 2017

8.11 The statements of continued strong support relating to on-shore wind contained within these documents are acknowledged. Support for on-shore wind is anticipated to meet with the continued aspiration to decarbonise the electricity network, enable communities to benefit more directly in their deployment and to support the renewables industry and wider supply chain. Larger, more optimal, turbines are anticipated as is the expectation that landscapes already hosting wind energy schemes will continue to do so beyond the lifetime of current consents / permissions.

8.12 However, it is also recognised that such support should only be given where

justified. The On-shore Wind Policy Statement sets out the need for a more strategic approach to new development that acknowledges the capacity that landscapes have to absorb development before landscape and visual impacts become unacceptable. With regard to planning policy, these statements largely reflect the existing position outlined within the NPF3 and SPP, a policy framework that supports development in justified locations.

8.13 It should be noted that the targets set out in these documents are for renewable energy projects generally, not just on-shore wind for which there is no specific target. The documents therefore do not represent a step change in the need for on-shore wind but an overall need for delivery of renewable energy projects to meet the targets.

Design and Layout.

8.14 The application seeks consent for a significant "horseshoe" shaped extension 48 turbines around the north, east and west of the existing Berry Burn wind farm in an area which is relatively free of environmental designations. The layout has close proximity to other wind farms including Hill of Glaskyle to the north west and Paul's Hill to the south east, resulting therefore in a significant massing of turbines for this south western corner of Moray, close to the Highland Council boundary at Dava.

8.15 The wind farm comprises three defined groups which will each incorporate an array of turbines as set out in paragraph 1.3 of this report. The design of the wind farm layout has been influenced by many factors including Efficient Design (i.e. turbine spacing; Environmental Constraints (i.e. avoidance of peat, water courses, steep slopes, noise sensitive properties); Landscape and Visual Impact; and Aviation Constraints (i.e. RAF Lossiemouth and Inverness Airport). This has resulted in the largest turbines being located towards the eastern side of the development, furthest from the Moray Council border with Highland Council.

8.16 The EIA report states that throughout the design evolution of the proposed layout of Clash Gour wind farm a key driver was the consideration of potential landscape and visual effects on receptors and how the proposed development would relate to the existing landscape character. In particular, the scale and number of turbines proposed, both in isolation and cumulatively with existing wind farms in the surrounding area. The landscape and visual effects potentially caused by the proposed development has been considered within the Landscape and Visual Impact (LVI) chapter of the EIA report. The resulting analysis has been an important input into the design evolution, in particular to the layout design of proposed turbines and location of infrastructure on the site. Different sizes of turbine across the site have been utilized, seeking to reduce potentially negative visual effects. The applicant has sought to minimise the visual impact of the proposed excavation for access tracks and other infrastructure, with the location of the substation compounds, construction compounds and met masts having been reviewed by the applicant to minimise visual effects.

8.17 With the general elevation across the site ranging from the lowest point in the north west of the site at 217m AOD to 483m AOD in the south of the site, a significant proportion of the development would face toward Highland .

8.18 The applicant is seeking a 50m micro-siting allowance for all infrastructure to help with the development constraints uncovered through the final ground investigations. It is not anticipated that the micrositing of turbines would result in any significant additional effects to the design as viewed from The Highland Council area.

8.19 The site wraps around the north, east and west of Berry Burn Wind Farm. Turbines have been set out with the smallest cluster in the northern array linking to larger cluster in the eastern and western array. The northern array has turbines laid out in rows of 2 or 3 west to east in a roughly linear formation whereas the eastern and western array are generally laid out north to south in an almost circular grouping then adjusted to take account of key on sit interests, water courses, hydrology, deep peat etc. The development, as generally viewed from the surrounding area, appears as a cluster of turbines as opposed to having geometric form.

8.20 The pattern of wind energy development in the surrounding area, development is focussed to the south and south East of Forres and Elgin where wind farms have a relatively small and narrow visual envelope. These schemes sit on a north west to south east axis. Existing wind farms in the immediate surrounding area within Moray are characterised by significantly smaller turbines, the majority of which are, approximately 100m in height to blade tip.. Wind energy in the south east of Highland, adjacent to the Moray boundary ranges in height from 98.8m to 125m to blade tip.

8.21 Across the immediate landscape of the study area there are several distinctive groups of wind turbines/wind farms with heights ranging from 99.5m to 176m (with the addition of Clash Gour). This highlights the complex nature and impact of the development on the landscape and reinforces the perception that this area could be viewed as a “wind farm landscape” rather than a landscape with wind turbines.

8.22 It has become increasingly important to consider their cumulative effects and the context in which wind farm development is seen. Of particular importance is; how 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. When viewed from surrounding upland locations, particularly to the south and west of the proposed development, the skyline appears relatively “simple”, for example over the large scale open upland moorland and hills. There is not always a simple visual relationship to this feature (as shown at Viewpoints 15, 19, 21 and 24) given the variable heights and spacing when viewed against a backdrop of existing wind farm development. The perception of scale and distance is distorted to a certain extent from Viewpoint 19 given the lack of reference points and due to the variable sizes and lack of clear distinction or delineation between existing wind farm development. A larger proportion of the skyline is taken up by wind farms when the proposed development is viewed from upland locations, the “infilling” between existing wind farms reduces the horizontal emphasis on the landscape further particularly when viewed from within Highland where it will present a confusing image with all visible wind farms merging together when viewed from the west and across the Moray Firth to the north.

8.23 SNH's Siting and Designing Wind Farms in the Landscape guidance (August 2017) outlines that the impact of a wind farm will depend on how and from where it is experienced. It is important to take account of how a wind farm will be experienced from surrounding roads, transport and recreational routes. Views will vary depending on the proximity to the road, mode of transport, angle of view and intervening landscape features. This is considered further in paragraphs 8.43 to 8.53 this report.

Landscape Impact

8.24 The Landscape and Visual Amenity Chapter of the EIA report gives an overview of the predicted landscape character effects. It states the landscape character types that cover the surrounding area are likely to be subject to significant effects up to a maximum distance of around 7.5km from the nearest turbine with the majority of character effects occurring within 2 to 4km. These significant character effects would occur where there is notable visibility of the proposed development either due to close proximity or as a result of larger extents of visibility. The area where significant effects on landscape character may arise for both scenarios, include the following:

- Parts of the Upland Moorland and Forestry LCT (out to a distance of approximately 2.5km to the north and 6.7km to the east from the nearest proposed turbine);
- Parts of the Open Rolling Uplands LCT (out to a distance of approximately 4km to the west and south from the nearest proposed turbine);
- Parts of the Strathdearn Hills LCT (confined to the area east of the A939, out to a distance of approximately 7.5km from the nearest proposed turbine).

Such effects would arise largely due to the close proximity and clear visibility of the proposed development but also take account of the interaction with the visibility and potential cumulative effects with other existing wind farms within this area, in particular Berry Burn, Pauls Hill and Hill of Glaschyle Wind Farms.

