Agenda item 10

Appendix 3

2025/0040/PAC

(ECU00004904)

NatureScot comments

NatureScot
NàdarAlba
Scotland's Nature Agency
Buidheann Nàdair na h-Alba

Molly Greasley
Energy Consents Unit
Response by email to Econsents_Admin@gov.scot

27 June 2025
Your ref: ECU00004904
Our ref: CDM179181

Dear Molly Greasley

ELECTRICITY ACT 1989
THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017
APPLICATION FOR SECTION 36 CONSENT FOR BALNESPICK WIND FARM

Thank you for your consultation on the above proposal dated 20 February 2025 and for allowing us additional time to respond.

Summary

This proposal will have significant adverse effects on the special qualities of the Cairngorms National Park such that the objectives of the designation and overall integrity of the area would be compromised. We therefore object to this proposal.

Appraisal of the impacts of the proposal and advice

1. Landscape and visual impacts

Our advice on this proposal will focus on effects of the proposed development on the Special Landscape Qualities (SLQs) of the Cairngorms National Park (CNP) and is provided in accordance with our *Agreement on roles in advisory casework between NatureScot and Scottish National Park Authorities*[1]. This should not however be interpreted as meaning there are no other significant landscape and visual effects that need to be considered when determining the application.

Cairngorms National Park
The proposed development would be sited on the northern edge of the Cairngorms National Park with the nearest turbine 0.6km from the Park boundary.

The Strathdearn Hills, within which the proposal is located, currently form an elevated simple moorland ridge enclosing the northern slopes of Strathspey, and providing a backdrop from key slopes and summits of the Cairngorms National Park (CNP). The location of the proposed development on this elevated ridge of the Strathdearn Hills would introduce visibility of turbines to lower lying areas of the Park for the first time. The proposal both individually, and cumulatively with the proposed Clune Wind Farm, would significantly adversely affect five of the Special Landscape Qualities (SLQs) of the CNP during the day and associated

[1] See: https://www.nature.scot/doc/agreement-roles-advisory-casework-between-naturescot-and-scottish-national-park-authorities.

lighting would extend these effects after dark. These impacts would be to a degree that would result in evident and noticeable material changes to the SLQs of the CNP such that the objectives of the designation and overall integrity would be compromised.

Accounting for the site's elevation and location immediately north of the CNP it is considered unlikely that the significant effects identified could be notably reduced through a reduction in turbine height or number. We therefore consider that these effects are unlikely to be overcome through re-design or removal of turbines.

We have considered other interests and taken them into account in reaching our conclusion on this proposal.

This proposal will have significant adverse effects on the special qualities of the Cairngorms National Park such that the objectives of the designation and overall integrity of the area would be compromised. We therefore object to this proposal.

We provide further comments on the effects on the Special Landscape Qualities in Annex 1 to this letter.

2. Protected areas - European sites

Darnaway and Lethen Forest, Kinveachy Forest, Abernethy Forest, Craigmore Wood, Anagach Woods and Cairngorms Special Protection Areas (SPAs)

The proposal could affect the above SPAs protected for capercaillie. The sites' 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, the Scottish Government is required to consider the effect of the proposal on the SPAs before it can be consented (commonly known as Habitats Regulations Appraisal). Our website has a summary of the legislative requirements[2].

Our advice is that this proposal is likely to have a significant effect on SPA capercaillie. 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 interest. To help you do this we advise that based on the information provided, our conclusion is that the proposal will not adversely affect the integrity of the site. The appraisal we carried out considered the impact of the proposals on the following factors:

- The applicants have identified potential for a likely significant effect through collision risk and barrier effects. This is due to the wind farm's location within dispersal distance of the Strathspey capercaillie SPAs to the south and south-west and the Darnaway and Lethen Forest SPA to the north-east. We also consider there is potential for disturbance and displacement, due to the proximity to Glenkirk Forest which could not be accessed for survey work.
- Although no dedicated capercaillie surveys have been undertaken, the applicant's Shadow Habitats Regulations Appraisal (HRA) states that no capercaillie or capercaillie signs were recorded during the course of other baseline ornithological survey work carried out for the proposed development. A comprehensive desk study has been undertaken using RSPB data and this has also returned no records within 2km of the proposed development site. The applicant's Shadow HRA is helpful in describing the suitability of habitat within Glenkirk Forest and considering the risk of collision from

[2] See: https://www.nature.scot/professional-advice/protected-areas-and-species/protected-species/legal-framework/habitats-directive-and-habitats-regulations/

the proposed development. We agree that the collision risk to capercaillie as a result of the proposed development is likely to be low due to its location (an elevated upland location away from routes likely to be more preferable for dispersing capercaillie), limited availability of habitat suitable for capercaillie in proximity to the development, and lack of nearby records.

