Agenda Item	6.1
Report No	PLS-52-24

#### HIGHLAND COUNCIL

**Committee:** South Planning Applications Committee

Date: 01 October 2024

**Report Title:** 23/05579/S36: Fred Olsen Renewables Limited

Culachy Estate, Land 4km SE of Newtown, Invergarry

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

# **Purpose/Executive Summary**

**Description:** Culachy Wind Farm - Erection and operation of a wind farm

comprising 8 wind turbines with a maximum blade tip height of 200m, battery energy storage system, site access junction, access tracks, crane hardstandings, underground cabling, on-site substation and maintenance building, temporary construction compounds, laydown

areas, batching plant and potential excavation/borrow pits.

Ward: 12 – Aird and Loch Ness and 11 – Caol and Mallaig

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

Reason referred to Committee: Section 36 Application

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

### Recommendation

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

### 1. PROPOSED DEVELOPMENT

- 1.1 The Highland Council has been consulted by the Scottish Government's Energy Consents Unit (ECU) on an application made under Section 36 of the Electricity Act 1989 (as amended) for the construction and operation of the Culachy Wind Farm and associated infrastructure. The application is for 8 wind turbines to be operated for a 35 year period, with all turbines having a maximum blade tip height of up to 200m. The proposal has capacity to generate approximately 57.6MW of installed capacity (depending on the turbine model chosen) plus 10MW of battery storage. This proposal falls under the provisions of the Electricity Act due to the combined power output of the operational development being over 50 MW.
- 1.2 Key elements of the development, as described and assessed within the proposals and the Environmental Impact Assessment Report (EIAR) include:
  - 8 wind turbines of up to 200 metres height to blade tip and up to 162 metres blade diameter with internal transformers;
  - A Battery Energy Storage System (BESS);
  - Associated turbine compound areas including foundations and hardstanding areas for erecting cranes at each turbine location;
  - A substation facility to provide a connection to the grid network;
  - Underground cables linking the turbines to the substation, typically placed along internal access tracks;
  - Two temporary construction compounds (10,000m² and 2,500m² respectively) with a concrete batching plant within the largest compound;
  - A new access junction with the U1667 Ardachy Road;
  - 8km of new track, of which 2km would be floating across areas of deeper peat;
  - 5.5km of upgraded existing track;
  - 7 new watercourse crossings; and
  - 2 borrow pits for the extraction of stone and aggregate used in the construction of the wind farm (location to be confirmed within 2 borrow pit search areas once geotechnical surveys completed).
- 1.3 Grid connection from the on-site substation would be subject to a separate process requiring a separate consent under Section 37 of the Electricity Act should this be via an overhead line.
- 1.4 A micro-siting allowance of 50m has been proposed by the applicant for the turbine locations and all ancillary infrastructure to accommodate unknown ground conditions. The micro-siting will be used to avoid any areas of deeper peat, higher elevations of ground, watercourse buffers, Ground Water Dependent Terrestrial Ecosystems and cultural heritage assets. The final design of the turbine (colour and finish), ancillary electrical equipment, landscaping and fencing etc. are also expected to be agreed with the Planning Authority, by condition, at the time of project procurement. Turbine manufacturers regularly update designs that are available,

thereby necessitating the need for some flexibility on the approved design details.

- 1.5 As permission is sought to operate the windfarm for 35 years; a further application would be necessary to determine any future re-powering proposal. If the decision is made to decommission the wind turbines, all components and above ground infrastructure would be removed. Any such track or infrastructure foundation retention would however need to be agreed via a decommissioning method statement and would require a planning application at the time of decommissioning. Any application for retention of such infrastructure will be determined in line with the Development Plan in place at that time.
- 1.6 Whilst public consultation for Section 36 applications is not mandatory, the applicant held two rounds of public exhibitions to seek the views of the local community on 20 April 2022 at Glengarry Community Hall and 21 April 2022 at Fort Augustus Village Hall, and on 24 and 25 October 2022 at the same venues. Event notifications were advertised in the Inverness Courier, Ness News and Lochaber Life as well as a newsletter issued to all residents and business premises located within 10km of the proposed development. A Pre-application Consultation Report accompanied the application that set out how public consultation has informed the submitted proposal.
- 1.7 The applicant made use of the Council's Pre-Application Advice Service for Major Developments in November 2021 (21/04202/PREMAJ). At the time of the advice being sought, the proposal comprised of up to 10 turbines up to 200m tip height. This was reduced to 8 turbines at 200m to tip in November 2022. The pre-application advice was unsupportive of a wind farm in this location and explained that the proposal would give rise to significant adverse landscape and visual (including cumulative) effects. Additionally, the response noted that the reduction from a 10 to 8 turbine scheme would not sufficiently mitigate the unacceptable landscape and visual effects of the proposal. The scale of turbines proposed was explained to be of concern, particularly given their siting in the Great Glen in close proximity to Loch Ness, Fort Augustus, tourist routes including the A82, A87 and the B862 Stratherrick Road, the Corrieyairack Pass and Great Glen Way. The site is also situated close to, and would have extensive visibility from, the Loch Ness and Duntelchaig Special Landscape Area (SLA) with the proposal having the potential to give rise to significant adverse effects for receptors at a number of locations including the northern side of the Great Glen at both a higher elevation and down to the shoreline as well as on the water of Loch Ness with a key view being identified as the Great Glen from Meall Fuar-mhonaidh.
- 1.8 The application site is also the subject of a previous refusal, the detail of which was known to the applicants and discussed further at the pre-application stage. The 2018 Reporter's appeal decision (PPA-270-2151) found that this previous wind farm proposal, comprising 13 substantially smaller wind turbines with a blade tip height of up to 149.5m, would give rise to a significant effect on the Loch Lochy and Loch Oich SLA, with the proposal being situated close to the Great Glen and being prominent in the views from most of the significant hills within the SLA on the western side of the Great Glen. While it as not found to significantly impact the qualities of the Loch Ness and Loch Duntelchaig SLA, the Reporter did agree that it resulted in adverse visual effects on the summit of Meall Fuar-mhonaidh along with Buruach and Sron na Muic. The pre-application advice stressed that any increase in the scale of proposed turbines would exacerbate such effects. The proposal is also located within

- a Wild Land Area (WLA 19: Braeroy, Glenshirra and Creag Meagaidh) with NatureScot previously noting that the proposed development would diminish the WLA. The Reporter agreed with this assessment and also noted that the cumulative effect of the proposal and its relationship with other wind farms was inappropriate. It was found that the proposal would be at a lower elevation and in closer proximity to Loch Ness than any other wind farm to date. Given the concerns raised in the preapplication response, and the relatively recent appeal decision, the pre-application advice made clear that it was unlikely that the proposed development could be supported, irrespective of the national renewable energy policy change which has occurred over the intervening period.
- 1.9 The application is supported by an EIAR, the contents of which has been informed through an EIA Scoping exercise. The EIA Scoping Report was submitted with a request for an EIA Scoping Opinion to the Energy Consents Unit on 2 February 2022. A Scoping Opinion was issued in May 2022. The Scoping layout consisted of 10 turbines with a 220m blade tip height which was subsequently reduced to eight turbines with a 200m blade tip height. The EIAR contains chapters on: site selection and design iteration; development description; approach to EIA; planning and energy policy; landscape and visual; ornithology; ecology; hydrology, geology and hydrogeology; cultural heritage; noise; traffic and transport; socioeconomics; tourism and recreation; and aviation. The application is also accompanied by a Planning Statement and the Pre-Application Consultation (PAC) Report.

### 2. SITE DESCRIPTION

- 2.1 The application site is located on the Culachy Estate, approximately 900m south of Fort Augustus near Loch Ness and the Great Glen. The estate covers 3,040ha, is under single ownership, and used for shooting and stalking. The site comprises 682ha and is located in the western part of the estate. It is bound by A82 and the Caledonian Canal to the north, and the River Tarff to the east. It would be accessed from the U1667 via a new junction with the A82. The site is located on rolling upland moorland with small areas of woodland along Connaichie Burn and its tributaries. It is largely within the River Tarff catchment and partly within the Calder Burn catchment. Tributaries of the Black Burn intersect the site in the north and water courses Allt Lagan a Bhainne and Allt Coire Uchdachan intersect the site in the south. The elevation varies from 200m Above Ordinance Datum (AOD) at the site entrance in the north to 650m AOD in the south. The Beauly-Denny 400kV Overhead Line (BDOHL) crosses the site from north to south.
- 2.2 The site is in a remote sparsely populated area and no residential properties lie within the site. The closest residential property is 3.6km from the proposed turbines. Eight properties are located within 500m of the proposed new junction on the U1667 Ardachy Road.
- 2.3 The key recreational interests in this area include walking and cycling. There are 27 recreational trails within 15km of the proposed development. The Corrieyairack Pass between Laggan and Fort Augustus is located within the site boundary and includes part of General Wade's Military Road. The Great Glen Way, one of Scotland's Great Trails, passes approximately 2km to the northwest of the site. The Scottish National Trail which spans the length of Scotland, passes approximately 6km to the west of

the site.

# **Environmental Designations and Habitats**

2.4 The site does not form part of any statutory or non-statutory designated sites for nature conservation. Designated sites for ecology within 5km of the site are listed in the table below.

Designation	Distance to Site Boundary	Qualifying Interests
Ness Woods SAC	0.02km E	Mixed woodland on base rick soils associated with rocky slopes
		Otter (Lutra lutra)
		Western acidic oak woodland
Glen Tarff SSSI	0.02km E	Beetle (Bolitophagus reticulatus)
		Upland mixed ash woodland
Easter Ness Forest SSSI	3.7km N	Upland mixed ash woodland
		Upland oak woodland

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

	Distance to the nearest turbine	Qualifying Interests
Loch Knockie and nearby Lochs SPA – incorporating Knockie Lochs SSSI and Glendoe Lochans SSSI	3.7km E/NE	Slavonian grebe, breeding for SPA; Common scoter, breeding for SSSI
West Inverness-shire Lochs SPA, SSSI	7.5km W	Black throated diver, breeding; Common scoter, breeding
Creag Meagaidh SPA, SSSI	10km S	Dotterel, breeding SPA; Breeding bird assemblage SSSI

Monadhliath SSSI	14.7km E	Dotterel breeding;
		Breeding bird assemblage

- 2.6 The proposed site includes 12.95ha of habitat listed on the Ancient Woodland Inventory (AWI) which is classified as Ancient (of semi-natural origin).
- 2.7 The site comprises upland and mire habitats, predominantly blanket bog, wet modified bog, wet heath, and unimproved acid grassland. Site surveys detected evidence of otter, water vole, red squirrel, mountain hare, brown hare, common lizard, common pipistrelle, soprano pipistrelle, natterer's bat, brown long-eared bat and sea/brown trout. The site and surrounds have been surveyed for breeding birds and transient birds.
- 2.8 There is known potential for areas of Ground Water Terrestrial Ecosystems (GWDTE's) within the site. The site is located with the River Tarff Drinking Water Protected Area (DWPA) which supplies Loch Ness and Invermoriston Water Treatment Works. There are two Private Water Supplies (PWS) located within the site at Culachy House and Ard Aluinn.
- 2.9 Class 1 and 2 peatlands which are defined as nationally important carbon rich soils, deep peat, and priority peatland habitat of high conservation value cover much of the site. Peat depth surveys recorded varying depths of less than 0.5m to up to 4m with almost 30% of less than 0.5m.
- 2.10 Fort Augustus Geological Conservation Review (GCR) Site is located 1.2km north and Glen Roy and Parallel Roads of Lochaber 4.4km south.

## Landscape Designations, Wild Land and Landscape Character

2.11 The proposed development is not located within any national or regional landscape designations. The proposed turbines and some access tracks lie within Wild Land Area 19 Braeroy-Glenshirra-Creag Meagaidh. Landscape designations within 45km of the site are tabled below.

Designated Landscape	Distance and direction from the Proposed Development		
National Park			
Cairngorms	12.5km E		
National Scenic Area			
Ben Nevis and Glen Coe	23km SW		
Glen Affric	26km W		
Glen Strathfarrar	34km NW		

Special Landscape Area (SLA)		
Loch Lochy and Oich	1.9km W	
Loch Ness and Duntelchaig	6km N	
Wild Land Areas (WLA)		
19 - Braeroy – Glenshirra-Creag Meagaidh	0	
20 - Monadhliath	17km E	
18 - Kinlochlourn-Knoydart-Morar	17.4km W	
24 - Central Highlands	17.6km N	
14 - Rannoch-Nevis-Mamores-Alder	22.3km SE	
15 - Cairngorms	Over 30km E	

2.12 The site is located within Landscape Character Type (LCT) 236 Smooth Moorland Ridges which extends south-west parallel to the Great Glen and transitions to the northeast with LCT 221 Rolling Upland- Inverness. The access track and site entrance are located in LCT 221. Surrounding LCTs with views of the site include LCT 239 Interlocking Sweeping Parks – Lochaber, LCT 235 Broad Forested Strath, LCT 237 – Rocky Moorland – Lochaber, LCT 220 – Rugged Massif – Inverness, LCT 225, Broad Steep-sided Glen and LCT 224 Farmed and Wooded Foothills.

## **Built Heritage**

- 2.13 There are no statutory designations within the site boundary. The Corrieyairack Pass, built as a military road by General Wade between Fort Augustus and Dalwhinnie, runs north-south to the immediate east of the site boundary within the Culachy Estate. It comes close to the site boundary to the east of the proposed borrow pit and to the north of Turbine 8. It comprises 4 scheduled monument listings at this location (SM6140, SM6141, SM6142 and SM6143) which form one continuous linear strip.
- 2.14 There are a further 12 scheduled monuments within 5km of the site which are set out in the table below and 19 scheduled monuments within 5-10km of the site boundary.

Site Name	Scheduled Number	Distance from Site
Corrieyairack Pass,military road, Allt Ruadh to watershed	SM6128	Within 2km
Kilwhimen Barracks, Fort Augustus	SM9903	Within 2km
Torr Dhuin Fort	SM764	Within 2km

Caledonian Canal Fort Augustus to Loch Ness	SM3614	Within 2km
Caledonian Canal, Cullochy Lock	SM5293	Within 2km
Caledonian Canal, Cullochy Lock to Kyltra Lock	SM6496	Within 2km
Caledonian Canal,Kyltra Lock to Fort Augustus	SM6497	Within 2km
Caledonian Canal,Loch Oich to Cullochy Lock	SM6495	Within 2km
aledonian Canal,Kyltra Lock	SM5291	Within 2km
Invergarry Castle	SM548	Within 5km
Cherry Island, crannog, Inchnacardoch Bay, Loch Ness	SM9762	Within 5km
Corrieyairack Pass,military road,Melgarve to Allt Ruadh	SM6129	Within 5km

- 2.15 There are no listed buildings within the Culachy Estate. There are 40 listed buildings within 5km and 29 listed buildings within 5km to 10km of the site boundary.
- 2.16 There are 37 non-designated heritage assets recorded within Culachy Estate (including some within the application site) comprising: an earthwork bank and cairn, a bothy, two stone dykes, six bridges, a building, three clearance cairns, a cairn, a dam, three enclosures, two farmsteads, a house, a lade, a non-designated section of Corrieyairack Pass military road, a mound, a sheep wash, nine shielings and a cottage.
- 2.17 The central section of the site has been noted as an area of medium archaeological potential. There is one Conservation Area (CA109) Fort Augustus and one Inventory Battlefield (BTL29 Blar na Léine) within 20km of the site.

### **Cumulative Development**

2.18 Appendix 1 of this report provides details of operational, consented/under construction, and in planning wind farm projects that the applicant took into consideration in their cumulative assessment dated August 2023. The applicant proposed to include wind farms within a 45km radius from the proposed turbines, this was increased to a 60km radius following consultation with THC. In that time the cumulative picture has changed with the permission for Bunloinn, Cloiche, Corriegarth 2 now consented in the intervening period with Tomchrasky proposed and currently pending consideration. Additionally, Millenium South has now expired. This has been reviewed Planning Officers and is up to date as of October 2024.

### 3. PLANNING HISTORY

3.1	22.02.2022	22/00824/SCOP – Culachy Wind Farm – Erection of up to 10 wind turbines, each up to 220m blade tip height, as well as associated on-site energy storage system and ancillary infrastructure.	Scoping Response Issued
	22.12.2014	14/04782/FUL – Culachy Wind Farm – Erection of 13 wind turbines with 12 up to 149.5m tip height and one up to 132m tip height including ancillary development. Appeal dismissed (PPA-270-2151) 27.04.2018.	Planning Permission Refused and Appeal Dismissed
	05.09.2014	14/03473/PAN - Culachy Wind Farm - Erection of wind farm. 13 wind turbines including operations	•
	21.01.2014	14/00239/SCOP - Culachy Wind Farm – Erection of 25 wind turbines including operations.	Scoping Response Issued

### 4. PUBLIC PARTICIPATION

- 4.1 Advertised: Section 36 Application and EIA Development Date advertised:
  - Inverness Courrier 5 and 12 December 2023
  - The Herald Print 5 December 2023
  - Edinburgh Gazette 5 and 12 December 2023

Representation Deadline: 2 February 2024

Representations Received by The Highland Council: 4 (3 objections, 1 general)

Representations Received by The Energy Consents Unit: 6 representations (2 objections, 4 support)

- 4.2 Material considerations raised in objections are summarised as follows:
  - Environmental damage from construction and disputed climate change benefits;
  - BESS needs water which is in low supply in the summer;
  - Traffic count date on Ardachy Road did not include tourist season;
  - Personal Injury Accident data incorrect for Ardachy Road;
  - Surface water runoff particularly on to Ardachy Road from the site access carriageway floods already;

- Specific and cumulative significant adverse landscape and visual effects including Wild Land Area;
- Planning history and previous wind farm refusal the significant adverse effects have not changed;
- Raptor collision risk, habitat loss and displacement for birds;
- Loss of peat;
- Pollution of private water supplies;
- Scheme specific and cumulative noise effects on residential amenity;
- Adverse impact on users of Corrieyairack Pass, General Wade's Military Road and Great Glen Way;
- Effect of aviation lighting;
- Wind farms do not last 35 years;
- Decommission should be secured by way of Section 75 legal agreement; and
- Not in accordance with the Development Plan.
- 4.3 Material considerations raised in support are summarised as follows:
  - Contribution towards renewable energy targets; and
  - Community / socio-economic benefits.
- 4.4 Non-Material considerations raised:
  - Lack of grid capacity;
  - Oversupply of renewable energy generation in the north of Scotland;
  - · Risk of fire/toxic gas release from BESS; and
  - The grid connection should be part of the application and EIA.
- 4.5 All letters of representation received by the Council are available for inspection via the Council's eplanning portal which can be accessed through the internet <a href="https://www.wam.highland.gov.uk/wam">www.wam.highland.gov.uk/wam</a>. Those representations received by the Scottish Government's Energy Consents Unit can be accessed via <a href="https://www.energyconsents.scot">www.energyconsents.scot</a> It should be noted that some representations have been submitted to both The Highland Council and Energy Consents Unit.

### 5. CONSULTATIONS

## Consultations undertaken by The Highland Council

5.1 Fort Augustus and Glenmoriston Community Council (Host) object to the application. It considers Ardachy Road as unsuitable for traffic associated with the proposed development and question why the road surveys presented in the EIA were undertaken in January outwith the tourist season given this is a popular route for visitors to the Highlands. It also raises concerns regarding the potential for increased fire risk from the associated BESS proposed and consider that there would be insufficient sources of water in the locality to effectively fight a fire if one

was to occur. The Community Council also raise concerns regarding the adverse effects on views from the Corrieyairack Pass, significant hills in the surrounding area and Wild Land Areas along with cumulative effects of wind farms in this area South/South East of Loch Ness. Concerns raised regarding the lack of information relating to the grid connection for the proposed development.

- Glengarry Community Council (Host) do not object to the application. It requests conditions be attached to ensure the reinstatement of ground disturbance and measures to prevent the loss of peatland and preservation of wildlife. Additionally, it seeks reassurance that conditions to control construction traffic and engagement with the local community will be included should the application The Highland Council recommend raising no objection to the proposed development.
- 5.3 **Laggan Community Council** were consulted but did not respond.
- 5.4 **Spean Bridge, Roy Bridge and Achnacarry Community Council** do not object to the application. Following dialogue with the developer regarding the transport of turbine towers and nacelle sections from Corpach Harbour to the site it has been assured that the community council will be consulted prior to a Construction Traffic Management Plan being progressed. The community council consider that the applicant has tried to minimise the visual impact through the design and layout of the proposed development welcomed the engagement with the local community.
- 5.5 **Stratherrick and Foyers Community Council** were consulted but did not respond.
- Access Officer does not object to the application. They identified a number of shortcomings with the draft Outdoor Access Management Plan submitted in support of with the application. This included a lack detail on the impact on the Corrieyairack Pass (a recorded public right of way) and need for protection and continued access to it during construction and on completion of the development. They request a condition to secure a detailed Outdoor Access Plan which addresses these issues. The Plan should manage site tracks and paths to maintain public access routes during construction and enhance public outdoor access longer term.
- 5.7 **Development Plans Team** do not object to the application but have raised several concerns and conclude that the proposal is not in overall conformity with the Development Plan. It cites the previous planning history at the site and the previous Reporters findings that significant adverse (post mitigation) effects on a Wild Land Area, on General Wade's Road designated as a Scheduled Monument, on landscape and on a range of visual receptors. The applicant assertions are contested; that the development should now be approved because the national planning policy context since the adoption of NPF4 is more supportive of onshore windfarms than it was in 2018, and the relative importance of wild land as a development constraint has diminished.

In summary, it finds that this proposal will have significant adverse landscape and visual impacts on a range of features/receptors (including but not restricted to) the Wild Land Area, noting these impacts are not localised and cannot be adequately mitigated. They state the turbine number reduction proposed is very marginal with this likely driven by the need to avoid steep/deeper peat and watercourses, as opposed to an attempt to achieve any meaningful landscape/visual mitigation. The

documentation submitted in support of the application does not set out any significant net socio-economic or community wealth building benefits to tip the balance in favour of overall Development Plan conformity.

The response also explains that whilst the generality of the HwLDP topic policies are superseded by those in NPF4, those that offer greater detail than NPF4 or that are tailored to Highland circumstance (and are not wholly incompatible with NPF4) are still relevant and may be applicable. In particular, HwLDP Policy 67 - Renewable Energy and its related Onshore Wind Energy Supplementary Guidance is relevant, the latter classifying the application site as principally within an "Area of Significant Protection". Also, HwLDP Policy 57 - Natural, Built and Cultural Heritage is relevant in terms of the protection of the General Wade's Military Road scheduled monument, the Wild Land area and regionally identified Special Landscape Areas.

- 5.8 **Environmental Heath** do not object to the application. It requests conditions to secure details of how the best practicable measures will be implemented to reduce the impact of construction noise at noise sensitive locations, details of the proposed scheme for dust suppression during construction and a private water supply mitigation and monitoring programme.
- 5.9 **Flood Risk Management Team** confirmed that it has no comment to make on the application.
- 5.10 **Forestry Officer** does not object to the application. They initially objected to the application and requested further planting details including the viability of local seed source, fencing proposals, ground preparation, likelihood of timely natural regeneration success based on local experience and the maintenance proposals to ensure successful establishment. Following the submission of further details, the objection has been withdrawn subject to a condition to secure a Compensatory Planting Plan.
- Historic Environment Team do not object to the application. The EIAR Cultural Heritage chapter makes recommendations for mitigation measures which will reduce the impacts to an acceptable level. This will involve a range of methods to include specific photographic recording, topographic survey and areas of watching brief as well as marking-out, avoidance and micro-siting. Excavation will be required where sites cannot be avoided. The Historic Environment Team is satisfied that these measures are appropriate. In addition, good practice measures are expected, and these should include the implementation of a protocol in the event of the discovery of previously unrecorded assets; inclusion within the CEMP; and the appointment of an Archaeological Clerk of Works. The applicant will need to submit a detailed Written Scheme of Investigation to agree these works and can be secured by condition.

Impacts on the setting of the scheduled sections of the former military road are problematic. It notes the detailed response from Historic Environment Scotland (HES) on this matter, and considers that an objection from the Historic Environment Team in regard to this issue would not be appropriate or justifiable. That said, it however advocates that HES's recommended further mitigation, by way of the removal or suitable relocation of Turbine 8, is implemented.

Landscape Officer objects to the application. They have come to different 5.12 conclusions regarding the impacts on Landscape Character Types, Special Landscape Area and more broadly on the strong sense of place of Loch Ness and the wider Great Glen. Additionally, the proposed development does not meet the expected threshold of various criteria Onshore Wind Energy Supplementary Guidance design criteria. The proposed development would erode the setting of Fort Augustus from elevated views, such as VP11 Great Glen Way within LCT 225 Broad Steep Sided Glen Carn an Doire Mhoir, along with VP13 Burach, and VP17 Meall Fuarmhonaidh marginally outwith LCT 225 Broad Steep Sided Glen. Likewise, there would be adverse effects on the character and setting of Fort Augustus within LCT 236 Smooth Moorland Ridges. The potential effects on how the Landscape Character Types in the area interact and how they come together to create the sense of place is possibly more significant than effects on individual landscape Character Types. Loch Ness and the wider Great Glen have a strong sense of place, which relies on the landscape character of the Glen itself, the character of glens which meet the Great Glen and in the variety and composition of the surrounding upland landscapes. This issue has not been addressed the applicant's Landscape Assessment.

The proposed development would have a detrimental effect on the appreciation of the entirety of the Great Glen as a landscape feature. As such, the proposed development would create an encirclement effect which would reduce the space between developments on each side of the Great Glen creating a competing line in the landscape.

5.13 **Transport Planning Team** do not object to the application, subject to conditions to secure: a Construction Traffic Management Plan (CTMP); detailed reviews of the routes to site for abnormal loads and general construction traffic; formation of a Community Liaison Group to monitor progress and agree suitable measures to address any community concerns; and a Wear and Tear agreement for the local road network under Section 96 of the Roads (Scotland) Act 1984 (As Amended). Whilst they welcome traffic accessing the site via the B851/B862 north of the U1667, as previously advised, appropriate mitigation in accordance with the Council's South Loch Ness Improvement Strategy would be applicable should any access via this northern route be required.

# **Consultations Undertaken by the Energy Consents Unit**

- 5.14 **British Telecom** do not object to the application. The application should not cause interference to BT's current and planned radio network.
- 5.15 **Highlands and Islands Airports Limited** do not object to the application. The application would not infringe the safeguarding criteria and operation of Inverness Airport.
- 5.16 **Historic Environment Scotland** do not object to the application. It states that the proposed development does not raise historic environment issues of national interest, however, they have identified a significant effect on the setting of one of the scheduled monuments that form part of the Corrieyairack Pass (military road, watershed to Allt Lagan a'Bhainne (SM6140)). It recommends the removal of Turbine 8 or its relocation to an area set back further from the Corrieyairack Pass

which would likely help to reduce the level of effect on the setting of the scheduled monument.

- 5.17 **Ironside Farrar** do not object to the application. Following review of the Peat Landslide Hazard Risk Assessment (PLHRA) they concluded that although much of the PLHRA is sound, there are some key elements that are considered to be insufficiently robust to support the PLHRA conclusions and sets out where minor revisions are required. The applicant has responded addressing the issues raised, however, Planning Officers await details of any further exchanges on this matter.
- 5.18 **JCR Windfarms** do not object to the application. There are no predicted interference issues with respect to radio systems within its remit, based on known interference scenarios and the data provided.
- 5.19 John Muir Trust object to the application. It states there is an adverse impact on a nationally important Wild Land Area (WLA). It considers that no technical justification is provided as to why the proposed development could not be sited outside the WLA or provide a clear explanation of why any alternative is unacceptable. By locating the proposed development within the WLA the applicant has failed to minimise significant impacts on the qualities of wild land, as required under NPF4 Policy 4 (g). The applicant has placed great weight on the impact of existing infrastructure, such as the Beauly Denny Overhead Line (BDOHL), on the wildness of the area to justify the impact of the proposed development. John Muir Trust disagree that this reduces the visual impact and consider the presence of the BDOHL would exacerbate the impact resulting in the loss of the sense of wildness from this part of the WLA. Cumulative impact with various renewable energy developments in planning are also of concern. The proposed development would have an adverse impact on the Corrievairack Pass, a popular route for accessing the WLA. The proposed development would bring significant infrastructure much closer to this popular recreational route and wild place undermining NPF4 Policy 4 to protect and restore natural places. By siting the development almost entirely on Class 1 peatland there is a lack of any meaningful attempt to avoid disturbance of this undeveloped peat. therefore failing to comply with the mitigation hierarchy required by NPF4 Policy 5 (a). Additionally, there is a lack of explanation why other, more suitable sites in compliance with NPF4 Policy 5 (c) (ii) of or Policy 2 (a) which requires the proposed development to be "sited and designed to minimise lifecycle greenhouse gas emissions as far as possible" were not considered.
- Ministry of Defence Defence Infrastructure Organisation do not object to the application. It requests conditions to secure the submission of an aviation safety lighting scheme detailing how the development will be lit throughout its operational life to maintain civil military aviation safety along with aviation charting and safety management measures to be submitted to the MOD 14 days prior to commencement of works.
- Mountaineering Scotland object to the application. It is focused on the enjoyment of hillwalking and mountaineering in a high quality environment and raise concern the proposed development will have on the visual impact on the uplands and some views to the uplands. There is evidence to suggest that wind farms will displace hillwalkers and this has not been properly addressed by the applicant. The site is adjacent to General Wade's Military Road over the Corrieyairack Pass and set within

a popular area for walking with historic resonance. Mountaineering Scotland profoundly disagree that significant visual effects would be limited to 5.5km and objects to the application because it would have substantial visual impacts diminishing the regional mountaineering recreation and tourism resource. The proposed development is not in compliance with NPF4 and the site does not have the capacity to support a commercial wind energy development without significant and unacceptable harm to the landscape setting of General Wade's Military Road along with significant adverse visual impact upon local Munros and Corbetts, including those set in Wild Land or Special Landscape Areas. They add that the EIAR overstates the benefits and understates the adverse impact. In terms of cumulative impact, the development would project wind farm development further south in the Monadhliath and into a different type of setting. Whilst the cumulative setting has evolved since the EIAR was complete with approval of Cloiche and Corriegarth 2, these recent consents are extensions to existing clusters whereas Culachy would be an isolated scheme. The proposed development offers only a modest energy contribution and presumed CO2 reduction that would be far outweighed by its damage and by the effect of a further southward thrust of the wind farm landscape already operational and consented around Fort Augustus and western Monadhliath.

- 5.22 **National Air Traffic Control Services** do not object to the application. The proposed development does not conflict with their safeguarding criteria.
- NatureScot do not object to the application. It agrees with the applicant that the proposed development would result in some significant adverse effects on WLQ 2 "a strong contrast of experience between the hills and plateaux with the straths, glens and corries, varying in their accessibility, exposure and visibility of human elements" of Braeroy, Glenshirra, Creag Meagaidh Wild Land Area (WLA 19). The proposed development would diminish the attribute "a sense of remoteness" expressed in the area. Like the applicant, they consider these effects to be limited in their extent, generally limited to the summit of Carn Dearg. Whilst there is divergence between where the effects of the proposed turbines may be greatest, NatureScot agree that they will be limited to the WLA study area.

The proposal is close to the Ness Woods SAC and Glen Tarff SSSI and West Inverness-shire Lochs SPA and SSSI. The status of these sites means that the requirements of the Conservation (Natural Habitats, &c.) Regulations 1994 as amended (the 'Habitats Regulations') apply or, for reserved matters, The Conservation of Habitats and Species Regulations 2017. As such, Energy Consents Unit, as competent authority, is required to consider the effect of the proposed development on the above designated sites (commonly known as Habitats Regulations Appraisal). NatureScot consider the proposed development is likely to have a significant effect on otter, mixed woodland on base-rich soils associated with rocky slopes, and western acidic oak woods within Ness Woods SAC and common scoter within West Inverness-shire Lochs SPA.

NatureScot note that whilst the area proposed for peatland restoration has been mapped, the calculations for this site have not been provided. To be able to assess whether the plan is sufficient to overcome the impacts on the peatland habitat detail on how the restoration area has been calculated should be provided for their review. The impacts of the development have been assessed as a 24.65ha of peatland loss.

As such the area for offsetting should be 246.5ha with additional area for the enhancement. The loss has been assessed with a direct loss plus a 10m indirect loss. As such the area for offsetting should use similar calculations for area of feature plus a 10m buffer for the indirect benefit.

NatureScot welcome the proposal to include a Bird Disturbance Management Plan. It considers that the Golden Eagle collision risk and population modelling is appropriate along with the proposed mitigation measures for black grouse detailed in (Table 7.20 of Chapter 8 Ornithology) which will minimise disturbance to black grouse during the construction phase.

As the development could affect internationally important natural heritage interests, any consent must be subject to conditions as detailed in their consultation response which in summary include the provision of the following: Construction and Environment Management Plan; Pollution Prevention Plan; Deer Management Statement; construction methods; and details of fencing.

- Royal Society for the Protection of Birds object to the application. It does not believe the impacts of the proposed development have been properly assessed. RSPB has requested further information and assessment on the potential impact on Common Scoter as a qualifying feature of the West Inverness-shire Lochs Special Protection Area (SPA) and Glendoe Lochans Site of Special Scientific Interest (SSSI). They also raised concern regarding the cumulative impact on the Golden Eagle through collision risk.
- 5.25 **Scottish Environment Protection Agency** do not object to the application. It requests conditions to secure: a 100m buffer to protect Ard Aluinn groundwater abstractions; crossing WX23 to be a single span bridge to convey the 1 in 200 year flood event (plus an allowance for climate change); all other water courses be designed as oversized bottomless culverts or traditional style bridges; a Peat Management Plan; a Biodiversity Enhancement Management Plan; adherence to the mitigation identified in the Schedule of Environmental Commitments (EIAR Table 15.1) and the outline CEMP; and borrow pit restoration and a Decommissioning and Restoration Plan.
- Scottish Forestry do not object to the application. It welcomes the developer's 5.26 commitment within the EIAR to ensure that any proposed changes to woodland address the requirements of Scottish Government's Policy on Control of Woodland Removal (CoWRP). Where woodland of high sensitivity is affected, as is the case here, the area of Compensatory Planting (CP) must always exceed the area of woodland being removed to compensate for the loss of environmental value. Rather than exceed policy requirements as is suggested (Forestry Technical Appendix 3.3) the area proposed for CP should instead be considered as in keeping with CoWRP. Though the commitment to include an area of existing SSSI woodland within the proposed CP enclosure is welcome, it is unlikely to have the desired effect of returning these woodlands to a more favourable condition and fully realise the objectives of NPF4 Policy 6 (d). Scottish Forestry would welcome the opportunity to work with the applicant, landowner and NatureScot to maximise the enhancement and improvement of these woodlands in order to return to a favourable condition. Scottish Forestry request a condition which secures monitoring as part of a Habitat Management Plan.