8.25 The summary goes on to state that there would be significant effects on the part of the Drynachan, Lochindorb and Dava Moors SLA that lies to the east of the A939 but not to other parts further to the west. While it is agreed that there will be significant effects on the SLA, it is considered that the extent of these effects have been underplayed with effects extending into the upland locations within the Drynachan, Lochindorb and Dava Moors SLA further west.. Further the applicant considered that whilst significant effects would occur to the 'Dark Skies' special landscape quality of the Hills of Cromdale and the 'Surrounding Hills' special landscape quality within a localised northern part of the Strathdearn Hills, the EIA report considered the overall effect of both scenarios on the Cairngorms National Park and its special qualities is considered to be not significant.

8.26 The Council has designated Drynachan, Lochindorb and Dava Moors as a Special Landscape Area (SLA). 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.

8.27 The area is seen to have a number of special qualities (for example - expansive views and broad panoramas across open, rolling moorland and vast skies instil a boundless sense of scale and space, enhanced by the consistency of moorland cover and landform character). Such areas are sensitive to change and thereby when considering development proposals care is needed when considering new land use proposals.

8.28 The citations for the Drynachan, Lochindorb and Dava Moor SLA note the openness and simplicity of the moorland setting where one can experience expansive horizons. 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".

8.29 The special qualities of the SLA include a "sense of solitude, views over heather moorland and big skies" where 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.

8.30 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 travel through this designation particularly using the main roads and rights of way (including the Dava Way) in the area. The visual impact on these receptors is considered further in the visual impact section of the report. However it can be noted at this point that due to the position of the wind farm and the visibility from within the SLA, in particular on the long fairly straight routes running north and south, the experience of the openness and simplicity of the landscape would likely be adversely affected as a result of this development.

8.31 Northbound travellers on the B9007 Carrbridge to Ferness road will pass through the SLA with glimpses of the proposed wind farm at Clash Gour. Whilst this is of some concern, the more sustained views travelling north along the minor Lochindorb road (Viewpoint 12) with up to 25 turbines visible from Clash Gour in addition to the existing 17 turbines visible within the Berry Burn Wind Farm is of greater concern. .

8.32 Northbound and southbound travelers on the A939 road will see a portion of the development passing through the SLA approaching Dava (shown on Viewpoint 8) with up to 11 turbines visible from Clash Gour in addition to the existing turbines within the Berry Burn Wind Farm. This amount of turbines will be theoretical visibility for approximately 3km along this stretch of the A939. While existing developments in the form of Berry Burn, Hill of Glaschyle and Cairn Duhie Wind Farms will be also be visible, there is a clear separation from the proposed wind farm. The addition of Clash Gour to the area would reduce the separation as

viewed from receptors on the A939 in an area where one can experience the special qualities of the SLA.

8.33 The ZTV shows that visibility is found on the ridgelines that project eastwards from the Strathdearn Hills to the south west of the SLA allowing distant visibility of the proposed development from more elevated parts of these ridges that form the edge to the Cairngorms National Park (Viewpoint 19). The ZTV also shows a more consistent area of theoretical visibility that lies between the proposed development and the Cairngorms National Park boundary (Viewpoint 24).

8.34 The applicant has highlighted that there will be a numbr of impacts on the special qualities of the SLA. In doing so, the applicant has highlighted that they consider that the impact of the development on the SLA will be significant. It has however sought to downplay the effects of the change on the SLA.

8.35 The above assessment appears to underplay a number of factors. Whilst the proposed development would be experienced within the context of existing wind turbine development there are significant cumulative effects that create a "wind farm landscape" from a number of viewpoints within Highland, particularly the surrounding hills. Whilst there are areas of respite from turbines along the A939 and B9007 given surrounding topography and vegetation there will be views of both Berry Burn and Clash Gour together where it would have a significant impact on the special qualities of the SLA.

8.36 Overall, it is considered that impacts on the SLA would occur beyond the limited area identified by the applicant. It is not considered that the reduction in blade tip height as proposed by the applicant's Scenario B would have a material impact on the effects identified. The potential impacts of the proposed development to the integrity of the SLA, including impacts on the wider setting, is considered with particular attention given to its key landscape and visual characteristics, its special qualities, and its sensitivities to change. Whilst the Highland Council have a number of concerns regarding the proposed development it is considered that the impact on the Drynachan, Lochindorb and Dava Moors SLA would not warrant an objection in landscape terms however, the visual impact of the development in areas within Highland is of significant concern and is discussed further in paragraphs 8.46.1 to 8.46.27 below.

<u>Sutors of Cromarty, Rosemarkie and Fort George</u>

8.37 The Council has designated Sutors of Cromarty, Rosemarkie and Fort George as an SLA. The area is seen to have a number of special qualities. The citations for the Sutors of Cromarty, Rosemarkie and Fort George SLA in particular note the visual interplay of land and sea; and the two distinctive gateways to Inverness and the Cromarty Firths. The SLA is considered to be an area of contrasts between the open coast and expansive waters of the Moray Firth and the intimate landscapes of the Cromarty and Inverness Firths. The landscape is sensitive to change noting development may "compromise the physical integrity and views of key landforms, such as the Sutors of Cromarty, the Eathie cliffs and the Channonry and Fort George promontories, built features, such as Fort George and Chanonry Lighthouse, and stretches of natural shoreline by introducing man made elements

of a scale or nature which would detract from the appreciation of these features".

8.38 The development sits outwith the SLA which is approximately 35km north west of the proposed development. However, the ZTV shows visibility throughout the SLA with cumulative effects from existing wind farms. Many receptors that experience the special qualities of the SLA are those using the area for recreation, particularly along the coastline, cliffs and raised beaches of the Black Isle, looking back across the Cromarty Firth to the south east into Moray. A key visual characteristic of the SLA are the views across the Firth, as such care is needed when considering proposals which effect this sensitive view.

8.39 Whilst some distance away from the proposed development, the key characteristics of the eastern part of the Sutors of Cromarty, Rosemarkie and Fort George SLA views south towards Moray would be affected to a greater extent resulting in a Medium-High magnitude of change, as assessed by the applicant. This is accepted and the impacts would be easiest to identify from areas such as Eathie where one can experience the interplay of views back and forth across the firth and the distinctive mountain backdrop.

8.40 Looking across the Cromarty Firth from Chanonry Point, Eathie, Fortrose and Rosemarkie as well as a number of other locations on the southern side of the Black Isle, views will be impacted by a further wind farm development at a significantly increased scale in comparison with the existing schemes that can currently be seen from the SLA including Farr, Moy, Tom na Clach and Cairn Duhie within the Highlands and Berry Burn, Hill of Glaschyle, Pauls Hill, Rothes I and Rothes II within Moray. The existing windfarms are spread over approximately 20km to 25km in the line of sight of key routes and viewpoints from within the SLA looking south. The cumulative visual impact is significant given the high vantage points across the Firth from the Black Isle allowing for expansive views into the Highlands and Moray. Given the scale of the proposed turbines in the eastern array, the movement of the larger blade tip height will draw the eye and Berry Burn, Hill of Glaschyle, Pauls Hill, Rothes I and Rothes II wind farms would become more apparent.