- We also consider that the risk of disturbance and displacement to breeding capercaillie is low, due to the limited availability of habitat suitable for capercaillie in proximity to the development and lack of nearby records.
- For these reasons we consider that the proposal will not adversely affect the *Population of the species as a viable component of the site*. We consider that the conservation objectives are met and it has been ascertained that the proposal will not adversely affect the integrity of the site, either on its own or in combination with other proposals.

Should the proposed development be consented, we advise that the applicants contact the RSPB Capercaillie Advisory Officer to requested updated desk study information. Although we consider the risk is very low, this precautionary approach would allow any necessary mitigation to be implemented for construction related disturbance.

3. Priority peatland habitats

We have assessed the quality and sensitivity of the peatland on the site using our framework and template in Annex 1 of our peatland guidance[3], the information presented in the EIAR and our observations on a site visit. The majority of the proposed development site is described in the EIAR as dry modified bog, and the site is dominated by grouse buts, peat hags and micro erosion. Despite this much of the site is able to maintain sphagnum cover and is dominated by species which are normally peat forming. Most of the site conforms to the NVC type M19c and, although mainly below 600m height, much of the habitat reflects montane bog. However, the site generally lacks the rarer features which would indicate higher quality habitat within the development area.

The outline Biodiversity Enhancement Management Plan proposes to restore 697.61ha of peatland. Although this is an outline plan it is well considered and appears aligned with best practice. The Plan includes a map (Figure 7.2.1) which identifies areas of hag reprofiling and areas of ditch blocking covering much of the site.

We therefore advise that predicted impacts (loss of 54.48ha of peatland habitat) could be offset by the peatland restoration measures proposed as part of this application.

4. Wider countryside birds

The applicants have provided us with further detail on the dates and timing of survey work carried out for this application. Although not all areas outside the proposed development site could be accessed for survey work we consider that any limitations have been clearly explained.

In relation to golden eagle, while we consider that the proposal on its own will not have a significant impact on the Natural Heritage Zone (NHZ) 10 population, a comprehensive assessment of cumulative impacts from Balnespick Wind Farm in combination with other proposals within NHZ10 has not been undertaken. The cumulative assessment has only considered wind farms within 10km of the proposal, which is contrary to our guidance and scoping advice. Given the increasing number of wind farm proposals within NHZ10, **we**

[3] See: https://www.nature.scot/doc/advising-peatland-carbon-rich-soils-and-priority-peatland-habitats-development-management.

recommend that a cumulative assessment of impacts to golden eagle at the NHZ 10 level should be undertaken by the applicants which considers both collision risk and foraging habitat loss. We would be happy to advise the applicants further on this, and to comment further once this additional information is available.

The EIAR identifies the potential for Schedule 1 birds to breed close to the proposed development site and a range of upland waders have also been recorded. We therefore welcome the applicant's intention to produce a Species Protection Plan for breeding birds. We recommend that this also covers access requirements and habitat management works. We recommend that our standing advice is followed, see: https://www.nature.scot/doc/standing-advice-planning-consultations-birds.

5. Protected species

We fulfil our advisory role on protected species through the provision of standing advice and do not expect to be consulted other than in exceptional circumstances not covered by the relevant standing advice available on our website[4]. Where a licence from NatureScot will be required by the applicant before they can proceed with the development, you would need to satisfy yourself that the licensing tests set out in those regulations are likely to be met before an application can be approved.

Otter, mountain hare and water vole have been recorded on site and the applicants should follow our standing advice (see above link) on pre-construction surveys, mitigation measures and any licensing requirements. We highlight that future survey work should also cover the section of access track where track upgrades are proposed as well as any additional areas where habitat management/ peatland restoration works are proposed.

Bats

The baseline bat surveys indicate a reasonable amount of pipistrelle bat activity on site. We would therefore recommend that the applicants implement the following additional mitigation for bats:

- Pitching the blades out of the wind ("feathering") to reduce rotation speeds below 2rpm while idling.

The reduction in speed resulting from feathering compared with normal idling may reduce fatality rates by up to 50%. As this option does not result in any loss of output, as best practice, it is recommended wherever it is practically possible and there remains uncertainty over the risk posed to bats. It can be applied at any site with a blade pitch control system which can be automated using SCADA data. For further advice see: https://www.nature.scot/doc/bats-and-onshore-wind-turbines-survey-assessment-and-mitigation.

Otters

In accordance with our guidance, where necessary trail camera monitoring should be carried out to determine the status of any potential holt sites. For further advice see: https://www.nature.scot/doc/standing-advice-planning-consultations-otters.

Mountain hare

Should this proposal be consented a Species Protection Plan will be required for mountain hares. This should include details of the measures proposed to minimise impacts on mountain hares; a summary of any

[4] See: https://www.nature.scot/professional-advice/planning-and-development/planning-and-development-advice/planning-and-development-protected-species.

residual impacts once these measures are taken into account; and details of any licensing requirements, including the proposed method for detecting and protecting any young hares ahead of groundworks commencing. This should follow our standing advice at: https://www.nature.scot/doc/standing-advice-planning-consultations-mountain-hare.