- Scotways object to the application. It states that the character of the area will be completely changed with turbines in this landscape. It has significant concerns regarding the impact on recreational amenity both within, and in the vicinity of, the application site and the change in the character of the landscape. Scotways note that the proposed access track will cut across a non-scheduled section of the Corrieyairack Pass/General Wade's Military Road, it is a recorded right of way and should be considered as such in the Outdoor Access Management Plan. Scotways consider the proposed development would have a high impact on the views from the historic Corrieyairack Pass/General Wade's Military Road and completely change the historic character of the landscape. It also raises concern about the cumulative impact of the proposed development.
- 5.28 **Transport Scotland** do not object to the application, subject to conditions to: secure the proposed route for any abnormal loads on the trunk road network; accommodation measures for abnormal loads including the removal of street furniture, junction widening and traffic management and any additional signing or temporary traffic control measures deemed necessary due to the size or length of any loads being transported must be undertaken by a recognised QA traffic management consultant. Additionally, Transport Scotland included a number of advisory notes setting out requirements relating to works within the trunk road network.

# 6. DEVELOPMENT PLAN POLICY AND OTHER MATERIAL POLICY CONSIDERATIONS

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

### 7. PLANNING APPRAISAL

- 7.1 Should Ministers approve the development, it will receive deemed planning permission under Section 57(2) of the Town and Country Planning (Scotland) Act 1997 (as amended). Although not a planning application, the Council processes Section 36 applications in a similar manner given that planning permission may be deemed to be granted.
- 7.2 Schedule 9 of The Electricity Act 1989 contains considerations in relation to the impact of proposals on amenity and fisheries. These considerations mean the developer is required to:
  - have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings, and objects of architectural, historic or archaeological interest; and
  - reasonably mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.

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

# **Planning Considerations**

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

## **Development Plan / Other Planning Policy**

- 7.5 The Development Plan comprises National Planning Framework 4 (NPF4), the adopted Highland-wide Local Development Plan (HwLDP), the adopted Inner Moray Firth Local Development Plan 2 (IMFLDP2), and all statutorily adopted supplementary guidance, including the Onshore Wind Energy Supplementary Guidance (OWESG). Appendix 4 of this report provides an assessment of compliance with the Development Plan/Other Planning Policy.
- 7.6 In summary, the principle of wind farm development is established in national policy, with the proposed development being of national importance for the delivery of the national Spatial Strategy. NPF4 considers that Strategic Renewable Electricity Generation and Transmission Infrastructure will assist in the delivery of the Spatial Strategy and Spatial Priorities for the north of Scotland, and that Highland can continue to make a strong contribution toward meeting Scotland's ambition for net zero. Alongside these ambitions, the strategy for Highland aims to protect environmental assets as well as to stimulate investment in natural and engineered solutions to address climate change. This aim is not new and will clearly require a balancing exercise to be undertaken, which is reflected throughout NPF4.
- 7.7 At the regional level, HwLDP also offers support for renewable development proposals where they are located, sited and designed such as they will not be significantly detrimental overall, individually or cumulatively with other developments.

To inform this assessment, the OWESG provides a methodology for a judgement to be made on the likely impact of a development on assessed "thresholds" listed in its 10 criterion, which are designed to assist the application of HwLDP policy in judging the final balance of benefits versus disbenefits of any given scheme. Appendix 5 provides an assessment against Landscape and Visual Assessment Criteria contained within Section 4 of the Onshore Wind Energy Supplementary Guidance.

# **Energy and Economic Benefit**

- 7.8 The Council continues to respond positively to the Government's renewable energy agenda. Installed onshore wind energy developments in Highland account for around 30% of the national installed onshore wind energy capacity, with a substantial number of onshore wind farm applications pending consideration at present. While Highland has effectively met its target, as previously set out in the Highland Renewable Energy Strategy, it remains the case that there are areas of Highland capable of absorbing renewable developments without significant widespread effects.
- 7.9 Notwithstanding any impacts that this proposal may have upon the landscape resource, amenity and heritage of the area, the development could be seen to be compatible with Scottish Government policy and guidance and increase its overall contribution to the Government, UK and European energy targets, with the development having the potential to generate up to approximately 57.6MW in addition to an indicative battery storage capacity of 10MW. Based on the average electricity consumption per UK household in 2021 of 3.295 MWh/year (BEIS, 2021) and assuming generation of 199,307MWh annually, the development would generate enough power to supply approximately 60,487 average Scottish households.
- 7.10 Wind turbines provide an important mechanism for the reduction of carbon dioxide (CO2), and other greenhouse gas (GHG) emissions into the atmosphere by reducing the consumption of fossil fuel generated mains electricity. However, during their manufacture, construction and decommissioning, wind farms can result in the emissions of GHGs, particularly where natural carbon stores, such as peat, are present and potentially impacted by the development, often termed "carbon balance". The EIAR assesses the GHG emissions and uses carbon dioxide equivalent (tCO2e) where equivalence means having the same warming effect as CO2 over 100 years. Taking account of the expected total CO2 loss from the carbon calculator result, the proposed development would be expected to result in a saving of approximately 86,101 tonnes of carbon dioxide (tCO2) per annum, meaning a total of over 3 million tonnes over the 35 year operational lifetime of the proposed development, through displacement of carbon-emitting generation.
- 7.11 As a result, the anticipated carbon payback period for the development would be approximately 2 years. This is the period of time a wind farm needs to be in operation before it has, by displacing generation from fossil-fuelled power stations, avoided as much carbon dioxide as was released in its lifecycle. As recommended in current guidance estimated savings are for replacement of fossil fuel electricity generation but, while this could be the case in the short term, it is not the most probable scenario in the longer-term. The grid-mix of electricity generation represents the overall carbon emissions from the grid per unit of electricity and

includes nuclear and renewables as well as fossil fuels. Based on the grid-mix results, the proposed development is expected to result in a saving of approximately 38,542 tCO2 per annum with an expected carbon payback time of 4.5 years. This means it is expected that the development would make a positive contribution to offsetting carbon emissions after 4.5 years following the date of final commission with the proposal reported by the applicant to have an overall beneficial effect on climate change.

- 7.12 The proposed development anticipates a construction period of approximately 24 months and an operational period of 35 years. There are likely to be some adverse effects caused by construction traffic and disruption, particularly during the construction phase when abnormal loads are being delivered to site. Such projects can offer investment/opportunities to the local, Highland, and Scottish economy, including businesses ranging across the construction, haulage, electrical and service sectors.
- 7.13 The EIAR states there were no significant adverse socio-economic effects. Whilst the direct beneficial socio-economic effects are not significant in EIA terms, they would be important to the local, regional and national economy, contributing to economic recovery and sustainable economic growth.
- 7.14 The assessment of socio-economic impact by the applicant reports a negligible beneficial effect on the local economy and Council area resulting from the construction. During the development and construction phase the proposal could generate up to £10.8 million Gross Value Added (GVA) and 155 job years (a job being equivalent to one person employed for a year) in the local Highland economy, with £17.8m GVA and 260 job years in Scotland (including Highland) and £32.5m GVA and 475 job years across the UK (including Scotland).
- 7.15 During each year of the operational phase the EIAR estimates that the development could generate up to £0.4 million GVA and 5 jobs in Highland, with £1.6m GVA and 15 jobs in Scotland (including Highland) and £2.3m GVA and 25 jobs across the UK (including Scotland).
- 7.16 The applicant has estimated that the construction cost of the development is approximately £58.1 million (CAPEX). It is anticipated that up to 28% of the overall value of contracts could be realised in the Council area (up to £16 million).
- 7.17 NPF4 Policy 11 c) offers support to schemes where community socio-economic benefits are maximised, with NPF4 Policy 25 enabling support to be given to schemes which contribute towards a local or regional wealth building strategy or have an element of community ownership. With no community ownership being proposed, the proposal cannot be given any additional support under NPF4 Policy 25. A condition could however be imposed to require a Local Employment Scheme for the construction of the development which refers to the provisions set out within the socio-economic assessment contained within the EIAR.
- 7.18 Since the application has been submitted, the Council has also published the Social Value Charter for Renewables Investment in June 2024. This has been brought to the applicant's attention. Owing to the nature of this document relating to community benefit, which is voluntary in nature, the applicant's response to the charter is not

documented within this Report on Handing as community benefit is not deemed a material planning consideration. Nevertheless, the applicant's response to the charter has been requested by Planning Officers to be communicated to the Council's Community Support and Engagement Officer and the Council's Economy and Regeneration service who liaise directly with applicants on this matter.

## Design, Landscape and Visual Impacts (including on Wild Land Areas)

- 7.19 The applicant has presented a number of submissions to illustrate the landscape and visual impact of the development both singularly and cumulatively with existing and consented wind farm developments, although the cumulative information included with the submission is now out of date with Bunloinn, Cloiche, Corriegarth 2 now consented in the intervening period since submission with Tomchrasky proposed and currently pending consideration. In this regard the applicant has tabled design iterations following input from pre-planning considerations; maps highlighting the Zone of Theoretical Visibility (ZTVs) in isolation and in combination with other wind farms; 21 viewpoints across a study area of 45km; assessment against Landscape Character Areas, Special Landscape Area Citations; Descriptions of Areas of Wild Land. EIAR Volume 1 Chapter 6 Landscape and Visual Impact is supplemented by EIAR Volume 4 Technical Appendix 6.1 Landscape and Visual Assessment Methodology, Technical Appendix 6.2 Wild Land Area Assessment, Technical Appendix 6.3 Lighting Assessment and Technical Appendix 6.4 Assessment of Highland Council supplementary guidance criteria.
- 7.20 The 21 viewpoints, all within 25km from the development, are representative of a range of receptors including residents at settlements, recreational users of the outdoors and road users with photomontages and wirelines contained within the EIAR Volume 3 Chapter 6 to Highland Council and NatureScot's standards. The expected bare earth visibility of the development can be appreciated from the EIAR Volume 2 Chapter 6 Figure 6.08 Blade Tip ZTV (45km) and Figure 6.14 Hub Height ZTV (45km). Figure 6.14 Landscape Character and Figure 6.15 Landscape Designations gives an overview of the visibility within the changing landform with Figure 6.17 Principle Visual Receptors (45km) showing users and key routes within the surrounding landscape.
- 7.21 The methodology for the Landscape and Visual Impact Assessment generally follows that set out in Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3). However, it does not set a threshold for significance; instead relying solely on professional judgement to identify when the threshold of an effect is significant. As set out in para 3.32 of GLVIA 3 the "LVIA should always distinguish clearly between what are considered to be significant and nonsignificant effects". EIAR Volume 4 Technical Appendix 6.1 Landscape and Visual Assessment Methodology sets out the indicative level of effect diagrams which the applicant has used to attribute Significant effects. The applicant has applied a threshold of moderate-minor impact as the threshold for not significant effects. The applicant has applied a threshold of moderate-major impact as the threshold significant effects. Moderate impact can be either significant or not significant. The Highland Council is in agreement that moderate impact can be significant but this needs to be considered on a viewpoint by viewpoint basis using professional judgement. This has been done in Appendix 6 to this report. The applicant has considered the sensitivity of the landscape and receptor from each viewpoint between medium, medium-high

and high with reference to who the receptor is likely to be. The study area is well used by tourists, hill walkers, recreational walkers, cyclists and those partaking in various other recreational activities therefore the sensitivity of each viewpoint is considered high by Highland Council.

- 7.22 Following a review of the LVIA, sufficient information has been provided to enable an assessment. Overall the photomontages are considered to have been produced to a good standard. Whilst there is a noticeable haze to some of the photomontages provided, particularly VP1 Corrieyairack Pass, VP3 Corrieyairack Hill, VP11 Burach, VP14 Ben Tee and VP17 Meall Fuar-mhonaidh, this is potentially due to the weather conditions when the images were taken between mid to late August 2022. Regardless, the images provided are considered satisfactory and in compliance with Council's standards, therefore the case officer is satisfied to rest upon the material presented in the LVIA.
- 7.23 In the assessment of each viewpoint the applicant has come to a judgement as to whether the effect is significant or not. This is undertaken on a viewpoint by viewpoint and case by case basis. In assessing visual impacts in particular, it is important to consider that the viewpoint is representative of particular receptors i.e. people who would be at that point and experiencing that view of the landscape not just in that single view but in taking in their entire surroundings.
- 7.24 A key consideration in the effects on receptors of wind energy development is the sequential effect when travelling through and area on the local road network both by individuals who live and work in the area and tourists. Those travelling scenic routes, whether designated as such or not, have a higher sensitivity to views. While a driver of a vehicle is likely to be concentrated on the view immediately in front, passengers have a greater scope for looking at their surroundings. In addition, the wider area is regularly frequented by cyclists. As such it is considered that road users are usually high sensitivity receptors.

### Siting, Design and Layout Evolution

- 7.25 EIAR Chapter 2 Site Selection and Design Iterations describes the scheme's evolution through several design and layout iterations including for 10 turbines of 200m tip height at pre-application stage, through 10 turbines of 220m tip height at Scoping stage, with the design process following throughout 2022 and 2023 reducing the turbines to 8 at 200m as informed by further survey work and pre-application discussions with consultees. The stated reasons for the site's selection (EIAR Volume 1, Chapter 2, Section 2.2.8) include that the site benefits from a strong wind resource, proximity to commercially viable grid connection as well as the road network and existing tracks associated with Beauly Denny Overhead Line as well as the site's distance from residential properties and settlements.
- 7.26 The Chapter sets out that the design of the wind farm has followed a constraints based approach in order that mitigation on environmental effects is embedded within the design, with key constraints including landscape character and visual amenity; ground conditions, topography and peat; noise sensitive receptors; watercourses, private water supplies and related infrastructure; ornithology; and, cultural heritage features. For example, the chapter sets out that turbines are further set back from

watercourses and areas of deep peat following further peat probing.

- 7.27 It is also important that siting, layout, and design principles consider the cumulative effects arising from a proposal's relationships with other wind energy developments in its wider context given the ever increasing presence of turbines in the landscape. Wind farm design should take into account the baseline and potential future baseline conditions. In this instance, the application does not relate to any operational wind farm, being its own standalone development with some separation from existing and approved schemes, although with landscape, visual, and environmental linkages with schemes in the wider area.
- 7.28 As such, factors such as the degree to which nearby developments follow similar "development patterns" in terms of siting, layout, and design can determine the degree to which schemes sit harmoniously or discordantly together in the landscape. Therefore, similarities and differences between receiving landscapes and Landscape Character Types; the degree to which the size and scale differences between the schemes and individual components, especially turbine proportions such as relative tip and hub heights, rotor diameters, and direction of rotor spin, are experienced by receptors and what effects these have such as the enjoyment of the view qualities, amongst others, are key in the assessment of cumulative landscape and visual effects.
- 7.29 Across the immediate landscape of the study area there are several distinctive groups of wind turbines/wind farms with the Bunloinn/Beinneun/Millenium cluster and Stronelairg/Cloiche/Dell cluster either side of the proposed development to the north west and north east respectively. The applicant considers the submitted design has a degree of coherence with the pattern of wind farms within the Monadhliaths. This is disputed with the wind farm encroaching into views experienced south westward down the Great Glen, with the proposal linking planned clusers of wind farm development either side of the Glen creating perceived encirclement of wind energy development.
- 7.30 The largest operational turbines within the 45km EIAR study area are the 7 Beinneun Extension turbines at 136m to tip height to the north west of the site while the smallest are the 5 Corrimony turbines at 100m to tip height further to north west. The majority of operational turbines are between 113.5m and 125m to tip height with some at 135m. However, the approval of the much more distant Bunloinn Wind Farm will introduce 10 turbines at 200m to tip, Bhlaraidh Extension will introduce 15 turbines at 180m, Dell will introduce 14 turbines at 130.5m along with Cloiche and Corriegarth 2 Wind Farms which will introduce turbines at 149.9m to the study area. Consequently, understanding the visual effects resulting from the interaction of Culachy with various turbines sizes of these schemes is also key to the assessment.
- 7.31 It has become increasingly important to consider the context in which wind farm development is seen and cumulative effects. 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 locations, particularly surrounding peaks and recreational routes either side of Loch Ness, the additional turbines will be viewed in the context of other wind energy in the wider surrounding area with the Bunloinn/Beinneun/Millenium cluster

and Stronelairg/Cloiche/Dell cluster particularly apparent, albeit with an element of separation between these schemes and the proposed development. As such, care and attention is required regarding design, siting and location to avoid detrimental visual impacts and the creation of a "wind farm landscape". To date, previous wind farm decisions and the patter of wind farm development has purposefully maintained a greater setback from Loch Ness, with wind farms in this area being restricted to higher ground, clustered in less prominent locations.

- 7.32 The proposed development will be located within Landscape Character Type (LCT) 236 Smooth Moorland Ridges with the site access track and entrance located within LCT 221 Rolling Uplands Inverness. Both LCT 236 and LCT 221 were assessed in detail. The detailed assessment also included views from LCT 239 Interlocking Sweeping Parks Lochaber, LCT 235 Broad Forested Strath, LCT 237 Rocky Moorland Lochaber, LCT 220 Rugged Massif Inverness, LCT 225, Broad Steep-sided Glen, LCT 224 Farmed and Wooded Foothills.
- 7.33 The turbines will be wholly placed within the Monadhliath ridge and tops, Rolling Uplands, with the specific Landscape Character Area (LCA) unit, which encompasses land set back from Loch Ness extending from the A82, beyond Fort Augustus, across the Monadhliath and over the A9 on the outskirts of Inverness over a distance approximately 60km. Several operational, approved, and proposed wind farms are contained within this LCA including, from southwest to northeast, Cloiche (approved), Dell (in planning), Stronelairg (operational), Corriegarth (operational), Corriegarth 2 (approved), Dunmaglass (operational), Aberarder (operational), Farr (operational), Glen Kyllachy and Moy (operational).
- 7.34 While the siting of these wind farms within the wider LCA demonstrates that the general LCTs and specific LCA have been accepted as having capacity to host wind energy development, it is salient to the assessment that these wind farms are all located to the northeast of proposed development which would be the most southerly wind farm south of Loch Ness beyond the A82. Also salient is that these developments are noticeably on higher ground, located within upland bowl landforms where the development appears relatively contained, whereas Culachy would appear in view at a lower elevation. Additionally, since the previous refusal decision (PPA-270-2151) the Bunloinn/Beinneun/Millenium cluster to the northwest and Stronelairg/Cloiche/Dell cluster northeast have undergone further consolidation to these groups which amplifies the incongruous location of the proposed development.
- 7.35 Not only is consideration of how the siting, design of developments relate to each other and the cohesiveness of their relationship to their surroundings from fixed viewpoints important, but also how wind farms relate to each other in terms of their frequency when moving through the landscape. Such consideration includes understanding the visual separation between schemes, which is important in order to allow receptors to experience and appreciate the character of the landscape and any special natural, architectural, cultural, and historic features in between. Care and attention are therefore required regarding design, siting and location to avoid detrimental impacts. Indeed, NatureScot's Siting and Designing Wind Farms in the Landscape Guidance notes that it can be particularly challenging to accommodate multiple wind farms in an area, and so advances wind farm design objectives of limiting visual confusion and reinforcing the appropriateness of each development for

its location.

- 7.36 Key considerations in coming to a judgement on the scheme are also derived from The Loch Ness Landscape Sensitivity study contained within the Onshore Wind Energy Supplementary Guidance (OWESG). This study identifies that any remaining capacity for larger scale development should be focused around existing clusters that are generally found in rolling uplands, rugged massif and rocky moorland Landscape Character Types. However, the development should be well designed, and the turbines should be:
  - Set back from key routes (e.g The Great Glen Way, the A82 and the A887 around Dundreggan).
  - Preserve mitigation established by current schemes.
  - Maintain the landscape setting of each existing scheme.
  - Respect spacing and scale of existing development pattern.

Minimise visual confusion from higher ground to the west and north and with Meall Fuar-mhonaidh and avoid a perception of the peak being encircle by development.

- 7.37 A key consideration in the consented pattern and design of wind energy development in the area has been managing the impacts upon the popular and accessible summit of Meall Fuar-mhonaidh (VP17), particulary in south westward views where the striking V shape of the Great Glen can be fully appreciated. Officers have continually sought to minimise impacts, for instance, three turbines were deleted from the Bhlaraidh Wind Farm extension scheme to resist the substantial encroachment towards the summit.
- 7.38 Another established pattern of wind farm development in this area is for schemes to be set back and well contained from Loch Ness and routes along the Great Glen. For schemes on both sides of Loch Ness, officers have sought to avoid/minimise visibility both on the water and along the surrounding loch level routes and approaches. This aspect is considered important as Loch Ness is a world-renowned tourist attraction, which is frequented daily by both locals and tourists. The mitigation to date has largely been achieved through the refusal of select poorly sited wind farm proposals, and by securing appropriate mitigation by design, including turbine deletions and careful consideration of the scale of turbines.
- 7.39 Officers have also sought to minimise impacts from visible aviation lighting, which was also successful at Bhlaraidh Wind Farm extension despite these turbines being in excess of 150m to blade tip. Unlike other consented schemes pending determination, this development is for turbines at 200m to blade tip with a requirement for visible aviation lighting so will extend landscape and visual impacts into hours of darkness. This is considered to be important given the popularity of the wider area for overnight camping.
- 7.40 In reviewing the siting, design, and layout of the proposal, whilst there has been changes made since the previous refusal, these are to the detriment of the landscape and visual receptors in this area, with the wind farm not being sensitively sited or being of an appropriate scale, with its overall design appearing to largely have disregard to the Council OWESG and The Loch Ness Landscape Sensitivity

study which has successfully facilitated a considerable amount of onshore wind development within its study area.

# **Ancillary Infrastructure**

- 7.41 Proposals for BESS facilities included with wind farm developments are effectively given planning permission in principle through wind farm consent. As such, conditions would need to be imposed to secure details of the siting, layout, access (for maintenance and emergency service vehicles), the design of all external components including compound and structure finishes, and grid connection. Details of the fire risk management system including fire suppression, water supply, drainage including containment and segregation of expended fire suppression agent and/or water from the water environment, as well as a Fire Risk Management Plan to include an Emergency Response Plan will be required and could be secured by condition in the event the scheme is approved.
- 7.42 The design of other components require to be progressed as details of final design are not shown within the EIAR, which can be secured by condition in the event the scheme is consented. The applicant is aware of the Council's requirement for associated buildings to be designed in a manner that reflects the Highland vernacular.

## Landscape Impact

- 7.43 There are several aspects to consider in determining whether this development represents an acceptable degree of impact on landscape character, including:
  - impacts on the Landscape Character Type (LCT) as a whole and on neighbouring LCTs; and
  - direct impacts on landscape designations and impacts on surrounding landscape designations.
- 7.44 The proposed development is located within Landscape Character Area (LCA) 6 Monadhliath ridge and tops, Rolling Uplands. LCA 6 is the most extensive landscape in the Study Area. External views are mostly from elevated viewpoints north of Loch Ness where it presents a multi-layered receding landscape, giving an impression of vast extent. Views are varied in character according to elevation from within the LCA. Key views are from:
  - Loch Ness West (most of LCA is obscured by intervening LCAs and topography, but southern end sweeps down to meet the Broad, Steep Sided Glen LCA and frames the central portion of long views).
  - Great Glen from Meall Fuar-Mhonaidh (forms a sweeping receding landscape to the south).
- 7.45 LCA 6 is generally visible from either within the LCA or from more distant elevated vantage points. The height of existing schemes means that development on the ground may be visible where the ground level itself is not, making distinctions between developments unclear. Therefore, maintaining space between developments is important to prevent coalescence.

- 7.46 Generally, the LCT has a lower sensitivity, this LCA is rated at 2-3 (4 being least sensitive to change), in recognition of existing density of development. People at key viewpoints, visitors/tourists, cyclists and walkers are the visual receptors with the highest sensitivity. Key routes within LCA 6 include the B862.
- 7.47 As identified in the Loch Ness Sensitivity Appraisal, current wind farm development consists broadly of:
  - Large windfarms set 2.5km 3km back from Rolling Uplands Boundary with Farmed Straths LCAs.
  - Generally the layout is deeper in the axis perpendicular to the Great Glen than the parallel axis.
  - Tend to be contained within shallow "bowls" in the landscape which are visible from within the LCA but not in more distant views.

Earlier developments appear at a regular spacing of 7km - 10km edge to edge. More recent applications/scoping reduce this spacing.

- 7.48 Whilst there is potential for extension to existing large scale wind farms, care is needed to ensure that:
  - Mitigation established by current schemes is not undone and that the landscape setting of each scheme is maintained.
  - Skylining and coalescence is avoided with current positioning, spacing and scale of turbine respected.

Commentary on these matters are contained elsewhere in the report.

- 7.49 It is noted within the Sensitivity Appraisal that turbines should:
  - Not breach the skyline when viewed from north side of Loch Ness.
  - Be set back from Key Routes.
  - Preserve mitigation established by current schemes.
  - Maintain the landscape setting of each existing scheme.
  - Avoid coalescence with current positioning.
  - Respect spacing and scale of existing development pattern.
- 7.50 Development of turbines (all scales) in other locations within the LCA should be avoided to ensure that the scale of the landform is maintained and that perspective, when viewed across Loch Ness in particular, is not adversely affected. When viewed from across Loch Ness, particularly Meal Fuar-Monaidh and a portion of the Great Glen Way, the proposed development would represent a notable increase in the influence of wind energy in the composition of the view appearing to extend beyond existing wind farm clusters in the Monhadliath Mountains much further into the view south down the Great Glen which is currently free from wind farm development.
- 7.51 Landscape character is the distinctive and identifiable pattern of elements that occur consistently in a particular type of landscape and the way that this pattern is perceived. Effects on landscape character occur both on the site, where the pattern

of elements that characterise the landscape would be directly altered by the addition of the proposed development to the landform and outwith the site in the wider study area, where visibility of the proposed development may alter the way in which this pattern of elements is perceived.

- 7.52 The locale forms a strong contrast to the Rugged and Rocky LCTs opposite the Great Glen. The contrast has value which should be protected by ensuring that wind energy development on elevated ground either side of the Great Glen remains inferior in scale and extent to the landscape character and does not lessen their apparent distinctiveness or the effect of the Great Glen as a great natural boundary.
- 7.53 The proposed development will be located within Landscape Character Type (LCT) 236 Smooth Moorland Ridges with a section of the site access track and entrance located within LCT 221 Rolling Uplands Inverness. Whilst not noted by the applicant, the proposed access extends beyond LCT 221 Rolling Uplands Inverness into LCT 225 Broad Steep-sided Glen (as shown in EIAR Chapter 6 Figure 6.05 Landscape Designations). Both LCT 236 and LCT 221 have been assessed by the applicant. The detailed assessment also included LCT 225 Broad Steep-sided Glen with a small portion of the access located here, LCT 224 Farmed and Wooded Foothills approximately 8km to the north east of the closest proposed turbines, LCT 239 Interlocking Sweeping Parks Lochaber approximately 10km to the south west of the closest turbines, LCT 220 Rugged Massif Inverness approximately 17km to the closest proposed turbines, LCT 235 Broad Forested Strath approximately 20km to the south west of the closest proposed turbines and LCT 237 Rocky Moorland Lochaber approximately 22km to the west of the closest proposed turbine.
- 7.54 The NatureScot 2019 Landscape Character Assessment describes the key characteristics of LCT 236 Smooth Moorland Ridges as follows:
  - Gently undulating hills with smooth elongated ridge profiles, developing a more undulating landform in transitional areas with Rugged Massif -Lochaber.
  - Simple, large scale landscape pattern dictated by uniform landcover and uncomplicated landform.
  - Plateau summits generally draped in a mixture of grasses, heather and sedges, with exposed peat hags.
  - Large blocks of conifer forests along the hill sides and lower foothills.
  - Broadleaf woods on lower slopes and along loch edges, often framing crofts.
  - Scattered croft settlements with stone dykes concentrated on lower slopes, particularly along roads and south-facing slopes.
  - Roads and transmission lines following the base of the hills.
  - Smooth open slopes highly visible.
- 7.55 The western edge of the LCT overlaps with the Loch Lochy and Loch Oich SLA and WLA 19 Braeroy, Glenshirra and Creag Meagaidh. The EIAR states the large-scale landscape and the application site is dominated by simple landcover of moorland and large blocks of coniferous forestry. The Millennium/Beinneun cluster are visible to the west on the opposite side of the Great Glen. Viewpoints VP5 Carn Dearg,

VP20 Meallan Odhar and VP21 Beauly-Denny track are all located within the LCT.

- 7.56 The applicant considered LCT 236 Smooth Moorland Ridges would be subject to localised Major and Significant effects within the site and approximately 3.5km to the south west, Moderate and Significant effects approximately 5km to the south west beyond the localised area then Minor and Not Significant effects for the rest of the LCT. The cumulative effect was considered Minor and Not Significant. Whilst the Landscape Officer agrees that effects would not be significant for the whole of the LCT they consider that Significant effects would be perceived from VP13 Burach and VP14 Ben Tee which demonstrate that the extent of effect would be greater, to around 8km.
- 7.57 The Landscape Officer does not agree that the presence of existing turbines in the neighbouring LCT provides any buffering effect for the introduction of the proposed development. The contrast in siting and relationship to other landscape character areas and topographic features serves instead to highlight the degree to which the application site and development differ from the existing. Whilst they acknowledge that the BDOHL and towers bring constructed features into the area, their presence creates potential difficulty for the development in terms of conflict of contrasting forms and their differing effects on the landscape, rather than necessarily setting a useful precedent.
- 7.58 The NatureScot 2019 Landscape Character Assessment describes the key characteristics of LCT 221 Rolling Uplands Inverness as follows:
  - A series of large scale, smooth, rounded hills with summits of similar height forming broad, undulating upland plateaux containing occasional steep-sided straths.
  - Open heather moorland dominates, the uniform colour and texture accentuating the landform.
  - Straths floors contain inbye pastures, trees and small patches of woodland.
  - Conifer forests limited to the lower edges of uplands and strath sides.
  - Settlement limited to a few isolated farms in remote straths.
  - A few mainly single track roads, integrated within the landform.
  - Uninhabited interior, largely inaccessible to vehicles.
  - Archaeological evidence of settlement and farming from prehistoric times to the 19th century.
  - Striking colour and textural contrast between strath floors and moorland vegetation above.
  - Expansive views from the hill tops and plateaux create a strong sense of openness and exposure.
  - Scale and distance difficult to judge.
  - Few signs of active management in the interiors, creating a strong perception of remoteness, although this is affected by a number of large wind farm developments.

- 7.59 A small portion of the southern edge of the Loch Ness and Duntelchaig SLA overlaps with the northern edge of the LCT with part of WLA 20 Monadhliath also within the LCT. The Stronelairg, Corriegarth, Dunmaglass, Easter Aberchalder, Glen Kyllachy and Farr wind farms are within this LCT and elevated parts have views towards the Millennium/Beinneun and Bhlaraidh wind farms. Viewpoints VP1 Corrieyairack Pass, VP2 General Wade's Military Road VP3 Corrieyairack Hill, VP4 Carn a' Chuilinn and VP21 Beauly-Denny track are within this LCT.
- 7.60 The applicant considered LCT 221 Rolling Uplands Inverness would be subject to localised Moderate-Major and Significant effects within the site and approximately 4km to the north east, 2km to the north west and 3km to the south east. Beyond this area the effect was considered to be Minor and Not Significant. The cumulative effect was considered Moderate-Major and Significant within the site and approximately 4km to the north east, 2km to the north west and 3km to the south east. Beyond this area the effect was considered to be Minor and Not Significant. The cumulative effect was considered Minor and Not Significant. This has been contested by Highland Council's Landscape Office who considers the Significant effects extend beyond the locale noted by the applicant.
- 7.61 It is considered that effects are more widespread than that identified by the applicant. Being immediately adjacent to, but from many areas, readily distinguishable from LCT 221 Rolling Uplands Inverness which is heavily and relatively successfully populated with wind energy developments. Developments are characteristically at a distance of between 7.5km to 10.5km from the boundary of the LCT 225 Broad Steep Sided Glen and at elevations typically above 700m AOD. In contrast, the proposed development sits approximately 3km from the boundary with the Broad Steep Sided Glen and the turbines sit below 500m AOD. The Landscape Officer considers the juxtaposition in both the underlying landscape of the site and the relationship of the development to the Great Glen landscape means it strikes a discordant note and by virtue of its position stands out from existing wind farms in the wider area.
- 7.62 The NatureScot 2019 Landscape Character Assessment describes the key characteristics of LCT 225 Broad Steep-Sided Glen as follows:
  - A clearly defined, broad, linear, steep sided, v-shaped glen and deep loch cutting through mountains and hills, with limited areas of flatter ground.
  - Large-scale conifer forests with small areas of open moorland covering most of the glen sides, particularly the lower slopes.
  - Small patches of broad leaved woodlands, mostly in side glens and close to the shore.
  - Agricultural land on less steep slopes, glen intersections and alluvial plains.
  - A few settlements, with a well-defined core, located at glen intersections and on gentler slopes, separated by long stretches of relatively uninhabited land.
  - Contrast between the busy trunk road and larger settlements on the west side and the quiet minor road on east side which has fewer settlements separated by large undeveloped areas.
  - Strong evidence of past settlement in the number and diversity of

- archaeological and historic sites from prehistoric times to the 20th Century.
- Contrast between the visual and seasonal diversity of broadleaf woodland and bright, open pockets of farmland and the forested and moorland surroundings.
- Contrast between the smaller scale landscapes of settled, lower slopes and the largescale moorland and forested backdrop.
- A simple linear and enclosed visual composition of bands of land, water and sky, with long skylines of even height, and the glen and loch as unifying features.
- Visual focus directed along the linear route of the glen or across the water to the opposite shore and up to the skyline.
- Viewpoints VP6 Fort Augustus, Car Park Adjacent to A82, VP7 Fort Augustus near Church Road, VP11 Great Glen Way, Carn an Doire Mhoir and VP19 Alltsigh Loch Ness are all within the LCT. VP17 Meall Fuar-mhonaidh is marginally outwith the LCT by approximately 125m but along with the Great Glen Way is one of the most popular recreational routes on the north western uplands above Loch Ness and is within the Loch Ness and Duntlechaig SLA. Likewise, VP13 Burach is approximately 250m outwith the LCT and is within the Loch Ness and Duntlechaig SLA. There are existing wind farms in the wider surrounding area with Bhlaraidh to the west, Corriegarth and Dunmaglass to the east and the Millennium/Bennieun cluster to the south which can be seen from parts of this LCT including from elevated slopes and parts of the loch and loch shore where intersecting glens offer views to surrounding uplands.
- 7.64 A large portion of LCT 225 Broad Steep-Sided Glen lies within the Loch Ness and Duntelchaig SLA (the area closest to the site around Fort Augustus is not designated) and the applicant considers the value to be Medium-High. It is considered the applicant has underplayed the value which is considered High. This large-scale landscape is dominated by Loch Ness and its steep sided slopes, which as the key characteristics describe, is a "simple linear and enclosed composition" that directs visual focus "along the linear route of the glen or across the water to the opposite shore and up to the skyline". The applicant noted the presence of existing wind energy development within neighbouring landscapes which reduces susceptibility to change as wind turbines are not an entirely unfamiliar feature, however, this may also result in cumulative effects, potentially increasing the susceptibility to change. On balance, the applicant considered this LCT to have a Medium-High susceptibility to change. It is considered the applicant has understated the value which is considered High. In combining the Medium-High value with the Medium-High susceptibility the applicant considered sensitivity to be Medium-High. It is deemed the applicant has underplayed the sensitivity which should be High. The Landscape Officer agrees that for the greater part of the LCT effects would be moderate and not significant but concludes that the setting of Fort Augustus would be eroded in elevated views such as VP11 Great Glen Way, Carn an Doire Mhoir and VP13 Burach in the Rugged Massif LCT and should be regarded as locally significant.
- 7.65 The applicant noted factors that increase the magnitude of change are the addition of large-scale wind turbines to the south which add further development to the

existing spread. They consider the proposed development would appear in the upland backdrop to the views across the Great Glen and Fort Augustus bringing development to a different part of the broad upland plateau to the south. They noted factors that decrease the magnitude of change such as the proposed development appearing within a large upland landscape to the east which is of a relatively simple broad upland landscape form and is set back from the ridgelines that help define the Great Glen.