8.41 It is considered that changes would occur to some of the key characteristics of this SLA over a relatively wide area along the coastline. Whilst the separation distance and the SLA is approximately 30km to 35 km. on the edge of the study area the effect will be noticeable given the lower topography to the south of the Firth rising toward the wind farm and increased turbine height in comparison to existing and consented development. Whilst the proposed development would not introduce 'new' effects to areas of the SLA that do not already experience visibility of wind farms, the cumulative impact and significant increase in height to tip will strengthen the effect currently experienced. It is however considered that the reduction in height of the turbines in Scenario B would have a positive effect when viewed from this SLA, it would not negate the identified impacts.

Impacts on Wild Land

8.42 Despite the wild qualities of the Drynachan, Lochindorb and Dava Moors SLA, it does not form part of a Wild Land Area (WLA). There are two WLAs within the study area, the Monadhliath WLA and the Cairngorms WLA. Both are located

across the south/south western fringes of the study area at approximately 40km with only a small amount of each WLA falling within the Study Area. There is either extremely limited theoretical visibility or none at all when the proposed development is viewed from within the Monadhliath WLA. Whilst there are areas of theoretical visibility of the new development from the Cairngorms WLA this is within the Cairngorms National Park area and outwith Highland. The EIA report concluded that the wildness qualities of both WLAs would not be significantly affected by the proposed development and no detailed assessment of effects was presented on this basis. SNH agree with this initial scoping and assessment.

Visual Impact

8.43 To assess the visual impact of the development upon key receptors, the applicant has undertaken a Landscape and Visual Impact Assessment as part of the EIAR. This assesses from 28 viewpoints representing impact on local properties, settlements, transport routes, footpaths, historic features, hilltops and valued landscapes. To aid in the assessment of the application the applicant has prepared photomontages and wirelines to SNH Guidance. Given it is outwith the Highland Council area they are not required to submit visualisations to Highland Council standards. The assessment presented within the supporting EIAR highlights visual impacts arising at 7 locations within Highland.

8.44 For those travelling scenic routes, whether designated as such or not, they will 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. As such it is considered that road users travelling through the SLA are generally higher sensitivity receptors.

8.45 The approach to the assessment of visual impact is based on a series of subjective judgements taking into account matters such as sensitivity, susceptibility and magnitude of change. The Council have carried out an appraisal of the assessment undertaken by the applicant for the viewpoints within the Highland Council area. As there is a level of subjectivity and the need for application of professional judgement in the assessment of visual effects, it is unsurprising that there are differences in opinion between the findings of the EIA Report and the appraisal undertaken by the Council. It should be noted that no particular expertise is required to assess visual impact, as opposed to landscape impact and there is no framework in the Guidelines for Landscape and Visual Impact Assessment 3 or elsewhere upon which to assess let alone judge the “acceptability” of a proposal. A comparison of the applicant’s assessed affects and the view of the Planning Authority is contained in Appendix 1 to this report with consideration of each of these viewpoints expanded in commentary below

Viewpoint 8 - A939. Near Aitnoch

8.46.1 This viewpoint is located on the section of A939 that runs between Dava and Nairn on a straight section of road to the north of Aitnoch. Views from the A939 public road are frequently obscured by roadside vegetation and landform (Knock of Braemoray). Technical Appendix 7.2 of the EIA Report states that the effect of the proposed development on road users and residential receptors as experienced at

this viewpoint is considered to be Not Significant.

8.46.2 The views toward the turbines would be oblique. Potential views towards the proposed turbines would be experienced as an impression rather than a focused observation the general road layout north and south. Whilst the existing Berry Burn turbines occupy a similar part of the panorama the scale of turbines is significantly larger and the western array is closer to the Highland boundary. Users of the Dava Way will experience a significant detrimental visual impact given the scale of the turbines, cumulative impacts with existing wind farm development and location closer to the well used recreational footpath. It is considered there are significant effects in EIA terms from Viewpoint 8.

8.46.3 Whilst the views will be filtered to a certain extent when visible they would draw the eye without becoming a focal point. The western array is at the closest point to the Highland boundary along this stretch and will be viewed against a backdrop of much smaller turbines at Berry Burn immediately behind. In this composition the contrast in scale between the 11 turbines in view will be readily apparent and may cause a distorted perception of scale given the majority of turbines are backdropped by the hills beyond (Carn Kitty and Lairg Hill) and seen below the blades of Berry Burn (particularly turbines 28, 34, 22, 38, 35, 39) presenting a confusing image. The Siting and Designing Windfarms in the Landscape 2017 states in para 3.33 “Careful consideration is…needed in the siting and design of wind farms, and between wind farms, to avoid confusing our sense of perspective. This is particularly the case where different turbine sizes are used and/or where there are gaps between groups of wind turbines at varying distances to viewers”. Whilst Cairn Duhie will be particularly prominent and reduces respite from wind farm development along this well used tourist route, the further development proposed here would not be considered desirable.

8.46.4 No turbines within the eastern array would be visible from this viewpoint, therefore the mitigation offered by Scenario B would not be applicable when considering visual impact at this viewpoint.

Viewpoint 12 – Lochindorb, minor road near B9007

8.46.5 The view overlooks Lochindorb from the minor road between the B9007 public road and A939 public road. Lochindorb Castle, a scheduled monument, is framed in the centre of the loch within Dava Moor. The changes to the topography and relative alignment of intervening features limit the extent of similar composition to approximately half a kilometre, with a comparable view from the short stretch of the B9007 around the junction with the minor road. The Detailed Assessment of Effects on Viewpoints (Technical Appendix 7.2) states the effect of the proposed development on road users at this viewpoint is considered to be Not Significant. This is due to the applicant considering that the existing Berry Burn Wind Farm provides a clear association of a wind farm influenced landscape in the distant upland to the north. However, it is considered that the introduction of the proposed development would intensify the visual effect that the existing Berry Burn turbines have on this location contrasting in scale with existing turbines, however, the proposed development would not diminish the large scale of the surrounding upland landscape and would broadly contain development to the same part of the

view already affected."