Scottish wildcat

Apparently suitable areas of juniper scrub/grassland occur on the edges of the proposed development site, such as along the Allt Bruachaig (close to the proposed borrow pit) and there is a wildcat record in the wider area. Given this record and the suitability of the scrub habitat we recommend that, should the proposed development be consented, a camera survey is undertaken around the scrub habitats within 200m of any proposed works, in advance of any works starting. If evidence is found of wildcat using the wider area, we advise that further follow-up camera surveys would be required immediately before work commences because wildcats are very mobile and can move den sites. This is particularly important if the works are to be done between April to August inclusive (the female denning season). If a wildcat is recorded[5] it should be assumed that it is denning or resting within the scrub. The applicants should also note that if applying for a licence, mitigation should include carrying out works outside the female denning season (i.e. work should avoid April to August inclusive). For further advice see: https://www.nature.scot/doc/standing-advice-planning-consultations-wildcats. If wildcat habitat could be affected by the proposed development we would also recommend compensation measures.

Please let Karen Reid (Karen.Reid@nature.scot) know if you or the applicants require any further information or advice from us in relation to this proposal.

The advice in this letter is provided by NatureScot, the operating name of Scottish Natural Heritage.

Yours sincerely

Chris Donald
Head of Operations, Central Highland

cc. Roddy Dowell, Highland Council; Emma Bryce, Cairngorms National Park Authority

[5] The applicants should follow our guidance for identification at: https://www.nature.scot/doc/definition-wildcat-updated-guidance.

Annex 1 – Cairngorms National Park

Assessment Baseline

The proposed development would be sited in the Strathdearn Hills just outside the northern edge of the Cairngorms National Park, with the nearest turbine 0.6km from the Park boundary.

Identified as a Cairngorms National Park (CNP) Landscape Character Area, the Strathdearn Hills[6] are a pronounced line of hills lying east of the A9 reaching around 650m AOD, that rise to an undulating plateau and form the northern edge of the CNP. The sensitivity of the hills is documented within the Dava Moor, Nairn and Monadhliath Area 2021 Wind Energy Landscape Sensitivity Study[7] which states that "*All wind turbine development should be sited well away from the band of low and diverse rocky hills lying either side of the B9007, which form a well-defined 'rim' on the boundary of the Cairngorms National Park. The band of smoother hills which lie on the southern edge of this* [Assessment Unit] *AU to the east of the A939 are also important in providing a backdrop to the Spey valley and large wind turbines sited in this area could be prominent when seen from the A95 and recreational routes and may adversely affect some of the special qualities of the Cairngorms National Park."*

Lying within the Park, the southern face of the Strathdearn Hills is within the Landscape Character Type (LCT) Rolling Uplands – Cairngorms (LCT 125), which describes them as the backdrop to Strathspey, appearing '*remote and formidable*' from the lower settled areas. Elevated roads on Dava Moor provide the opportunity for extensive panoramic views south across the CNP when approaching from the north, and in turn from elevated summits within the Park, including the Meall a' Bhuachaille ridge, central Cairngorm massif and Monadhliath plateau - the Strathdearn Hills form a broad skyline without any clearly identifiable features.

Operational wind farms closest to the north-western boundary of the CNP include Moy, Tom nan Clach, Farr and Glen Kyllachy. Consented wind farms include Tom nan Clach extension and Cairn Duhie. Wind farms in planning at the time of the assessment included Ourack which has since been consented[8].

From some elevated areas at the north-western edge of Park, operational wind farms Glen Kyllachy, Farr, Moy and Tom nan Clach appear as discernible features in views (e.g. Viewpoints (VP) 1-Carn Glas-Choire, 6-Beinn Mhor and 10-Carn nam Bain-tighearna). However, they do not significantly affect the Special Landscape Qualities (SLQs) of the CNP: Tom nan Clach Wind Farm, the closest at approximately 5.8km from the boundary, appears in views out from the Park as a relatively compact feature in the wider landscape, due to turbine heights (125m to blade tip) and partial screening from landform. The Farr and Glen Kyllachy Wind Farm cluster makes a larger array but, given the turbine heights (102-110m to blade tip) and greater distance from the Park, does not significantly affect the Special Landscape Qualities (SLQs) of the Park.

From higher elevations within the Park interior where operational wind farms are visible, they are perceived as distant features due to the turbine heights (all below 125m to blade tip) and their distance >5km from the Park boundary (as shown by VPs 16-Cairngorm, 22-Meall a' Bhuachaille, 23- Cromdale Hills and 24-Craiggowrie). From the majority of locations at lower elevations in the study area, no operational

[6] See: https://cairngorms.co.uk/uploads/documents/Cairngorms-Landscape-Character-Assessment-Final-Report-Complete-with-cover-and-rotated-small.pdf.

[7] https://www.highland.gov.uk/downloads/file/25661/dava_moor_nairn_and_monadhliath_wind_energy_landscape_sensitivity_study_-_final_report_december_2021.