- 7.66 The applicant considered the change to key characteristics would be minimal from a large area of the LCT with significant portions having limited visibility or no visibility of the development. They noted turbines would appear set well back into the upland and away from the leading ridgeline of the Great Glen which forms the dramatic backdrop to this settlement which would not erode the setting of Fort Augustus. The Landscape Officer does not agree that the setting of Fort Augustus would not be eroded by the introduction of the proposed development and regard the degree to which turbines are "set back well in the upland" to be overstated.
- 7.67 The applicant considered the proposed development would be seen within the close context of Meall a Cholumain communications mast and BDOHL towers and would not affect views of the Great Glen. The Landscape Officer does not agree that infrastructure such as Meall a Cholumain communications mast and the BDOHL are sufficiently prominent in the landscape, or closely enough related in character as to make the introduction of large bladed wind turbines any less of an introduction of built elements of a new character. Again, whilst BDOHL and other infrastructure has previously been introduced into the landscape and it has some adverse impact, the adverse effect of the proposed development would be much greater due to the significant scale, of 200m to blade tip, and movement of the turbines.
- 7.68 The EIAR considered the magnitude of change as Medium-Low and the effect Moderate and Not Significant. It is considered the applicant has understated the effects from the LCT. The Landscape Officer agrees that for the greater part of the LCT effects would be Moderate and Not Significant but concludes that the setting of Fort Augustus would be eroded in elevated views such as VP11 on the Great Glen Way and VP13 in the Rugged Massif LCT and should be regarded as locally Significant.
- 7.69 The EIAR Cumulative Assessment noted there would be limited visibility of Bhlaraidh Extension from the LCT which tends to occur where there is no visibility of the development and they would share a similar pattern of visibility to the operational schemes in the baseline. The now consented Corriegarth 2 and Cloiche would also be seen from elevated sections of the LCT. Millennium South is referenced but has since expired. The applicant considers the magnitude of change is negligible resulting in a Minor and Not Significant cumulative effect. Whilst it is deemed the applicant has slightly understated their assessment as the magnitude of change is considered Low and Moderate-Minor but still agree the effect is Not Significant.
- 7.70 When seen from viewpoints from the Great Glen Way above the Loch, as well as from Meall Fuar-mhonaidh and other upland locations to the north west above Loch Ness, the development is prominent in views in a manner which would be a significant departure from the appearance of any existing consented development. As the LCT 236 Smooth Moorland Ridges slopes descend to the floor of the Great

Glen, without the screening benefit of the LCT 224 Farmed and Wooded Foothills which forms a ridge of low rocky hills that help separate the LCT 225 Broad Steep-sided Glen from LCT 221 Rolling Uplands - Inverness, there is an immediacy to the turbines presence in the Great Glen. From VP11 Great Glen Way, Carn an Doire Mhoir and VP17 Meall Fuar-mhonaidh the presence of the turbines affects the perception of scale of the broad, steep-sided glen and further complicates the combination of LCTs which contribute to the local landscape composition which are important to the sense of place of south Loch Ness. Seen from VP17 Meall Fuar-mhonaidh the encirclement effects detract from the setting of Loch Ness introducing a new focus which affects the pre-eminence of the loch in the view.

- 7.71 There will be significant effects on the appreciation of the entirety of the Great Glen as a landscape feature, the encirclement, as the development closes up the space between developments on each side of the glen creates a competing line in the landscape, the chains of wind energy developments on each side of the Glen seem linked, and that linkage cuts across the line of the glen, competing with it as a dynamic force in the landscape.
- 7.72 The Landscape Officer notes the potential effects on how LCTs in the area interact and how they come together to create the sense of place is possibly more significant than effects on individual LCTs. Loch Ness and the wider Great Glen have a strong sense of place, which relies on the landscape character of the Glen itself, the character of glens which meet the Great Glen and in the variety and composition of the surrounding upland landscapes. The Landscape Officer considered that this is something which the LVIA does not address.
- 7.73 The proposed development would have a detrimental effect on the appreciation of the entirety of the Great Glen as a landscape feature. The proposed development would create an encirclement effect which would reduce the space between developments on each side of the Glen creating a competing line in the landscape. The Landscape Officer notes the chains of wind energy developments on each side of the Glen appear to be linked, and that linkage cuts across the line of the glen, competing with it as a dynamic force in the landscape.
- 7.74 Whilst the Landscape Officer conceded the ZTV of the proposed development is relatively constrained for a development of this scale, there remains visibility which creates adverse effects on both the landscape character and on the sense of place in and around Loch Ness and the Great Glen. For the reasons noted above, the Landscape Officer cannot support of the proposed development.
- 7.75 LCT 239 Interlocking Sweeping Peaks, LCT 235 Broad Forested Strath, LCT 237 Rocky Moorland Lochaber, LCT 220 Rugged Massif Inverness, and LCT 224 Farmed and Wooded Foothills are all considered to have either Moderate, Moderate-Minor or Minor and Not Significant effects. The cumulative effect was considered to have either Moderate-Minor or Minor and Not Significant effects. This has not been contested by Highland Council's Landscape Officer.

### **Designated Landscapes**

7.76 The proposed development is located on Wild Land Area 19 Braeroy, Glenshirra, Creag Meagaidh which is directly affected and included in the assessment. Through

consultation with Highland Council and NatureScot it was agreed that the assessment would focus on Loch Lochy and Oich SLA (1.9km west) and Loch Ness and Duntelchaig SLA (6km north). Other designations were scoped out owing to the lack of visibility.

### **National Scenic Areas**

7.77 Starting at the national level, the proposed development has been screened out from having any significant impacts on NSAs given the separation from the site and limited visibility with the closest being Glen Affric NSA which is located approximately 20km to the north west, Ben Nevis and Glen Coe to the south west, Kintail NSA approximately 35km to the north west and Knoydart NSA approximately 35km to the north west. From the ZTV presented at (EIAR Volume 2 Figure 6.9 Landscape Planning Designations), visibility across these NSAs, as well as across all of the more distant NSA to the north east, south east and south west towards the edge of the 45km study area would be limited, despite the introduction of turbines of up to 200m in height into the landscape.

### Wild Land

- 7.78 Turning to Wild Land Areas (WLAs), it is important to note that with the introduction of NPF4 in February 2023 there has been a significant policy change brought about by NPF4 Policy 4 Natural places which states that renewable energy developments that support national targets will be supported in WLA and that buffer zones around WLAs will not be applied, so that effects of development outwith WLAs will not be a significant consideration. The vast majority of the site lies within WLA 19 Braeroy, Glenshirra, Creag Meagaidh with all proposed turbines and associated ancillary infrastructure located within the designation with only the proposed access extending beyond the WLA to the U1667 Ardachy Road to the north.
- 7.79 Along with the majority of the site being located within WLA 19 there are 6 other WLAs within the 45km study area WLA 13 Moidart, Ardgour WLA 14 Rannoch, Nevis, Mamores, Alder, WLA 18 Kinlochhourn, Knoydart, Morar, WLA 20 Monadhliath, WLA 24 Central Highlands and WLA 26 Coulin and Ledgowan Forest (as shown on EIAR Volume 2 Figure 6.9 Landscape Planning Designations). EIAR Volume 2 Figure 6.9 Landscape Planning Designations shows the ZTV from the proposed development in these WLAs. The applicant has provided a Wild Land Impact Assessment (EIAR Volume 4 Technical Appendix 6.2) which considers there is potential for Significant effects at WLA 19 and has included a detailed assessment. The applicant considers there are no Significant effects in the remaining WLAs. NatureScot has not contested this assessment.

## Bareroy, Glenshirra, Creag Meagaidh - WLA 19

- 7.80 All the proposed development except the northern access will be within WLA 19 Braeroy, Glenshirra, Creag Meagaidh which extends to around 17km to the south east and south west from the closest turbines. The development would also be theoretically visible from a number of WLAs.
- 7.81 VP20 Meallan Odhar and VP21 Beauly-Denny track are located within the WLA with close proximity north eastern and south views of the proposed development at a

distance of 0.72km and 0.92km from the nearest proposed turbine respectively. Additionally, VP1 Corrieyairack Pass and VP2 General Wade's Military Road are marginally outwith the WLA but will also have views from close range north west and south at a distance of 1.28km and 1.74km from nearest proposed turbine respectively. VP3 Corrieyairack Hill looking west is located 3.75km from the nearest proposed turbine, VP4 - Carn a' Chuilinn looking south west is located 4.48km from nearest proposed turbine and VP5 - Carn Dearg looking north east is 5.42km from nearest proposed turbine.

- 7.82 Whilst it is considered the applicant has understated some elements of their assessment of these viewpoints there is general agreement with the applicant's conclusions that there will be no significant effects from the proposed development, both in isolation and cumulatively with other wind energy developments.
- 7.83 NatureScot published descriptions for each of the 42 WLAs across Scotland in January 2017. These descriptors set out Wild Land Qualities (WLQs) for each of the WLA's. WLQs are the result of a particular combination of wild land attributes and responses and how they influence an experience. For WLA 19 the WLQs are as follows:
  - Quality 1 Rounded hills and plateaux that are awe-inspiring in their massive scale and simplicity, whilst geological features and rivers contribute strongly to the sense of naturalness.
  - Quality 2 A strong contrast of experience between the hills and plateaux with the straths, glens and corries, varying in their accessibility, exposure and visibility of human elements.
  - Quality 3 A hidden interior that is simple in landform and land cover, contributing to a perceived "emptiness" and a strong sense of remoteness and sanctuary.
  - Quality 4 Access and recreation focused around the margins, with an interior that is visited by few and possesses a sense of solitude, physical challenge and risk.
  - Quality 5 Long, remote glens that penetrate far into the hills and plateaux: some arresting by virtue of their narrowness and steep side-slopes, and some because of their openness against a surrounding backcloth of towering mountains.
- The study area identified in the wild land assessment includes the plateau in the northern part of WLA 19 and its containing hills Poll Gormack, Meallan Odhar and Glas Carn, extending south to Carn Dearg where the ZTV indicates visibility. NatureScot consider the northern part of the study area to be defined as the area within the immediate context of the proposed development turbines, following the north eastern and north western boundary of the WLA from Blackburn of Corrieyairack and extending to approximately 3.5km to the south west defined by the hills of Meallan Odhar, Glas Charn and Leac nan Uan. NatureScot deem the southern extent of the study area to include Carn Dearg and consider this area a part of the WLA interior. The applicant's assessment concludes that there would be significant effects on WLQ 2 with these effects localised to the northern part of the study area. The assessment finds the baseline of existing development to strongly

influence the sense of wildness in the northern part of the WLA. The wildness attributes and perceptual responses are found to be expressed to moderate and low degrees across the study area, and therefore the sensitivity of WLQ 2 to the proposed development is considered to be medium-low.

7.85 The experience of the bowl-like plateau that defines the northern part of the study area and Carn Dearg which marks the southern extent contrast greatly. The boundary of the WLA is well defined from plateau by the BDOHL, and outward views are limited. Carn Dearg (834m AOD) lies in the interior of WLA 19 offering extensive and awe-inspiring views over neighbouring WLAs. Across the study area WLQ 2 is most strongly expressed on Carn Dearg as described:

"Upon the tops, where the adjacent straths, glens and corries are screened by the landform, an open platform offers views over an awe-inspiring succession of elevated hill horizons that extend far into the distance. These views include mountains and ridges within other wild land areas such as the Monadhliath WLA (20) to the north east, the Cairngorms WLA (15) to the east and the Rannoch, Nevis, Mamores and Alder WLA (14) to the south west. Furthermore, the sense of remoteness upon the tops is often heightened because human artefacts and contemporary land use (including access routes) located within adjacent glens and straths are screened by the intervening landform."

- 7.86 NatureScot agree the sense of remoteness and naturalness have been eroded by the BDOHL and associated track across the moorland plateau noting that the wild land qualities, including WLQ 2, are not expressed to a high degree in this area as a result of the BDOHL. NatureScot consider WLQ 2 is best expressed and is of higher sensitivity to the proposal in the southern part of the study area (as illustrated in VP5 Carn Dearg). Whilst they do not consider WLQ 2 to be as strongly expressed across the plateau in the northern part of the study area as described, the attributes of remoteness and the sense of sanctuary and solitude which underpin this quality, continue to be expressed to a moderate degree. They agree with the conclusions of the applicant's assessment that the development would intensify the influence of energy infrastructure in the northern part of the study area. The assessment finds the effects on WLQ 2 to be moderate and significant and would be contained to the northern part of the study area. NatureScot are in agreement that the proposal would diminish the attribute a sense of remoteness expressed in the area and concur that the effects on WLA 19 outwith the study area would not be significant. Additionally, they agree that the proposed development would not result in significant cumulative effects on WLA 19.
- 7.87 Outside the WLA existing wind farms appear on hills to the north and west though their influence is limited given their distance (above 13km) and height (under 200m) and lack of visible lighting. The BDOHL does not appear as a prominent feature when viewed from elevated hills where it is backclothed at distances upwards of approximately 4km (VP3 Corrieyairack Hill located 3.75km from nearest proposed turbine, VP4 Carn a' Chuilinn located 4.48km from nearest proposed turbine and VP5 Carn Dearg located 5.43km from the nearest proposed turbine). As such, NatureScot consider the BDOHL and existing wind farms have a limited influence on the sense of remoteness and the sense of awe experienced from Carn Dearg and WLQ 2 remains well expressed.

- NatureScot consider the proposed development would appear backclothed by the hills when viewed from Carn Dearg. Their proximity, solidity, colour and height mean turbines would appear prominent in views towards WLA 20 Monadhliath diminishing the perception of the expansive wild land area whilst reducing the sense of awe. The development would intensify the influence of energy infrastructure in the interior of the WLA, eroding the sense of remoteness. NatureScot regard the magnitude of change in this part of the study area as greater than that identified by the applicant and greater than in the northern part of the study area due to the heightened susceptibility of this quality to the proposal. As such, NatureScot consider the development would result in Significant adverse effects on WLQ 2, a strong contrast of experience between the hills and plateaux with the straths, glens and corries, varying in their accessibility, exposure and visibility of human elements. However, it takes the view that these impacts would be limited in their extent to the summit of Carn Dearg.
- 7.89 In terms of aviation lighting, 4 of the 8 turbines would be fitted with visible aviation lighting. The Assessment of the Proposed Aviation Lighting Scheme (EIAR Volume 4 Chapter 6 Appendix 6.3) in its consideration from VP21 Beauly-Denny track 0.92km from the nearest proposed turbine beyond the site boundary to the north west, which represents hours of darkness views from the northern edge of WLA 19, states:
  - "The Proposed Development lights would be seen as an introduction of lights to a part of the upland horizon where none are currently seen, with no existing lighting present in any other direction of view."
- 7.90 As such, the assessment finds Significant visual effects from VP21 as a result of turbine lighting. Though effects of lighting have not been assessed from VP5 Carn Dearg, in the WLA interior, the photomontage report indicates visibility of turbine hubs T1, T7 and T8. The introduction of new bright red lights would contribute to the erosion of the sense of remoteness across the study area. However, NatureScot is content that the applicant has explored available forms of lighting mitigation (as set out in EIAR Volume 1 Chapter 14 Aviation Lighting) and that the effects on the wild land qualities would not be significant.
- 7.91 Overall, NatureScot agree with the applicant that the proposed development would result in some Significant adverse effects on WLQ 2 of WLA 19. Similarly, like the applicant, it considers these effects to be limited in their extent with the impacts limited to the summit of Carn Dearg. Whilst NatureScot disagree where the effects of the proposed turbines may be greatest, it does concede the effects will be limited to the WLA study area.
- 7.92 NatureScot's approach to advising on wind farm applications is to generally focus upon impacts on Scotland's landscapes that could potentially raise issues of national interest. Whilst the comments are noted regarding the impacts on landscape this should not be interpreted as meaning there are no other significant effects that need to be considered when determining the application. As noted elsewhere within the report, it is considered there are Significant visual impacts from within WLA 19 and other locations within the study area as outlined within the report and summarised in Appendix 5 Assessment against Landscape and Visual Assessment Criteria and Appendix 6 Visual Assessment Appraisal.

# **Designated Landscapes - Special Landscape Areas (SLAs)**

7.93 The Landscape and Visual Impact Assessment in Chapter 6 of the EIAR gives an overview of the impacts and effects of the proposed development on landscape designations within the study area. The applicant considered there would be no significant effects to the Loch Lochy and Loch Oich SLA and Loch Ness and Duntelchaig SLA. Highland Council's Landscape Officer does not contest that the effects on Loch Lochy and Loch Oich SLA are considered Not Significant. However, they consider there will be impacts on the Loch Ness and Duntelchaig SLA beyond the limited areas identified by the applicant.

# **Loch Ness and Duntelchaig SLA**

- 7.94 The Council has designated Loch Ness and Duntelchaig as an SLA. The Assessment of Highland Special Landscape Areas (2011) identifies the Special Qualities of the SLA as the dramatic Great Glen, contrasting intimate plateau and historic landscape with further detailed summary provided on each of these aspects.
- 7.95 Noted for its ever changing compositions, this area is dominated by the vast linear feature of Loch Ness and its dramatic landform trench, flanked by steep, towering wooded slopes that lead to undulating moorland ridges and a contrasting remote interior plateau of upland lochs, small woods and rocky knolls. The SLA is particularly sensitive to additional large features upon the side slopes or ridge lines of the glen. This is because these may contrast with the distinct linear form of the glen, the characteristic concentration of built elements along the shore or over flatter adjacent areas, interrupt the sequential experience travelling along the glen, affect the perception of its scale, and change the open nature of views passing between the shore and the surrounding slopes. Both sides of Loch Ness are sensitive to the introduction of built development which would intrude on views up and down the loch and also across the loch. Combinations of developments which would result in a series of linear or point features may distract from the sequential experience when travelling along the loch. The addition of some developments may introduce levels of activity which would disturb the tranquillity experienced during still weather conditions.
- 7.96 The nearest proposed turbine is approximately 5.6km from the edge of the SLA boundary. The ZTV shows visibility within the south western portion of the SLA from sections of the A82 adjacent to the shoreline, Great Glen Way above Loch Ness represented by VP11 Great Glen Way, Carn an Doire Mhoir and other upland locations at higher elevation such as VP13 Burach and VP17 Meall Fuar-mhonaidh. The proposed development creates a line of features which cuts across the glen, rather than running in parallel on opposing sides of the glen. This would reduce the appreciation of the westward extent of the glen and diminish its character as the dominant dynamic feature of the landscape.
- 7.97 Many receptors that experience the special qualities of the SLA are those using the area for recreation, including tourists, particularly along the upland landscapes above both the east and west shore including the South Loch Ness trail, Great Glen Way and Meall Fuar-mhonaidh. A key visual characteristic of the SLA are long vistas of grand proportions. The striking, linear landform of the loch creates a dramatic

sequence of landscape elements along its length. The water's surface combines with adjacent steep slopes to create a simple and distinctive profile of contrasting planes and edges. The skyline is generally horizontal; however, there are occasional features such as hill peaks, pylons, telecommunications mast and views of wind turbines.

- 7.98 Meall Fuar-mhonaidh is regarded as a "Key Location" in the Council's OSWEG. The proposed development would contribute to a perception of Meall Fuar-mhonaidh being encircled by development. There are numerous developments that are visible or prominent in the landscape from the summit of the hill, but the proposed development adds considerably to the degree to which those developments appear to encircle the loch.
- 7.99 Whilst it is important to recognise that the proposed development sits outwith the SLA, many receptors that experience the special qualities of the SLA are those who use the area for recreation. The visual impact on these receptors from upland locations, represented by VP17 Meall Fuar-mohnaidh, would likely be adversely affected as a result of this development. Whilst the proposed development would be experienced within the context of existing turbines the scheme would represent a notable increase in the influence of wind energy in the composition of the view when looking across Loch Ness and down the Great Glen. The additional turbines are prominently located between existing clustered turbine arrays extending into an area of respite free from wind energy development. Overall, this increases the sense of turbines spreading further along the horizon south east of the Loch Ness.
- 7.100 From viewpoints VP11 Great Glen Way, Carn an Doire Mhoir, VP13 Burach and VP17 Meall Fuar-mhonaidh, whilst spread out over an area of approximately 11km above Loch Ness, they share a similar south viewing angle towards the development. It is considered receptors at all 3 viewpoints noted above within the SLA would experience Significant effects. From the upland locations to the north west of Loch Ness the proposed development will have a detrimental impact upon the central feature of the SLA and the striking view of the Great Glen. From these viewpoints turbines appear at a much lower elevation in comparison to surrounding wind farms and closer to the Loch. Whilst there are several other wind farms visible from these summits, this is a discernible difference. The development would also remove an area of respite between wind farms in the view.
- 7.101 The proposed development will have a detrimental effect on the appreciation of the entirety of the Great Glen as a landscape feature given the encirclement around the south eastern portion of Loch Ness. The proposed development further reduces space and areas of respite between developments on each side of the glen.

# Loch Lochy and Loch Oich SLA

- 7.102 The Council has designated Loch Lochy and Loch Oich as an SLA noted for classic Highland scenery of scale, striking linearity of the Great Glen with long narrow lochs and distinctive mountain-top views which are considered to create "intimate drama".
- 7.103 The nearest proposed turbine is approximately 2.7km from the edge of the SLA boundary. The ZTV shows visibility within the central portion of the SLA restricted to upland locations at higher elevation above the Great Glen Way between South

Laggan Forest and Glengarry Forest, represented by VP14 Ben Tee. The summit provides hillwalkers with long panoramic and elevated views along the Great Glen taking in the sequential folds of upland hills, glens and ridges on the southern side of the Great Glen.

- 7.104 Receptors at the viewpoint noted above within the SLA would experience Significant effects. The proposed development will result in the addition of wind turbines in the upland landscape on the south eastern edge of Loch Ness and bring the influence of turbines nearer to receptors from this Corbett summit. The juxtaposition of existing clustered groups of turbines in the distance to the north east behind the proposed development emphasises the effect of turbines appearing to be flowing across the landscape closer to upland locations within the SLA.
- 7.105 The applicant considers the "intimate drama" special quality noted is experienced from the glen floor of the Great Glen and is largely unaffected by the proposed development from views within this SLA. Whilst this point is generally agreed, the scale, striking linearity, long narrow lochs special quality and classic Highland scenery and distinctive mountain-top views special quality will be detrimentally impacted from this summit location within the SLA.
- 7.106 Again, whilst it is important to recognise that the proposed development sits outwith the SLA, many receptors that experience the special qualities of the SLA are those who use the area for recreation. Whilst the proposed development would be experienced within the context of existing turbines the scheme would represent a notable increase in the influence of wind energy in the composition of the view when looking to the north east with the southern shores of Loch Ness off centre from the outlook. The additional turbines are projecting further across the landscape some distance from the contained turbines of Stronelairg, Corriegarth and Dunnmaglas in the background.
- 7.107 In summary, in assessing the acceptability or otherwise of the development's impact on the SLAs, NPF4 Policy 4d explains that where such impacts occur, proposals will only be supported where any such significant adverse effects are clearly outweighed by social, environmental or economic benefits of at least local importance. The SLA and the landscape composition impacts of the proposal do not weigh in favour of development, but the severity and acceptability of these must be carefully considered in the round and are just some, albeit important, key determining factors for this application.

## **Visual Impact**

7.108 The Council considers visual impact using the criterion set out in Section 4 of the OWESG, with assessment against the criterion and view as to whether the threshold set out in the guidance is met or not, is contained in Appendix 5 to this report. Unsurprisingly, as visual impact assessment combines objective and subjective aspects through the application of professional judgement, there are differences between the applicant's assessment and the appraisal undertaken. It should be noted that 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.

- 7.109 In relation the OWESG criterion, the case officer considers that the proposed development scores poorly, with none of the 10 criteria being met. Even allowing for subjective judgement it is considered the applicant has understated the detrimental impacts of the proposed development. The OWESG criterion is a useful tool to inform wind farm design and to generally guide development to appropriate places. The OWESG criterion are not however absolute policy requirements, with these reflecting the time of the OWESG's publication which pre-dates NPF4.
- 7.110 The applicant's assessment draws upon the supportive elements of how the proposal could be viewed within the landscape. For significant turbines at 200m to blade tip visibility is relatively well contained with the proposed development mostly hidden from views to the north east, east, south east and south. The ZTV however demonstrates that the scheme will be extensively visible out to approximately 4km to the north east, east and south with a pocket of visibility between 4km and 5.5km to the south west in the immediate surrounding area beyond the site. Visibility is heavily confined given the steep sided slopes of the Great Glen and its associated ridgeline along with the surrounding landform limiting views north east, east, south east and south. Beyond this distance there is significant visibility to the north west between 5km and 15km roughly following the A82 along the shoreline of Loch Ness, Great Glen Way overhead and upland locations beyond. Pockets of visibility are dispersed beyond 15km across summits and upland areas to the south west, west and north west.
- 7.111 When considering the additional visibility of turbines beyond that experienced as a result of the consented and operational wind farms in the study area the proposed development will introduce some new areas of visibility where turbines are not currently theoretically visible. Areas of new wind farm visibility are within the immediate 5km surrounding the site, South Laggan Forest adjacent to the Great Glen Way over a stretch between approximately 10km and 20km to the south west, section of the A82 when entering Fort Augustus approximately 11km to the north east extending into the northern portion of the settlement and the very northern shores of Loch Ness at Tor Point, Aldourie Castle and a stretch of the A82 from approximately Lochend to Balchraggan between 35km and 45km on the fringes of the study area. Where the development will be experienced in combination with the operational development, while not adding new areas of visibility, it will increase the intensity of turbines visibility.
- 7.112 Whilst the proposed development will introduce additional visibility of turbines seen in isolation it will also be seen in conjunction with existing wind farms over a larger range generally to the east, north east, north, north west and west. The proposed development would extend the theoretical visibility of turbines beyond that already experienced as a result of the operational/consented wind farms in the area.
- 7.113 These effects are largely experienced by receptors accessing surrounding hills and trails, however, they will also be experienced by receptors using local transport networks such as the A87, accessing lower level routes such as the A82 and B862 or visiting the local tourist attractions such as Meall Fuar-mhonaidh.
- 7.114 The EIAR includes a visual impact assessment from all but 1 of the 21 viewpoints, with most viewpoints considered by the applicant to be used by receptors between

Medium and High sensitivity and susceptibility to wind energy development. VP19 Alltsigh Loch Ness looking south east across Loch Ness contains no further analysis from the applicant as the design mitigation process removed visibility of turbines from the lower areas of the Glen including from this location. What follows is a summation of the visual impacts grouped by receptors. Consideration of each viewpoint based on the applicant's methodology is contained within Appendix 6 of this report.

7.115 Whilst a large scale wind energy scheme would be expected to result in significant visual impact effects, the Council, through the OWESG, also acknowledges that significant effects does not automatically translate to unacceptable effects. Following a review of the applicant's LVIA, there are differences between the assessment of officers and that of the applicant.

# Impact on Recreational Users of the Outdoors

- 7.116 Owing to the site location, the majority of selected viewpoints, 16 from 21, are representative of views obtained from recreational users of the outdoors.
- 7.117 From the applicant's assessment the 7 significant effects identified are located at close proximity to the proposed development within 5.5km from the closest turbines. These are geographically spread to Corbett summits to the east, north east and south west (Corrieyairack Hill, Carn a' Chuilinn and Carn Dearg respectively) and Corrieyairack Pass/General Wade's Military Road to the south east and north.
- 7.118 The visual receptors for the development have been assessed by the applicant (EIAR Volume 1, Chapter 6 Landscape and Visual Impact Assessment, 6.11 Residual Effects Assessment and Table 6.12 Summary of Effects). The applicant has identified Significant effects on receptors at viewpoints VP1 Corrieyairack Pass, VP2 General Wade's Military Road, VP3 Corrieyairack Hill, VP4 Carn a' Chuilinn, VP5 Carn Dearg, VP20 Meallan Odhar and VP21 Beauly-Denny track. There is agreement with this assessment as it relates to these viewpoints.
- 7.119 The remaining viewpoints outwith have been assessed by the applicant and considered Not Significant. Having undertaken an appraisal of the applicant's assessment using the same methodology, there are unreported adverse significant visual effects on receptors at viewpoints VP11 Great Glen Way, Carn an Doire Mhoir, VP13 Burach, VP14 Ben Tee, VP16 A87, Loch Garry and VP17 Meall Fuarmhonaidh. A summary of the applicant's assessment and officer appraisal of this assessment, which highlights the differences and any concerns with regard to visual impact, can be found in Appendix 6.
- 7.120 The methodology outlining how the applicant has come to their findings in Appendix 6 is included (EIAR Volume 4 Chapter 6 LVIA Methodology). Section 5.3 Assessment of Visual Effects considers various elements in coming to a judgement on the visual effect of the proposed development. The sensitivity of receptors is influenced by the value of the view and susceptibility to change leading to a sensitivity rating. It is considered the applicant has understated the sensitivity of receptors given that walkers, tourists and recreational users of the outdoors, including passengers in vehicles and cyclists, attention and interest is on their surroundings. The applicant has considered the sensitivity of receptors as High from

close proximity views from the historic Corrieyairack Pass/General Wade's Military Road, residential and road users within Fort Augustus, An Suidhe viewpoint, Great Glen Way and Meall Fuar-mhonaidh within the SLA. Whilst this is agreed the applicant has classed surrounding Corbett summits as Medium-High or Medium and A82, B862, A87 key routes as Medium-High. Given the location of these viewpoints within this part of Highland it is considered that all the receptors are High.

- 7.121 The magnitude of change on views is an expression of the change that would result from the proposed development influenced by the size or scale of change, geographical extent, leading to a magnitude of change rating. Again, it is considered that the applicant has understated the effects on receptors from the majority of viewpoints given the significant change brought about by the 8 additional turbines within the landscape.
- 7.122 In considering contested effects at VP11 Great Glen Way, Carn an Doire Mhoir and VP17 Meall Fuar-mhonaidh, located above Loch Ness and within the Loch Ness and Duntlechaig SLA, receptors will be a mixture of hill walker, recreational walkers, tourists along with Highland based residents making using of the easily accessible viewpoints and walking routes. The locations are noted as a "Key Route" and "Key View" respectively within the OSWESG. As such, there is agreement that the sensitivity of receptors is High.
- 7.123 Meall Fuar-mhonaidh in particular, is one example of a distinct hill peak nearly 700m high that stands out as a landmark clearly visible from both ends of the loch. Meall Fuar-mhonaidh is a good vantage point from which to appreciate the massive scale and alignment of the Great Glen fault within a backcloth of the Monadhliath massif to the south and the Balmacann and Affric mountain interior to the north west, with both areas possessing wildness qualities.
- 7.124 The proposed development will result in the addition of wind turbines in the iconic upland landscape that lies beyond and to the south of the Great Glen and the southern edges of Loch Ness. Whilst not immediately behind the view of Fort Augustus, the proposed development would appear in the same part of the panorama as this key focus of the view creating an additional emphasis on the upland beyond. From VP11 Great Glen Way, Carn an Doire Mhoir the proposed turbines would appear close to the horizon as a linear array, with the blades of T1, T2, T3, T4, T5 and T6 breaking the skyline. T2 and T8 of the array appear as outliers. From VP17 Meall Fuar-mhonaidh, whilst turbines appear as a linear array backlothed by the landform T8 appears as an outlier slightly disconnected from the rest of the group.
- 7.125 The applicant considered this magnitude of change as low and the effect not significant. However, the introduction of the proposed development would, when seen from this summit, tend to extend the line of visible development to the south east of Loch Ness and curve it round to link visually to developments to the north west in addition to creating an effect of encircling Meall Fual-mhonaidh. As such, it is considered the magnitude of change is Medium-High with a Major and Significant effect.
- 7.126 Whilst it is agreed the proposed turbines would not be dominant features in the view, they add to a sense of increasing the presence of wind energy development

extending the horizontal spread of turbines further into the view south towards the Great Glen which has up until now been safeguarded from development. The proposal has a resultant Significant and detrimental effect upon the central feature of the Loch Ness and Duntelchaig SLA and the striking view of the Great Glen. Given the consolidation of existing wind farm clusters over the years in the wider surrounding area, as opposed to any expansion closer to the steep sided slopes of the Great Glen, the proposed development appears incongruous due to a lack of relationship to these existing developments and the established pattern of development.