8.46.6 In this view where 25 turbines can be seen from the roadside, the increased scale and cumulative impact of the proposed turbines on the existing is evident but the turbines generally remain below the summit heights and are seen beyond the low saddle of ground between Knock of Braemoray and Carn Biorach which frame the development. As such, the proposal remains contained and landscape scale is not unduly diminished. It is considered that the inclusion of a great quantity of turbines, at a larger scale in this view will further impact the view experienced from this area. Whilst the smaller turbines of Berry Burn wind farm lying behind the proposal limits any confusion of size and scale it is undeniable that the proposed scheme introduces turbines at a magnitude, approximately 50% higher than existing turbines, which are not yet experienced in the surrounding area. Combined with the visual impacts arising from Tom nan Clach Wind Farm the perception of an intensity of wind farms within the core of the SLA to the west of B9007 will increase.

8.46.7 Overall, the existing Berry Burn turbines occupy a similar part of the panorama, however, the proposed wind farm development will significantly increase the scale of turbines. Further, there are concerns regarding the setting of the scheduled monument and the cumulative visual impact of Berry Burn in the background therefore it is considered that the applicant has underplayed the effects of the development from this viewpoint which the Council consider to be significant in EIA terms.

Viewpoint 14 – A96 (Heathfield)

8.46.8 This view from the A96 largely looks out over Moray located between the two Local Authority areas at the approximate midway point between Nairn and Forres north west of the proposed development. The proposal is screened from the road for east bound travellers by the topography and Hardmuir Wood. There is limited visibility with blade tips seen alongside the blade tips from Berry Burn and Hill of Glaschyle above the woodlands of Darnaway Castle. 19 of the theoretically visible turbines would be visible above the treeline of surrounding forestry as a series of blade tips, 12 of these will be barely discernible small blade tips amongst the branches. While there is potential for this development, along with Berry Burn, Hill of Glaschyle, and Pauls Hill 1 and 2 to become more exposed to view if and when the conifer woodland is felled, the belt of mature deciduous trees which surround much of the plantation are likely to provide a degree of continuing cover. This section of A96 has views in multiple directions, due to its elevation, across large open fields broken by occasional woodland and shelterbelt planting. Darnaway Forest and Altyre woods combine to create multiple layers of tree lined ridgelines that follow the gently undulating topography, this is also typical of other views from further east along the A96. Potential views towards the proposed turbines would be restricted to eastbound road users, as for westbound road users the proposed turbines would not be noticable when within the Highland Council area.

8.46.9 The applicant considers the visual impact of the proposed development from this viewpoint to be not significant. Whilst the cumulative impact on views from the A96 would increase should the forestry screening the proposed development be

removed there are not considered to be significant effects in EIA.

Viewpoint 15 – Carn a Ghille Chearr (Cromdale Hills)

8.46.10 Carn a Ghille Chear is a plateau summit that lies at the end of a distinctive ridgeline plateau of connected summits collectively called the Hills of Cromdale on the boundary of Highland and the Cairngorms National Park. This area marks a topographical threshold between the Cairngorms National Park to the south and the upland moorlands to the north. It is a complex combination of rocky and knolly hill summits that form a distinctive ridgeline which due to their elevation are susceptible to changes as a result of the proposed development. Views to the north and east are focussed along Strath Spey and towards the opposite hill summits of Roys Hill and Ben Rinnes with views to south dominated by the larger mountains of the Cairngorms. The proposed development as seen from this location would sit behind the turbines of Paul's Hill at a distance of approximately 14.5 kilometres. 41 of the proposed turbines would be visible from this location with the eastern and western array of turbines the most prominent. While the turbines proposed are larger than the existing Paul's Hill development, the proposed development will be seen beyond the horizon with all rotor sweeps partially obscured, which is likely to reduce any effects of confusion of scale or perspective. A smaller number of turbines will be seen to the west of the view where they will be seen largely backclothed and in association with the Hill of Glaskyle turbines. Generally the development would be seen to concentrate and intensify the presence of development but would not increase the horizontal spread of wind energy as perceived in the view.

8.46.11 The majority of walkers will consider the enjoyment of the surrounding landscape an important part of their overall experience. The higher value landscape of the Cairngorms National Park is not a feature of the view north towards the proposed turbines. Whilst the cumulative impact on views across the Hills of Cromdale would increase as the proposed development is viewed beyond Pauls Hill there are not considered to be significant effects in EIA terms from Viewpoint 15.

8.46.12 The eastern turbines of Scenario B would be located in the eastern part of the horizon in Viewpoint 15. As a result of these turbines dropping out of view in Scenario B the horizontal extent would remain similar. The effect of Scenario B on Hill Walkers represented by this viewpoint would also therefore remain Not Significant.

Viewpoint 19 - Carn an Uillt Bhric (outlier of tri tighearnan)

8.46.13 The viewpoint is located on the Carn an Uillit Bhric hilltop with expansive panoramic views over the western portion of the SLA along the course of the River Findhorn. Findhorn valley from where the viewpoint is accessed (walking up from Daless) is a picturesque and distinctive upland glen landscape. It is made even more distinctive by the plateaux and hills of the upland areas that surround the valleys, which are notable for their mass and overall large scale. Distant views to the north include views of the Moray coastal plain and Moray Firth and views to the south include the mountains and uplands of the Cairngorms.

8.46.14 The development will be seen in close association with an assortment of existing

wind farm developments in the same direction of view. 47 of the proposed wind turbines would be visible including 40 hubs. The proposed development will have the effect of intensifying and consolidating what is presently a more scattered group of existing developments but will not extend the overall spread of those turbines across the horizon. Seen in context with Tom Nan Clach this reinforces the view as one which contains a considerable amount of wind energy development.

8.46.15 The Detailed Assessment of Effects on Viewpoints (Technical Appendix 7.2) states the effect of the proposed development on hill walkers at this viewpoint is considered to be Not Significant and while the proposed development increases the extent of turbines visible to the east but it does so within a distant and developed large scale upland landscape.

8.46.16 The LVIA is however confusing as to which developments will be clearly visible. It claims that Hill of Glaschyle, Berry Burn and the Rothes turbines are barely visible in the distance, yet describes the proposed development appearing to sit within the gaps between existing turbines. Logic would dictate that the proposed development can only appear to sit within the gaps if the developments can be readily perceived. Also absent from the visual impact assessment consideration is the proximity of the Tom Nan Clach turbines to the south/east of the viewpoint at a distance of around 4km.

8.46.17 In terms of the cumulative impact, the Detailed Assessment of Effects on Viewpoints (Technical Appendix 7.2) goes on to state that the presence of this wind farm when considering the addition of the proposed development would reduce the additional influence as it would have given its position in the background of this more prominent scheme. The cumulative magnitude of change for the proposed development in the consented scenario is considered, by the applicant, to be low resulting in no significant effect. This is disputed.