[8] See: EIAR Volume 2 Figure 6.27 Other Wind Farms within 20km.

wind farms are currently visible, as shown by the cumulative ZTVs[9] and VPs 7-Carrbridge, 8-Nethy Bridge and 9-Auchgourish.

With regards to emerging applications, we note that scoping Highland and Clune Wind Farms are now full applications. Clune is considered in this advice. Although the Highland Wind Farm application has also been submitted, the cumulative effects with Highland have not been considered in our response as at the time of preparing this response we had yet to complete an appraisal of the application on its own.

The applicant's assessment of the effects on SLQs of the CNP

The applicant has provided an assessment of the effects on the SLQs of the CNP which broadly follows our guidance[10]. This found no significant effects on any of the six SLQs considered, largely due to their consideration of the proposal resulting in no greater than 'low' magnitude of change. Our view is that the turbine height and proximity of the proposal to the Park represents a substantial change to the wind energy development baseline around the north-western edge of the CNP.

The LVIA identified significant localised effects on LCT 125, LCT 291 Open Rolling Upland, LCT 221 Rolling Uplands – Inverness (the LCTs corresponding to the "rim" of the Park).

In terms of effects resulting from visible aviation lighting, the LVIA Technical Appendix 6.5 focuses solely on the effects of the visible aviation lighting on visual amenity. The applicant scopes out effects of landscape character during dark sky hours when aviation lighting is operating noting that "*Without being able to fully appreciate landscape features and components that contribute to landscape character it is not possible to carry out a meaningful landscape character assessment. This follows the approach of the Reporter's recommendation to Scottish Ministers for Crystal Rig IV (WIN-140-8)*". We consider that aviation lighting affects both landscape and visual receptors[11] and that there are notable differences between the site of the proposed development and consented Crystal Rig IV in terms of landscape character, designated landscapes, baseline light levels and the established and emerging patterns of wind farm development. For example, the site of the proposed development is located in the Drynachan, Lochindorb and Dava Moors SLA, adjacent to Cairngorms National Park where there is largely an absence of aviation lighting, and SLQs are susceptible to this type of change.

We note that one night-time viewpoint has been provided within the CNP (VP 7: Carrbridge). It was agreed through pre-application discussion that Craiggowie (VP 24) would also be included as a night-time viewpoint to represent upland areas of the Park where SLQs relating to darkness and wildness are well expressed. Although Appendix 6.6 Assessment of Night-time Lighting suggests that a visualisation illustrating the proposed turbine lighting from VP 24 has been provided with the application, the supplied visualisation only includes daytime photography with no illustration of turbine lighting. Furthermore, we do not consider that the three night-time visualisations provided within the LVIA present an accurate image of the intensity of predicted turbine lighting or demonstrate the worst-case scenario. In our experience, the turbine lighting would appear as prominent bright red lights from those distances.

We consider that the applicants assessment underplays the significance of day and night-time effects on a number of the SLQs.

[9] See: Figure 6.29 CZTV to 45km with operational Dunmaglass, Correigarth and Stronelairg Wind Farms and Figure 6.28 CZTV to 45km with operational Tom Nan Clach, Moy, Farr and Glen Kyllachy Wind Farms.
[10] See: https://www.nature.scot/doc/special-landscape-qualities-guidance-assessing-effects.
[11] See: https://www.nature.scot/doc/guidance-aviation-lighting-impact-assessment.

NatureScot Appraisal of Effects on the SLQs of the Cairngorms National Park

From the ZTVs provided[12], the proposed turbines would be visible across large swathes of lower lying Strathspey, the Dulnain Strath, Abernethy and Rothiemurchus (albeit much of this latter area is heavily wooded) and from elevated areas including the Cromdale Hills, Strathdearn Hills, the Craiggowrie - Meall a' Bhuachaille ridge, the Monadhliath, and key summits and north-west facing slopes of the Cairngorms central massif. **The turbine height and proximity of the proposal to the Park would represent a substantial shift in the wind farm development baseline around the north-western edge of the CNP.**

We consider that the proposed development is likely to result in significant effects on the following SLQs, ordered in terms of relevance:

- **SLQ 6 - Landscapes both cultural and natural**
- **SLQ 10 - The surrounding hills**
- **SLQ 30 - Grand panoramas and framed views**
- **SLQ 32 - Dark Skies**
- **SLQ 28 - Wildness**
-

We provide more details of our appraisal below.