- 7.127 It is considered receptors will experience Significant effects from VP13 Burach and VP14 Ben Tee which are representative of some of the detrimental visual impacts experienced from surrounding Corbett summits. These examples are located approximately 12.5km to the north of the site and approximately 13.5km to the south west. The summit of Bruach (607m AOD) is within the Loch Ness and Duntlechaig SLA which increases its sensitivity. The applicant deems the sensitivity of hill walkers looking out from the summit as Medium-High. This is disputed and is considered High.
- 7.128 The view south towards the proposed development is across the southern end of Loch Ness, Fort Augustus and the Caledonian Canal with Loch Lochy visible in the distance. Glen Tarff and the Culachy Estate are visible in the southern portion of the Great Glen. The site can be seen on a more elevated upland landform beyond the leading ridge above Glen Tarff. The broad upland moorland of the site and surrounding area can be seen between successive ridges that gradually increase in elevation towards the Monadhliath Mountains beyond. Towers and overhead lines of the BDOHL are seen from this location. Meall a Cholumain is visible close to the site. Operational wind farms visible in the view include Stronelairg, Corriegarth, Dunmaglass Estate, Farr, Bhlaraidh, Beinneun and the Millennium/Beinnuen cluster.
- 7.129 All the proposed turbines would be visible showing as blades, hubs and towers in view. Access tracks and hardstandings would be visible but are less perceptible given the distance from the viewpoint. Once again, the proposed development will result in the addition of wind turbines in the iconic upland landscape that lies beyond and to the south of the Great Glen and the southern edges of Loch Ness. Whilst not immediately behind the view of Fort Augustus, the proposed development would appear in the same part of the panorama as this key focus of the view creating an additional emphasis on the upland beyond. Turbines appear as a linear array backlothed by the landform in the background. Turbines T2 and T8 appear as outliers on either side of the proposed development disconnected from the rest of the group. T2 has the effect of extending the horizontal spread of the development further into the Great Glen slopes and will have a detrimental impact on the view down the renowned Great Glen. Additionally, there are stacking effects from T1 and T4.
- 7.130 The applicant considered the magnitude of change was Medium-Low and the effect Moderate and Not Significant. Along with the encirclement effect noted there will be detrimental impact on the setting of Fort Augustus with turbines seen to be sweeping across the landscape. The magnitude of change is considered Medium-High and the effect is Major and Significant.

- 7.131 In terms of Ben Tee (901m AOD), the view north east from the summit towards the proposed development is across Laggan beyond the southern shores of Loch Ness providing hillwalkers with long panoramic and elevated views along the Great Glen. The hilltop is located on the fringes of Loch Lochy and Loch Oich SLA. The applicant deems the sensitivity of hill walkers looking out from the summit as Medium-High. This is disputed and is considered High.
- 7.132 This viewpoint is located on the summit of Ben Tee (901m AOD) with long panoramic and elevated views along the Great Glen due to its elevation and conical form. Views to the south and west are across the spectacular mountain ranges and deep straths and glens of the central highlands. Views towards the proposed development to the north east take in the sequential folds of upland hills, glens and ridges on the southern side of the Great Glen render a large scale upland landscape. The Corrieyairack Pass is apparent in amongst this landform configuration along with a distant view of the BDOHL. The Millenium/Benneun cluster is seen in the mid distance to the north with Corrimorry, Bhlaraidh, Farr, Dunmaglass, Corriegarth and Stronelairg.
- 7.133 All the proposed turbines would be visible with 7 showing as blades, hubs and towers to varying degrees and 1 turbine showing as blades and hubs only. Access tracks and hardstandings would be visible for 2 turbines but are less perceptible given the distance from the viewpoint.
- 7.134 The proposed development will result in the addition of wind turbines in the upland landscape on the south eastern edge of Loch Ness and bring the influence of turbines nearer to WLA 19 and to the viewer from the Corbett summit. Whilst turbines appear as a linear array backlothed by the upland landform in the background the juxtaposition of existing clustered groups of turbines in the distance to the north east behind the proposed development emphasises the effect. Turbines appear to be flowing across the landscape closer to Ben Tee with the grouping appearing incongruous. Additionally, there are stacking effects from T2 and T6 and T3 and T4 which would draw the eye. This panorama south east of Loch Ness is currently free from wind energy development and the proposed development would increase the spread of wind turbines into an area that has previously been safeguarded from turbines.
- 7.135 The applicant considered this magnitude of change as Medium-Low and the effect Moderate and Not Significant. As above, this is disputed for the reasons noted, the magnitude of change is considered Medium-High and the effect is Major and Significant.
- 7.136 Along with the Great Glen Way and surrounding Corbetts the Corrieyairack Pass and General Wade's Military Road are regarded as a key recreational route which would have visibility of the proposed wind farm for a sustained period of approximately 8km. Whilst the applicant does concede that there will be significant effects it is considered they have been understated and are more wide ranging given the unique track.
- 7.137 The visual impact from the Corrieyairack Pass is demonstrated by the visualisations VP1 Corrieyairack Pass, VP2 General Wade's Military Road and VP3 Corrieyairack

- Hill. The Corrieyairack Pass, originally built as a military road by General Wade, leads across the Monadhliath Mountains from Laggan in Badenoch to Fort Augustus. This linear walk climbs to a height of over 770m through remote terrain and is also popular with mountain bikers and walkers along with an annual duathlon (Corrieyairack Challenge).
- There are close proximity views of the proposed development from General Wades Military Road and Correiyairack Pass which would be adversely affected by the proposal. VP1 - Corrievairack Pass, VP2 - General Wade's Military Road and VP3 -Corrieyairack Hill show a large proportion of the turbines visible in the foreground of the landscape along with access tracks and hardstanding. This will have the effect of drawing the eye and will be viewed through the Beauly Denny line in the foreground. The scale of the landscape, the perception of being on the single route passing through it and the perceived uniqueness and antiquity of the Corrieyairack Pass as a route, give it a remarkable sense of place that is hard to quantify through the LVIA analysis. The relationship of the Corrievairack Pass and the wider landscape is not only about built heritage and setting but also a matter of history. This background provides a greater sense of place to many and has an important effect on the experience of walking the Corrieyairack Pass route or other forms of recreation. For receptors the turbines will tend to dominate the view, even with the close proximity of the BDOHL. For receptors travelling along the route the turbines will tend to dominate the view and give the impression that one is moving into a windfarm landscape.
- 7.139 Whilst it is considered that the proposed development will have a detrimental visual impact it is not considered that the location of the turbines will adversely affect the setting of the heritage assets noted. Neither Highland Council's Historic Environment Team nor Historic Environment Scotland object to the proposed development. However, given the close proximity of turbines to the Corrieyairack Pass both raised concerns regarding the proposed development. Historic Environment Scotland requested that T8 either be relocated or removed as it detrimentally impacts the setting of one of the scheduled monuments that form part of the Corrieyairack Pass (military road, watershed to Allt Lagan a'Bhainne (SM6140). The Historic Environment Team requested that both T1 and T8 either be relocated or removed given the detrimental impacts.
- 7.140 In their assessment, the applicant makes reference to existing large scale man-made structures within these views and the wider landscape which decrease the magnitude of change from various viewpoints considered. Whilst BDOHL and its associated towers and other ancillary infrastructure have previously been introduced into the otherwise remote landscape and it has an adverse effect on the amenity to a certain extent, the adverse effect of the proposed development would be much greater due to the significant scale and movement of the turbines.
- 7.141 Other key recreational routes to the south of Loch Ness including the National Cycle Route, the South Loch Ness Trail from Fort Augustus to Foyers. Views will be relatively brief and fleeting with fewer turbines in view when travelling in south westerly direction and it is agreed that effects will not be significant.

## **Impact on Road Users**

- 7.142 The impact on road users been assessed from the A82 (VP1 A82 North of Fort Augustus), B862 (VP12 B862 An Suidhe Car Park) and A87 (VP16 A87, Loch Garry) with the A87 being the subject of further route analysis with the provision of sequential assessment including photography and wirelines at regular intervals (Figures 6.47a-j). Whilst it is agreed the impact on the A82 and B862 is Not Significant the impact on road users along a section of the A87 is considered Significant.
- 7.143 The views from these routes would be experienced transiently by road users, mainly drivers and passengers along with cyclists, who would view the proposed development as part of the changing sequence of views encountered from the road. Each of these routes were driven in both directions by case officer in order to assess the potential effects.
- 7.144 The transition into the Great Glen is important. The A87, A82 and B862 roads along with the Great Glen Way are noted as "Key Routes" in Highland Council's OSWESG and are affected to varying degrees by the proposed development.
- 7.145 Given the site location and topography the proposed turbines are relatively well screened from both the A82 and B862. From the A82 when travelling south west from the outskirts of Invermoriston to Easter Portclair there will be sporadic visibility over approximately 2km where between 1 and 2 blade tips are theoretically visible as demonstrated by the ZTV. Beyond Portclair, more sustained visibility over approximately 4km on the approach to Fort Augustus of between 1 and 6 blade tips theoretically visible as demonstrated by the ZTV. From the B862 when travelling south west from the B851 junction, through Errogie and beyond Gorthleck there will be a stretch of approximately 10km of intermittent visibility where between 1 and 2 blade tips are theoretically visible as demonstrated by the ZTV. It is agreed with the applicant's assessment that no significant effects would occur on these routes.
- 7.146 The visual impact on receptors from both VP10 An Suidhe and VP12 B862 An Suidhe Car Park raised concerns. This recognised viewpoint is within the Loch Ness and Duntelchaig SLA, on the South Loch Ness Trail and also on General Wades Military Road. The viewpoint is a popular destination for hill walkers, recreational walkers, tourists and road users given the short distance from the B862 and nearby An Suidhe car park. It is a brief drive from Inverness for tourists arriving by minibus and busses. Whilst it is agreed that the sensitivity of the An Suidhe viewpoint is High it is also considered the car park is High as opposed to Medium-High noted by the applicant.
- 7.147 In the view south towards the proposed development 5 of the 8 turbines would be visible from these locations. 3 turbines appears as very small blade tips beyond intervening topography and the other 2 with hubs and approximately half the towers visible in the mid distance.
- 7.148 Whilst there is general agreement that the effects would not be significant from these viewpoints the isolated setting of the proposed development is a clear deviation from the clustered approach to wind farms in the wider surrounding area. As such, there is no particular link or association to existing wind farm development with the proposed

- development appearing incongruous and still raises concerns even though it does not overwhelm the outlook.
- 7.149 The A87 connects the Great Glen and the A82 at Invergarry to Skye in the western Highlands. It is a key connecting and scenic route through Kintail to the western coastal and island landscapes of Scotland. The route itself largely follows straths and glens or lochsides and as such theoretical visibility of the proposed development is on a section of the road between the Glen Garry west viewpoint and Invergarry for approximately 6km when heading in an easterly direction.
- 7.150 The applicant has provided a series of wirelines along the A87 at approximately every 1km to 1.5km at key locations to provide an understanding of the theoretical visibility. The 10 wireline locations are organised west to east as receptors move towards the development starting at the Loch Garry west viewpoint to Invergarry (A87 route analysis VP1 Loch Garry (LVIA VP16) and ending at VP10 Invergarry) travelling along the A87 (VP2 near Allt a' Bhiora crossing, A87, VP3 near Daigean, A87, VP4, junction with minor road to Tomdoun, A87, VP5, parking near Coille Achaidh Luachraich, A87, VP6 near Leacan Dubha access, A87, VP7 near Blar an Eas, A87, VP8 near White Bridge parking, A87, VP9, Craigard and A87, VP10 Invergarry).
- 7.151 The applicant notes that the A87 is not located within a designated landscape and value is considered to be Medium. On balance, they considered the susceptibility of road users to be Medium-Low. In combining the Medium value and Medium-Low susceptibility, sensitivity is considered to be Medium. Although not a promoted tourist route, the A87 is one of the few arterial routes in the Highlands and described as a "gateway" route in the OWESG. Parts of the A87 pass through the locally designated Moidart, Morar and Glen Shiel SLA to the north of Loch Cluanie and within the Kintail NSA through Glen Shiel. It is considered the applicant has understated the value of the route which is assessed as High.
- 7.152 Whilst the applicant notes that the A87 is currently screened by vegetation and forestry this may not always be the case in future. The land between the A87 and Lochy Garry is owned by Forestry Land Scotland. Ardochy Land Management Plan is in the initial phases of felling areas either side of the A87. A portion of woodland has recently been cleared approximately 1.4km east from the Loch Garry viewpoint west. The next phase of tree felling will remove a significant portion north of the A87 with a timeline of up until 2031 with tree removal proposed on a portion of land adjacent to the recently felled area south of the A87 approximately 730m east from Loch Garry viewpoint west after 2051.
- 7.153 Theoretical visibility along this section of route is greatest to the west the Loch Garry west viewpoint to Leacan Dubha, beyond which there is no visibility further west. Current visibility of the proposed development would mean receptors view turbines for a short section of around 200m to the east of the Glen Garry viewpoint, glimpses through a gap in the treeline at the forestry access track near Allt a Bhiora, approximately 500m straight section to the east of Allt na Bhiora aligned with the proposed development with up to 3 turbines in view in the narrow gap between forested road edges and the section of road between the forestry access near Daigean and the parking access around 700m to the east. Between Leacan Dubha and Invergarry visibility is more limited and intermittent with a short section of

- approximately 450m near Craigard to the west of Invergarry where the view across the floor of Glen Garry opens up with up to 3 blade tips above the distant upland ridge to the east.
- 7.154 The proposed development would extend the influence of wind energy development along a stretch of approximately 6km along the A87 heading east from the Glen Garry west viewpoint layby to the outskirts of Invergarry where between 7 and 8 blades along with combinations of hubs and towers to varying degrees theoretically visible as demonstrated by the ZTV. Turbine T1 appears as an outlier out of keeping with the rest of the group. Whilst backlothed the turbines would bring significant visibility into an area of respite along a key route.
- 7.155 The applicant considers the magnitude of change is Medium-Low and the effect on road users is considered to be Moderate-Minor and Not Significant. Whilst it is agreed the magnitude of change is Medium-Low, the effect is considered Moderate given the potential for the picture to change in future and potentially Significant. It is considered there would be Significant visual effects on the views of road users/cyclists from this stretch of the A87 if large swathes of forestry were to be removed in future. Whilst the proposed development would not overwhelm the route it would significantly detract from the visual appeal of the A87 overlooking Loch Garry, if the existing vegetation currently shielding visibility were to be removed, which will be the case given that this is a plantation forestry.
- In terms of cumulative impacts, the now consented Cloiche Wind Farm would only be visible as small blade tips from the most elevated sections of the A87, close to the Glen Garry viewpoint west. More importantly, the now consented Bunloinn Wind Farm and the proposed Tomchrasky Wind Farm proposed developments would be visible from sections of the A87 and A887. Along the A87 Bunloinn would be visible when travelling in both directions along this route and Tomchrasky visible only when travelling westbound. When road users are heading east Bunloinn along with the proposed development would be experienced in sequence. Bunloinn would introduce substantial levels of visibility in the view west from the A87 and fall out of view further to the east when approaching the Glen Garry west viewpoint when the visibility. Whilst the applicant notes that no simultaneous visibility of these developments will occur along the A87 they concede there is a sequential cumulative effect, albeit reported as Not Significant, for users of the A87. The applicant considers the level of change is increased when compared to the assessment against operational/under construction/proposed baseline largely due to the extended effect along the A87 resulting from the introduction of Bunloinn overlooking Loch Lovne but also due to the contribution of the proposed development which contributes to this extended view of wind farm development.
- 7.157 In terms of sequential visibility, Bunloinn will be visible between the northern entrance to Beinneun Forest and as the road approaches the layby above Loch Loyne for approximately 4.5km southbound. Review of the Bunloinn application (22/01760/S36) noted significant visual effects for southbound road users for approximately 2.5km between the layby above Loch Loyne and the layby at Willie Macrae Memorial. Assuming a speed of 50-60 mph, these views would be experienced for approximately 4 minutes for southbound users.

## Impact on Residential Receptors

- 7.158 Settlements, as defined within HwLDP, that lie within the study area include Fort William, Fort Augustus and Drumnadrochit accessed from the A82. Fort Augustus is the neighbouring settlement approximately 6.5km to the north east from the closest proposed turbine. Due to the site location and topography, the proposed turbines are relatively well screened from these settlements with only some blade tips theoretically visible as demonstrated by the ZTV. However, visibility heightens the awareness of a number of wind energy developments to the south east and south west of Loch Ness in the wider surrounding area of the these settlements.
- 7.159 Whilst there are occasional scattered properties along the north western shoreline of Loch Ness set back from the A82 the vast majority are free from theoretical visibility until the fringes reaching the fringes of the study area at between 40km and 45km at Lairgmore and Lochend. Whilst up to 8 turbine blade tips are theoretically visible from the northern shores of Loch Ness the set back from the proposed development on the edge of the study area limits any potential impact on residents.
- 7.160 From the B862, the same situation occurs with the vast majority of scattered properties free from theoretical visibility until the outskirts of Errogie where up to 2 blade tips would be seen along a stretch of approximately 8km travelling south west through Errogie and Gorthleck until the end of Loch Mhor. The set back beyond 20km from the proposed development limits any potential impact on residents. Whilst there is the capacity for small pockets of theoretical visibility of up to 6 blade tips around Torness and Whitefield between the B852 and B862 properties are limited in this area.
- 7.161 There are no properties within 2km of the site. The applicant notes in the LVIA that the closest residential property is approximately 3.6km to the north east of the proposed development. However, Aberchalder Farm, set back from the Aberchalder swing bridge to the north west, is 2.4km from the nearest turbine and would have no theoretical visibility of the proposed development given the surrounding landform. The applicant has since confirmed that Aberchalder Farm is the closest residential property to the proposed development.

# **Cumulative Landscape and Visual Impact**

- 7.162 In addition to the above, it is important to consider the context of the development in combination with other windfarm developments and assess the likely cumulative effects. Of particular importance is how wind energy developments relate to each other in design and relationship to their surroundings, their frequency when moving through the landscape and their visual separation to allow experience of the character of the landscape in between.
- 7.163 In this instance, cumulative impacts of the proposed development in combination with existing wind farms has been found to give rise to a number of significant cumulative visual effects, over and above the significant effects identified in the "solus" assessment. Whilst the applicant considers they have mitigated cumulative effects through the site selection this is disputed. From key views overlooking Loch Ness from within the Loch Ness and Duntelchaig SLA such as the Great Glen Way, Meall Meall Fuar-mhonaidh and the Burach Corbett, the proposed development

would appear visually separate from surrounding wind farms. However, the location is within a different landscape context moving further towards the steep sided slopes of the Great Glen in the landform beyond the south western shores of the loch, at a lower elevation and different scale to surrounding existing wind farms. This has the effect of pronouncing the cumulative effect given the disparity between the proposed development and existing wind energy development within the landscape.

- 7.164 The applicant has carried out an assessment of potential cumulative effects from the LCT's, SLA's and 21 viewpoints within their LVIA. Potential cumulative impacts on WLA are included separately within their Wild Land Assessment (EIAR Volume 4 Chapter 6 Appendix 6.2).
- 7.165 Unusually, the applicant has considered cumulative effects in 2 separate tranches, 1 with the proposed development along with other consented developments and 1 with the proposed development along with other proposed developments pending consideration through the planning process at the time of submisison. Since the application was submitted the cumulative picture has changed with Bunloinn, Corriegarth 2 and Cloiche all now consented. Additionally, Millenium South has since expired. All of these schemes are noted within the applicant's assessment as proposals currently pending consideration with Tomchrasky still currently pending consideration.
- GLVIA3 advises in relation to the baseline, taking the "proposed development" to 7.166 mean the main proposal that is being assessed "it is considered that existing schemes and those which are under construction should be included in the baseline for both landscape and visual effects assessments (the LVIA baseline). The baseline for assessing cumulative landscape and visual effects should then include those schemes considered in the LVIA and in addition potential schemes that are not yet present in the landscape but are at various stages in the development and consenting process". This is not the case as the applicant has split consented projects and those currently pending consideration. For ease of reference and to fit with the Council's standard practice for review of the Visual Assessment Appraisal in Appendix 6, the cumulative column considers the proposed development in association with other consented development and applications currently pending consideration. Where there are any discrepancies regarding magnitude of cumulative change and/or level of cumulative effect the higher value has been applied.
- 7.167 The applicant has identified significant cumulative effects on receptors at viewpoints: VP1 Corrieyairack Pass, VP3 Corrieyairack Hill, VP4 Carn a' Chuilinn, VP5 Carn Dearg, VP13 Burach and VP20 Meallan Odhar. There is agreement with this assessment as it relates to these viewpoints. However, it is considered that there are also significant effects at VP14 Ben Tee, VP16 A87, Loch Garry VP 17 Meall Fuarmhonaidh and that the full effects have been understated by the applicant from these viewpoints.
- 7.168 The 2 views noted from upland locations will experience slightly different cumulative effects. From Meall Fuar-mhonaidh, the proposed development has the effect of encircling Loch Ness as there is current respite between the defined clusters of Stronelairg/Cloiche/Dell and Millenium/Beinneun either side of the large panoramic views towards the Great Glen. From Ben Tee, turbines appear to be flowing over the

landscape in the mid distance with the Stronelairg/Cloiche/Dell cluster beyond drawing attention to the proposed development and inconsistent location. As noted, there will be cumulative impacts when travelling along the A87 east given the sequential impact of Bunloinn.

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

- 7.169 There is a statutory requirement to provide aviation lighting on turbines over 150m in height. Given the environment of the area light pollution raises concerns. The applicant proposes to use a reduced lighting scheme. It notes this is acceptable where the hours of darkness use of the airspace is rarely low flying Visual Flight Rules (VFR) traffic with no Night Vision Goggles (NVG). The applicant proposes a cardinal lighting scheme which requires visible spectrum obstacle lights on the turbines that define the geographical footprint of the wind farm. It is proposed to light turbines T1, T2, T7 and T8 with nacelle mounted, medium intensity (2000 candela(cd)), visible spectrum, steady red obstacle lights which would operate from dusk until dawn.
- 7.170 Hours of darkness visualisations have been produced for the 3 viewpoints VP12 B862 An Suidhe car park, VP16 A87, Loch Garry and VP21 Beauly Denny track. Both 2000cd and 200cd intensity nacelle lights have been assessed representing 2 differing situations 2000cd represents the maximum intensity possible, 200cd represents the maximum intensity that would be used when visibility extending from the wind farm exceeds 5km. In addition to the hours of darkness visualisations the applicant has carried out a representative viewpoint assessment for VP12 B862 An Suidhe Car Park, VP16 A87, Loch Garry, VP21 Beauly Denny Track.
- 7.171 Aviation lighting will disrupt the sense of remoteness experienced during hours of darkness from locations across the area. While during the day one's eye would be drawn to the moving blades of the turbines, in hours of darkness one's eye would be drawn toward the red aviation lighting, which can flatten a sense of distance in the darker landscape. Depending on the position of the receptor to the lighting, the lights may appear to flash as a result of the turning of the turbine blades, passing between the light and the viewer. This may be a visually confusing effect for the receptor unless aware of the reason for the lights, while in hours of darkness one does not have the benefit of being able to relate the lighting to a landform.
- 7.172 It is considered the most significant effects will be on recreational users of the outdoors represented by VP1 to VP5 along with VP20 and VP21 on/around the Corrieyairack Pass/General Wade's Military Road and surrounding Corbetts all within 5.5km of the proposed development. Between 1 and 4 nacelle lights would be visible from these locations at the highest intensity given the limited set back from the scheme. However, those visiting these locations in hours of darkness is considered to be low.
- 7.173 The Assessment of Visible Aviation Lighting (EIAR Volume 4 Chapter 6 Appendix 6.3) in its consideration from VP21 Beauly-Denny track 0.92km from nearest turbine to the north west notes the proposed development lights would be seen as an introduction of lights to a part of the upland horizon where none are currently seen, with no existing lighting present in any other direction of view. The applicant notes that the effect is considered Moderate and Significant. The Significant effect is not

disputed. Though effects of lighting have not been assessed from the other viewpoints noted above, either within the WLA 19 interior or marginally outwith the designation, the hours of daylight viewpoints show the majority of hubs, if not all hubs, will be seen from these viewpoints.

- 7.174 NatureScot note in its consultation response that the introduction of new bright red lights would contribute to the erosion of the sense of remoteness across WLA 19. However, it is content that the applicant has explored available forms of lighting mitigation as set out in EIAR Volume 1 Chapter 14 Aviation Lighting and that the effects on the wild land qualities would not be significant.
- 7.175 The applicant notes that in distant views over 10km the aviation lights are still likely to be visible, based on experience of other operational wind farm aviation lights viewed in the field, however, the proposed lighting unit to be used and reduced intensity are mitigating factors that increase with distance. This includes views from Great Glen Way, Carn an Doire Mhoir 10.26km to the north east, Burach at 12.5km to the north, Ben Tee at 13.4km to the south west AND Meall Dubh at 14.3km to the west.
- 7.176 It is agreed that road users utilising the B862 and A82 would not experience Significant effects given that hubs are hidden from view from these routes. The A87 along the stretch above Loch Garry, noted previously, raises concern given that all 4 nacelle lights are theoretically visible for an extended stretch of the road. However, the set back of approximately 16km would appear to mitigate the effect. As such it is agreed the impact on road users would not be Significant.
- 7.177 Given the intervening landform settlements will not see any hubs and nacelle lights with very limited impacts on residential receptors.
- 7.178 The presence of any visible aviation lighting is of concern, particularly when this is seen intermittently due to passing blades, with these additional visual impacts having been effectively designed out by the consented wind farm schemes in the locality which has very limited sources of light pollution. Planning conditions can however be applied to potentially limit the duration of these effects should Primary Surveillance Radar (PSR) or the use of aircraft installed Electronic Conspicuity (EC) equipment mitigation measures become widely available across the UK, and can be deployed at reasonable cost, as is now the case elsewhere in Europe. It is therefore proposed that the need for aviation lighting to be monitored throughout the lifetime of the development and switched off should this become redundant. The prospect of this however remains uncertain at the present time.

### Construction

7.179 There are likely to be some adverse impacts caused by construction traffic and disruption, which are most likely to be within the service sector particularly during the construction phase when abnormal loads are being delivered to site. It is anticipated that the construction period for the development would take 24 months. Working hours on site would usually be restricted to 07.00 – 19.00 Monday to Friday, 08.00 – 13.00 on Saturday with no Sunday or Bank Holiday working. It is recommended that the applicant continues to keep noise to a minimum on the site and construction noise will be considered as part of the Construction Environment Management

#### Document.

- 7.180 Developers must comply with reasonable operational practices with regard to construction noise so as not to cause nuisance. Section 60 of the Control of Pollution Act 1974 sets restrictions in terms of hours of operation, plant and equipment used and noise levels etc. and is enforceable via Environmental Health and not Planning. A condition is requested to secure details of how contractors would employ the best practicable means to reduce the impact of noise from construction activities.
- 7.181 The nature of the project anticipates the need for a Construction Environmental Management Plan (CEMP). An outline CEMP has been provided (EIAR Volume 4 Chapter 3 Appendix 3.1), the detailed CEMP can be secured via condition. It should include site specific environmental management procedures which can be finalised and agreed through appropriate planning conditions. Due to the scale of the development SEPA would control pollution prevention measures relating to surface water run-off via a Controlled Activities Regulations (CAR) Construction Site Licence.
- 7.182 In addition to the requirement for submission and agreement on a CEMP the Council will require the applicant to provide a financial bond regarding final site restoration (restoration bond) in the event of non-operation and to provide a Construction Traffic Management Plan (CTMP) for the use of the local road network.
- 7.183 Should the development be granted consent, a Community Liaison Group (CLG) will be conditioned to ensure that the Community Council and other stakeholders are kept up to date and consulted before and during the construction period.
- 7.184 Once the turbines have been installed, the access tracks, substation and hardstanding areas around the turbines would remain in place for the operational lifetime of the development. The construction compound areas and turning heads would be temporary, these areas and the site borrow pits would be restored.
- 7.185 The CEMP would control potentially polluting activities and prevent adverse impacts on river catchments, properties, and the environment during construction. The Principal Contractor would implement measures outlined within the CEMP as agreed with consultees including SEPA, NatureScot and THC. In order to protect the water environment, the applicant included an outline Water Quality Management Plan (WQMP). It is anticipated that this would require a programme of pre-construction monitoring. Prior to construction, detailed site investigations of underlying deposits would inform detailed design and suitable micro-siting of the turbines and associated infrastructure. If potential effects to surface watercourses or groundwater are identified, baseline water quality monitoring would be undertaken as required. This may also include groundwater level and flow monitoring. No water quality monitoring or intrusive investigations, other than peat depth survey work and peat sample laboratory analysis have been undertaken as part of the EIAR. Therefore, the employment of an Ecological Clerk of Works (ECoW) is required and could be controlled by condition.
- 7.186 Design and construction of a suitable drainage system would follow Sustainable Urban Drainage Systems (SUDS) principles and would ensure natural drainage without significant alteration of the hydrological regime of the local site area. Any construction activity relating to, or undertaken in, the vicinity of watercourses would

be carried out in general accordance with relevant SEPA Pollution Prevention Guidelines, The Water Framework Directive (WFD), The Water Environment and Water Services (Scotland) Act 2003 (WEWS), and the Controlled Activities Regulations (CAR) 2011 (as amended).

7.187 The Ard Aluinn Private Water Supply (PWS) is located within 250m of a new section of track. The EIAR identified a significant effect on this resource. With additional mitigation including monthly water quality monitoring, thresholds for parameters to be agreed with SEPA and THC, this was reduced to a residual minor effect and not significant. The Environmental Health Team has requested a detailed PWS mitigation and monitoring plan be submitted prior to the commencement of development which could be finalised by condition. The effect on the PWS is noted by SEPA who have requested a 100m buffer to protect Ard Aluinn groundwater abstractions which could also be controlled by condition.

## Roads, Transport and Access

- 7.188 The EIAR assessed the impact of the development on roads, transport and access including movement of Abnormally Indivisible Loads (AIL). Assessment of operational impact on traffic flows was scoped out, it was concluded that only light vans or similar vehicles would be required roughly twice a week for maintenance, which would not significantly impact traffic numbers.
- 7.189 All AlL traffic would access the development via the A82 (T) from the Port of Entries (POEs) at Kyle of Lochalsh Harbour and Corpach Harbour, using proven abnormal load routes. Access to the development would be routed from the A82 (T) onto the U1667 Ardachy Road. Traffic would access the site via a new simple priority junction on the U1667 Ardachy Road, located approximately 52m to the north east of the existing junction with the A82 (T). Based on consultation with THC no construction vehicles would be permitted to access the site from the north of the site on the U1667 Ardachy Road due to existing constraints on the road network at this location, including carriageway running widths and a narrow bridge located to the northeast of the site access junction which crosses the River Tarff.
- 7.190 Construction personnel would access the site from Inverness, Fort Augustus, Fort William and other local settlements. Personnel would likely travel to the site via the A82 (T) from the north or south, before accessing the site from the U1667 Ardachy Road. Wherever practical, construction materials would be sourced from south/west of the development from local suppliers, thus minimising the number of Heavy Goods Vehicles (HGVs) passing through Fort Augustus. This would also reduce the number of HGVs required to negotiate the tight left hand turn manoeuvre between the A82 (T) and the A1667 Ardachy Road. The development would include approximately 8km of new access tracks and 5.5km of existing tracks which would be upgraded.
- 7.191 The EIAR assessed the impact on traffic during the 24 month construction period. This included HGVs, AlLs and all staff/personal and light goods vehicles. The peak traffic flows were predicted in month 10 of the construction programme. During this month, an average of 72 HGV movements were predicted per day and it estimated that there would be a further 46 car and light van movements per day to transport

construction workers to, and from, the site.

- 7.192 The total traffic movements were predicted to increase by 181.2% on the U1667 Ardachy Road, where the site access would be located. Whilst this increase is high, the EIAR states that it is caused by the relatively low baseline vehicle flows on the road at this location. On the rest of the public road network within the study area, the next highest total traffic increase (3.2%) is on the A82 (T) at Aberchalder to the south of the development. The HGV traffic movements would increase by 328.7% on the U1667 Ardachy Road where the site access would be located. Whilst this increase is again high, the EIAR states that it is caused by the relatively low baseline HGV flows on the road at this location. On the rest of the public road network, the highest HGV traffic increase would be 39.6% on the A82 (T) at Aberchalder to the south of the site.
- 7.193 Abnormal loads would move turbine blades from the Kyle of Lochalsh, with towers and nacelle sections transported from the Port of Corpach due to a weight constraint to the east of Kyle of Lochalsh. They would require an escort, either by private contractor or by the police. Abnormal load movements are generally one way as the vehicles retract to the size of an HGV for their return journey. The EIAR proposes to mitigate effects through an Abnormal Loads Transport Management Plan (ALTMP) with trial runs. The EIAR states that it would schedule abnormal loads in close liaison with the THC, Transport Scotland, and Police Scotland to minimise disruption and disturbance to local residents and road users. Accommodation works might be required along the route, such as vegetation clipping and clearance of street furniture. The details of these could be secured by condition.
- 7.194 The EIAR assessed the cumulative impact of abnormal loads which included Bhlaraidh Wind Farm Extension and Dell Wind Farm using predicted peak flows. However, additional renewable energy proposals have either been consented or are currently at various stages within the planning process (such as the proposed Loch Kemp hydro scheme (23/06025/S36) for example) since the EIAR has been undertaken as set out in Appendix 2, and therefore the applicant's cumulative assessment may be incomplete. The combined traffic flows assessed by the applicant indicated that there would be a large increase in HGV flows along the A82(T) north of Fort Augustus and at Aberchalder, which would exceed the thresholds for detailed assessment within the IEMA Guidelines. The EIAR notes that this would not be attributable to the development because the HGV construction traffic would be routing to the site from the south. A review of existing capacity was undertaken which concluded that there would be no road capacity issues if the development and other schemes were constructed at the same time. The EIAR states that in the event of all the sites being constructed at the same time impacts could be mitigated through the use of an overarching Traffic Management and Monitoring Plan (TMMP) and by introducing a phased delivery plan which would be agreed with THC and Police Scotland. The details of these could be secured by condition.
- 7.195 The EIAR assessed the likelihood for construction traffic to cause severance, driver delay, pedestrian delay, road safety, non-motorised user amenity, fear and intimidation and large loads for users of the A82(T), residents on the U1667 Ardachy Road, residents on the A82(T) near Aberchalder and users of the core path and public right of way. It concluded that there would be a significant effect on users of

the U1667 Ardachy Road and users of the Core Path/Public Right of Way but with mitigation these effects would be reduced to not significant. Traffic during construction would be managed through a Construction Traffic Management Plan (CTMP) which would include the ALTMP and could be conditioned. It would include road condition surveys and provision of information to local residents and users of amenities. Restrictions on vehicle routeing to the site would be implemented for the duration of the constriction phase, with no construction vehicles permitted to access the site from the north on the U1667 Ardachy Road. Traffic volumes would decrease considerably outside the peak period of construction. The anticipated total traffic volumes are projected to be within the capacity of the roads assessed and the environmental effect is considered not significant.