8.46.18 It is considered the visual impact assessment of non-significant impacts for hill walkers underplays the impacts which are likely to be significant from this and surrounding hilltops (Cairn Kincraig, Carn Monadh nan da Allt, Cairn nan Tri-tighearnan and Carn a Mhais Leathain etc.) looking across the SLA to wind farms beyond. Hill of Glaschyle, Berry Burn, Cairn Duhie and Pauls Hill are discernible from each other, but the Clash Gour proposal would create almost continual wind turbines from this part of the SLA popular with hill walkers and locals. The proposed development would have an impact on the distinctiveness of these groups and affect the relationship of the existing wind farms with their landscape settings. In doing so it would have an adverse impact on the SLA as highlighted in para's 8.24 to 8.36 above. In addition, the proposal will distort the scale of surrounding turbines, would result in significant cumulative effects upon visual amenity and create a wider wind farm landscape which raises significant concerns.

8.46.19 The majority of walkers will consider the enjoyment of the surrounding landscape an important part of their overall experience. Wind energy development should seek to achieve a threshold where the proposal maintains appropriate and effective separation between developments and/or clusters. When viewed from this viewpoint, there is minimal separation between existing wind farm development which creates a large indiscernible wind farm grouping leading to cumulative

impacts from this viewpoint which will be experienced by receptors. There will be significant impacts on the upland landscape to the within the western portion of the SLA. The proposed development will infill existing gaps between defined groups of wind farm development to create a "wind farm landscape" when viewed from the western uplands within the SLA. There are considered to be significant effects in EIA terms from Viewpoint 19.

8.46.20 Scenario B would not mitigate the cumulative impacts noted above.

Viewpoint 21 – Cam Sgriob

8.46.21 The viewpoint is located on Cam Sgriob hilltop with panoramic views looking north east from the edge between Highland and the Cairngorms National Park boundary on the Strathdearn Hills. It is located on one of the more distinct rocky summits on the ridgeline of interlinking summits that define the northern boundary edges of the Cairngorms National Park. The hill is roughly midway between the A939 and B9007 road corridors that intersect this ridgeline. It can be accessed either from the south along tracks from Achnahannet which connects via a minor road to the A938 or by approaching from the north along a much longer track that connects to the minor road around Lochindorb. 38 turbines will be visible. This includes blade tips of 9 turbines in the eastern part of the site and 4 in the northern part of the site. The other 25 turbines vary in tower and hub visibility, the majority of these are in the western part of the site. The proposed development appears in front of Berry Burn at an increased magnitude, whilst the extent across the landscape will not increase it is difficult to distinguish between the wind farms creating a cumulative effect upon visual amenity from this and surrounding hilltops (Creag an Righ, Creag Ealraich, Creag Laith etc.). Whilst there is general support for the appropriate clustering of wind farms there are significant concerns regarding the setting of the existing and proposed which give the appearance of a windfarm landscape.

8.46.22 The Detailed Assessment of Effects on Viewpoints (Technical Appendix 7.2) states that the changes in the view would be moderated by the amount of the development actually visible due to the intervening topography, which also provides a sense of containment within which the proposed development maintains a similar extent to the existing Berry Burn wind turbines. This is disputed.

8.46.23 In terms of the cumulative impact, the Detailed Assessment of Effects on Viewpoints (Technical Appendix 7.2) goes on to state that Cairn Duhie will introduce wind development further to the west and will be a noticeable addition from this location in an area which is currently undeveloped. It is not disputed that the introduction of Cairn Duhie further intensifies the developed nature of the landscape to the north but it is considered that the proposed development makes a significant contribution to this as well. The cumulative magnitude of change is considered to remain Medium, however, the increases in level of change described above would result in a Significant cumulative effect for the proposed development in the consented scenario. The cumulative impact on views from the Strathdearn Hills would increase as a result of Berry Burn in the background, however the proposed development is viewed beyond and there are not considered to be significant effects in EIA terms from Viewpoint 21.

Viewpoint 24 – Sgor Gaoithe/Huntly's Cave track

8.46.24 The viewpoint is located on Sgor Gaoithe/Huntly's Cave track on the edge of the Highland and Cairngorms National Park boundary looking north across the eastern portion of the SLA. The track is accessed from the south at Auchnagallin and the landscape of this southern section of track which lies at the northern edges of the Cairngorms National Park is particularly scenic with elevated views south towards the Cairngorm mountains and across the Strathspey. The Cairngorms National Park boundary follows a ridgeline of interconnecting hills and rocky outcrops across the Strathdearn range, as a result there is a change in the focus of views at to a wide northerly panorama across a large upland plateau moorland landscape. When walking to the south the change in character is noticeable as the Cairngorm mountains contrast with wooded glens within Strathspey. 28 turbines from the eastern and northern array will be theoretically visible from this location. Whilst Hill of Glaschyle retains adequate separation from the proposed development and is read as a separate wind farm Berry Burn is located behind the proposed prominent turbines beyond the ridgeline and it is unclear if this is a continuation of the same wind farm. The separation does not appear particularly clear leading to cumulative impacts. Whilst views of the SLA are generally obscured from view due to topography the LVIA accepts there will be significant impacts on hill walkers given the close proximity of the turbines to the hill track.

8.46.25 The effect of the proposed development on walkers at this viewpoint is considered to be Significant. This is largely due to the proximity and relative scale of the proposed development to the viewpoint. In terms of cumulative impact the Detailed Assessment of Effects on Viewpoints (Technical Appendix 7.2) states that the proposed development will lead to very minor increases in cumulative magnitude of change due to the scale of change they will have on this location but have identified a significant cumulative effect from this viewpoint. This is not disputed.

8.46.26 None of the turbines that reduce in size as a result of Scenario B would be visible from this location.

8.46.27 The cumulative impact of Berry Burn and Hill of Glaschyle wind farms raise concerns from this location in combination with the proposed development raises concerns from this viewpoint. The effect of the proposed development on walkers at this viewpoint is considered to be Significant. This is largely due to the proximity and relative scale of the proposed development is considered to have significant effects in EIA terms from Viewpoint 24.

8.47 As highlighted in paragraphs 8.46.1 to 8.46.27 above, using the southern edge of the Black Isle for recreation will see the additional development on the rising land to the south of the Moray Firth. In areas such as on the coastal walks, cliffs and raised beaches of the Black Isle, looking back across the Moray Firth to the south east into Moray one already can see a clear pattern of wind energy development. Given a key visual characteristic of the SLA are the views across the Firth, this requires some further consideration. While the applicant has not provided wireframes or visualisations from this area, the existing pattern of development shows each wind farm in its own setting but due to the scale and location of the proposed development it is considered that these individual settings will be lost and

consolidate the view of turbines into a large cluster of development. This will be emphasised by the scale of the proposed turbines and would likely have a detrimental visual affect.

8.48 Impacts on tourists and those taking part in recreation may vary, but their susceptibility to change is regarded as high by the Council because their purpose is to enjoy their surroundings. Whilst the surrounding landform and vegetation restricts views along portions of key routes (A939, B9007 and adjoining Lochindorb road) the brief glimpses of the proposed development will have a significant effect due to their magnitude of change and will be viewed with existing wind farm development in the background creating a cumulative effect where turbines become a dominant feature in particular views. There are more sustained views between Dava and north of Aitnoch on the A939 and from both the A96 and A832 either side of the Moray Firth.