SLQ. 6 *Landscapes both cultural and natural* and SLQ. 10 *The surrounding hills*

SLQs 6 and 10 are considered together given some of the similar underlying characteristics relating to the upland moorland hills and their perceived wildness. For example, the SLQ6 description states "*At the lower altitudes the land has been long-inhabited, with patterns of land use, settlement and transport derived from the primary industries of farming, forestry and field sports. In contrast, the highest ground comprises uninhabited wild land of moor and mountain"*; while SLQ10 states *"The 'lesser hills' within the Park have their own ridges, summits and plateaux and would be impressive in any other location. (…) They contribute significantly to the wild, untamed appearance of the area".*

These SLQs are appreciated from elevated areas surrounding Strathspey such as the Cromdale Hills, the Craiggowrie - Meall a' Bhuachaille ridge, the north-east Monadhliath (e.g. VP 18) and Beinn Mor, where the lower lying landscape exhibits evidence of settlement and land use which is rich in cultural history. Lower wooded hills and pastoral green straths containing settlement contrast with the bare rolling uplands of brown heather moor that '*contribute significantly to the wild, untamed appearance of the area*'. In turn, the surrounding hills, when viewed from the strath, appear remote and uninhabitable, in part due to the lack of development. This evokes the sense that the containing hills are '*under the dominion of nature*' and contributes to the experience of these SLQs from Strathspey.

The proposed turbines would be visible looking across Strathspey as represented from Carn Sleamhuinn (676m AOD, VP 18 (Figure 6.53)), Beinn Mor (471m AOD, VP 6, Figure 6.41)), Meall a' Bhuachaille and the ridge extending to Craiggowrie (687m AOD, VP 24 (Figure 6.59)) and Creagan a' Chaise (722m AOD, VP 23 (Figure 6.58)). From these areas, the Strathdearn Hills appear as a long, level ridgeline which lacks any distinctive summits or other landform features. Balnespick Wind Farm would be much closer to the Park than existing wind farms which appear from these locations as distant features associated with the landforms north and outside the Park. Due to its height and siting, Balnespick would appear as a prominent vertical feature on the skyline at distances of 15-25km, detracting from the strong horizontal emphasis and reinforcing the northern boundary of the Park. The turbines would introduce an incongruous built element to the bare, uninhabited uplands, eroding the current distinction between the cultural (settled strath) and natural (moorland hills) landscapes.

[12] Figure 6.2 P21-0584_EN_02A Blade Tip ZTV to 45km with Viewpoints A1

These SLQs are also appreciated from Strathspey, from where there would be some visibility of turbines across a swathe of low land within 20km including the settlements of Carrbridge (VP 7 (Figure 6.42)), Boat of Garten and Nethy Bridge (VP 8 (Figure 6.43)). Outwards views from these areas are intermittent in places due to screening from trees, built elements and landform, and the influence of the surrounding hills is limited. As a result, where they are visible the bare uplands form an important contribution to these qualities which are moderately expressed in the settled areas.

The qualities are well expressed across Strath Dulnain, as the landscape opens to wider views of the surrounding hills; the Strathearn Hills appearing 'formidable' from the unmarked road between Carrbridge and Balnaan. West of the A9, from Upper Dulnain, Carn Lethendry, and the foothills of the Monadhliath (VP 19) external views are limited to the band of hills around the north-west of the Park. From these low-lying areas and side slopes, the Strathdearn Hills appear to be a considerable height unmoderated by higher summits. Without visibility of the Cairngorm Central Massif, the Strathdearn Hills make a substantial contribution to the '*untamed, wild appearance of the* area'.

From these lower-lying areas the proposed development would introduce a prominent man-made feature on the skyline, diminishing the perceived wildness and scale of the underlying hills. The current absence of wind development visible from this area (as illustrated by the cumulative ZTVs[13]) would be disrupted and the sense that the surrounding hills are *'under the dominion of nature'* would be eroded. The introduction of vertical infrastructure on the surrounding featureless skyline would detract from the broad, horizontal emphasis and create a prominent man-made focal point. The introduction of large-scale wind energy development to the hills containing Strathspey would introduce an incongruous element to the bare, uninhabited uplands, representing a substantial change to the distinct pattern of development and eroding the distinction between the cultural (settled strath) and natural (moorland hills) landscapes.

As daylight fades the key characteristics which underpin these qualities tend to be less well expressed as the characteristics are largely reliant on visual information therefore the strength of these SLQs is reduced. The appearance of turbine lighting would therefore have little adverse effect on these SLQs.

The proposed turbines would introduce incongruous structures to the bare, uninhabited uplands, representing a substantial change to the distinct pattern of development and eroding the distinction between the cultural (settled strath) and natural (moorland hills) landscapes from both elevated and lower lying areas of Strathspey.

The proposal would diminish the sense that surrounding hills are *'under the dominion of nature'* and reduce the contribution of the Strathdearn Hills to the '*wild, untamed appearance of the area'*. The effects on the SLQs *The surrounding hills* and *Landscapes both cultural and natural* are considered to be significant.