- 7.196 The Transport Planning Team and Transport Scotland have confirmed that the development traffic can be accommodated on the road network, subject to conditions as well as the requirement for a legal agreement to address "wear and tear" provisions. These would be consistent with current best practice and need to highlight potential cumulative impacts arising with other major developments. They request conditions to secure the following:
  - approval of a proposed route for any abnormal loads on the trunk road network;
  - approval of all accommodation measures required, including the removal of street furniture, junction widening, and traffic management prior to movement by abnormal load;
  - approval of additional signing or temporary traffic control measures deemed necessary due to the size or length of any loads being transported prior to the movement of any components and/or construction materials;
  - a Construction Traffic Management Plan to include a range of measures including protocols and a programme for abnormal loads;
  - Community Liaison Group;
  - a detailed review of the routes to site for construction traffic followed by a programme of mitigation works in addition to any works needed to enable the local road network to accommodate abnormal load movements;
  - following completion of the trial run and structural assessments, full details of all road improvement/mitigation measures needed to facilitate abnormal load movements; and
  - all traffic management being undertaken by a quality assured contractor.
- 7.197 In terms of wider public access, there are no core paths within the site boundary or the wider Culachy Estate. There are however a number of local tracks/paths which intersect the site. The most used path being the Corrieyairack Pass which runs between Laggan and Fort Augustus. Sections of the Corrieyairack Pass are designated as Scheduled Monuments. The proposed site access track would cross the non-designated section of the Corrieyairack Pass, approximately 500m south of the site access junction and a crossing point would be formed at this location. The THC Access Officer has no objection to the application provided there is a condition which secures an updated Outdoor Access Management Plan. This would ensure

access is provided throughout the construction period and that enhanced recreational access opportunities are provided during the operational phase. It would include details of signage to be included on the site to warn users of the paths within the wind farm of any hazards such as maintenance or potential ice throw during winter. The Access Officer identified a number of limitations with the draft Outdoor Access Management Plan, including a lack detail on the impact on the Corrieyairack Pass and protection measures during and after construction, which would need to be addressed whin finalising this Plan.

- 7.198 Neither Highland Council's Historic Environment Team nor Historic Environment Scotland object to the proposed site access track crossing the Corrieyairack Pass. This is subject to photographic recording, topographic survey and areas of watching brief as well as marking-out, avoidance and micro-siting which could be controlled by condition. In addition, good practice measures are expected and shall include the implementation of a protocol in the event of the discovery of previously unrecorded assets, included within the CEMP, along with the appointment of an Archaeological Clerk of Works and detailed Written Scheme of Investigation to agree these works. Again, these details could be secured by condition in the event that consent was granted.
- 7.199 The traffic effects during the decommissioning phase can only be fully assessed closer to that period, 35 years on from the completion of the development. As elements of the development are likely to remain in-situ (such as cable trenches, access tracks, etc.) the traffic flows associated with the decommissioning works would be lower than those associated with the construction phase. The construction phase therefore represents a worst-case assessment and, as such, no further assessment of the decommissioning phase was carried out. It should be noted that prior to decommissioning of the development, a traffic assessment would be undertaken, and appropriate traffic management procedures followed

# Water, Flood Risk, Drainage and Peat

- 7.200 The site is located within the River Tarff catchment and its tributary sub-catchments and is partly within the Calder Burn catchment area. The River Tarff flows into Loch Ness approximately 2km northeast of the site at Fort Augustus. A network of cut drainage channels intersect the site. There is a high likelihood of fluvial flooding (10% annual probability of flooding) along watercourses, including the River Tarff and its main tributaries Black Burn and Allt Lagan 'Bhainne. The extent of flooding is confined to the watercourse channel.
- 7.201 The site lies within a Drinking Water Protected Area (DWPA), as protected by Article 7 under the Water Framework Directive (WFD), which supplies Loch Ness and Invermoriston Water Treatment Works. The groundwater underlying the site is drinking water protected and there are two Private Water Supplies (PWS's) located within the site at Culachy House and Ard Aluinn. The EIAR identified 27 properties within the 2km study area that may be affected by the development and one SEPA abstraction point within 1km of the site.
- 7.202 The EIAR is clear that a Construction Environmental Management Plan (CEMP) will be in place. The CEMP will ensure that potential sources of pollution on site can be effectively managed throughout construction and in turn during operation; albeit

there will be fewer sources of pollution during operation. The CEMP needs to be secured by planning condition to ensure the agreement of construction methodologies with statutory agencies following appointment of the contractor and prior to the start of development or works.

- 7.203 The Council's Flood Risk Management Team and SEPA have not raised any concerns regarding flooding. SEPA request conditions to secure a 100m buffer to protect Ard Aluinn groundwater abstractions; crossing WX23 to be a single span bridge to convey the 1 in 200 year flood event (plus an allowance for climate change); all other water courses are to be designed as oversized bottomless culverts or traditional style bridges; a Peat Management Plan; a Biodiversity Enhancement Management Plan; adherence to the mitigation identified in the Schedule of Environmental Commitments (EIAR Table 15.1) and the outline CEMP; and borrow pit restoration and a Decommissioning and Restoration Plan.
- 7.204 The EIAR sets out embedded mitigation included in the design of the wind farm to reduce potential adverse effects with a 50m buffer around all watercourses and avoidance of deeper peatland (>1m) for the location of turbines and other infrastructure. This includes measures to prevent sediment pollution, chemical pollution and to enable surface water drainage management. Watercourse crossings have been avoided in the design of the access track layout as far as possible, however a total of 16 watercourse crossings would be needed (7 new watercourse crossings and 9 existing watercourses).
- 7.205 The watercourse crossings would be regulated under SEPA's Controlled Activities Regulations (CAR) regime. The crossings would be designed to convey the 1 in 200 years plus climate change event and to allow hydraulic continuity so that the local hydrology is not significantly altered. SEPA have requested a condition to ensure that the crossing WX23 is a single span bridge to convey the 1 in 200 year flood event (plus an allowance for climate change). It states all other watercourses crossing should be designed as oversized bottomless culverts or traditional style bridges. The final detailed design for all water crossings, including any potential upgrades or amendments required to existing crossings could be addressed by condition and in accordance with the requirements of the Water Environment (Controlled Activities) (Scotland) Regulations 2011.
- 7.206 Post construction, the EIAR proposes an Operational Environmental Management Plan (OEMP) to be developed and agreed with NatureScot, SEPA, and THC. This could be secured by condition. The OEMP would detail site drainage design, soft engineering and measures proposed to control operational surface water runoff from hardstanding. Storage of fuels would follow best practice. EIAR Volume 4 Chapter 8 Appendix 8.6 includes an outline Biodiversity Enhancement Management Plan which covers habitat enhancement and peatland restoration and could also be conditioned.
- 7.207 With the embedded and good practice mitigation, no significant adverse effects have been identified in the EIAR with the exception of the impacts on the PWS Ard Aluinn. Watercourses across the site and water quality would be required to be managed through the construction, operation and decommissioning phases of the development. This could be secured by condition, with the final scheme being developed in consultation with Highland Council, SEPA, and relevant fishery boards. SEPA has no objection to the development subject to conditions which protect the

- PWS, details of watercourse crossings, Peat Management Plan, Biodiversity Enhancement Management Plan, borrow pit restoration and a Decommissioning and Restoration Plan. They also request a mechanism to secure mitigation identified in the Schedule of Environmental Commitments (EIAR Chapter 15 Schedule of Environmental Commitments Table 15.1) and the outline CEMP.
- 7.208 The proposal will result in a loss of priority peatland habitat. NatureScot consider the quality of this habitat is such that the impacts could be overcome by offsetting. However, it recommends further information be submitted with regards to how the restoration area has been calculated is provided to assess whether the restoration plan is sufficient to offset the impacts on peatland. Class 1 and 2 peatlands which are defined as nationally important carbon rich soils, deep peat, and priority peatland habitat of high conservation value cover much of the site. Survey work within the EIAR showed that peat depth varied across the site from 0 to 4.2m with an average depth of 0.9m. The deepest pocket of peat was recorded in the northwest of the development approximately 1.7km from Turbine T1. The localised areas of thick peat identified have been avoided through the designed layout. Overall, 81,528 m³ is expected to be excavated with the majority of impacts relating to access tracks, turbine hardstandings and borrow pit search areas (EIAR Volume 4 Chapter 9 Appendix 9.2 Table 4.1). All excavated peat could be reused on site. The application included a Draft Peat Management Plan which could be finalised by condition.
- 7.209 The habitat survey found that the most common and extensive habitat on the site is blanket bog, mainly represented by M17 and M19 communities. The National Vegetation and Habitats Survey Report indicates that some of these areas are relatively more intact, active and 'better quality bog' however, degraded areas are widespread across the site with large areas of peat hagging. M1, M2, M3, and M20 communities (including M15 and M25 on deep peat) were also recorded on the site and are priority peatland habitats.
- 7.210 A Peat Landslide Hazard and Risk Assessment (PLHRA) has been submitted with the application which states there is an insignificant risk of a peat landslide at the turbine locations and associated infrastructure. Ironside Farrar identified a number of issues with the information submitted to which the applicant has responded and they have confirmed these are considered appropriate.
- 7.211 There is known potential for areas of Ground Water Terrestrial Ecosystems (GWDTE's) within the site. However, it is noted that the locations assessed appear to be in connectivity with wider blanket bog wet modified bog habitats present across the site and therefore it remains important to maintain surface water distribution across the site. Neither SEPA nor NatureScot raised concerns regarding the potential impact on GWDTE, mitigation measures can be covered in the CEMP.
- 7.212 Given the watercourses across the site, water quality will require to be managed through the construction, operation and decommissioning phases of the development. This can be secured by condition, with the final scheme being developed in consultation with Council, SEPA, and relevant fishery boards.

# Natural Heritage (Including Ornithology)

- 7.213 The EIA assessed the impact on freshwater ecology, terrestrial ornithology and terrestrial non-avian ecology. This included protected species surveys. The presence of otter, water vole, red squirrel, mountain hare, brown hare, common lizard, common pipistrelle, soprano pipistrelle, natterer's bat, brown long-eared bat and sea/brown trout were identified. The EIAR scoped out the assessment of effects on aquatic habitats including standing water, running water and fisheries. It also scoped out the effects on badger, beaver, brown hare, great crested newt, pine marten, red squirrel, wildcat, mountain hare, otter, roosting bats and low collision risk bat species, deer and common lizard for a range of reasons including the absence of protected features, lack of suitable habitat and limited desk based or field evidence.
- 7.214 NatureScot consider the mitigation measures detailed in Chapter 15 Schedule of Environmental Commitments (Appendix 3.1 Outline Construction Environmental Management Plan and Appendix 8.5 Draft Species Protection Plan) are appropriate and are satisfied there will be no impacts if implemented.

# Designated Sites - Natural Heritage

- 7.215 The site does not form part of any statutory or non-statutory designated sites for nature conservation. The Ness Woods Special Area of Conservation (SAC) and the Glen Tarff SSSI are located approximately 25m north, downslope of the site, along the River Tarff and its tributaries. Qualifying features for the Ness Woods SAC include mixed woodland on base rich soils associated with rocky slopes, otter and western acidic oak woodland. Qualifying features for the Glen Tarff SSSI include beetles (Bolitophagus reticulatus) and upland mixed ash woodland. The Easter Ness Forest SSSI lies 3.7km from the site boundary with qualifying features as upland mixed ash woodland and upland oak woodland. There is hydrological connectivity between the development and Ness Woods SAC and Glen Tarff SSSI which are downstream of the site. The EIAR concluded that with the mitigation set out in the CEMP, which would be monitored by the ECoW, no potential effects on SAC or SSSI habitats are predicted.
- 7.216 No potential effects are anticipated on the Bolitophagus reticulatus beetle, due to the lack of impact on its woodland habitat in the Glen Tarff SSSI. Otters that form part of the SAC population may be present but are unlikely to be disturbed by construction or operation which would be approximately 270m west of the SAC. The application proposes the ECoW would ensure that all reasonably practicable measures are taken during construction (including pre construction otter surveys and ongoing otter monitoring during construction) so it complies with the relevant wildlife legislation and there would be no impacts on the SAC. The EIAR also concluded that the development is unlikely to result in fragmentation of otter populations or territories nor create any barrier effects with respect to movement of otters with the SAC or locally.
- 7.217 NatureScot consider the proposed development is likely to have a significant effect on the otter, mixed woodland on base-rich soils associated with rocky slopes, and western acidic oak woods qualifying interests of the Ness Woods SAC. Consequently, the Scottish Government, as competent authority, is required to carry

out an Appropriate Assessment in view of the site's conservation objectives for its qualifying interests. NatureScot advise that if the proposal is carried out strictly in accordance with the following mitigation measures the proposed development will not adversely affect the integrity of the site. A CEMP in accordance with SEPA guidance, Deer Management Statement and construction methods and location of fencing shall be agreed with NatureScot.

- 7.218 There are no statutory designations with ornithological features within the development site. Loch Knockie and nearby Lochs SPA (underpinned by Knockie Lochs SSI and Glendoe Lochans SSSI) are 3.7km to the nearest turbine and West Inverness-shire Lochs SPA and SSSI is 7.5km to the nearest turbine. The potential for connectivity for the Common Scoter population was identified between Loch Knockie and nearby Lochs SPA and West Inverness-shire Lochs SPA and the proposed development. The EIAR concluded that the development would not be a barrier to movement between these sites as it is situated to the south of the southern most parts of the SPAs. On this basis any potential significant effect on either SPA was ruled out and the SPAs were scoped out for further assessment in the EIA.
- 7.219 Given the close proximity to the West Inverness-shire Lochs SPA and SSSI protected for its breeding population of black-throated diver and common scoter the site's status means that the requirements of the Conservation (Natural Habitats, &c.) Regulations 1994 as amended (the 'Habitats Regulations') apply or, for reserved matters, The Conservation of Habitats and Species Regulations 2017. Consequently, Energy Consents Unit is required to consider the effect of the proposal on the West Inverness-shire Lochs SPA before it can be consented (commonly known as Habitats Regulations Appraisal).
- 7.220 NatureScot's advice is that the proposed development is likely to have a significant effect on common scoter of West Inverness-shire Lochs SPA. Additionally, there is potential for scoters within the Glendoe Lochans SSSI to move to Loch Garry (and vice versa), which is a constituent loch of the West Inverness-shire SPA. This could place them at risk of collision with the turbines of this proposed scheme. Consequently, the Scottish Government, as the competent authority, is required to carry out an Appropriate Assessment in view of the site's conservation objectives for its qualifying interests.
- 7.221 Based on NatureScot's current knowledge of the common scoter using the lochs their conclusion is that the proposal will not adversely affect the integrity of the site. The appraisal carried out considered the impact of the proposals on the following factors:
  - Breeding female scoter return to the same loch each year and do not move between them during the breeding season.
  - Females only take short breaks from incubating during the night, indicating they do not fly far during recesses.
  - Male scoter remain close to the females, to guard them against rival males, in the early part of the breeding and then leave the breeding lochs in late summer without using the other lochs in the SPA
  - During the breeding seasons at daylight hours scoters stay within the breeding lochs and the immediate areas of suitable breeding habitat

surrounding the loch. We therefore conclude that the only part of the scoter population that might be exposed to collision mortality by flying into turbines at night or in low visibility are unpaired males. Mortality to this part of the population would not undermine the viability of the SPA population, and the conservation objectives would be met.

- 7.222 Creag Meagaidh SPA (and associated SSSI) and Monadhliath SSSI were both scoped out of the assessment. On the basis of the species listed on the Creag Meagaidh SPA and the distance (over 10km) from the site, the EIAR concluded there was no potential for connectivity.
- 7.223 The RSPB objects to the application until further information and assessment has been provided on the potential impact on Common Scoter as a qualifying feature of the West Inverness-shire Lochs Special Protection Area and Glendoe Lochans Site of Special Scientific Interest.

## **Species Protection**

- 7.224 The EIAR concluded that there would be a potentially significant effect due to disturbance/displacement of lekking or foraging Black Grouse during construction from habitat disturbance or direct habitat loss. The EIAR commits to a Bird Disturbance Management Plan which would set out detailed measures to ensure legal compliance and safeguard breeding birds. It would require pre-construction surveys and good practice measures during construction including those to protect the black grouse. This would specify surveys during the main lekking season. If surveys record lekking within 750m of the works all potentially disturbing construction activities would be prohibited until a risk assessment is undertaken and appropriate steps taken. All other effects during construction or operation on black grouse, golden eagle and golden plover are predicted to be not significant. Cumulative effects are also not predicted to be significant.
- 7.225 NatureScot welcome the submission of a Bird Disturbance Management Plan. It has confirmed the Golden eagle collision risk modelling and population model are acceptable and agree with the conclusion that this proposal will not have an adverse impact on the conservation status of golden eagle in the NHZ10. Likewise, the proposed mitigation measures for black grouse detailed in Table 7.20 of EIAR Volume 1 Chapter 8 Ornithology is considered sufficient to minimise disturbance to black grouse during construction of the wind farm.
- 7.226 The application proposes a Species Protection Plan to ensure that all reasonably practicable measures are taken during construction to ensure compliance with wildlife legislation for protected species should any evidence be found during preconstruction surveys. These measures would be overseen by the ECoW. In addition to this specific mitigation a draft Biodiversity Enhancement Management Plan was included in the application and would be developed to further mitigate the effects on black grouse and provide additional enhancement measures.
- 7.227 The Species Protection Plan (Appendix 8.5), Biodiversity Enhancement Management Plan (Appendix 8.6) and proposed Bird Disturbance Management Plan can be controlled by condition. The EIAR concluded that with the mitigation measures set out in these plans, the ECoW and the CEMP there would be no

significant adverse effects on ecological resources or receptors.

#### **Habitat Loss**

- 7.228 The site comprises upland and mire habitats, predominantly blanket bog, wet modified bog, wet heath and unimproved acid grassland with some ancient woodland. The habitat survey found that the most common and extensive habitat on the site is blanket bog, mainly represented by M17 and M19 communities. The NVC and Habitats Survey Report indicates that some of these areas are relatively more intact, active and "better quality bog", however, NatureScot noted that degraded areas are widespread across the site with large areas of peat hagging. M1, M2, M3, and M20 communities (including M15 and M25 on deep peat) were also recorded on the site and are priority peatland habitats.
- 7.229 The EIAR concludes that there would be a significant adverse short-term impact due to the loss of blanket bog and wet bog which would potentially become positive in the long-term with the restoration plans.
- 7.230 The EIA Report calculates that the proposal will result in 24.65ha direct and indirect habitat loss of blanket bog and wet modified bog habitats. The area proposed for peatland restoration is 424.6ha and is within Management Unit A in line with NatureScot's guidance which recommends a 1:10 ratio of loss offsetting and an additional restoration of 10% if the baseline assessment of peatland on the site to achieve enhancement.
- 7.231 The proposed restoration techniques include drain blocking, revegetation of bare peat, hagg and gully reprofiling and grazing management. NatureScot note the plan for these follows best practice and refers to the Peatland Action Technical Compendium. It is suggested that there will be opportunities for peat excavated during construction to be reused where appropriate. However, this should not be included in offsetting measures as it will mainly be used for the regeneration of excavated areas.
- 7.232 Whilst the area proposed for peatland restoration is mapped, it is not clear to NatureScot how this area has been calculated. For NatureScot to assess whether the plan is sufficient to overcome the impacts on the peatland habitat further detail on how the restoration area has been calculated should be provided. The impacts of the development have been assessed as a 24.65ha of peatland loss. As such the area for offsetting should be 246.5ha with additional area for the enhancement. The loss has been assessed with a direct loss plus a 10m indirect loss. As such the area for offsetting should use similar calculations for area of feature plus a 10m buffer for the indirect benefit. From the information provided, NatureScot notes it does appear that the impacts of the development could be offset by an appropriate restoration plan.
- 7.234 The EIAR proposes embedded mitigation and compensation. The outline Biodiversity Enhancement Management Plan sets out mechanisms for mitigation and compensate of habitat loss which includes restoration of bog and upland peat habitat including restoration of peatland habitat.

7.235 In addition to the proposed compensatory natural regeneration area there are opportunities to explore further biodiversity enhancement in Glen Tarff SSSI and Ness Woods SAC. NatureScot agree with the consultation comments from Scottish Forestry and welcome further ambition to maximise the enhancement and improvement of these woodlands and request that this is considered further as part of the Biodiversity and Enhancement.

# **Forestry**

- 7.236 Areas of native woodland, classified on the Native Woodland Survey of Scotland were identified in the northwest of the site along the Connachie Burn. The applicant proposes to use the infrastructure built for the construction of the Beauly-Denny line where possible to minimise the impact on this existing woodland. The applicant also proposes a 20m operational disturbance zone to concentrate construction in one area.
- 7.237 The EIAR identified disturbance or loss of a maximum 1.53ha of woodland within this zone. It also identified a potential maximum loss of 2.71ha within the proposed 50m micrositing area (termed operational buffer). The EIAR has identified a total compensation area of 6.62ha adjacent to the Glen Tariff SSSI woodland which would comprise 3.88ha of compensatory planting through natural regeneration and the protection of a further 2.74ha of existing woodland as mitigation. This would be achieved through deer fencing and excluding browsing animals from the total area of 6.62ha. It states this would exceed the 1.53ha requirement for compensatory planting in line with the Control of Woodland Policies and NPF4 Forestry, while securing biodiversity enhancement with expansion of a designated area.
- 7.238 Scottish Forestry do not object to the application. It requests a condition which secures monitoring as part of the outline Biodiversity Enhancement Management Plan and that the Plan should include details of further actions to ensure successful woodland establishment should natural regeneration prove unsuccessful. It should also include a maintenance programme for compensatory planting over the lifespan of the development. As the area identified for compensatory planting is immediately adjacent to, with certain operations in a SSSI it would need to be screened under by Scottish Forestry under The Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017.
- 7.239 Highland Council's Forestry Officer has no objection to the proposed development following the submission of a detailed compensatory planting plan which shows how trees/woodland proposed to be removed would be compensated for with new planting. Additionally, details including the viability of local seed source, fencing proposals, ground preparation, likelihood of timely natural regeneration success based on local experience and the maintenance proposals to ensure successful establishment were provided and considered satisfactory.

## **Built and Cultural Heritage**

7.240 There would be no direct construction impact on the scheduled monuments that comprise this section of the Corrieyairack Pass. There would, however, be a permanent change in setting, the EIAR concluded there would be no significant residual effect with mitigation measures embedded in the design. However, Historic

Environment Scotland (HES) state there would be a significant effect on SM6140 (watershed to Allt Lagan a'Bhainne) which forms one of the long straight sections of the Corrieyairack Pass where there are wide open views of the turbines for a extended length of the route. HES states the turbines would have an impact on the way the monument is appreciated and experienced within its setting. The turbines would represent a significant alteration to the upland, remoteness and perceived isolation that contributes to the setting of the monument with the greatest impact from T8. Whilst HES consider the effect would likely be significant and they recommend mitigation, either relocating or removing T8 to reduce the effect, it does not raise an issue of national interest.

- 7.241 Historic Environment Team Conservation agree that the impacts on the setting of the scheduled sections of the former military road are problematic, particularly with regards to T1 and T8. It notes a C18 Military Road runs through the site, which is a Scheduled Ancient Monument therefore no impacts will be acceptable on this road, and the applicant will be required to make an application for Scheduled Monument Consent to HES. Whilst HET consider the effect would likely be significant and they recommend mitigation, either relocating or removing T1 and T8 to reduce the effect, they do not raise an objection to the proposed development.
- 7.242 There are non-designated post-medieval heritage assets within the Culachy Estate including a bank associated with Knollbuck farmstead (MHG22966). There would be a direct (physical) impact on a section of this bank where the proposed access track would truncate approximately 35m of the length of the bank to the south. The EIAR states that the majority of this feature along with other features which form Knollbuck Farmstead would remain unaffected by the proposed access track and the assessment concluded that the effect would be negligible and not significant. There would also be a direct effect on a non-designated section of the Corrieyairack Pass (HA9) which was assessed as not significant with mitigation including location of signage and chicane adjacent to, and not on, the asset.
- 7.243 7 non-designated heritage assets (a bridge, site of a cottage, site of an earthwork bank and calm, a dyke, a clearance cairn, Knollbuck Farm and a sheep wash) are located within the 50m micrositing tolerance of proposed new tracks, existing tracks to be upgraded or a borrow pit location. The EIAR concluded that the assets could be directly impacted accidently by construction works as well as by micrositing design. The EIAR proposes mitigation including demarcation with fencing and a programme of archaeological mitigation with a watching brief over ground-breaking works in areas of archaeological potential. The proposed site access track will cross a non-scheduled section of the Corrieyairack Pass/General Wade's Military Road, approximately 500m south of its connection to U1667 Ardachy Road. The EIAR states these works would be agreed with Highland Council. With this mitigation the EIAR concludes the effect would be not significant.
- 7.244 The EIAR states that should micrositing design result in direct impacts on any of the above heritage assets, programmes of pre-construction photographic recording, topographic survey and archaeological excavation as appropriate would be carried out prior to construction commencing. Following the implementation of pre-construction mitigation, a watching brief of any ground breaking works in the relevant micrositing areas which would directly impact any of the above heritage assets is

proposed. This can be controlled by condition.

- 7.245 The central part of the site is identified by the EIAR as an area of medium potential for archaeological remains. The proposed access track would run through a field where a bank and clearance cairn of possible medieval date are recorded (MHG62470). It would also pass through a known post-medieval farmstead (MHG22966). Historic Environment Team – Archaeology concur with the EIAR Cultural Heritage recommendations for mitigation measures which will reduce potential impacts to an acceptable level. This will involve a range of methods to include specific photographic recording, topographic survey and areas of watching brief as well as marking-out, avoidance and micro-siting. Excavation will be required where sites cannot be avoided. The Historic Environment Team is satisfied that these measures are appropriate. In addition, good practice measures are expected, and these should include the implementation of a protocol in the event of the discovery of previously unrecorded assets; inclusion within the CEMP; and the appointment of an Archaeological Clerk of Works. The applicant will need to submit a detailed Written Scheme of Investigation to agree these works and can be secured by condition.
- 7.246 The EIAR concluded that there would be no significant cumulative or residual. In terms of Policy 7(h) of National Planning Framework 4 (NPF4), it states that the integrity of the setting of the 5 Scheduled Monuments would not be significantly adversely affected and in terms of Policy 7 (o) of NPF4, the non-designated heritage assets within the site have been avoided as far as practicable; where direct impacts are predicted, appropriate mitigation has been proposed in line with Policy 7(o) of NPF4.

#### Noise and Shadow Flicker

- 7.247 Prediction and evaluation of construction and decommissioning phase noise has been scoped out of this assessment. The assessment focused on operational plant and turbine noise. The surrounding area is sparsely inhabited; there are no identified properties within the 35dB contour and 22 noise sensitive receptors outside the 35dB noise contour. The assessment adopted the noise limits for wind turbine noise from Highland Council's supplementary guidance for wind energy developments. The supplementary guidance states that: the overall fixed minimum daytime noise limit should be 35 dBLA90,10min; and the overall fixed minimum night-time noise limit should be 38 dBLA90,10min.
- 7.248 The EIAR states that predicted operational noise levels would be more than 10dB below these noise limits. It concludes that noise effects, in isolation and cumulative, would not be significant. The EIAR proposed no specific mitigation beyond appropriate specification of the final turbine model and transformer plant and development of the outline CEMP to address construction noise.
- 7.249 Highland Council's Environmental Heath Team state that the applicant has submitted a noise impact assessment which demonstrates that predicted turbine noise levels are very low at all noise sensitive receptors. The maximum predicted level is 23dB which is more than 10dB below the lower ETSY standard of 35dB. As such, there is no likelihood of a significant impact from noise, either in isolation, or cumulatively with another development. Similarly, the assessment has also considered the

cumulative impact with noise arising from the Beauly Denny transmission line and again concluded that wind farm noise levels would not result in any impact on receptors. However, it is expected that the developer/contractor would employ the best practicable means to reduce the impact of noise from construction activities. The applicant would be required to submit a scheme demonstrating how this would be implemented.

7.250 Shadow flicker may occur under certain combinations of geographical position and time of day when the sun passes behind the rotors of a wind turbine and casts a shadow over neighbouring properties. The EIAR states it is not anticipated that shadow flicker would be a significant issue either individually or cumulatively because no residential dwellings are located within the shadow flicker study area.

#### **Telecommunications**

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

#### **Aviation**

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

### **Other Material Considerations**

- 7.253 The applicant has sought permission to operate the windfarm for 35 years. As with any wind farm, the Planning Authority would request that any forthcoming permission includes a clear description of development which specifies the precise number of turbines to be developed, the maximum blade tip height, the rotor diameter and includes details of all associated ancillary infrastructure with such matters not be left to planning conditions, which could lead to scope for further redesign or re-powering without requiring a full fresh consent. In this regard the description of development, requires to be amended should the 200m scheme be consented.
- 7.254 At the end of its operational life, usual decommissioning and restoration requirements should therefore be secured. If the decision is made to decommission the wind farm, all components, track access and associated infrastructure requires to be removed from the site. The Planning Authority also requires that any foundations remain on site; the exposed concrete plinths would also be removed to a depth of 1m below the surface, graded with soil and replanted. Cables also require to be cut away below ground level and sealed. It would be expected that any new tracks or areas used for constructing the wind farm would be reinstated to the approximate pre-development condition, unless otherwise agreed with the Planning Authority.

- 7.255 The requirements to decommission at its end of life is relatively standard and straight forward, with any request for re-powering to be considered with the submission of a relevant future application. It is important to ensure that any approval of this project secures by condition a requirement to deliver a draft A finalised Decommissioning and Restoration Plan (DRP) for approval prior to the commencement of any development and ensure an appropriate financial bond is put in place to secure these works.
- 7.256 The finalised DRP would be expected to be submitted to and approved in writing by the Planning Authority in consultation with SEPA no later than 12 months prior to the final decommissioning of the site. The detailed DRP would then be implemented within 18 months of the final decommissioning of the development unless otherwise agreed in writing with the Planning Authority.
- 7.257 Given the complexity of major developments, and to assist in discharge of conditions, the Planning Authority usually seeks that the developer employs a Planning Monitoring Officer (PMO). The role of the PMO, amongst other things, would include the monitoring of, and enforcement of compliance with, all conditions, agreements and obligations related to this permission (or any superseding or related permissions) and shall include the provision of a bi-monthly compliance report to the Planning Authority.
- 7.258 Given proposed associated BESS on site, a fire safety management plan could be secured by condition. There are no other material considerations.

## 8. MATTERS TO BE SECURED BY LEGAL AGREEMENT / UPFRONT PAYMENT

8.1 A wear and tear agreement for the impact on the local road network, a decommissioning and restoration financial guarantee and a scheme for community benefit can be secured by condition. Therefore, no further legal agreements are required should consent be granted.

## 9. CONCLUSION

- 9.1 The Scottish Government gives considerable commitment to renewable energy and encourages planning authorities to support the development of wind farms where they can operate successfully and be situated in appropriate locations. The project has potential to contribute to addressing the climate emergency through additional renewable energy generation. In this regard it is anticipated to contribute an additional 57.6MW of installed capacity, plus 10MW of battery storage, and make a meaningful contribution toward addressing climate change on the road to net zero. As with all applications, a balancing exercise must be undertaken. The benefits of the proposal must be weighed against potential drawbacks and then considered in the round, taking account of the relevant policies of the Development Plan, which includes NPF4, as well as all other material planning considerations.
- 9.2 Notwithstanding the nature and scale of the proposal, there have been a low level of public representation, with 3 objections and 1 general comment received by the Council along with 2 objections and 4 support comments received by Energy Consents Unit. In addition to the objections noted from non statutory consultees (John Muir Trust, Mountaineering Scotland, Royal Society for the Protection of Birds

and Scotways). The 2 host community councils, Fort Augustus and Glenmoriston Community Council object to the proposed development although Glengarry Community Council do not object. Highland Council's Landscape Officer raises an objection to the the landscape, visual and cumulative impacts of the proposal. Both the Council's Development Plans Team and Historic Environment Team raised significant concerns that the proposal is not in overall conformity with the Development Plan and with regards to the impact on the historic environment albeit that neither has raised an objection.

- 9.3 Given the 200m scale of turbines to blade tip there is no doubt the proposed development will increase the visibility of wind energy development in the immediate and wider surrounding area. Significant landscape and visual impacts are expected from wind farm developments, however, in this case, these are considered to extend beyond localised range. The applicant has provided a comprehensive Landscape and Visual Impact Assessment and its findings are contested. Whilst it is agreed that there will be significant effects on receptors at representative viewpoints: VP1 Corrieyairack Pass, VP2 General Wade's Military Road, VP3 Corrieyairack Hill, VP4 Carn a' Chuilinn, VP5 Carn Dearg, VP20 Meallan Odhar and VP21 Beauly-Denny track, it is considered the applicant has understated the significant effects on receptors at representative viewpoints: VP11 Great Glen Way, Carn an Doire Mhoir, VP13 Burach, VP14 Ben Tee, VP16 A87, Loch Garry and VP17 Meall Fuarmhonaidh.
- 9.4 Additionally, the applicant considers that, on balance, the proposed development meets all of the relevant OWESG criterion. The case officer disagrees and considers that the proposed development scores poorly, with none of the 10 criteria being met. Even allowing for subjective judgement it is considered the applicant has understated the detrimental impacts of the proposed development.
- 9.5 Given the close proximity to the Great Glen, Loch Ness, Fort Augustus, tourist routes including the A82, A87 and the B862 Stratherrick Road, Corrieyairack Pass, General Wade's Military Road, Great Glen Way along with various surrounding Corbett summits the landscape and visual impacts are considered unacceptable. The site is also situated close to, and would have extensive visibility from, within the Loch Ness and Duntelchaig Special Landscape Area (SLA) with the proposal having the potential to give rise to significant adverse effects for receptors at a number of locations including the northern western sides of Loch Ness at mid to higher elevations with a key view being identified as the Great Glen from Meall Fuarmhonaidh.
- 9.6 The proposed development would have a significantly detrimental effect on the appreciation of the entirety of the Great Glen as a landscape feature. The location of the wind farm would have a cumulative encirclement effect on each side of the Great Glen as the proposed development would minimise respite between existing wind energy developments. The Loch Ness Landscape Sensitivity Appraisal identifies that any remaining capacity for larger scale wind energy development should be focused around existing clusters that are generally found in rolling uplands, rugged massif and rocky moorland Landscape Character Types. This is not the case with this proposed development which would extend turbines further towards the steep sided Great Glen slopes and into iconic views overlooking Loch Ness. The location, elevation and scale of turbines combine to create an incongruous effect out of

keeping with existing and proposed wind farms. Put simply, the proposed development is in the wrong place which would undo previously secured mitigation associated with the adjacent surrounding wind farms and have a significantly detrimental visual and cumulative impact

- 9.7 The application has been assessed against the policies set out in NPF4 and the Development Plan, including Policy 67 of the Highland wide Local Development Plan with its 10 tests which are expanded upon with the OWESG. This policy also reflects policy tests of other policies in the plan, for example Policy 28. Whilst the proposal can be considered to benefit from an in principle support given the contribution the development would make to towards tackling climate change, this is outweighed by the significant landscape and visual effects both in isolation and cumulatively with surrounding wind farms.
- 9.8 Schedule 9 of the Electricity Act sets out what an applicant shall do in relation of the preservation of amenity. It is considered that the proposal has not had regard to the desirability of preserving natural beauty and the significant detrimental effects cannot be mitigated. This is by virtue of the location, setting and design of the wind farm, resulting in landscape and visual impacts, in isolation and cumulatively, which cannot be accommodated.
- 9.9 All relevant matters have been taken into account when appraising this application. It is considered that the proposal does not accord with the principles and policies contained within the Development Plan and there are no material considerations which would lead to a different conclusion.