8.49 Whilst Highland Council's Landscape Officer considered the proposal would not result in significant detriment to the experience of the landscape or visual resource from the majority of viewpoints (outwith Viewpoint 19 which raised number of concerns) when viewed from the Highlands, it was noted that there would be localised effects on perception of scale and some aspects outwith the SLA.

8.50 It is considered that the development will be prominent and will have significant visual impact in its immediate locality. It will thereby impact on the general amenity of the area, impact on those who live in this area and those travelling in and around this locality. Principal routes in the wider area including the more distant A95(T) road and A96(T) road will be affected by the development. Significant impacts are experienced on stretches of the A939 (tourist) road, the B970 and the A940 Dava road/Dava Way heading out of the Highland area.

8.51 As highlighted in the landscape assessment, the rolling upland landscape helps to separate the impact of existing wind farms to some extent, reducing the occurrence of cumulative visual impact for receptors from a number of viewpoint with the exception of those on higher ground, such as Viewpoint 15, 19 and 21.

8.52 The proposal would clearly adds to the cumulative experience of onshore turbines seen in the landscape, not just from sequential viewing of projects but also collectively in the wider study area. A key difference with the Clash Gour proposal is the significant increase in scale to 176m which dwarves surrounding windfarms in the locality. Whilst travelers crossing the Dava Moor using the A939, B9007 and Lochindorb road will already view wind farms at distance on their journey through the area their experience of Clash Gour, whilst maybe only brief glimpses, will be at a superior scale and the western turbine array will be closer to the Highland boundary.

8.53 The extending visual influence of this wind farm is to the south west, west and north west as seen in ZTV. It is the view to west and south west which impacts upon the designated landscape Drynachan, Lochindorb and Dava Moor Special Landscape Area (SLA) and raises most concern. Whilst the impact on the more distant Sutors of Cromarty, Rosemarkie and Fort George SLA to the north west may not be as significant the cumulative impact of wind farm development

continuously along this upland moorland is not seen as desirable.

Cultural Heritage

8.54 The majority of cultural heritage assets identified within the surrounding area are post-medieval, pre-improvement period agricultural use of the landscape and none of the assets identified are assessed as being of more than local cultural heritage importance. However, the most prominent historic site, Lochindorb Castle (scheduled monument index no. 1231), will be adversely affected by the proposal. Viewpoint 12 shows proposed turbines directly behind the castle considerably closer, and so more noticeable, than turbines within the Berry Burn windfarm. The proposed turbines are seen behind lower ground at the northeast end of the loch that was used by the important communication route toward Moray that the castle controlled. Views that include this communication route and the castle contribute to an understanding of an important aspect of the castle's historic role. The visualisation also illustrates the strong visual qualities of the castle ruins within their Highland glen setting. The relationship of the castle, the loch and the wider landscape is not only about built heritage and setting but also a matter of history, folklore and legend. This background provides a greater sense of place to many and has an important effect on the experience of Lochindorb.

Economic Impact and Tourism

8.55 The proposal will allow the existing land uses of the site to largely continue. The project will offer temporary jobs during the construction phase and longer term servicing jobs during the lifespan of the wind farm. Such contracts continually add to the economic base of the Highlands and Scotland generally.

8.56 Given the importance of landscape and views to tourists particularly to travellers, cyclists, walkers and other recreational users in the area using the A939 road (a National Tourist Route) and the Dava Way, the adverse visual impacts of the development raise concerns. A number of valued interests would be impacted by the development, important to the social history associated with Lochindorb and the Dava Moor areas. These interests draw heavily on the unspoilt and unchanged nature of the area, which resonates with its past.

8.57 A more general concern is that this area of Moray when viewed for the Highlands appears as a wind farm landscape which would detract from the experience and enjoyment of the countryside which is the appeal to many visitors and to those using the countryside for recreation. Visit Scotland noted that scenery and the natural environment have become the two most important factors for visitors in recent years when choosing Scotland as a holiday location. Successive views from upland locations such as Viewpoint 19 clearly illustrate that the dominance of wind energy development has reached a critical stage given the size of turbines and cumulative effects, regardless of whether either Proposal A or Proposal B is developed. Overall, whilst the proposed development may not put off visitors there may be an impact on repeat visitors given the visual effect of the proposed development.

Roads and Traffic

8.58 No objections have been raised by the Trunk Road authorities subject to conditions on any consent to ensure safeguards for road users and traffic safety matters in general. Traffic flows on these roads should not be significantly affected by the construction of the wind farm, with the A96(T) road already accommodating such construction/delivery traffic from other onshore wind energy projects in the wider locality. The A939 provides a valued section of the national tourist route for travelers between Inverness to Aberdeen via Grantown on Spey. Such routes encourage traffic away from trunk roads offering a scenic alternative particularly for tourists.

8.59 The turbines will be brought in from Inverness Harbour. Whilst it has accommodated materials associated with wind farms before there has been nothing of this scale previously. An assessment of the route will be required and street furniture removal and road improvements may be required. Section 96 of the Roads (Scotland) Act legal agreement will be required covering wear and tear of public roads.

Aviation

8.60 Aviation lighting (comprising medium intensity 2000 candela lighting) will be required for all turbines higher than 150 metres. The applicants advise that the Civil Aviation Authority has a policy which states that the lighting can be operated at 10% of its intensity (i.e. 200 candela) when visibility is better than 5km whereby the applicants propose to install visibility sensors to the lighting to ensure it operates a lower intensity when visibility is good. In addition it is proposed to explore the possibility of using 'smart' aviation lighting (aviation obstruction lighting detection system) whereby the lights would only be switched on when aircraft approach them. This would include a reduction in the impact of night time light pollution and extend the life expectancy of the obstruction lights. It is highlighted that such systems are not approved for use to date in the UK and further dialogue is required between the applicant and HIAL regarding appropriate potential mitigation in addition to addressing concerns regarding impact on the radar at the airport.

Dark Skies

8.61 Dark Skies are acknowledged, an SLQ within the Cairgnroms National Park, in the EIA report as a distinctive feature for both the Strathdearn and Cromdale Hills. The EIA report cites that there is very little existing lighting in the Strathdearn Hills and that that there is no existing lighting in the Cromdale Hills which creates an intermediate skyline by the darker contrast of the closer uplands and the lighter Moray Firth in the distance.

8.62 Viewpoint 15 from the Cromdale Hills (which can be extrapolated to represent wider impacts of lighting along the whole range) shows the additional effect of the taller turbines, and the impact a red aviation warning light upon the current special quality of dark skies. When walking north to south along the Cromdales towards the Cairngorms National Park boundary the strength and intensity of the experience of surrounding hills, extensive moorland, dominance of natural

landscapes, the panoramas (and experience of wildness and dark skies) increases. Whilst walking away from the proposed development there are significant adverse affects to Dark Skies.