SLQ 30. Grand panoramas and framed Views

The description of this SLQ notes that *"…Views range from broad pastoral straths of green, over rolling hills of brown heather moor, with woodland at lower levels; and far, distant exposed, wild mountain terrain…The assemblage of landscape features is aesthetically pleasing with views often framed by vegetation and landform, and the eye led to an inviting arrangement of hill slopes and glens."*

The Cairngorms central massif encompasses some of Scotland's highest peaks. On the north-western reaches of the Cairngorms central massif, inward views look over dramatic jagged granite forms, and

[13] Figure 6.29 CZTV to 45km with operational Dunmaglass, Correigarth and Stronelairg Wind Farms and Figure 6.28 CZTV to 45km with operational Tom Nan Clach, Moy, Farr and Glen Kyllachy Wind Farms

outward views (VP 16 (Fig. 6.51)) extend over Strathspey beyond the Monadhliath and Strathdearn Hills to the far reaches of the north-east coast and western highlands, exemplifying the *Grand panoramas and framed Views* SLQ. Beyond the Park boundary (which is not discernible from the Cairngorms central massif) the open rolling moorland continues west into the Monadhliath and north into Dava Moor, where some existing wind farms are sited. However, due to their scale (all <125m to tip height) and distance from the Cairngorms massif (beyond 25km), they do not appear as prominent features, and do not significantly detract from the experience of this SLQ.

Sited on the ridge of the Strathdearn Hills, the proposal would disrupt the continuation of simple open moorland when viewed from the central massif and have the effect of foreshortening the perceived depth of the landscape to the north. Although the lateral extent of the proposal is relatively small within the wider panorama, the proposal would introduce a large scale vertical man-made focal point that 'breaks' the long horizontal ridgeline and would detract from the focal elements of Loch Morlich and the Meall a' Bhuachaille ridge in views over Strathspey.

The experience of this SLQ is not limited to a few key summits. From Speyside the hills rise in tiers and the ZTV[14] shows swathes of visibility across these slopes (VP 22), as well as the ascents of Braeriach via Sron la Lairig, Bynack Mor from Abernethy and Cairn Gorm via Fiacaill a Choire Chaise and Sron an Aonaich. These journeys via corries, valleys and ridges offer changing views north and west sometimes unfolding with height gained or framed by landform; SLQ 30 is well expressed. On slopes below the peaks (i.e. below around 800m) far reaching views are not yet available, and the dramatic interior of the massif is not yet revealed, focussing attention on the immediate Strathspey landscape instead. Visibility of the proposal reaches the north-west facing corries of Braeriach and Cairn Gorm, their towering walls forming a great amphitheatre overlooking Strathspey. Existing wind farms are less apparent from these elevations due to screening from intervening landform, whereas the proposed turbines would appear as large-scale structures in these views. The Strathdearn Hills have a simple, horizontal emphasis with no distinctive features, the turbines would break the skyline and draw attention from the '*inviting assemblage*' of landscape elements in views from these areas. This effect would also be experienced from the Cairngorm Mountain Coire Cas Car Park (635m AOD), a popular viewpoint looking over Glenmore, limited and framed on either side by the ridges extending northwards from the Cairngorms massif. Loch Morlich draws the eye north, nestled '*like a jewel within dense forests of pine*' below the Meall a' Bhuachaille ridge. The proposed development would sit in the middle distance of this view above the shoulder of Craiggowrie, appearing as a dominant focus on the horizon.[15]

There would be significant adverse effects on the *Grand panoramas and framed views SLQ* as appreciated from a number of locations, routes and summits within the Cairngorm massif, due to its vertical scale, proximity, and location within key framed views.

SLQ 32. Dark Skies

The SLQ description notes *"At night, even the complete absence of colour, a pitch black sky bespeckled only with the light of the stars, is a distinctive feature as dark skies become increasingly rare in Britain."* Where skies remain dark, with only natural ambient lighting from the moon and stars, and uninterrupted by artificial light this '*dark skies*' characteristic can instil a sense of calm, spirituality and sense of awe. This SLQ can be found to varying degrees across the study area (not just in the Cairngorms Dark Skies Park).

[14] Figure 6.2 P21-0584_EN_02A Blade Tip ZTV to 45km with Viewpoints A1

[15] Supporting viewpoints are provided from summit locations and do not represent the 'framed views' element of SLQ30.

There would be visibility[16] across Strathspey and Abernethy of up to five lights from elevated areas including the north-west slopes of the Cromdale Hills, the Monadhliath, Meall a' Bhuachaille, and the central Cairngorms massif[17]. Ascertaining how well expressed this quality is, in order to establish a baseline, must be informed by field assessment. We have undertaken field work both during the hours of daylight and after dusk to inform our understanding of the baseline landscape character.

As light fades, the strength of this quality increases particularly where light sources are only notable from the A95 and A9 corridors, occasional lights from scattered buildings and intermittent headlights such as from the edge of the Monadhliath (VP18 (Figure 6.53)), Strathdearn Hills (VP1 (Figure 6.36)), VP5 (Figure 6.40), VP10 (Figure 6.45) and the Cromdale Hills (VP23 (Figure 6.58). Although the consented Ourack Wind Farm will introduce turbine lighting to some elevated locations within the Park, we do not anticipate that the Ourack lights would result in extensive effects on the Dark Skies quality from some of the more susceptible locations. From parts of the central Cairngorms massif and the Meall a' Bhuachaille-Craiggowrie ridge, Aviemore constitutes a small cluster of light sources contained within the low-lying strath and therefore has a limited effect on the Dark Skies SLQ. This quality is well expressed across the study area and moderately susceptible to change.