### 10. IMPLICATIONS

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

#### 11. RECOMMENDATION

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

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

A. Members granting delegated authority to the Area Planning Manager – South to respond to the Scottish Government's Energy Consents Unit / Scottish

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

## B. Reasons for Objection

- 1. The application does not accord with the provisions of Section 36 of the Electricity Act 1989 by virtue of not demonstrating sufficient regard to the desirability of, and failing to reasonably mitigate effects detrimental to, conserving flora and physiographical features of special interest by virtue of failing to demonstrate compliance with NPF4 Policies 4 (Natural Places), 11 (Energy), and HwLDP Policies 67 (Renewable Energy Developments), 28 (Sustainable Design) and the Onshore Wind Energy Supplementary Guidance as the development would have a significantly detrimental visual impact, particularly as viewed by recreational users of the outdoors in the wider vicinity of the site but most acutely to the north west, south west, south east, east and north east of the proposed development as represented by viewpoints: VP1 Corrieyairack Pass, VP2 General Wade's Military Road, VP3 Corrieyairack Hill, VP4 Carn a' Chuilinn, VP5 Carn Dearg, VP10 An Suidhe, VP11 Great Glen Way, Carn an Doire Mhoir, VP12 - B862 An Suidhe Car Park, VP13 Burach, VP14 Ben Tee, VP16 A87, Loch Garry and VP17 Meall Fuar mhonaidh, VP20 Meallan Odhar and VP21 Beauly-Denny track. It is considered the applicant has understated the significant effects on receptors at representative viewpoints. It is also considered there are adverse visual impacts at viewpoints: VP10 An Suidhe VP12 and B862 An Suidhe Car Park. This is by virtue of the design and location of the proposed development which would undo previously secured mitigation associated with the adjacent surrounding wind farms and have a significantly detrimental visual and cumulative impact.
- 2. The application does not accord with the provisions of Section 36 of the Electricity Act 1989 by virtue of not demonstrating sufficient regard to the desirability of, and failing to reasonably mitigate effects detrimental to, preserving natural beauty and conserving physiographical features of special interest because the proposal would result in significantly detrimental landscape effects on: Landscape Character Type LCT 225 Broad Steep Sided Glen, LCT 236 Smooth Moorland Ridges; and on the on the Loch Ness and Duntelchaig Special Landscape Area that is not clearly outweighed by social, environmental, or economic benefits. Consequently, the proposal does not accord with NPF4 Policy 11 (Energy) at d) and e), Policy 4 (Natural Places) at d) and engages the provisions of NPF4 Policy 4a) as well as HwLDP Policies 67 (Renewable Energy Developments) and Onshore Wind Energy Supplementary Guidance, 28 (Sustainable Design), 57 (Natural, Cultural and Built Heritage), and 61 (Landscape).

Signature: David Mudie

Designation: Area Planning Manager – South

Author: Roddy Dowell

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

Relevant Plans: Plan 1 - Figure 1.1 Site Location Plan

Plan 2 - Figure 1.2 Site Layout Plan

Plan 3 - Figure 3.3 Indicative Turbine Elevations

Appendices: Appendix 1 – Letters of Representation

Appendix 2 - Cumulative Wind Farm Developments

Appendix 3 - Development Plan and Other Material Policy

Considerations

Appendix 4 - Compliance with the Development Plan / Other Planning

Policy

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

Supplementary Guidance

Appendix 6 - Viewpoint Assessment Appraisal – Visual Impact

### **Appendix 2 - Cumulative Wind Farm Developments**

Windfarm	No Turbines	Blade Tip Height (m)	Status	Distance from nearest proposed development turbine (km)
Millenium Wind Farm	6	125	operational	9.5
Millennium Group	26	115/125	operational	9.9
Stronelairg	66	135/125/110	operational	10.0
Beinneun Extension	7	136	operational	13.7
Beinneun	25	132	operational	13.8
Bhlaraidh	32	135	operational	18.0
Corriegarth	23	120	operational	21.5
Corrimony	5	100	operational	23.0
Dunmaglass Estate	33	120	operational	30.0
Glen Kyllachy	20	110	operational	43.0
Farr	40	102	operational	43.6
Aberarder	24	130/175	consented	32.4
Dell	14	130.5	consented	11.4
Bhlaraidh Extension	15	180	consented	18.6
Bunloinn	10	200/230	consented April 24	20.3
Cloiche	36	149.9	consented 30 Nov 23	7.2
Corriegarth 2	16	149.9	consented Dec 23	21.1
Dell Redesign (Dell 2)	9	200	application	11.4
Tomchrasky	43	185	application	16.9
Chrathaich Wind Farm	14	149.5	application	19.9
Loch Liath Wind Farm	26	200/180	application	20.7
Fiodhag	46	149.9	scoping	19.8

### Appendix 3 - Development Plan and Other Material Policy Considerations

#### **DEVELOPMENT PLAN**

### National Planning Framework 4 (2023)

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

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

- 1 Tackling the climate and nature crisis.
- 2 Climate mitigation and adaptation
- 3 Biodiversity
- 4 Natural places
- 5 Soils
- 6 Forestry, Woodland and Trees
- 7 Historic assets and places
- 11 Energy
- 13 Sustainable transport
- 22 Flood risk and water management
- 23 Health and safety
- 25 Community wealth benefits
- 33 Minerals

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

- A3.2 28 Sustainable Design
  - 29 Design Quality and Place-making
  - 30 Physical Constraints
  - 31 Developer Contributions
  - 51 Trees and Development
  - 52 Principle of Development in Woodland
  - 53 Minerals
  - 55 Peat and Soils
  - 56 Travel
  - 57 Natural, Built and Cultural Heritage
  - 58 Protected Species
  - 59 Other important Species
  - 60 Other Importance Habitats

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

#### Inner Moray Firth Local Development Plan 2 2024 (IMFLDP)

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

#### Onshore Wind Energy Supplementary Guidance, Nov 2016 (OWESG)

A3.4 The Onshore Wind Energy Supplementary Guidance (OWESG) provides additional guidance on the principles set out in HwLDP Policy 67 for renewable energy developments. The Guidance sets out the Council's agreed position on onshore wind energy matters, and, although reflective of Scottish Planning Policy at the time of its adoption prior to the adoption of NPF4, the document remains an extant part of the Development Plan and is therefore a material consideration in the determination of onshore wind energy planning applications. Nevertheless, the Spatial Framework included in the document is no longer relevant to the assessment of applications as in effect, the policies of NPF4, specifically Policy 11 Energy, removes Group 2 Areas of significant protection from consideration by effectively making all land in Scotland either Group 1 Areas where wind farms will not be acceptable, or Group 3, Areas with potential for wind farm development. However, the document also contains the Landscape Sensitivity Appraisals which identifies Key Views, Key Routes and Gateways as well as Landscape Character Area sensitivities and guidance. This appraisal forms part of the statutorily adopted Onshore Wind Energy Supplementary Guidance. The site falls within the area covered by the Loch Ness study, with the turbine envelope for this application falling within the Landscape Character Area (LCA) LN6 Monadhliath ridge and tops, Rolling Uplands.

### Other Highland Council Supplementary Guidance

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

#### OTHER MATERIAL POLICY CONSIDERATIONS

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

- A3.6 The Highland-wide Local Development Plan is currently under review and is at Main Issues Report Stage. It is anticipated the Proposed Plan will be published following publication of secondary legislation post National Planning Framework 4.
- A3.7 In addition, the Council has further advice on delivery of major developments in a number of documents. This includes Construction Environmental Management Process for Large Scale Projects (Aug 2010) and The Highland Council Visualisation Standards for Wind Energy Developments (Jul 2016).

#### Other National Guidance

- Onshore Wind Energy Policy Statement (2022)
  - Draft Energy Strategy and Just Transition Plan (2023)
  - Draft Scottish Biodiversity strategy to 2045: tackling the nature emergency (2023)
  - Scottish Energy Strategy (2017)
  - 2020 Routemap for Renewable Energy (2011)
  - Energy Efficient Scotland Route Map, Scottish Government (2018)
  - Siting and Designing Wind Farms in the Landscape, SNH (2017)
  - Assessing Impacts on Wild Land Areas, Technical Guidance, NatureScot (2020)

- Wind Farm Developments on Peat Lands, Scottish Government (2011)
- Historic Environment Policy for Scotland, HES (2019)
- PAN 1/2011 Planning and Noise (2011)
- PAN 60 Planning for Natural Heritage (2008)
- Circular 1/2017: Environmental Impact Assessment Regulations (2017)

### Appendix 4 - Compliance with the Development Plan / Other Planning Policy

### **National Policy**

- A4.1 NPF 4 forms part of the Development Plan and was adopted in February 2023. It comprises three parts:
  - Part 1 sets out an overarching spatial strategy for Scotland in the future. This includes spatial principles, national and regional spatial priorities, and action areas;
  - Part 2 sets out policies for the development and use of land to be applied in the preparation of local development plans; local place plans; masterplans and briefs; and for determining the range of planning consents. This part of the document should be taken as a whole in that all relevant policies should be applied to each application; and
  - Part 3 provides a series of annexes that give the rationale for the strategies and policies of NPF4, it outlines how the document should be used, and sets out how the Scottish Government will implement the strategies and policies.
- A4.2 Part 1 the Spatial Strategy explains the unprecedented national challenges and need to reduce greenhouse gas emissions and adapt to future impacts of climate change. It sets out that that Scotland's environment is a national asset which supports the nation's economy, identity, health and wellbeing and explains that choices need to be made on sustainable use of natural assets in a way which benefits communities. The spatial strategy reflects legislation in setting out decisions required in the long-term public interest. However, in doing so it is clear that the right choices about where development should be located need to be made to ensure clarity over the types of infrastructure provided and the assets that should be protected to ensure they continue to benefit future generations. The Spatial Priorities support the planning and delivery of sustainable places to reduce emissions, restore and better connect biodiversity; liveable places for better and healthier lives; and productive places where there is a greener, fairer and more inclusive wellbeing economy.
- A4.3 At the national level, NPF4 considers that strategic renewable electricity generation and transmission infrastructure will assist in the delivery of the Spatial Strategy and Spatial Priorities for the north of Scotland, and that Highland can continue to make a strong contribution toward meeting Scotland's ambition for net zero. Alongside these ambitions, the strategy for Highland aims to protect environmental assets as well as to stimulate investment in natural and engineered solutions to address climate change. This aim is not new and will clearly require a balancing exercise to be undertaken, which is reflected throughout NPF4.
- A4.4 The proposed development is of national importance for the delivery of the national Spatial Strategy, whereby in principle support for this type of development is established. As the proposed development would be capable of generating over 50 MW, it is of a type and scale that constitutes NPF4 National Development 3 Strategic Renewable Electricity Generation and Transmission

Infrastructure.

- A4.5 Part 2 Policies: NPF4 Policies 1, 2, and 3 now apply to all development proposals Scotland-wide, which means that significant weight must be given to the global climate and nature crises when considering all development proposals, as required by NPF4 Policy 1. To that end, development proposals must be sited and designed to minimise lifecycle greenhouse gas emissions as far as is practicably possible in accordance with NPF4 Policy 2, while contributing to the enhancement of biodiversity, as required by NPF4 Policy 3.
- A4.6 Complementing those policies is NPF4 Policy 4 Natural Places, which sets out that development proposals by virtue of type, location, or scale that have an unacceptable impact on the natural environment will not be supported. The policy goes on to clarify what that means for different designations. It sets out that proposals with likely significant effects on European sites (SACs or SPAs) require appropriate assessment, and that development proposals that will affect a National Park, NSA or SSSI will only be supported where:
  - i) the objectives of designation and the overall integrity of the areas will not be compromised; or
  - ii) any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.
- A4.7 Similarly, sites designated in Development Plans for local nature conservation or Special Landscape Areas (SLAs) are protected in NPF4 Policy 4 unless the development will not result in significantly adverse effects on its qualities or its integrity, or these effects are clearly outweighed by social, environmental, or economic benefits of at least local importance. The most significant policy change for Natural Places brought about by NPF Policy 4 is with regard Wild Land Areas, which states that renewable energy developments that support national targets will be supported in Wild Land Areas (WLA) and that buffer zones around WLAs will not be applied, so that effects of development out with WLAs will not be a significant consideration.
- A4.8 Policy 11 intent is to "encourage, promote and facilitate all forms of renewable energy development onshore and offshore. This includes energy generation, storage, new and replacement transmission and distribution infrastructure and emerging low-carbon and zero emissions technologies including hydrogen and carbon capture utilisation and storage (CCUS)". It specifies that the principle of all forms of renewable, low-carbon, and zero emission technologies is supported (with the exception of wind farm proposals located in National Parks or National Scenic Areas) including 'enabling works, such as grid transmission and distribution infrastructure' which encompasses this application.
- A4.9 It states that development proposals should only be supported where they maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities. The policy goes on to say that significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets, while identifying impacts,

including cumulative impacts, that must be suitably addressed and mitigated against. Policy 11 e) i to xiii) sets out the criteria against which applications must be assessed.

- A4.10 This includes a broad range of matters similar those to be assessed under HwLDP Policy 67 including landscape and visual impacts. It advises that where impacts are localised and / or appropriate design mitigation has been applied such effects will generally be considered acceptable. While the adopted NPF4 reflects a stronger presumption in favour of all national scale energy developments, judgment is still required at the project level to ensure proposals do not have unacceptable landscape and visual impacts even if the contribution to national renewable energy targets is considerable.
- A4.11 On that point it is noted that both legislation and planning law indicate that where there may be incompatibility between NPF4 and the Local Development Plan (LDP) (HwLDP, IMFLDP2, and Highland Council Supplementary Guidance) published prior to NPF4, then the more recent document shall prevail. Notwithstanding however, in instances of incompatibility, this requirement may not eliminate the provisions of the LDP in their entirety whilst these documents remain an extant part of the adopted Development Plan. That means that the Council may wish to still give considerable weight to the provisions of its LDP over national policies where there is strong justification for doing so, such as where the Council feels that LDP policy is better equipped to respond to local matters of importance or site-specific conditions for example.
- A4.12 It is considered the proposal is not in overall conformity with NPF4 Policy 11, particularly with regards to 11 e) ii. which requires the proposed development project design and mitigation will demonstrate how the following impacts are addressed:
  - Significant landscape and visual impacts, recognising that such impacts are to be expected for some forms of renewable energy. Where impacts are localised and/or appropriate design mitigation has been applied, they will generally be considered to be acceptable;
- A4.13 The current proposal will have significant adverse landscape and visual impacts on a range of features/receptors (including but not restricted to) WLA 19 Braeroy, Glenshirra, Creag Meagaidh, Loch Ness and Duntelchaig SLA, Loch Lochy and Oich SLA along with the Corrieyairack Pass, General Wade's Military Road and Great Glen Way. The proposed development has not set out any significant net socioeconomic or community wealth building benefits that may tip the balance in favour of overall development plan conformity
- A4.14 Additionally, whilst the generality of HwLDP's topic policies are superseded by those in NPF4 HwLDP policies that offer greater detail than NPF4 or that are tailored to Highland circumstance (and are not wholly incompatible with NPF4) are still relevant and may be applicable. In particular, Policy 67 Renewable Energy and its related Onshore Wind Energy Supplementary Guidance is relevant, the latter classifying the application site as principally within an "Area of Significant Protection". Also, Policy 57 Natural, Built and Cultural Heritage in terms of protection of WLA 19 Braeroy, Glenshirra, Creag Meagaidh, Loch

Ness and Duntelchaig SLA, Loch Lochy and Oich SLA, Corrieyairack Pass and General Wade's Military Road scheduled monuments.

- A4.15 it is considered the proposal is not in overall conformity with Policy 57, Policy 61 and Policy 67 of HwLDP. Policy 57 requires all development proposals be assessed taking into account the level of importance and type of heritage features, the form and scale of the development, and any impact on the feature and its setting. The following criteria will also apply:
  - For features of local/regional importance development will be allowed if it can be satisfactorily demonstrated that they will not have an unacceptable impact on the natural environment, amenity and heritage resource; and
  - For features of national importance development will be allowed if it can be shown not to compromise the natural environment, amenity and heritage resource. Where there may be any significant adverse effects, these must be clearly outweighed by social or economic benefits of national importance. It must also be shown that the development will support communities in fragile areas who are having difficulties in keeping their population and services.
- A4.16 In terms of Policy 67, whilst the proposed development would contribute towards meeting renewable energy generation targets and generally have a positive effect on the local and national economy the Council has to be satisfied that it is located, sited and designed not to be significantly detrimental overall, either individually or cumulatively with other developments, having regard in particular to any significant effects on the following:
  - Natural, built and cultural heritage features;
  - Visual impact and impact on the landscape character of the surrounding area (the design and location of the proposal should reflect the scale and character of the landscape and seek to minimise landscape and visual impact, subject to any other considerations);
  - Amenity at sensitive locations, including residential properties, work places and recognised visitor sites (in or outwith a settlement boundary); and
  - The amenity of users of any Core Path or other established public access for walking, cycling or horse riding;
- A4.17 Part 3: Annex B National Developments Statements of Need. National developments are significant developments of national importance. Appendix B identifies 18 types of national development which will support the delivery of the spatial strategy. The statements of need set out in the Appendix are a requirement of the Town and Country Planning (Scotland) Act 1997). Any project identified as national development is required to be considered at a project level to ensure all statutory tests are met.

This project is classified as National Development under Annex B Section 3 which states National Development for renewable energy includes "Strategic Renewable Electricity Generation and Transmission Infrastructure" including:

- a) On and off shore electricity generation, including electricity storage, from renewables exceeding 50 megawatts capacity;
- A4.18 This brings the application under the tests set out under Policy 11. As noted earlier, it is considered the proposal is not in overall conformity with NPF4 Policy 11, particularly with regards to 11 e).

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

- A4.19 The HwLDP identifies the site as "wider countryside" under Policy 36. It sets out a range of parameters against which development will be assessed. It states that development proposals may be supported if they are judged to be not significantly detrimental under the terms of the policy noting "Renewable energy development proposals will be assessed against Renewable Energy Policies, the non-statutory Highland Renewable Energy Strategy and where appropriate the Onshore Wind Energy Supplementary Guidance".
- A4.20 HwLDP Policy 57 Natural, Built and Cultural Heritage requires all development proposals be assessed taking into account the level of importance and type of heritage features, the form and scale of the development, and any impact on the feature and its setting. It does acknowledge the nearby internationally important Ness Woods SAC, Loch Knoche and nearby Lochs SPA, nationally important Glen Tarff SSSI, Parallel Roads of Lochaber SSSI and Glendoe Lochans SSSI, WLA 19 Braeroy, Glenshirra Creag Meagaidh along with locally important Loch Lochy and Oich SLA and Loch Ness and Duntelchaig SLA. It also acknowledges the nationally important scheduled monuments associated with the Corrieyairack Pass and General Wade's Military Road and in the wider surrounding area.
- A4.21 HwLDP Policy 67 Renewable Energy sets out that 'renewable energy development should be well related to the source of the primary renewable resource needed for operation'. It states that 'The Council will consider the contribution of the proposed development in meeting renewable energy targets and positive/negative effects on the local and national economy as well as all other relevant policies of the Development Plan and other relevant guidance.' The Council will support proposals where it is satisfied they are located, sited and designed such as they will not be significantly detrimental overall, individually or cumulatively with other developments against eleven specified criteria (as listed in HwLDP Policy 67). Such an approach is consistent with the concept of Sustainable Design (HwLDP Policy 28) and the concept of supporting the right development in the right place at the right time.
- A4.22 Policy 69 Electricity Transmission Infrastructure states that 'proposals for overground, underground or sub-sea electricity transmission infrastructure (including lines and cables, pylons/ poles and vaults, transformers, switches and other plant) will be considered having regard to their level of strategic significance in transmitting electricity from areas of generation to areas of consumption'. Subject to balancing with this consideration, and taking into account any proposed mitigation measures, the Council will support proposals which are assessed as not having an unacceptable significant impact on the

environment, including natural, built and cultural heritage features.

- A4.23 Although HwLDP Policy 67 and Policy 69 are considered compatible with NPF4 Policy 11, NPF4 expresses greater support for renewable energy projects outwith National Parks and NSAs and requires greater weight to be attributed to the twin climate and biodiversity crises in the decision making process, whilst still recognising that a balancing exercise must still be carried out
- A4.24 As noted earlier, it is considered the proposal is not in overall conformity with HwLDP Policy 57 and 67.

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

- A4.25 The majority of the application side lies outside the boundary of the Inner Moray Firth Local Development Plan (IMFLDP). Only the site access falls within the plan boundary. There are no policies specific to the proposed development.
- A4.26 The IMFLDP contains policy on Nature Protection, Preservation and Enhancement (Policy 2). This sets out that major development will only be supported where it is demonstrated that the proposal will conserve and enhance biodiversity within and adjacent to a site. This is similar to the approach taken in NPF4 and will be considered in the relevant sections of this report.
- A4.27 The IMFLDP also sets out that developers will be required to demonstrate that adequate capacity to serve the proposal exists or can be created by a programmed improvement or via direct developer provision or funding. Where this is appropriate, the need for enhancements to infrastructure will be highlighted in this report.

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

- A4.28 The Council's OWESG forms part of the Development Plan and remains a critical document in the determination of applications. The supplementary guidance does not provide additional tests in respect of the consideration of development proposals against Development Plan policy. However, it provides a clear indication of the approach the Council takes towards the assessment of proposals, and thereby aids consideration of applications for onshore wind energy proposals.
- A4.29 The OWESG approach and methodology to the assessment of proposals is applicable and is set out in the OWESG Para 4.16 4.17. It provides a methodology for a judgement to be made on the likely impact of a development on assessed "thresholds" to assist the application of HwLDP Policy 67. The 10 criteria are particularly useful in considering visual impacts, including cumulative impacts. An appraisal of how the proposal relates to the thresholds set out in the criteria, is included in Appendix 5 of this report.

# Onshore Wind Energy Policy Statement (2022) and Draft Energy Strategy and Just Transition Plan (2023)

- A4.30 The Onshore Wind Energy Policy Statement supersedes the previously adopted Onshore Wind Energy Policy Statement which was published in 2017. The document sets out a clear ambition for onshore wind in Scotland and for the first time sets a national target for a minimum level of installed capacity for onshore wind energy, being 20 GW. This is set against a currently installed capacity of 9.4 GW (June 2023). Therefore, a further 10.6 GW of onshore wind requires to be installed to meet the target. It is however acknowledged that targets are not caps. In delivering such a target Scotland would play a significant role in meeting the requirement of 25-30 GW of installed capacity across the UK identified by the Climate Change Committee.
- A4.31 Like the previous iteration of the Onshore Wind Energy Policy Statement, the document recognises that balance is required and that no one technology can allow Scotland to reach its net zero targets. The document is clear that in achieving a balance, environmental and socio-economic benefits to Scotland must be maximised. In taking this approach, this echoes Scotland's Third Land Use Strategy.
- A4.32 The document recognises that there may be a need to develop onshore wind energy development on peat. Priority peatland is present on the site, and it is considered that a Peat Management Plan and a more ambitious Habitat Management Plan can be secured by condition.
- A4.33 Additionally, the document acknowledges that in order for Scotland to achieve its climate targets and the ambition for the minimum installed capacity of 20 GW by 2030, the landscape will change. However, the OWEPS also sets out that the right development should happen in the right place. Echoing NPF4, the document sets out that significant landscape and visual impacts are to be expected and that where the impacts are localised and / or appropriate mitigation has been applied the effects will be considered acceptable.
- A4.34 The role of Landscape Sensitivity Appraisals in considering wind energy proposals is promoted through the document. This highlights the importance of applying those contained within the Council's OWESG when assessing applications.
- A4.35 Benefits to rural areas, such as provision of jobs and opportunities to restore and protect natural habitats, are also highlighted in the document. It considers some of the wider benefits and challenges faced by in delivery of ambition and vision for onshore wind energy in Scotland. These include shared ownership, community benefit, supply chain benefits, skills development and financial mechanisms for delivery. The proposed development does lead to such benefits being delivered, however, in relation to maximising socio-economic benefits, there is no current guidance on what that should look like and evidence of a significant shift of requirements is yet to emerge, which Members may expect to see, from what was likely to be offered pre-adoption of NPF4.

- A4.36 Finally, the document also highlights technical considerations, those relevant to this application have been considered and mitigation, where required has been secured by condition.
- A4.37 The Draft Energy Strategy and Just Transition Plan has been published for consultation. Ministers will likely give consideration to this document in their decision on the application, however, limited weight can be applied to the document given its draft status. Unsurprisingly, the material on onshore wind in the document reflects in large part that contained in NPF4 and the Onshore Wind Energy Policy Statement 2022. A fundamental part of the Strategy is expanding the energy generation sector. Overall, the draft Energy Strategy forms part of the new policy approach alongside the OWEPS and NPF4 and confirms the Scottish Government's policy objectives and related targets reaffirming the crucial role that onshore wind and enabling transmission infrastructure will play in response to the climate crisis which is at the heart of all these policies.
- A4.38 To deliver the ambition for onshore wind, the Onshore Wind Sector Deal for Scotland was introduced in September 2023. The document focuses on necessary high-level actions by Government and the Sector to support onshore wind delivery. Jointly, Government and the Sector are committed to working together to ensure a balance is struck between onshore wind and the impacts on land use and the environment. The document looks to expediate decision making and consent implementation to achieve 20 GW of installation by 2030, meaning we should be seeing faster decisions on applications that are already in the system, with more consents being build out. Again, the sector deal does not detail what the socio-economic commitments should be.

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

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

The nearest settlements are Invergarry and Fort Augustus approximately 6.5km and 8km respectively from the closest proposed turbines. Due to the site location and topography, the proposed development is relatively well screened from these settlements with only some blade tips theoretically visible as demonstrated by the ZTV. However, visibility heightens the awareness of a number of wind energy developments to the south east and south west of Loch Ness in the wider surrounding area of the these settlements.

Meall Fuar-mhonaidh is regarded as a "Key Location" relevant to the proposed development. The proposed development would contribute to a perception of Meall Fuar-mhonaidh being encircled by development. There are numerous developments that are visible or prominent in the landscape from the summit of the hill, but the proposed development adds considerably to the degree to which those existing developments appear to encircle the outlook. The site, being closer to the Great Glen and lower in elevation than existing developments on the south east side of the Loch Ness, has the effect of curving the line of development towards the loch and associating them more closely with the existing development on the north west side. Encirclement by development has the potential to isolate Meall Fuar-mhonaidh from its wider setting, diminishing the appreciation receptors at the summit have for its relationship to the variety of landscapes which contribute to the unique sense of place. The proposed development would extend the visual effects of wind energy developments on the Great Glen.

The proposed development is not considered to meet the threshold of Criterion 1.

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

The transition into the Great Glen is important. The A87, A82 and B862 roads along with the Great Glen Way are noted as key routes and are affected to varying degrees by the proposed development. Given the site location and topography the proposed turbines are relatively well screened from both the A82 and B862. From the A82 when travelling south west from the outskirts of Invermoriston to Easter Portclair there will be sporadic visibility over approximately 2km where between 1 and 2 blade tips are theoretically visible as demonstrated by the ZTV. Beyond Portclair, more sustained visibility over approximately 4km on the approach to Fort Augustus, between 1 and 6 blade tips are theoretically visible as demonstrated by the ZTV. From the B862 when travelling south west from the B851 junction, through Errogie and beyond Gorthleck there will be a stretch of approximately 10km of intermittent visibility where between 1 and 2 blade tips are theoretically visible as demonstrated by the ZTV.

The proposed development would extend the influence of wind energy development along a stretch of approximately 6km along the A87 heading east from the Glen Garry west viewpoint layby to the outskirts of Invergarry where between 7 and 8 blades along with combinations of hubs and towers to varying degrees theoretically visible as demonstrated by the ZTV. Whilst views are currently screened by trees along the southern boundary of

the A87 this could change in future with sustained views along this route if the existing vegetation were to be removed.

The turbines will be seen from various sections of the Great Glen Way when travelling in a south westerly direction looking south down the Great Glen with occasional visibility of fewer turbines in view from the north eastern section of the route and a number of popular hill tops. Visibility becomes more sustained with an increased number of turbines in view when continuing along the Great Glen Way moving closer to the proposed development. This is shown by VP17 Meal Fuar-mhonaidh, moving on through VP13 Burach then on to VP11 Great Glen Way, Carn an Doire Mhoir and beyond, where 8 blade tips are in view along with hubs and large portions of towers along with ancillary development being perceptible. Significant visual effects are noted from the viewpoints representing the impacts of the proposed development on the Great Glen Way.

The proposed development is not considered to meet the threshold of Criterion 2.

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

The applicant has presented an assessment based on an Inner Study Area (within the Culachy Estate boundary) and Outer Study Areas (2km and 5km from the turbine array). There are no statutory designations within the site boundary. The Corrieyairack Pass, built as a military road by General Wade between Fort Augustus and Dalwhinnie, runs north to south to the immediate east of the site boundary within the Culachy Estate. It comes close to the site boundary to the east of the proposed borrow pit and to the north of Turbine 8. It comprises 4 scheduled monument listings at this location (SM6140, SM6141, SM6142 and SM6143) which form one continuous linear strip. There are a further 12 scheduled monuments within 5km of the site and 19 scheduled monuments between 5km and 10km of the site boundary which (noted in the table 2.14 in the report).

There are no listed buildings within the Inner Study Area. There are 40 listed buildings within the Outer Study Area and 29 listed buildings beyond this between 5km and 10km of the site boundary.

There are 37 non-designated heritage assets recorded within the Inner Study Area (including some within the application site).

There is 1 Conservation Area at Fort Augustus (CA109) and 1 Inventory Battlefield (BTL29 Blar na Léine) within 20km of the site.

There are close proximity views of the proposed development from General Wades Military Road and Correiyairack Pass which would be adversely affected by the proposal. VP1 Corrieyairack Pass, VP2 General Wade's Military Road and VP3 Corrieyairack Hill show a large proportion of the turbines visible in the foreground of the landscape along with access tracks and hardstanding. This will have the effect of drawing the eye and will be viewed through the Beauly Denny line in the foreground. The scale of the landscape, the perception of being on the single route passing through it and the perceived uniqueness and antiquity of the Corrieyairack Pass as a route, give it a remarkable sense of place. The relationship of the Corrieyairack Pass and the wider landscape is not only about built heritage and setting but also a matter of history. This background provides a greater sense of place to many and has an important effect on the experience of walking

the Corrieyairack Pass route along with other forms of recreation. For receptors, the turbines will tend to dominate the view. Whilst the large scale BDOHL man-made structure has previously been introduced into the otherwise remote landscape and it has an adverse effect on the amenity of the Pass, the adverse effect of the proposed development would be much greater due to the significant scale and movement of the turbines.

There are a number of Corbetts in the immediate surrounding area to the east, south east, south west and north west which will have visibility of the wind farm represented by VP3, VP4, VP5, VP13, VP14, VP15, VP17 and Munros set back further to the north west represented by VP18. The table in Appendix 6 of this report identifies that there would be significant effects at all these viewpoints except VP15 and VP18.

The proposal would be visible from within a number of sites designated for their natural qualities including Wild Land Areas and Special Landscape Areas. There are concerns regarding the impact on the WLA 19 Braeroy, Glenshirra, Creag Meagaidh given the proposed development will introduce a new prominent feature into an area noted for its solitude, sanctuary and sense of remoteness.

The turbines will be visible from a section of the Great Glen Way route and a number of popular hill tops including Meal Fuar-Mhonaidh on the north western side of Loch Ness overlooking the loch to the east/south east. The Great Glen itself and Loch Ness are regarded as landmarks relevant to this criterion.

Meal Fuar-Mhonaidh in particular, is one example of a distinct hill peak nearly 700m high that stands out as a landmark clearly visible from both ends of the loch. As described at Criterion 1, the introduction of the proposed development would, when seen from Meall Fuar-mhonaidh tend to extend the line of visible development to the south east of Loch Ness and curve it round and link visually to developments on the north west in addition to creating an effect of encircling the outlook. This creates a line of features which cuts across the glen, rather than running in parallel on opposing sides of the glen. This would reduce the appreciation of the westward extent of the glen and diminish its character as the dominant dynamic feature of the landscape.

Meall Fuar-Mhonaid is a good vantage point from which to appreciate the massive scale and alignment of the Great Glen fault within a backcloth of the Monadhliath massif to the south and the Balmacann and Affric mountain interior to the north west, both areas which possess wildness qualities. While the proposed turbines would not be dominant features in the view they could be considered to add to a sense of increasing the presence of wind energy development extending the horizontal spread of turbines further into the view south towards the Great Glen which has up until now been safeguarded from development. The proposal has a detrimental impact upon the central feature of the Loch Ness and Duntelchaig SLA and the striking view of the Great Glen. Given the consolidation of existing wind farm clusters over the years in the wider surrounding area, as opposed to any expansion closer to the steep sided slopes of the Great Glen, the proposed development appears incongruous due to a lack of relationship to these developments.

In addition, the presence of the development at the southern end of the Loch Ness, when seen from locations such as viewpoints VP12 and VP15, introduces a new focal point into a complex local landscape composition where the Smooth Moorland Ridges are seen in a layered composition behind the southern end of the Rolling Uplands together with the Broad Steep Sided Glen at a point where its Key Characteristic of "Contrast between the

smaller scale landscapes of settled, lower slopes and the large scale moorland and forested backdrops" is particularly evident. This landscape complexity and local composition is important to the sense of place for south Loch Ness, the presence of the large turbines introduced here would disrupt that relationship between Loch and surroundings to its detriment.