8.63 SNH agree with the EIA report that the proposed development at Clash Gour cumulatively has the potential to introduce or intensify some adverse significant effects on the Dark Skies SLQ. It is recognised that there would be an increase in magnitude of change contributing to significance of cumulative effects on the collective appreciation of Dark Skies.

Other material considerations

8.64 Ornithology surveys have been carried out across the site from 2013 to 2018, including vantage point watches; scarce breeding birds (for raptors, divers and any other species listed in Schedule 1 of the Wildlife and Countryside Act 1981); upland breeding birds; black grouse; and winter walkovers for non-breeding birds. The key constraints identified were lochs and routes to feeding areas on the Moray Firth used by red throated divers and nest sites and flight lines of raptors including hen harrier, merlin and goshawk. Suitable buffers were considered during the design evolution process and no turbines are proposed within 500m of lochs or known nest sites. A 500m buffer was applied either side of Loch Dallas early in the constraints modelling process, resulting in a 1km corridor to maintain diver movements from north to south.

8.65 The existing wind farms of Berry Burn and Pauls Hill have habitat management plans (HMP) in operation where the focus of conservation is on moorland habitats and improving nesting and foraging for hen harrier and black grouse. The outline HMP for Clash Gour aims to deliver conservation measures which complement those of adjacent wind farms. SNH noted that proposed turbine number 47 and existing turbine 16 on Berry Burn are less than 500 metres apart, spanning a watercourse. SNH considered this would create a narrow corridor between the wind farms where future hen harrier flight activity could be anticipated. SNH suggested the distance should be increased between turbine 47 and the existing turbine 16 to offer greater flight space where there is no collision risk. SNH's flight activity recorded to date on Berry Burn and Clash Gour indicates that this is a relatively well-used area.

8.66 Given the separation of the proposed development from properties within Highland noise is not considered to be an issue. The results of previous research undertaken by the applicant has demonstrated that vibration resulting from the operation of wind farms is imperceptible at typical separation distances. Therefore, vibration effects during operation and have not been considered. There will be no impacts on residential amenity as a result of shadow flicker on any properties with the Highland area.

9. CONCLUSION

9.1 The Scottish Government gives considerable commitment to renewable energy and encourages planning authorities to support the development of onshore wind farms where they can operate successfully and where concerns can be satisfactorily addressed. The project has the potential to provide 225MW of renewable energy towards Scottish Government targets. However, as with all applications, the benefits of the proposal must be weighed against potential drawbacks and then considered taking account of the relevant at a national and local level.

9.2 In considering the application from a Highland perspective, the application is seen as being significantly detrimental in terms of individual visual impact and cumulative visual impact particularly within the Drynachan, Lochindorb and Dava Moor SLA but also further afield including looking across the Moray Firth from the Black Isle. It is therefore considered to be in conflict with the Scottish Planning Policy. Given the location in close proximity of the Dava Moor and significant increase in turbine size, the proposed development is likely to have significant adverse visual impacts.

9.3 This development would add considerably to the cumulative impact of onshore wind energy in the area, although it is recognised that existing schemes (constructed and approved) have an impact this is mitigated by the scale, location and relationship with other developments. In particular, the location and scale of the proposed development create challenging cumulative effects as a result of filling in the gaps between the existing wind farms within the area when viewed from areas of Highland to the west and north of the proposed development.

9.4 Taking these matters into consideration, it is not considered that the proposed development would be in accordance with national policy by virtue of the visual impact in a Special Landscape Area in Highland which are not set easily aside by the contribution the project would make to meeting renewable energy generation targets or the benefits to the economy. There are no other material considerations that would justify supporting the application.

9.5 All relevant matters have been taken into account when appraising this application. It is considered that the proposal has a significant adverse effect the receptors within The Highland Council area and for the reasons outlined above it is considered that the Council should raise an objection to the application as the impacts of the proposed development do not, on balance, accord with the provisions of national or local policy in relation to The Highland Council's interests.

10. IMPLICATIONS

10.1 Resource: Not applicable

10.2 Legal: Not applicable

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

10.4 Climate Change/Carbon Clever: Not applicable

10.5 Risk: Not applicable

10.6 Gaelic: Not applicable

11. RECOMMENDATION

Action required before decision issued N

Subject to the above, it is recommended that the Highland Council raise an objection to this Section 36 application for the reasons highlighted below.

1. The proposal is contrary to Scottish Planning Policy (2014) as the development would have a significantly detrimental visual, individual and cumulative impact as viewed by travelers, including tourists, and recreational users of the outdoors when viewed from the west within the designated Drynachan, Lochindorb, Dava Moor Special Landscape Area, in particular on key tourist routes including the A939, B9007 and minor Lochindorb road linking the two as demonstrated by viewpoints 8 and 12 and upland locations as demonstrated by viewpoints 19 and 24. Within the SLA the development would encroach upon this valued open landscape where the proposed turbines would impact visually on some of the wide and uncluttered horizontal views that many experience travelling through this valued area by virtue of the design, location (including pattern) and scale of turbines which is an exponential increase in comparison to surrounding wind farm development. It would reduce the sense of isolation noted within the citations arising from the lack of habitation and other built features.

2. The proposal is contrary to Scottish Planning Policy (2014) as the development would have significant cumulative visual impacts as viewed by recreational users of the outdoors (including tourists) when viewed from the north within the Sutors of Cromarty, Rosemarkie and Fort George Special Landscape Area in elevated positions along the southern edge of the Black Isle.

Signature:	David Mudie
Designation:	Area Planning Manager – South
Author:	Roddy Dowell
Background Papers:	Documents referred to in report and in case file.
Relevant Plans:	Figure 1 Location Plan
	Figure 2 Proposed Site Layout

Appendix 1 – Summary Appraisal of Viewpoints

Viewpoint		Receptor	Susceptibility	Sensitivity	Magnitude of Change	Magnitude of Change (Scenario B)	Overall	Notes
Viewpoint 8 - A939, near Aitnoch	APP	Road users	Medium-Low	Medium	Medium-Low	Medium-Low	Not Significant	Well used tourist route. The larger scale and location closer to Highland would lead to cumulative effects with Berry Burn wind farm as a result of the increase in visibility of wind turbines as one travels along the A939 in areas where there are currently limited visibility of wind turbines.
		Residential	High-Medium	High-Medium				
	THC	Road users	Medium	Medium	Medium	Medium	Significant	
		Residential	High-Medium	High-Medium				
Viewpoint 12 - Lochindorb, minor road near B9007	APP	Road users	Medium-Low	Medium	Medium-Low	Medium-Low	Not Significant	Well used tourist route. The larger scale and location closer to Highland would draw the eye and lead to cumulative effects with Berry Burn wind farm as one travels along the minor road linking the B9007 and the A939.
	THC	Road users	Medium	Medium-High	Medium	Medium	Significant	
Viewpoint 14 - A96 (Heathfield)	APP	Road users	Medium-Low	Medium-Low	Low	Low	Not Significant	Broad agreement. Wind turbines are not an uncharacteristic feature in the view from this part of the
	THC	Road users	Medium-Low	Medium-Low	Low	Low	Not Significant	