From elevated areas around Strathspey, five turbine lights would be visible from Carn Sleamhuinn (VP18), Creagan a Chaise (VP23), the Meall a' Bhuachaille Ridge (VP22 (Figure 6.57) and VP24), the Strathdearn Hills west of Carn-Glas Choire, Cairn Gorm (VP16) as well as other key summits of the massif, representing a substantial change to the baseline. The Turbine Lighting Intensity ZTV[18] illustrates "theoretical reduction in the candela intensity of the lights at vertical angles above and below the horizon"[19] showing the areas of greatest intensity to be around 800m AOD and decreasing with both elevation and proximity to the proposal. Although the area is not included on the ZTV, it can be expected that the intensity would be high from similar elevations on Meall a' Bhuachaille, Craiggowrie and the north-western extent of the central massif due to the horizontal angle at which the turbines would be seen. Lighting would be experienced by a number of sensitive receptors during hours of low-light and darkness (the area is used year-round for recreational activities that start and end during hours of darkness). The proposed turbine lighting would add a new layer of obvious bright red lights to the uplands, incongruous with the current development pattern of lighting contained to the straths and eroding the underpinning characteristics of the SLQ '*the complete absence of colour*' and *'a pitch black sky bespeckled only with the light of the stars'.*

Across lower lying areas of the Park, the dark skies SLQ is best expressed outwith settlements, as street lighting and light emitting from dwellings is clustered and can be evident. Some lower lying areas are visited specifically for the appreciation of this quality, such as Achnahannet where there are few artificial lights and the remote road provides access to a very dark landscape. On the peripheries and within some smaller settlements, the quality can be well expressed as the baseline photography from within Carrbridge illustrates (VP 7). The turbine lights (between 1 and 3) would appear beyond and above both the lower lying settled landscape and the surrounding hills. They would have the effect of both extending areas of artificial lighting and intruding on the experience of dark skies appearing as a distraction, drawing attention away from the appreciation of the stars and moon on clear nights.

Contrary to the technical appendix and pre-application advice provided, there are no night-time visualisations from elevated areas within the Park, therefore this analysis has been based on our professional judgment. There is a visualisation provided from Carrbridge at 6.9km to the south-east of the

[16] EIAR Volume 2 Figure 6.24 Lit Turbine Zone of Theoretical Visibility to 20km with Viewpoints
[17] EIAR Volume 2 Figure 6.18 P21-0584_EN_18A Hub Height ZTV to 45km with Viewpoints A1
[18] EIAR Volume 2 Figure 6.25 Turbine Lighting Intensity Zone of Theoretical Visibility with Viewpoints
[19] Technical Appendix 6.6 Assessment of Night-time Lighting

site which shows a very dark baseline landscape. However, we do not consider that this, together with the other two night-time visualisations, present an accurate image of the intensity of predicted turbine lighting. From our own experience the turbine lights would appear from these distances as prominent bright red lights, an uncharacteristic colour in this setting, which would draw attention to new structures which would otherwise not be visible after dusk.

There would be significant adverse effects on the *Dark skies* SLQ across both upland and lower lying areas of the CNP.

SLQ 28. Wildness

The description for this SLQ notes that "*Other areas of the Park are less remote, but the preponderance of near natural vegetation, together with distinctive wildlife and the general lack of development, can still give a perception of the dominance of nature. This includes the managed grouse moors, and the ancient, managed woods and plantations."*

Ascending the Strathdearn Hills, the cultivated fields and settlements of Strath Spey are left behind and a sense of wildness comes to the fore. Heather moorland dominates, and the open rolling landform and general absence of development make it difficult to judge distance and scale. The hills straddle the Rolling Uplands – Cairngorms (LCT 125), Rolling Uplands – Inverness (LCT221) and Open Rolling Upland (LCT 291). They are characterised by their broad rounded form and open and relatively featureless appearance, becoming increasingly steep, with craggy sides between the highest point at Carn Glas-choire at 659m AOD and Creag Liath 450 AOD. From the hills the expansive sweeps of moorland to the north and extensive views south across Strathspey to the Cairngorm massif are appreciated along with a strong sense of expansiveness. There are some obvious signs of management such as hill tracks, bothies and muirburn however despite this there remains a moderately high perception of remoteness and an overarching dominance of nature in this large-scale landscape. We are in agreement with the SLQ assessment considering the Wildness SLQ to be strongly expressed here.