The proposed development would significantly affect the fabric and setting of valued natural landmarks. The proposed development, by its presence, would diminish the prominence of the landmarks noted above and disrupt the relationship to the setting.

The proposed development is not considered to meet the threshold of Criterion 3.

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

For the proposed development this would include a number of popular recreational routes and the core paths in the area. As covered above in Criterion 3, the turbines will be visible from an extended section of the Great Glen Way represented by VP11 Great Glen Way, Carn an Doire Mhoir and VP17 Meal Fuar-Monaidh on the north western side of Loch Ness. Whilst not a dominant feature the proposed development would appear incongruous located some distance between the consolidated Millenium/Beinneun cluster and Stronelarig either side of views towards the Great Glen. The proposed development would have a cumulative affect that would extend the horizontal spread of turbines closer to the steep sided slopes of the Great Glen when looking south east across Loch Ness.

Given the upland location of this stretch of the Great Glen Way there will be views of the development for sustained periods of approximately 12km walking in a southerly direction. Whilst the slopes above the northern shores of Loch Ness have sustained views of the proposed development the southern slopes only have relatively small pockets of visibility. Likewise, visibility from key recreational routes to the south of Loch Ness including the National Cycle Route, South Loch Ness Trail from Fort Augustus to Foyers will be relatively brief and fleeting with fewer turbines in view when travelling in a southerly direction.

The Corrieyairack Pass is regarded as a key recreational route which would have visibility of the proposed wind farm for a sustained period of approximately 8km. The visual impact from the Corrieyairack Pass is demonstrated by the visualisations VP1 Corrieyairack Pass, VP2 General Wade's Military Road and VP3 Corrieyairack Hill. The Corrieyairack Pass, originally built as a military road by General Wade, leads across the Monadhliath Mountains from Laggan in Badenoch to Fort Augustus. This linear walk climbs to a height of over 770m through remote terrain and is also popular with mountain bikers and walkers. The route is shared with the BDOHL which detracts slightly from the otherwise wild and remote feel of the track.

In addition to the visibility on and adjacent to the Corrieyairack Pass, there are views of the proposed development from viewpoints VP4, VP5, VP13, VP11, VP13, VP14, VP16, VP17, VP20 and VP21 which are considered to have Significant visual effects on receptors.

The proposed development would significantly affect the amenity of key recreational routes and would detract from the visual appeal of the Corrieyairack Pass to the east,

south east, north east, Great Glen Way and Meal Fuar-Monaidh to the north/north east and various Corbetts to the east/south east, south west and north west.

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

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

The transition into the Great Glen is important. The A87, A82 and B862 roads along with the Great Glen Way are noted as key routes and are affected to varying degrees by the proposed development. Given the site location and topography the proposed turbines are relatively well screened from both the A82 and B862. From the A82 when travelling south west from the outskirts of Invermoriston to Easter Portclair there will be sporadic visibility over approximately 2km where between 1 and 2 blade tips are theoretically visible as demonstrated by the ZTV. Beyond Portclair, there is more sustained visibility over approximately 4km on the approach to Fort Augustus with between 1 and 6 blade tips theoretically visible as demonstrated by the ZTV. From the B862 when travelling south west from the B851 junction, through Errogie and beyond Gorthleck there will be a stretch of approximately 10km of intermittent visibility where between 1 and 2 blade tips are theoretically visible as demonstrated by the ZTV.

The proposed development would extend the influence of wind energy development along a stretch of approximately 6km along the A87 heading east from the Glen Garry west viewpoint layby to the outskirts of Invergarry where between 7 and 8 blades along with combinations of hubs and towers to varying degrees theoretically visible as demonstrated by the ZTV. Whilst views are currently screened by trees along the southern boundary of the A87 this could change in future given it is plantation forestry with sustained views along this route if the existing vegetation were to be removed.

It is considered there would be significant visual effects on the views from this stretch of the A87. Whilst the proposed development would not overwhelm the route it would significantly detract from the visual appeal of the A87 overlooking Loch Garry if the existing trees currently shielding visibility were to be removed.

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

#### Criterion 6 is related to respecting the existing pattern of development

The pattern of development is discussed under Criteria 1 above in so far as it relates to encirclement around the Great Glen, particularly from the "Key View" Meall Fuar-mhonaidh and the "Key Route" Great Glen Way. Proposals should contribute positively to existing pattern or objectives for development in the area. The strong pattern of development in this area is for wind farms to be sited in the Rolling Uplands LCT with a setback of approximately 7.5km to 10.5km from the edge of the Broad Steep Sided Glen LCT and where the Farmed and Wooded Foothills LCT lies between the Broad Steep Sided Glen and the Rolling Uplands. Turbines are generally located at elevations above 700m. In contrast, the proposed development sits approximately 3km from the boundary with the Broad Steep Sided Glen, well south of the end of the Farmed and Wooded Foothills and the turbines sitting below 500m.

The existing pattern of wind energy development in the Monadhliath Mountains is characterised by locations on the "third horizon" when viewed from the west of the Great Glen. Existing development tends to be located within shallow bowls not visible from distant views. Additionally, development in the wider surrounding area such as the Millenium/Beinneunn cluster, Stronelairg and to a lesser extent Corriegarth have successfully expanded or are due to expand further within their contained upland bowl landforms with Bunloinn, Cloiche and Stronelairg all consented. Previously instituted mitigation measures have sought to minimise visibility by settling these wind energy developments into the landscape in locations where they can benefit from some rising ground to contain them. Whilst the proposed development is located within a similar landform it is at lower elevation where there is less separation from the edge of the Great Glen and more visible at distance. Additionally, the proposed development would be in closer proximity to the southern shores of Loch Ness than any other wind farm to date. This iconic panorama is currently free from wind energy development and the proposed development would increase the spread of wind turbines into an area that has previously been safeguarded to retain views south down the Great Glen. This combined with the significant scale of turbines adds to the sense of encirclement of Loch Ness.

While it is appreciated that there are views in which the proposed development appears contained by the landscape there are important angles of view, from Meall Fuar-mhonaidh and from the Great Glen way, where that is not evident. It is considered that the proposed development will not contribute positively to the existing pattern or objectives for development in the area.

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

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

The Loch Ness Landscape Sensitivity Appraisal concludes that development in this Landscape Character Type should maintain space between existing development to prevent coalescence. Whilst the proposed development has reasonable separation from existing and proposed development in the Monadhliath Mountains to the north east and Glen Moriston to the north west the site is located closer to the edge of the Great Glen therefore the visual separation appears inconsistent. It is considered there are Significant cumulative effects on receptors from viewpoints VP1, VP3, VP4, VP5, VP13, VP14, VP17, VP20, VP21. This is in part due to the incongruity of the proposed development which is spreading turbines further across the upland landscape closer to the Great Glen when compared with relatively contained consolidated development such as the Millenium/Benneun cluster, Stronelairg and Corriegath wind farms contained within upland bowl landforms.

The proposed development would not retain appropriate and effective separation between existing development, does not relate well to the landscape setting and would increase the visual prominence of surrounding wind turbines.

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

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

The existing pattern of wind energy development in the Monadhliath Mountains is characterised by locations on the "third horizon" when viewed from the west of the Great Glen. Whilst the landscape is of sufficient scale to accommodate the proposed development it is located within a lower elevation than existing wind energy development in the Monadhliath Mountains.

NatureScot's Siting and Designing Windfarms in the landscape states that a:

"wind farms should be: of minor vertical scale in relation to the other key features of the landscape. This does not suggest a literal physical comparison between turbine heights measured against landform height, rather, where the perceived vertical scale of landform is an important attribute of the landscape, the perception of vertical scale should not suffer a reduction by the introduction of turbines."

From much of the area of visibility, the development is clearly read as a large development in the landscape. In locations where additional landscape character types other than the host Smooth Moorland Ridges are not visible or prominent, the development appears appropriately scaled. Where the development is seen in a wider landscape context, with Rolling Uplands visible and cumulative developments in view, the proposed development appears discordant and out of scale. This is particularly the case where the proposed development is viewed from the far side of the Great Glen, where its relative proximity to the glen and the scale of turbines combine to have a diminishing effect on the perception of scale and distance in and around the Great Glen, to the detriment of its sense of place.

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

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

As noted for Crietrion 7 and 8 the Loch Ness Landscape Sensitivity Appraisal concludes that development in this Landscape Character Type should maintain space between existing development to prevent coalescence. Whilst the proposed development has reasonable separation from existing and proposed development in the Monadhliath Mountains to the north east and Glen Moriston to the north west the site is located closer to the edge of the Great Glen at a lower elevation therefore the visual separation appears inconsistent with existing and consented developments. This is in part due to the incongruity of the proposed development which is spreading turbines further across the upland landscape closer to the Great Glen when compared with relatively contained, consolidated development such as the Millenium/Benneun cluster, Stronelairg and Corriegath wind farms contained within upland bowl landforms.

Whilst there is clear separation between surrounding wind energy schemes the proposed development is not considered to relate well to the existing landscape setting surrounding wind energy developments.

The proposed development is not considered to meet the threshold of Criterion 9.

#### Criterion 10 is related to distinctiveness of landscape character.

For the avoidance of doubt this does not relate to landscape designations. Consideration should be given to the variety of landscape character as one travels through the area and

how that changes and transitions as one moves through the area. The proposed development will create infill between defined groups of wind farms and will dominate the south western portion of Monadhliath ridge and tops, Rolling Uplands, reducing the legibility of the landscape and undermining the mitigation and design concept of surrounding developments in the Monadhliath Mountains. Various outlooks towards the proposed development, represented by views from VP11, VP13 and VP17 on the north western slopes above Loch Ness are considered to dominate the local landscape character of the steep glens looking towards the Great Glen to such an extent that they would become a significant characteristic. It is considered the proposed development does not maintain the integrity and variety of Landscape Character Areas.

The proposed development is not considered to meet the threshold of Criterion 10.

#### Appendix 6 - Viewpoint Assessment Appraisal - Visual Impact

			Proposed Dev	relopment		Cumulative			
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major- Moderate are Significant. Moderate may be significant)	Magnitude of Cumaltive Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)	
VP1 -	Арр	High	High	Major	Significant	High	Major	Significant	
Corrieyairack Pass	THC	High	High	Major	Significant	High	Major	Significant	
1.28km from nearest turbine View North West	The baseline is as described in Section 6.1 of the EIAR Volume 1: Chapter 6 Landscape of Visual Impact Assessment.  Receptors will be a mixture of hill walkers, recreational walkers, cyclists along with those using the route for recreational events (duathalon). The designated Scottish National Trail has historical significance with Scheduled Monuments along the route. It is agreed the sensitivity of receptors is High.								

All turbines and hubs would be visible in the foreground with almost all the towers in view. T8 is particularly prominent in the forefront of the view due to its close proximity to the route. Additionally, access tracks and hardstanding for all turbines would be seen from this section of Corrieyairack Pass.

The proposed Tomchrasky wind farm would not be immediately apparent given intervening landform with a portion of 1 blade tip visible. The now consented Bunloinn wind farm would appear in the view to the south west amongst Beinneun and Beinneun Extension wind farms further increasing the number of turbines already visible as part of the Beinneun/Millennium wind farm cluster. The level of change is considered similar to the assessment against the operational/under construction/consented/proposed baseline given the influence of the proposed development. It is agreed the magnitude of change is considered to be High resulting in a Major and Significant effect. Millennium

			Proposed Development		Cumulative			
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major- Moderate are Significant. Moderate may be significant)	Magnitude of Cumaltive Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)
		wind farm noted to the sou		•	he applicant no	tes that the lar	rge scale man-	made structure BDOHL has
	previou		he otherwise r	emote landsca	ape and it has a	ın adverse effe	ect on the ame	nity of the Pass, the adverse effect
VP2 - General	App	High	High	Major	Significant	Negligible	Minor	Not Significant
Wade's	THC	High	High	Major	Significant	Negligible	Minor	Not Significant
Military Road  1.74km from nearest turbine  View South	The baseline is as described in Section 6.1 of the EIAR Volume 1: Chapter 6 Landscape of Visual Impact Assessment.  Receptors will be a mixture of hill walkers, recreational walkers, cyclists along with those using the route for recreational events (duathalon). The designated Scottish National Trail has historical significance with Scheduled Monuments along the route. It is agreed the sensitivity of receptors is High.							

			Proposed Development			Cumulative			
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major- Moderate are Significant. Moderate may be significant)	Magnitude of Cumaltive Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)	
	No oth	er operational or proposed	d wind farms c	an be seen fro	m this view and	d there are no	cumulative eff	ects.	
	There is agreement with the applicant's assessment. Again, whilst the applicant notes that the large scale man-made structure BDOHL had previously been introduced into the otherwise remote landscape and it has an adverse effect on the amenity of the road, the adverse effect of the proposed development would be much greater due to the significant scale and movement of the turbines.								
VP3 - Corrieyairack Hill	Арр	Medium-High	Medium- High	Moderate- Major	Significant	Medium- High	Moderate- Major	Significant	
1 1111	THC	High	High	Major	Significant	High	Major	Significant	
3.75km from nearest turbine  View West	Receptors will be hill walkers appreciating the view from the summit with a high susceptibility to change. The viewpoint is relatively easily accessed from the elevated section of the Corrieyairack Pass either from Melgarve to the south east along a rough track or a much longer								

			Proposed Development			Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major- Moderate are Significant. Moderate may be significant)	Magnitude of Cumaltive Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)
	magnit	ude of change and level o	f effect it is ag	reed the effec	on receptors is	s Major and Si	gnificant.	
	Dell wi These wind fa The no develo consid constru	nd farm is also to the north schemes will increase the arm and Tomchrasky wind ow consented Cloich and Spment and intensification dered the applicant has unduction/consented/proposed it is considered the application.	n east beyond spread of turk farm proposal stronelairg 2 word the cumulat derplayed the discenarios it is	the Stronelairy bines and inter I would appear ind farms bring ive effect. Mille cumulative ma s agreed the e	g wind farm with a sify the visual of the view to be turbines close ennium South we gnitude of chartifect on receptors.	h the consente effect experier the south west er to the viewpo vind farm noted nge and level cors is Major an	ed Bhlaraidh Ei aced from this amongst Beir oint and furthe d to the west h of effect with re d Significant.	estate and Corriegarth wind farms. Extension wind farm to the north. Extension wind farm to the north. Extension wind farm to the north. Extension wind farm cluster. Extension wind farm cluster. Extension wind farm cluster. Extension wind farm cluster. Extension with the applicant's Extension wind farm to the north wind farm cluster. Extension wind farm to the north wind farm cluster. Extension wind farm to the north.  Extension wind farm to the north.  Extension wind farm to the north.  Extension wind farm to the north.  Extension wind farm to the north.  Extension wind farm to the north.  Extension wind farm to the north.  Extension wind farm to the north.  Extension wind farm to the north.  Extension wind farm to the north.  Extension wind farm to the north.  Extension wind farm cluster.  Extension wind farm to the north.  Extension wind farm cluster.  Extension wind farm cluste
VP4 - Carn a' Chuilinn	Арр	Medium-High	Medium- High	Moderate- Major	Significant	Medium- High	Moderate- Major	Significant
4.48km from	THC	High	High	Major	Significant	High	Major	Significant
nearest turbine View South West	Recept worn to by the	rack from the Glendoe Res applicant. Chuillinn (816m AOD) is a	oreciating the vervoir track to	view from the so the foot of the panoramic vie	summit with a he summit. The s	iigh susceptibi sensitivity is co	ity to change. nsidered High	This Corbett is accessed along a rather than Medium-High specified ath Mountains accessed from the distinctive Ben Tee. Views north

			Proposed Development			Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major- Moderate are Significant. Moderate may be significant)	Magnitude of Cumaltive Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)
	east. T the Ne distinc include All turb tracks	The view south west toward evis range beyond in the dist t feature in the views south Millennium/Beinneun clust pines, hubs and the majorit	ds the propose stance. Beinne n and west acr ster, Bhlaraidh ty of towers wo elopment will i	ed developmer eun and Millen ross the upland n, Stronelairg, I ould be visible increase the pr	nt overlooks the nium wind farm d landscape thro Dunmaglass Es in the foregrou cominence of wi	upland platea s are located pough the Corri tate, and Corrind in the view	u backdropped past the site to eyairack Pass iegarth. south west wit	liath Mountains are seen to the d by the Carn Dearg summits with the north west. The BDOHL is a . Wind farms visible in the view h all hardstanding and access ed into the foreground of the view
	the not wind far These and To now co distant margin effect of Whilst	rth. The consented Aberar arms. Dell is also to the no schemes will increase the omchrasky proposed wind onsented Cloiche would appet to the north east. Millen hally underplayed the cumon receptors is Major and S	der wind farm rth east beyon e spread of turk farm would ap opear in close nium South wi ulative magnitu Significant.	is to the north and the Stronela bines and inter opear to the so context to Stro ind farm in the ude of change	east on the dising wind farm which wisify the visual earth and north representations to the note with the west and level of effects.	tant horizon be ith the consen- effect experient espectively of the orth east with st has since expect with regard	eyond the Dun ted Bhlaraidh need from this v the Beinneun/N consented Con opired. Whilst it ds to the conse	g the spread of turbines in view to maglass Estate and Corriegarth Extension wind farm to the north. view. The now consented Bunloinn Millenium wind farm cluster. The rriegarth 2 wind farm adjacent in the t is considered the applicant has ented scenarios it is agreed the
VP5 - Carn Dearg	Арр	Medium-High	Medium	Moderate	Significant	Medium	Moderate	Significant
LICORG	H	+		1		l	1	

			Proposed Dev	relopment		Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major- Moderate are Significant. Moderate may be significant)	Magnitude of Cumaltive Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)
5.42km from	The ba	seline is as described in S	High Section 6.1 of t	he EIAR Volui	ne 1: Chapter 6	│ High うLandscape o	 f Visual Impac	t Assessment.

5.42km from nearest turbine

View North East Receptors will be hill walkers appreciating the view from the summit with a high susceptibility to change. The hilltop is accessed from Glen Roy and Glen Turret to the south along a steeply sloping rough path cut into Gleann Eachach. The sensitivity is considered High rather than Medium-High specified by the applicant. The Carn Dearg summit is within WLA 19 which increases its sensitivity.

Carn Dearg (768m AOD) is part of a group of hills to the south and east of the Great Glen close to another Carn Dearg (816m AOD) to the north west and Carn Dearg Beag (680m AOD) to the south east.

Summit views to the south include a scenic view along Glen Roy with the distinctive Nevis range mountain profile creating an impressive background in the distance. The view east has a similar focus along the upper Spey valley overlooking Loch Spey with spectacular silhouettes of the distant Cairngorm mountains. Views to the west and north look out towards the long sloping profile of the other Carn Dearg summit. The view to the north east towards the site is across the northern portion of WLA 19. The proposed development site appears in the outlook north east as an area of subdued upland bowl moorland along Coire Odhar Beag between the slopes of Leac nan Uan and Glas Charn framing the view. The BDOHL and towers can be seen traversing through the landscape. Wind farms visible in the view include Millennium/Beinneun cluster and Bhlaraidh.

All of the turbines would be visible from this location with 5 seen as tips, hubs and the majority of towers, 2 as tips and hubs and 1 as blade tips only beyond the ridgeline. Access tracks in the central portion of the site area would be visible along with 4 turbine hardstandings. The proposed development will increase the prominence of wind energy with turbines pulled into the foreground of the view in the northern portion of WLA 19.

The consented Bhlaraidh Extension will be seen in close context to the Bhlaraidh wind farm to the north. The now consented Bunloinn would be visible to the north west adding to Beinneun and Extension wind farms. Consented Dell is not discernible to the north east.

			Proposed Dev	/elopment		Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major- Moderate are Significant. Moderate may be significant)	Magnitude of Cumaltive Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)
	view to creatir of effe Signifi	o the north west has since ag a contrast in scale. Whil ct with regards to the oper cant.	expired. The past it is consider ational/under	proposed deve gred the application construction/co	lopment is loca ant has margina onsented/propo	ted in the fore ally underplaye sed scenarios	ground of Bhla ed the cumulati it is agreed the	nium South wind farm noted in the raidh and Bhlaraidh Extension ive magnitude of change and level e effect on receptors is Major and is general agreement with the
VP6 - Fort Augustus,	Арр	High	Negligible	Minor	Not Significant	Negligible	Minor	Not Significant
Car Park Adjacent to A82	THC	High	Low	Moderate - Minor	Not Significant	Negligible	Minor	Not Significant
7.85km from nearest turbine View South	Recep Park in The vi the roa easter	n the centre of Fort August ew to the west is across th ad. The view south and tov n edges of the Great Glen	sidents and to us on the pavo e car park. Th vards the site . BDOHL towe	urists within th ement betweel e view north a is also constra ers skyline on t	e settlement. T n the car park a nd east is restri ined by adjacer he hillside cross	he viewpoint is and the A82. icted by trees, nt properties a sing Meall a C	b located on the properties and and trees toward holumain.	t Assessment.  e northern edges of the Riggs Car  I other garden vegetation beyond ds the hills that form the south

			Proposed Dev	/elopment		Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major- Moderate are Significant. Moderate may be significant)	Magnitude of Cumaltive Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)
	There Whilst	ial for emerging vehicles frage are no existing, consented	om the car pa	rk and surrour	nding junctions.	· ·		re of Fort Augustus given the
VP7 - Fort Augustus	Арр	Medium	Medium- Low	Moderate- Minor	Not Significant	Negligible	Minor	Not Significant
near Church Road	THC	High	Medium- Low	Moderate	Not Significant	Negligible	Minor	Not Significant
8.01km from nearest turbine View South	Recep Augus Views Great	tus. to the south are relatively Glen. Neither the lower po ne is separated by Glen Ta	n the settleme open through ortion of the Gr	nt. The viewpo adjoining trees eat Glen or Fo	oint is located or s, restricted by t rt Augustus bel	n Church Stre the steep topo low can be see	et in the elevat graphy to the r en from the vie	ed northern portion of Fort  north with glancing views along the wpoint. To the south the horizon yline on the hillside crossing Meall a

			Proposed Dev	elopment		Cumulative			
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major- Moderate are Significant. Moderate may be significant)	Magnitude of Cumaltive Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)	
	Whilst	e tips would be visible bey it is considered the applica ant's conclusions.	_		ed some eleme	ents of the asse	essment there	is general agreement with the	
VP8 - Loch Lundie	Арр	Medium	Negligible	Minor	Not Significant	Negligible	Minor	Not Significant	
8.43km from nearest	THC	High	Low	Moderate- Minor	Not Significant	Negligible	Minor	Not Significant	
turbine	The ba	aseline is as described in S	Section 6.1 of t	he EIAR Volui	me 1: Chapter 6	6 Landscape o	f Visual Impac	t Assessment.	
View East	Receptors will be hill walkers and recreational walkers appreciating the view. The viewpoint over Loch Lundie is located on an elevated plateau to the north of Glen Garry and west of the Great Glen. It is accessed via a path from the A87 to the south which loops around the loch connecting to the overhead line access tracks to the east which continues on to Fort Augustus. The sensitivity is considered High rather than Medium specified by the applicant.  Loch Lundie is lined by large forestry plantations to the east and south in the middle distance along with several small woods along the southern edges of the loch. Views east and south focus on the loch with the striking setting of the steep sloping southern sides of the Great Glen. An overhead line connects to the Auchteraw substation to the north passes to the east and south of Loch Lundie. Views to the north and west are limited by the intervening landform of Meall Chrom Dhoire. There are no wind farms in the existing view.								
	7 of the 8 turbines would be visible, 1 with blades, hubs and the top of the tower visible, 2 as blades with hubs close to the horizon and 4 as blade tips only. Whilst turbines T2, T3, T4 and T6 skyline beyond the undulating hills beyond the proposed development is relatively well								

			Proposed Dev	velopment		Cumulative			
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major- Moderate are Significant. Moderate may be significant)	Magnitude of Cumaltive Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)	
	contair	ned from this viewpoint.							
	There are no operational/under construction/consented/proposed wind farms in the view.								
		it is considered the applicant's conclusions.	ant has margir	nally understat	ed some eleme	ents of the asse	essment there	is general agreement with the	
VP9 - A82 North of Fort	Арр	Medium	Negligible	Minor	Not Significant	Negligible	Minor	Not Significant	
Augustus 9.21km from	THC	High	Low	Moderate- Minor	Not Significant	Negligible	Minor	Not Significant	
nearest turbine	The ba	aseline is as described in S	Section 6.1 of t	the EIAR Volui	me 1: Chapter 6	6 Landscape o	f Visual Impac	t Assessment.	
View South	Receptors will be road users. The viewpoint is located at a small layby on the A82 north of Fort Augustus. This viewpoint is within the Loch Ness and Duntelchaig SLA with views across the southern end of the designation. The sensitivity is considered High rather than Medium specified by the applicant.								
	The A82 is a busy road representing road users travelling south towards Fort Augustus. The view to the north and east is restricted by steep forested slopes and trees along the roadside. The view to the south and west is across the southern end of Loch Ness, edge of the Fort Augustus and north facing summits on the southern aspect of the Great Glen.								
	The C	ulachy Estate and wooded	Glen Tarff ca	n be seen in th	ne view towards	the site area.	The combinat	ion of the Great Glen along with the	

			Proposed Dev	velopment		Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major- Moderate are Significant. Moderate may be significant)	Magnitude of Cumaltive Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)
	Ben Te Meall a 4 blade pulled There Whilst	ee the most distinctive. BD a Cholumain communication e tips would be visible bey into the layby and due to t are no existing/consented	OHL towers a ons mast another ond the ridgeling the speed of transfer of the proposed wing the speed wing the s	re skylined on her distinguish ne. However, avel with only d turbines in th	the southern si ing feature on t the attention of a glimpsed of the ne view.	ide of the Grea the southern ric road users is l ne blade tips.	at Glen and dro dgeline. likely to remair	is in the background beyond, with op down towards Fort Augustus with in focussed on the road unless is general agreement with the
VP10 - An Suidhe	Арр	High	Low	Moderate- Minor	Not Significant	Low	Moderate- Minor	Not Significant
11.06km from nearest	THC	High	Medium- Low	Moderate	Not Significant	Medium- Low	Moderate	Not Significant
turbine View South	The baseline is as described in Section 6.1 of the EIAR Volume 1: Chapter 6 Landscape of Visual Impact Assessment.  Receptors will be hill walkers, recreational walkers, tourists and road users given the short distance from the B862 and nearby An Suidhe							
West	car pai	rk. This recognised viewpo	oint is within th	e Loch Ness a	ind Duntelchaig	SLA, on the S	South Loch Ne	ss Trail and also on General Wades which increases its sensitivity.
	The vie	ew west and north west is	partially mask	ed by the rock	y landform of B	einn a Bhacai	dh with outlying	g summits within central Highlands

			Proposed Development			Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major- Moderate are Significant. Moderate may be significant)	Magnitude of Cumaltive Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)

either side beyond. The view to the north is dominated by the attractive and raised outlook across the landscape of Strath Errick and Loch Mhor. The Great Glen is evident as a compelling linear characteristic breaking the sequential ridge layers with the more distant steep sloping northern sides of the Great Glen beyond. The view to the east is amidst the upland glen of the Cumrack Burn and the sheer slopes of the Carn a Bhreabadair ridge, with the lower slopes covered by small clusters of woodlands following the numerous carved burn corridors which adds to the picturesque interest. South west is a scenic view over Loch Tarff with the Great Glen extending across the backdrop. To the west of Loch Lochy. The mountain ridges including Sean Mheall and Ben Tee combine to establish a distinct mountain environment in the background of the Great Glen on the distant horizon.

The view to the south towards the proposed development is to the front of the upland glen of the Cumrack Burn covered with sporadic trees and small woodland clusters at the foot of the surrounding rocky slopes and along incised burn channels. The rock-strewn profiles of the hills immediately encompassing the glen of the Cumrack Burn reduce steadily in height towards Loch Tarff which are a distinguishing feature in this view. Carn Clach nan Fearna creates a focus within close proximity to Loch Tarff with the Braeroy hills such as Carn Dearg in the distance. Wind farms in the view include Beinneun/Millennium cluster, Dunmaglass Estate and Corriegarth. The BDOHL is to the south but only partially visible at distance between the closer hill forms and intervening rocky topography.

5 of the 8 turbines would be visible from this location. 2 with blades, hubs and approximately half the towers visible in the mid distance and 3 as very small blade tips beyond intervening topography.

Consented Bhlaraidh Extension will appear within close context to Bhlaraidh wind farm and would notably increase the spread of development visible to the north from this viewpoint. To the east, consented Aberarder will appear beyond the Dunmaglass Estate wind farm appearing as additional turbine blade tips on the far-off horizon. Now consented Bunloinn would appear within the same part of the panorama to the south of Beinneun and Extension with now consented Corriegarth 2 in close context in the foreground of the Corriegarth wind farm in the view east. Millenium South wind farm noted to the west has since expired. Given the horizontal spread into a different portion of the view currently free from wind farm development, it is considered the applicant has understated the cumulative magnitude of change and level of effect with regards to the operational/under construction/consented/proposed scenarios, however, on balance it is

			Proposed Development			Cumulative					
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major- Moderate are Significant. Moderate may be significant)	Magnitude of Cumaltive Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)			
	agreed	agreed the effect on receptors is not significant.									
	signific farms i	As with VP12 B862 An Suidhe Car Park slightly further to the east, whilst there is general agreement that the effects would not be significant, from this viewpoint the isolated setting of the proposed development is a clear deviation from the clustered approach to wind farms in the wider surrounding area. As such, there is no particular link or association to existing wind farm development with the proposed development appearing incongruous.									
VP11 - Great Glen Way, Carn an Doire Mhoir	Арр	High	Medium- Low	Moderate	Not Significant	Negligible	Minor	Not Significant			
	THC	High	Medium- High	Major	Significant	Low	Moderate- Minor	Not Significant			
10.26km from nearest turbine View South	The baseline is as described in Section 6.1 of the EIAR Volume 1: Chapter 6 Landscape of Visual Impact Assessment.  Receptors will be hill walkers and recreational walkers appreciating the view from this highly valued and often visited location. The Great Glen Way is noted as a "Key Route" within the OSWESG. This section of the route is easily accessed from nearby parking off the A82. The sensitivity is considered High rather than Medium specified by the applicant. This section of the Great Glen Way above Loch Ness is within the Loch Ness and Duntlechaig SLA which increases its sensitivity.  The viewpoint is from an elevated section of the Great Glen Way, on the northern slopes of the Great Glen with the small bench acting as a stopping point for walkers. This section of the popular long distance route rises up from Fort Augustus crossing the south western margin of the high ridge between the Great Glen and Glen Moriston before stepping down to Invermoriston further to the north. Whilst surrounding parts of the route are within forestry, this ridge portion opens out with panoramic views to the east and south across Loch Ness and along the Great Glen with Fort Augustus visible. Views west and north are curbed by the higher elevated parts of the ridge.  The view south towards the proposed development is across the southern end of Loch Ness, Fort Augustus and the Caledonian Canal with										

			Proposed Development			Cumulative				
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major- Moderate are Significant. Moderate may be significant)	Magnitude of Cumaltive Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)		
	of the clandfor floor of All turk blades	Loch Lochy and additional parts of the Great Glen visible in the expanse. Glen Tarff and the Culachy Estate are viewed on the southern side of the Great Glen. Towers and overhead lines of the BDOHL are seen from this location. Meall a Cholumain is a notable feature within the landform to the south of Fort Augustus in this view along with the communications mast and BDOHL towers crossing there and the valley floor of the Great Glen. Wind farms visible in the view include Corriegarth, Dunmaglass Estate, Farr and the Millennium/Beinnuen cluster.  All turbines would be visible from this location with 6 turbines showing as blades, hubs and various portions of towers visible, 1 turbine with blades and hub and 1 turbine as blade tips only above the landform. A section of access track that follows the BDOHL route from the site entrance would be partially visible from this location.								
	Great (would propose Additional landscore) detriments of the control of the contr	The proposed development will result in the addition of wind turbines in the iconic upland landscape that lies beyond and to the south of the Great Glen and the southern edges of Loch Ness. Whilst not immediately behind the view of Fort Augustus, the proposed development would appear in the same part of the panorama as this key focus of the outlook creating an additional emphasis on the upland beyond. The proposed turbines would appear close to the horizon as a linear array, with the blades of T1, T2, T3, T4, T5 and T6 breaking the skyline. Additionally, T2 appears as an outlier disconnected from the rest of the group and particularly prominent. appearing higher within the landscape. This has the effect of extending the horizontal spread of the development further into the Great Glen slopes and has a detrimental impact on the view towards the renowned Great Glen. This panorama is currently free from wind energy development and the proposed development would increase the spread of wind turbines into an area that has previously been safeguarded to retain views south towards the Great Glen.								
	There are no existing, consented or proposed wind turbines in the view.  The applicant considered there is a Medium-Low magnitude of change. It is considered there is Medium-High magnitude of change. Overa this has led to a conclusion of Major impact on receptors. The effect is considered Significant.									
VP12 - B862	Арр	Medium-High	Low	Moderate-	Not	Low	Moderate-	Not Significant		

				elopment		Cumulative	Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major- Moderate are Significant. Moderate may be significant)	Magnitude of Cumaltive Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)	
An Suidhe				Minor	Significant		Minor		
Car Park	THC	High	Medium- Low	Moderate	Not significant	Medium- Low	Moderate	Not Significant	
11.59km	The ba	aseline is as described in S	is as described in Section 6.1 of the EIAR Volume 1: Chapter 6 Landscape of Visual Impact Assessment.						

from nearest turbine

View South West

Receptors will be hill walkers, recreational walkers, tourists and road users along the B862. This recognised viewpoint is within the Loch Ness and Duntelchaig SLA and on the South Loch Ness Trail. The sensitivity is considered High rather than Medium specified by the applicant. This viewpoint is on the heavily promoted South Loch Ness Trail within the SLA and culturally significant which increases its sensitivity.

Views are panoramic and distant to the north due to the elevation of this section of the road. This northern view includes Strath Errick and Loch Mhor at a lower elevation towards the outlying landscape of Duntelchaig and provides a markedly attractive outlook from this viewpoint. The view to the east is amidst the upland glen of the Cumrack Burn and the sheer slopes of the Carn a Bhreabadair ridge, with the lower slopes covered by small clusters of woodland following the numerous carved burn corridors which adds to the picturesque interest. The view west is limited by the landform of An Suidhe, albeit that An Suidhe is also the focus of attention for those who have stopped here to walk up to the summit.