								A96. They are experienced as a distant impression rather than a focused observation and screened by existing woodland.
Viewpoint 15 – Carn a Ghille Chearr (Cromdale Hills)	APP	Hill walkers	Medium	Medium-Low	Low	Low	Not Significant	The applicant has underplayed the impact on hill walkers. Hill of Glaschyle, Berry Burn, Pauls Hill are all within the horizon and the proposed wind farm will add to the lack of clear separation or distinction between new and existing development.
	THC	Hill walkers	Medium	Medium	Medium	Medium	Not Significant	
Viewpoint 19 - Carn an Uillt Bhric (outlier of Tri tighearnan)	APP	Hill walker	High-Medium	High-Medium	Low	Low	Not Significant	The applicant has significantly underplayed the impact on hill walkers and recreational walkers. The proposed development will create unacceptable infill between defined groups of wind farms to create a “wind farm landscape”. There will be a significant detrimental visual effect due to
	THC	Hill walkers	High-Medium	High-Medium	Medium-High	Medium-High	Significant	

								cumulative effects when viewed from the western uplands within the SLA.
Viewpoint 21 - Cam Sgriob	APP	Hill walker	Medium	High-Medium	Medium	Medium	Not Significant	Broad agreement. The cumulative impact on views from the Strathdearn Hills would increase with Berry Burn viewed in the background.
	THC	Hill walkers	Medium	High-Medium	Medium	Medium	Not Significant	
Viewpoint 24 - Sgor Gaoithe/ Huntly's Cave Trac	APP	Recreational walkers	Medium	High-Medium	High-Medium	High-Medium	Not significant	Broad agreement. The proposed development will have a significant visual effect due to the close proximity of the turbines and cumulative impact due to alack of clear separation with Berry Burn in the background.
	THC	Recreational walkers	Medium	High-Medium	High-Medium	High-Medium	Significant	

Interpretation notes

- The methodology followed is the same as that set out by the applicant in Appendix 7.1 of the Environment Statement.
- The applicant's assessment in terms of the susceptibility, viewpoint value, sensitivity, magnitude and overall significance has been taken from Appendix 7.2 of the Environment Statement.
- APP is short for Applicant
- THC is short for The Highland Council
- Where text is highlighted in bold in the column titled "Overall", this means that a significant effect has been identified.
- For the more detailed consideration of the impacts pelase see paras 8.46.1 to 8.46.27 of the main report.

290000 300000 310000 320000 330000

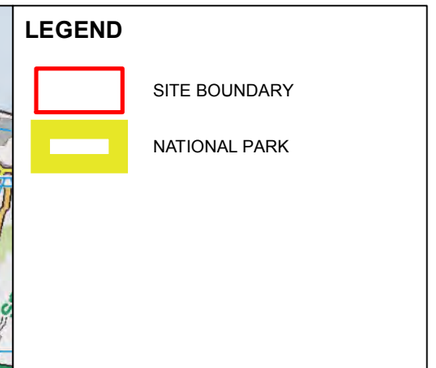
860000 850000 840000 830000

LEGEND

SITE BOUNDARY

NATIONAL PARK

N



FORCE 9 ENERGY

SLR global environmental solutions

CLASH GOUR WIND FARM

PLANNING STATEMENT

SITE CONTEXT

FIGURE 1

Scale 1:150,000 @ A3 Date OCTOBER 2018

0 2.5 5 7.5 10 Kilometers

304000 306000 308000 310000 312000 314000

850000 848000 846000 844000 842000 840000

SITE ENTRANCE COMPOUND
B1
S1a
S1b
B2
NORTH
S2
SOUTH
EAST 1
EAST 2
EAST 3
S3
Burntack
Tomnamoon
Greens Kennels
Sleughwhite
Muckle Greens (ruin)
Mill Buie
371
Tom na Moin
Coldwells
Craigrey
Leonach
Scottackleys
Meikle Hill
284
Tomcork
Coldburn
Aultanuish
Aultahurn
Yellowbog
Regaule
Wester Greens
Lone Hill
Hill of Tomechole
Craigs of Sluggan
Auchness
Ballachraggan
Falls of Auchness (Waterfall)
Knock na Snaird
Soccach
Torwinny
Coldwells
Hill of Glaschyle
Johnstripe
Moss of Faebuie
Red Craigs
Moss of Bednawinny
Tapp
Tomnanuan
Souldow
Cairn of Ballindea
Cairn
Burn Circles
Beachans
Tomcork
Dallasbraughty
Bantrach
Lurg
Berryburn
Carn Ghiubhais
Loch Noir
Lochan an Sauch
Cairn of Cluny
Cluny
Shian of Tu
Feakirk
Falls of Feakirk
Shenvault
Moidach More
Carn Kitty
521
(522)
Carn Shalag
Clashindarroch
Sliabh Bainneach
483
Carn Dearg
521
Lochan a' Chearsinn
Larig Hill
545
Meikle Ben Shalag
Loch Trevie
Glen Trevie
The Seven Sisters
Loch of the Cowlatt
Lochs of Little Benshalag
Hill of Slackmore
357
Loch of Ribreck
Miller's Loch
Hawk's Craig
Lochs of Bogmussach
River Lossie
Quarry
Fire Tower
Tapp
Beetle Hillock
Shian of the Shenil
Bog Mussach
Ford
Knows of Bogmussach
Annagate
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LEGEND

- SITE BOUNDARY
- TURBINE LAYOUT
- 130m TO TIP
- 136.5m TO TIP
- 143m TO TIP
- 149.5m TO TIP
- 176m TO TIP (SCENARIO B - 149.5m TO TIP)
- NEW WATERCOURSE CROSSING
- UPGRADED WATERCOURSE CROSSING
- PROPOSED PERMANENT MET MASTS
- HARDSTANDINGS
- SITE ENTRANCE COMPOUND
- BATTERY STORAGE OPTIONS
- SUBSTATION OPTIONS
- CONSTRUCTION COMPOUNDS
- BORROW PITS
- NEW ACCESS
- UPGRADED EXISTING ACCESS TRACK
- NEW ACCESS TRACK MET MAST
- FORESTRY EXTRACTION ROUTE

FORCE 9 ENERGY

SLR global environmental solutions

CLASH GOUR WIND FARM

PLANNING STATEMENT

PROPOSED SITE INFRASTRUCTURE

FIGURE 2

Scale 1:40,000 @ A3 Date OCTOBER 2018