The proposed turbines would be located within the rolling uplands outside the Park on the plateau and northern slopes of Carn Ian Ruaidh (632 AOD). There would be visibility of the proposal across stretches of the Strathdearn Hills along the edge of the Park as demonstrated by the ZTV[20]. From the more steep, craggy hills east of Carn Glas-choire, the proposal would appear on the skyline when travelling west along the band of hills towards the development site, introducing a new man-made focal point on the horizon and detracting from the expansive views north and more scenic views south. The proposed development would erode the current dominance of nature as the turbines would provide a new and obvious focus when looking west across the Park, as VP 5 illustrates.

Between Carn Glas-choire and Carn nam Bain-tighearna (634m OAD) there is a strong connection between the landscapes across the Park boundary as the LCT transitions from Rolling Uplands – Cairngorms to Rolling Uplands – Inverness. The transition is less obvious on the ground, and the area is characterised by the open, rolling moorland hills evoking a sense of remoteness and expansiveness, which underpin the Wildness SLQ. Existing wind farm Tom nan Clach is also sited within this LCT 221 however, sited further from the Park (approximately 5.8km) it is partially screened by landform and at 125m to blade tip it appears as a relatively compact feature in the wider moorland landscape. With visibility of all turbines, including a number of full towers from base to blade-tip and associated access tracks, Balnespick would form a large and prominent change that would diminish the perceived extensiveness of the vast upland moorland whilst looking along the edge of the Park (VP 10 (Figure 6.45)) and increase the influence of human infrastructure to a degree that the character would be redefined.

[20] Figure 6.3 P21-0584_EN_03A Blade Tip ZTV to 20km with Viewpoints A1

Overall, Balnespick Wind Farm would erode the current dominance of nature along the Strathdearn Hills due to the introduction of obvious development in close proximity and would substantially reduce the sense of remoteness and expansiveness. This proposal would result in a substantial shift in the proximity, prominence and visual intrusion of wind farm development on the Wildness SLQ across these hills, introducing prominent modern structures in the immediate landscape, and in panoramic views from the Strathdearn Hills. The effects of the proposal (both turbines and the associated infrastructure where seen) would extend along the majority of the Strathdearn Hills for approximately 20km. The proposed development would result in significant adverse effects on the Wildness SLQ in this part of the Park.

As daylight fades the key characteristics which underpin this quality change altering the baseline. Some characteristics, such as the naturalness of vegetation, are weakened and ultimately no longer present as they rely on noting the differentiation between land uses which is challenging as light fades. Other characteristics are strengthened, such as the apparent lack of development due to features such as hill tracks and bothies becoming increasingly less visible. From the Strathdearn Hills the strength of this SLQ would increase with the reduction in natural light (VP 3 (Figure 6.38) illustrates the absence of light across Dava Moor). Up to four aviation lights on the consented Ourack Wind Farm would be visible between Creag Liath and Carn Glas-Choire, and at a distance of approximately 20km on the summit of Carn nam Bain-tighearna. Balnespick would introduce additional lighting in successive views from these areas, and in combined views from Carn nam Bain-tighearna. Aviation lighting would draw attention to structures which would otherwise not be visible after dusk, especially where they are seen to flash, reducing the sense of risk and tranquility. All five aviation lights would be visible between Carn nam Bain-tighearna and Carn Glas-choire which is not currently affected by aviation lighting[21], increasing effects of aviation lighting west along the Strathdearn Hills. Adverse effects on the Wildness SLQ would extend into significant adverse night-time effects along the band of hills in this part of the Park.

There would be significant daytime and night-time effects on the Wildness SLQ from the Strathdearn Hills.

Cumulative Effects

The applicant has not included a paired cumulative ZTV with Clune. Our appraisal has used comparison of individual ZTVs provided with corresponding applications.

Cumulative scenario with Clune Wind Farm in the baseline

Clune Wind Farm (ECU00005038) would comprise a development of up to 26 turbines (200m to blade tip) on the north-eastern Monadhliath (0.9km from the CNP). The addition of Balnespick Wind Farm 9.5km north-east of Clune would intensify the presence and influence of wind farm development from Strathspey surrounding elevated areas within ZTV coverage. From key summits, the two proposals would redefine the northern and western Park boundaries and affect a greater portion of panoramic views, and framed views towards the Monadhliath and Strathdearn Hills. The worst-case scenario of aviation lighting would include visibility of five Balnespick lights in addition to the ten Clune lights as seen by sensitive receptors from key summits of the Cairngorms massif and Meall a' Bhuachaille ridge and the Strathdearn Hills. From elevated and lower lying areas of Strathspey, Balnespick would introduce a vertical man-made focal point to the northern, simple ridgeline and when seen with Clune on the western skyline would intensify the erosion of contrast between the settled strath and uninhabited upland of the surrounding hills.

The addition of Balnespick Wind Farm would intensify significant adverse effects found on the SLQs 6, 10, 30 and 32 as a result of Clune.

[21] Figure 6.34 Cumulative Zone of Theoretical Visibility to 45 km with in planning Ourack and Kellas Drum Wind Farms