The view to the south towards the proposed development is framed by the slopes of Carn an t-Suidhe and the steep sloping Carn a Bhreabadair ridge. It is an upland outlook over moorland covered, angular hills with higher mountains in the background beyond. The profile of Carn Clach nan Fearna creates a characteristic emphasis to the foreground of the view with the Braeroy hills such as Carn Dearg in the distance to the east and the mountain ridges to the west of Loch Lochy including Sean Mheall and Ben Tee in the distance further to the west. There are no existing windfarms in the view south with Corriegarth and Dunmaglass Estate seen in the view north

5 of the 8 turbines would be visible from this location. 2 with blades, hubs and approximately half the towers visible in the mid distance and 3

			Proposed Dev	/elopment		Cumulative			
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major- Moderate are Significant. Moderate may be significant)	Magnitude of Cumaltive Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)	
	as blad	de tips beyond intervening	topography.			1	<u>I</u>		
	farm a panora farm in curren effect verceptor As with viewposurrou	ppearing as additional turk ama to the south of Beinne the view east. Millenium s tly free from wind farm dev with regards to the operations ors is not significant. In VP10 An Suidhe slightly bint the isolated setting of t	pine blade tips bun and Extens South noted to relopment, it is conal/under corfurther to the value of the proposed of	on the outlying sion with now on the west has sometimed the considered the construction/construc	g horizon. Consconsented Corr since expired. (alle applicant has sented/proposedere is general alle a clear deviation	sented Bunloin iegarth 2 in clo Given the horiz s understated to d scenarios, ho greement that on from the clo	on would appear ose context in to zontal spread in the cumulative owever, on bal the effects wo ustered approa	beyond Dunmaglass Estate wind ar within the same part of the the foreground of Corriegarth wind into a different portion of the view magnitude of change and level of lance it is agreed the effect on build not be significant, from this ach to wind farms in the wider ith the proposed development	
VP13 – Burach	Арр	Medium-High	Medium- Low	Moderate	Not Significant	Medium	Moderate	Significant	
12.58km from nearest	THC	High	Medium- High	Major	Significant	Medium- High	Major	Significant	
turbine	The baseline is as described in Section 6.1 of the EIAR Volume 1: Chapter 6 Landscape of Visual Impact Assessment.								
View South	-	tors will be hill walkers appeared on the s					J	SLA which increases its sensitivity.	

. <u> </u>			Proposed Dev	elopment		Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major- Moderate are Significant. Moderate may be significant)	Magnitude of Cumaltive Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)

approximately 2km of open rocky moorland slopes from the Great Glen Way to the south east the large cairn indicates that the summit is frequented by hill walkers. The summit is on the high ridge between the Great Glen and Glen Moriston, the surrounding ridge has an open and exposed character with panoramic views over the surrounding landscape and along the Great Glen. Views to the west include Glen Moriston, Balmacaan plateaued landscape containing Bhlaraidh wind farm with the more mountainous landscapes of the western Highlands in the background. To the north, views are across the rocky ridgeline of hills that forms the northern sides of the Great Glen with Meall Fuarmhonaidh, a notable landform along this ridge. To the east the view is across the Great Glen and Loch Ness with Strath Errick backclothed by the Monadhliath Mountains.

The view south towards proposed development is across the southern end of Loch Ness, Fort Augustus and the Caledonian Canal with Loch Lochy visible in the distance. Glen Tarff and the Culachy Estate are visible in the southern portion of the Great Glen. The site can be seen on more elevated upland beyond the leading ridge above Glen Tarff. The broad upland moorland of the site and surrounding area can be seen between successive ridges that gradually increase in elevation towards the Monadhliath Mountains beyond. Towers and overhead lines of the BDOHL are seen from this location. Meall a Cholumain is visible close to the site. Wind farms visible in the view include Stronelairg, Corriegarth, Dunmaglass Estate, Farr, Bhlaraidh and the Millennium/Beinnuen cluster.

All turbines would be visible showing as blades, hubs and towers in view. Access tracks and hardstandings would be visible but are less perceptible given the distance from the viewpoint. The proposed development will result in the addition of wind turbines in the iconic upland landscape that lies beyond and to the south of the Great Glen and the southern edges of Loch Ness. Whilst not immediately behind the view of Fort Augustus, the proposed development would appear in the same part of the panorama as this key focus of the view creating an additional emphasis on the upland beyond. Turbines appear as a linear array backlothed by the gently sloping landform in the background. Both T2 and T8 appears as outliers on either side of the proposed development disconnected from the rest of the group. T2 has the effect of extending the horizontal spread of the development further into the Great Glen slopes and has a detrimental impact on the view. Additionally, there is a stacking effect of T1 and T4. This panorama is currently free from wind energy development and the proposed development would increase the spread of wind turbines into an area that has previously been safeguarded to retain views of the Great Glen.

			Proposed Dev	elopment		Cumulative			
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major- Moderate are Significant. Moderate may be significant)	Magnitude of Cumaltive Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)	
	of turb Beinner northe develo the hor east w would South magnit on rec	ines visible to the north we eun in this view and the promotion of Glen Moriston. To present on the horizon. To rizon than existing turbines with the turbines larger in sofurther expand on Stronelawind farm in the view to the tude of change and level of eptors is Major and Significant considered there is tude of change and Major	est. The now coposed Tomch to the east, co the south east s. Now consencale than the eairg and conse e west has sin f effect with recant.	onsented Bunlarasky wind far nsented Abera Dell will appeated Corriegart xisting developented Dell wind ace expired. W gards to the open	loinn would appear ar would appear ar within the co h 2 would appear pment increasir I farms filling ga hilst it is considuerational/unde	pear within the ar further west, or beyond the I ntext of Strong ar within in the age the horizont aps in the applier construction.	same part of to disconnected Dunmaglass Estairg wind farm e foreground of cal spread of tu ad of developm cant has margi and consented	d substantially increase the spread he panorama to the west of from the existing turbines on the state wind farm extending in but will be more noticeable above of Corriegarth wind farm in the view orbines. Now consented Cloiche ment to the south east. Millennium inally underplayed the cumulative discenarios it is agreed the effect considered there is Medium-High eceptors. The effect is considered	
VP14 - Ben Tee	Арр	Medium-High	Medium- Low	Moderate	Not Significant	Medium- Low	Moderate	Not Significant	
13.41km from nearest	THC	High	Medium- High	Major	Significant	Medium- High	Major	Significant	
turbine									
View North								ther Kilfinnan in the Great Glen or Loch Lochy and Loch Oich SLA.	

				elopment/		Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major- Moderate are Significant. Moderate may be significant)	Magnitude of Cumaltive Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)

The sensitivity is considered High rather than Medium specified by the applicant.

This viewpoint is located on the summit of Ben Tee (901m AOD) providing hillwalkers with long panoramic and elevated views along the Great Glen due to its elevation and conical peak. Views to the south and west are across the spectacular mountain ranges and deep straths and glens of the central highlands. Views to the north are across Glen Garry and towards the Millennium/Beinneun wind farm cluster on the opposite side of this wide wooded glen. The view north east is an extended outlook to the Great Glen that includes Loch Ness and is a key focus for views from the summit. To the east the view is across the Great Glen, however, the glen floor and Loch Lochy is largely out of sight given the intervening landform and lower elevated uplands that contain the northern sides of the Great Glen. To the east, the sequential folds of upland hills, glens and ridges on the southern side of the Great Glen render a large scale upland landscape. The Corrieyairack Pass is apparent in amongst this landform configuration along with a distant view of the BDOHL. Existing wind farms include the Millennium/Beinneun cluster in the mid distance to the north with Corrimony, Bhlaraidh, Farr, Dunmaglass Estate, Corriegarth and Stronelairg visible in the distance.

All of the proposed turbines would be visible with 7 turbines showing as blades, hubs and tower to varying degrees and 1 turbine showing as blades and hubs only. Access tracks and hardstandings would be visible for 2 turbines but are less perceptible given the distance from the viewpoint.

The proposed development will result in the addition of wind turbines in the upland landscape on the south eastern edge of Loch Ness and bring the influence of turbines nearer to WLA 19 and to the viewer from the Corbett summit. Turbines appear as a linear array backlothed by the upland landform in the background. The juxtaposition of existing clustered groups of turbines at Stronelairg wind farm in the distance to the north east behind the proposed development emphasises the effect that turbines appear to be flowing across the landscape in the mid distance closer to Ben Tee with the grouping appearing incongruous. Additionally, there are stacking effects of T2 and T6 and T3 and T4 which would draw the eye and appear. This panorama south east of Loch Ness is currently free from wind energy development and the proposed development would increase the spread of wind turbines into an area that has previously been safeguarded from turbines.

				elopment		Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major- Moderate are Significant. Moderate may be significant)	Magnitude of Cumaltive Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)
							ass Estate within the same visual turbines. Now consented Bunloinn he proposed Tomchrasky wind farm n close context and in the nted Dell wind farms. Millennium of wind energy development in lusters of turbines within the effect from turbines with the een located. As such, it is lium-Low magnitude of change and ot significant. It is considered there ajor impact on receptors. The	
VP15 - Meall Dubh	Арр	Medium	Low	Minor	Not Significant	Medium- Low	Moderate	Not significant
14.36km from nearest	THC	High	Medium- Low	Moderate	Not Significant	Medium- Low	Moderate	Not significant
turbine	The ba	aseline is as described in S	Section 6.1 of t	he EIAR Volui	me 1: Chapter 6	6 Landscape c	of Visual Impac	t Assessment.

				elopment/		Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major- Moderate are Significant. Moderate may be significant)	Magnitude of Cumaltive Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)
View East	Recen	tors will be hill walkers an	preciating the	view from the (	Corbett summit	The sensitivit	v is considere	d High rather than Medium

View East

Receptors will be hill walkers appreciating the view from the Corbett summit. The sensitivity is considered High rather than Medium specified by the applicant.

This viewpoint is located on the summit of Meall Dubh (788m AOD) providing hillwalkers with panoramic views of the open and exposed surrounding landscape. Views to the north include Glen Moriston, the large level landscape of Balmacaan with the mountainous landscapes that lie to the north of Glen Affric and Glen Strathfarrar in the background. To the west, views are also across high hills and mountain ranges of the central and western Highlands with the peaks either side of Loch Cluanie particularly notable. To the south, the view is dictated by the significant outline of Ben Tee with a portion of forestry covering the lower slopes within Glen Garry. To the east the view is across the Great Glen, however, the prevailing and exposed moorland of adjoining ridges impedes views into the Great Glen. Looking towards the proposed development only the top of the steep north facing slopes of the Great Glen are visible, including the Meall a Cholumain communications mast. The broad upland moorland of the site and surrounding area can be seen between continuous ridges that gradually increase in elevation towards the Monadhliath Mountains beyond. The BDOHL towers can be seen to the south east intersecting the site and beyond the elevated Corrieyairack Pass where they become skylined. The Millennium wind farm is in the foreground view to the east with some blades visible beyond the nearby ridge to the south east in the direction of the proposed development. Beinneun wind farm is visible in close proximity to the south west but is obscured by the summit cairn in the viewpoint photography. In the distance other wind farms visible in the view include Stronelairg, Corriegarth, Dunmaglass Estate, Farr and Bhlaraidh.

All 8 turbines would be visible from this location with all blades, hubs and various proportions of towers in view.

To the north east, the consented Bhlaraidh Extension will appear within close context to the operational Bhlaraidh wind farm and from this location will slightly extend the spread of development visible to this part of the panorama. The Aberarder consented development will appear beyond Dunmaglass Estate only slightly extending the operational development on the horizon. Millenium wind farm to the east will appear within close proximity to the viewpoint location. The consented Dell development will appear in the distance to the east within the context of the Stronelairg extending its horizontal spread close to the horizon along with the now consented Cloiche wind farm. The now consented Corriegarth 2 would appear within close context and in the foreground of Corriegarth wind farm. The now consented Bunloinn

			Proposed Dev	ed Development Cumulative				
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major- Moderate are Significant. Moderate may be significant)	Magnitude of Cumaltive Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)
	propos east ha Whilst Milleni	sed Tomchrasky wind farm as since expired. the proposed developmer um in particular along with it is considered the applica	application w at will spread the other farms in	ould appear in he horizontal e n the wider sur	views to the no expanse of turbi rounding area t	orth in reasona ines further ac the visual impa	ross the landso	nsion development and the imity. Millenium South noted to the cape, given the close proximity of ally mitigated.  agreement with the applicant's
VP16 - A87, Loch Garry	Арр	Medium	Low	Minor	Not Significant	Negligible	Minor	Not Significant
15.97km from nearest	THC	High	Medium- Low	Moderate	Significant	Medium- Low	Moderate	Significant
turbine View East	The baseline is as described in Section 6.1 of the EIAR Volume 1: Chapter 6 Landscape of Visual Impact Assessment.  Receptors will be road users with these being a mixture of residents and tourists. The location is noted as a "Key View" (A87 Viewpoint above Loch Garry) and "Key Route" within the OSWESG. The sensitivity is considered High rather than Medium specified by the applicant This viewpoint is located on an elevated section of the A87 (245m AOD) with the nearby viewpoint above Loch Garry looking south west to Inchlaggan and along Glen Garry towards Knoydart. The panorama also includes an elevated view south across Glen Garry/Loch Garry towards Ben Tee and its lower elevated forested slopes. Views to the north, and west along the A87 are curtailed by steep sloping forestry Views east towards the proposed development are along the A87 framed by the forestry, trees and other vegetation that line this section of the road. There are no operational wind farms in the view from this location, however, the now consented Bunloinn wind farm is in close proximity and has a cumulative effect for road users travelling east along the A87.							

				elopment		Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major- Moderate are Significant. Moderate may be significant)	Magnitude of Cumaltive Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)

All 8 turbines are theoretically visible from this location, 3 as blades, hubs and a significant portion of towers, 4 as blades, hubs and a smaller portion of towers and 1 as a blade tip.

The proposed development will result in the addition of wind turbines in the view across Glen Garry travelling south east. The proposed turbines would appear as a linear array backclothed by the intervening landform. The applicant considers the magnitude of change is Low and the level of effect is Minor leading to a Moderate and Not Significant effect. This panorama is currently free from wind energy development and the proposed development would increase the spread of wind turbines into an area that has previously been safeguarded to retain views across Loch Garry. The proposed development would extend the influence of wind energy development along a stretch of approximately 6km along the A87 heading east from the Glen Garry west viewpoint layby to the outskirts of Invergarry where between 7 and 8 blades along with combinations of hubs and towers to varying degrees theoretically visible as demonstrated by the ZTV. Whilst views are currently screened by trees along the southern boundary of the A87 this could change in future with sustained views along this route if the existing plantation forestry were to be removed.

Whilst there are no existing, consented or proposed wind turbines in the view the now consented Bunloinn wind farm will have a significant sequential cumulative effect on road users travelling east along the A887/A87. The applicant considers that there will be Negligible magnitude of change and Minor level of effect leading to Not Significant effect on receptors. Along the A87 Bunloinn would be visible when travelling in both directions along this route and the proposed Tomchrasky wind farm visible only when travelling westbound. When road users are heading east Bunloinn wind farm and the proposed development would be experienced in sequence. Bunloinn wind farm would introduce substantial levels of visibility in the view west from the A87 and fall out of view further to the east when approaching the Glen Garry west viewpoint. Whilst the applicant notes that no simultaneous visibility of these developments will occur along the A87 they concede there is a sequential cumulative effect, albeit reported not to be significant, for users of the A87. In terms of sequential visibility, Bunloinn wind farm will be visible between the northern entrance to Beinneun Forest and as the road approaches the layby above Loch Loyne for approximately 4.5km southbound. There would be a short period of respite then a further 6km of theoretical visibility along a portion of 6km of the A87 travelling east. The applicant considered there is a Negligible magnitude of change and Low level of effect leading to a

			Proposed Development			Cumulative			
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major- Moderate are Significant. Moderate may be significant)	Magnitude of Cumaltive Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)	
	and M More b magnit	oderate level of effect and	the cumulative	e effect is cons s a Low magni	sidered Significates tude of change	ant. and Minor leve	el of effect. It is	Medium-Low magnitude of change s considered there is Medium-Low on receptors. The effect is	
VP17 - Meall Fuar-	Арр	High	Low	Moderate- Minor	Not Significant	Medium- Low	Moderate	Not Significant	
mhonaidh 22.16km	THC	High	Medium- High	Major	Significant	Medium- Low	Moderate	Significant	
from nearest turbine  View South East	The baseline is as described in Section 6.1 of the EIAR Volume 1: Chapter 6 Landscape of Visual Impact Assessment.  Receptors will be hill walkers, recreational walkers and visitors appreciating the view. The location is noted as a "Key Location" within the OSWESG. The summit is within the Loch Ness and Duntlechaig SLA and overlooks key aspects of the SLA which increases its sensitivity.  The viewpoint is popular with a mixture of walkers taking a detour from the Great Glen Way, visitors stopping for take in the scenic views and local residents utilising the easily accessed route from the nearby car park Grotaig. The summit of Meall Fuar-mhonaidh (699m AOD) is a relatively straightforward gradual climb from the car park. Panoramic views across much of Loch Ness are a key feature of the vista and more distant views across the mountainous landscapes beyond form a dramatic backdrop. The view south towards the site is across the southern half of Loch Ness and whilst the southern edges of Loch Ness are evident, Fort Augustus is not visible due to intervening hills on the northern side of the loch. Culachy Estate can be made out in the distant view due to the contrasting colour of the estate woods and grounds set against subdued surrounding moorland. The BDOHL towers are discernible in this distant view as they cross the site area along with the mast near Sron na Muic to the south. Wind farms visible in the wider panorama include Stronelairg, Corriegarth, Dunmaglass Estate, Farr, Bhlaraidh, Beinneun and the Millennium/Beinnuen cluster.								

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				relopment		Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major- Moderate are Significant. Moderate may be significant)	Magnitude of Cumaltive Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)

All turbines would be visible showing as blades, hubs and towers in view. Access tracks and hardstandings would be visible but are less perceptible given the distance from the viewpoint. The proposed development will result in the addition of wind turbines in the iconic upland landscape that lies beyond and to the south of the Great Glen and the southern edges of Loch Ness. Whilst not immediately behind the view of Fort Augustus, the proposed development would appear in the same part of the panorama as this key focus of the view creating an additional emphasis on the upland beyond. Turbines appear as a linear array backlothed by the gently sloping landform in the background. To appears as an outlier slightly disconnected from the rest of the group. This panorama is currently free from wind energy development and the proposed development would increase the spread of wind turbines into an area that has previously been safeguarded to retain views south towards the Great Glen.

The consented Bhlaraidh Extension will appear within close context to Bhlaraidh wind farm and appear to bring development closer and at a larger scale. Now consented Bunloinn would appear within the same part of the panorama as Beinneun and Extension in the view south extending development to the west with the proposed Tomchrasky appearing beyond and to the east of Bhlaraidh wind farm. These schemes would appear to narrow the gap between the Beinneun and Bhlaraidh wind farms. To the east, consented Aberarder will appear beyond Dunmaglass Estate wind farm development extending the operational development on the horizon. Now consented Corriegarth 2 would appear within close context and in the foreground of the Corriegarth wind farm in the view east. These turbines would appear larger in scale than the existing development and increase the horizontal extent currently occupied by Corriegarth wind farm with several turbines appearing above the horizon unlike the existing turbines. Now consented Cloiche would further expand Stronelairg and consented Dell with turbines extending on the horizon to the south east with the Cloiche turbines appearing larger and more visible than the Stronelairg turbines with many behind intervening landform. To the south east Dell will appear within the context of the Stronelairg wind farm but will be slightly more conspicuous above the horizon than the existing visible turbines. These developments further contribute to the increased awareness of wind energy development in multiple facets of the view. However, recent wind energy development has tried to consolidate existing clusters of turbines within the contained upland bowl landform whereas this proposed development is expanding into an area of respite free from turbines with the intention to protect views south towards the Great Glen. As such, it is considered that the cumulative impacts have been understated. The applicant considered there is a Medium-Low magnitude of change and Moderate level of effect leading to a

			Proposed Development			Cumulative				
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major- Moderate are Significant. Moderate may be significant)	Magnitude of Cumaltive Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)		
	change Signifie More to Mediu	e and Major level of effect. cant. proadly, the applicant cons	Overall, this h	nas led to a co s a Medium-Lo	nclusion of Maj w magnitude o	or impact on re f change and N	eceptors. The office of the control	of effect. It is considered there is or impact on receptors. The effect is		
VP18 - Toll Creagach	Арр	Medium-High	Negligible	Minor	Not Significant	Negligible	Minor	Not Significant		
32.23km from nearest	THC	High	Medium- Low	Moderate	Not Significant	Medium- Low	Moderate	Not Significant		
turbine	The baseline is as described in Section 6.1 of the EIAR Volume 1: Chapter 6 Landscape of Visual Impact Assessment.									
View South East	Receptors will be hillwalkers appreciating the view from Munro summit. The viewpoint is located within the Glen Affric NSA and WLA 24 Central Highlands and overlooks key aspects of the NSA including a panorama of Glen Affric. The sensitivity is considered High rather that Medium-High specified by the applicant.  This viewpoint is located at the summit of Toll Creagach (1054m AOD) connected to a line of Munros in the Fasnakyle Forest including To a Choinnich (1112m AOD) and Carn Eighe (1183m AOD). It is accessed via the Chisolme Bridge car park in Glen Affric and a long walk through Gleann nam Fiadh and Allt Toll Easa. The summit is often accomplished as part of an elongated route across these interconnected peaks.							tivity is considered High rather than the Fasnakyle Forest including Tom rk in Glen Affric and a long walk		

			Proposed Development			Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major- Moderate are Significant. Moderate may be significant)	Magnitude of Cumaltive Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)

To the south and west, views across Glen Affric are a key feature of the panorama. To the north, the coastline of the Moray Firth can be seen past prevailing hills. To the east, the broad upland plateau of the Balmacaan Forest extends towards the Great Glen which can be recognised as a robust linear feature that appears to disrupt the consecutive layers of ridges, with the more distant uplands and Monadhliath Mountains beyond. To the west, views are across Loch Mullardoch and the mountain ranges of the western Highlands. The proposed development appears in the view east as an area of muted upland moorland in the distance beyond the outlying Inchnacardoch Forest woodland slopes. The BDOHL and towers can be seen cutting across the landscape and is more prominent in the plateau foreground between Dundreggan and Guisachan. Wind farms visible in the view include Stronelairg, Corriegarth, Bhlaraidh, Corrimony, Dunmaglass Estate, Farr and the Millennium/Beinneun cluster.

All of the turbines would be visible with blades, hubs and the majority of all towers in view. The access tracks and hardstandings are theoretically visible but are not readily perceived due to distance from the proposed development.

To the east, the Aberarder consented development will appear beyond Dunmaglass Estate wind farm appearing to extend the operational development across the horizon. The consented Bhlaraidh Extension will appear within close context to Bhlaraidh wind farm marginally extending and overlapping with the turbines in the view. Dell will appear within a central position within the horizontal extent of the visible Stronelairg turbines. The now consented Bunloinn would appear to the south of Beinneun and Extension in this view but is restricted with the proposed Tomchrasky which would appear in the foreground of Beinneun and Extension wind farms with a minimal separation between schemes. The now consented Corriegarth 2 and Cloiche would appear within close context to the existing Corriegarth and Stronelairg wind farms. Millennium South noted to the south east has since expired.

The proposed development would appear as a relatively small feature in a distant view within close context to existing turbines. Key parts of the panorama within the NSA, for which the viewpoint is valued, would not be affected by the proposed development. In terms of the cumulative effects of operational/under construction/consented/proposed scenarios, given the locations of these developments close to

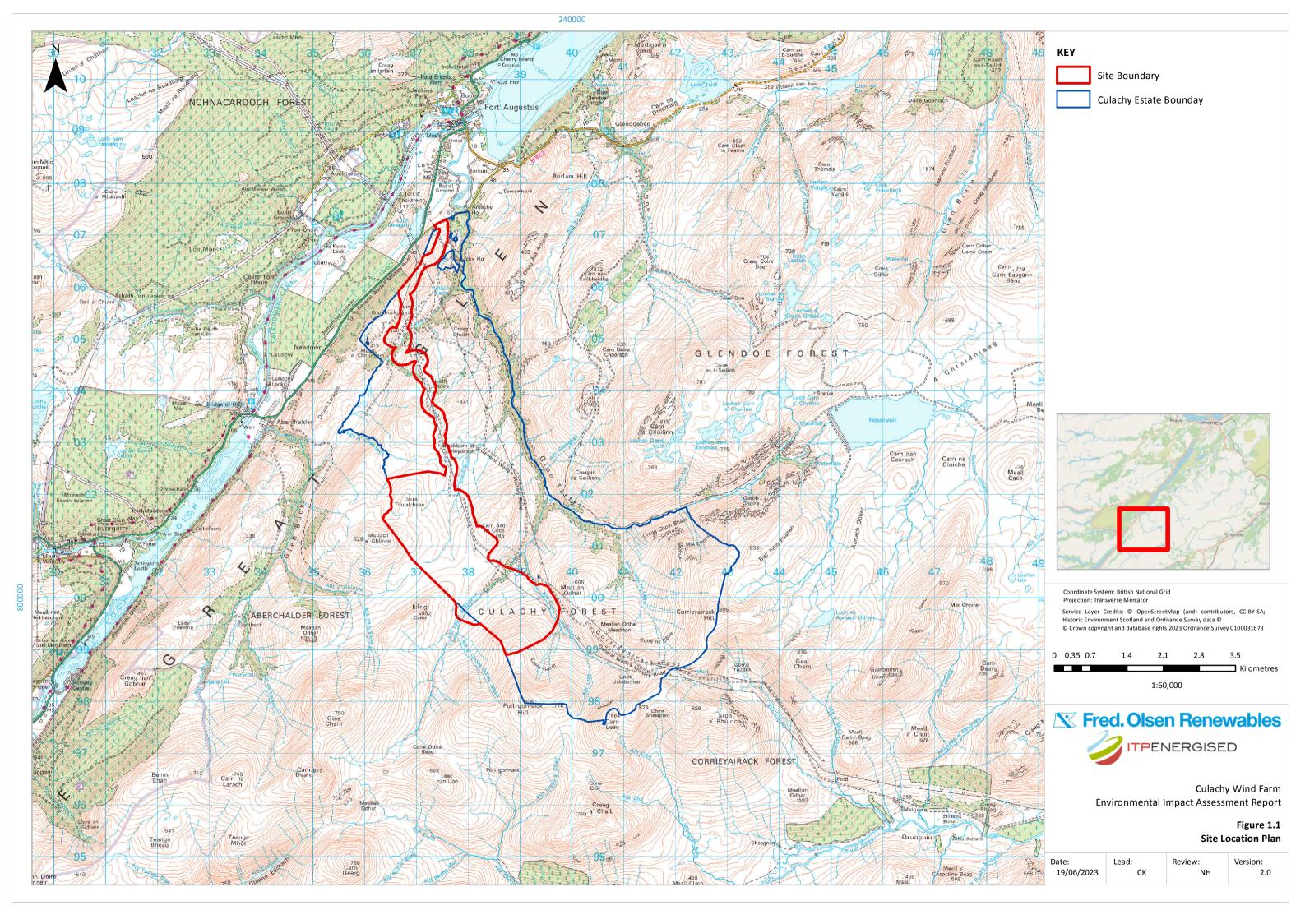
			Proposed Development			Cumulative			
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major- Moderate are Significant. Moderate may be significant)	Magnitude of Cumaltive Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)	
		• •		•		•		agreement with the applicant's	
VP19 - Alltsigh Loch	Арр	Medium-High	Negligible	Minor	Not Significant	Negligible	Minor	Not Significant	
Ness 19.18km	THC	High	Medium- Low	Moderate	Not Significant	Medium- Low	Moderate	Not Significant	
from nearest turbine View South East	This viewpoint had theoretical visibility at the point of Scoping (22/00824/SCOP) but through the design mitigation process the applicant has significantly reduced the levels of visibility from the lower areas of the Glen including from this location looking south east across Loch Ness. As such, it was not considered or assessed in detail within the EIAR Chapter 6 Landscape & Visual Impact Assessment as outlined in Section 6.11.3.								
VP20 - Meallan	Арр	Medium-High	High	Major	Significant	Medium- High	Moderate- Major	Significant	
Odhar	THC	High	High	Major	Significant	High	Major	Significant	
1.72km from nearest turbine View North	Recep	aseline is as described in S tors will be hill walkers and vity is considered High rat	d recreational	walkers. The v	iew point is witl	nin WLA 19 Br	•	t Assessment. irra and Creag Meagaidh. The	

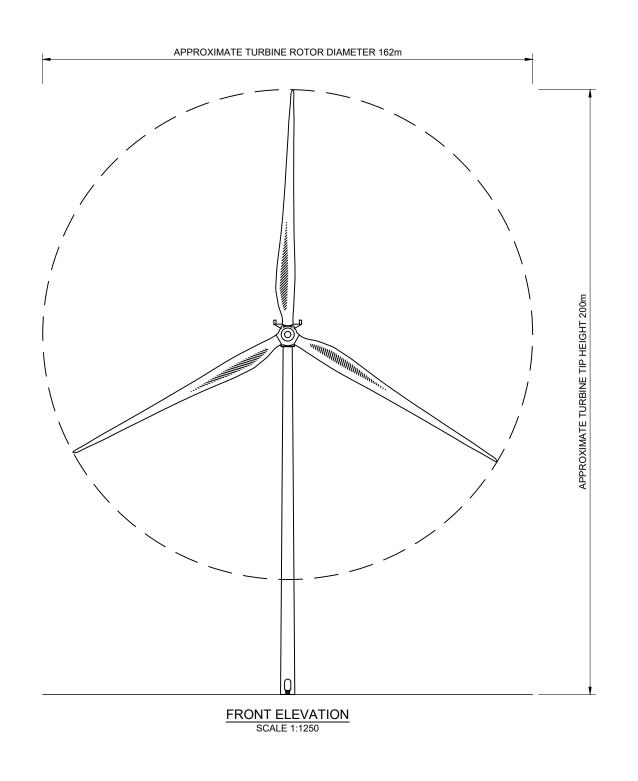
			Proposed Development			Cumulative			
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major- Moderate are Significant. Moderate may be significant)	Magnitude of Cumaltive Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)	
East	The viewpoint is positioned within secluded glen in the Aberchalder Forest area, east of Loch Oich and the Great Glen. It is act tracks that navigate the south east steep slopes of the Great Glen from Aberchalder which sits at the head of Loch Oich. The volume north, east and south from this location is contained by the moorland covered slopes of the sheltered glen and the location has quality, appropriate for its location at the edges of the WLA. Views to the north west are more expansive with a glimpse of the Buck runs parallel with the Great Glen but at higher elevation, the ridge of hills along the south east side of the Great Glen and Forest hills and crests which are populated by wind farms including the Millenium/Beinneun cluster.  6 of the 8 turbines would be visible from this location with all skylining beyond the ridgeline. 3 will be seen as blades, hubs and proportions of towers, 1 will appear as blades and hub in view with 2 others showing as blade tips only. Given the close proxim and T4 appear particularly prominent as they extend to a considerable height above the horizon from this view. T3 and T4 would stacking effects.  The Millennium/Beinneun wind farm cluster will appear in the view to the west. The now consented Bunloinn would be visible to the section of the section of the close proximal transfer and the section of the section o					ad of Loch Oich. The view to the n and the location has an isolated with a glimpse of the shallow Glen of the Great Glen and Beinneun n as blades, hubs and various Given the close proximity T2, T3 is view. T3 and T4 would create			
	the ma	ignitude of change is cons it is considered the applica	idered to be H	igh resulting ir	n a Major and S	significant effe	ot.	est has since expired. It is agreed agreement with the applicant's	
VP21 Beauly-	Арр	Medium-High	High	Major	Significant	Negligible	Low	Not Significant	
Denny track	THC	High	High	Major	Significant	Negligible	Low	Not Significant	
0.92 from	The ba	aseline is as described in S	Section 6.1 of t	he EIAR Volui	me 1: Chapter 6	6 Landscape c	of Visual Impac	t Assessment.	

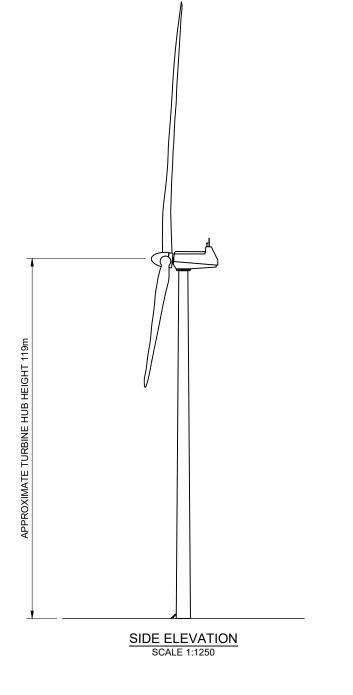
				Proposed Development			Cumulative			
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low	Magnitude of change (Scale of Change / Extent / Duration) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major and Major- Moderate are Significant. Moderate may be significant)	Magnitude of Cumaltive Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance (Major and Major-Moderate are Significant. Moderate may be significant)		
nearest turbine	Receptors will be hill walkers and recreational walkers. The view point is within WLA 19 Braeroy, Glenshirra and Creag Meagaidh. The sensitivity is considered High rather than Medium-High specified by the applicant.									
View South	The viewpoint is accessed via tracks that serve the BDOHL from the Culachy Estate to the north. There are panoramic views in all directions across the wide bowl shaped, relatively simple, large scale upland moorland plateau enclosed by the rocky hills along the periphery. The BDOHL, towers and adjacent track intersect the landform in the forefront of the view.									
	There	There are no existing, consented or proposed wind turbines in the view.								
			ines would be visible from this location with 7 blades, hubs and the majority of towers in view with 1 turbine showing as blade ess tracks and hardstandings of 2 turbines would be visible.							
		Whilst it is considered the applicant has understated some elements of the assessment there is general agreement with the applicant's conclusions.								

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- ALL DIMENSIONS ARE IN METRES UNLESS OTHERWISE STATED.
   DO NOT SCALE FROM THIS DRAWING.
   THIS DRAWING IS FOR PLANNING PURPOSES ONLY AND NOT FOR CONSTRUCTION.

В	TRANSFORMER REMOVED	MH	MB	JS	14/11/23
Α	FIRST ISSUE	МН	JL	SB	07/06/23
REV	DESCRIPTION	BY	СН	APP	DATE

## CLIENT:

## **▼ Fred.Olsen Renewables**

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IFS DOC NO.: 1320909	IFS ACTIVITY: 304.30415
SCALE: 1:1250 @ A3	SHEET NO.: 1 OF 1

natural

## **FOR INFORMATION**

PROJECT: CULACHY WIND FARM

DRAWING TITLE: FIGURE 3.3

INDICATIVE WIND TURBINE GENERAL ARRANGEMENT

DRAWING NO.: 15607\_DET\_3000

REVISION В

