Agenda item 11

Appendix 3

2025/0047/PAC

(ECU00005038)

NatureScot comments

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

Rebecca Hindson
Energy Consents Unit
Response by email to Econsents_Admin@gov.scot

27 June 2025
Your ref: ECU00005038
Our ref: CDM179372

Dear Rebecca Hindson

ELECTRICITY ACT 1989
THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017
APPLICATION FOR SECTION 36 CONSENT FOR CLUNE 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.**
- **River Spey Special Area of Conservation (SAC): The proposal could affect internationally important natural heritage interests and we therefore object to this proposal until further information is provided.** This will enable us to carry out an appraisal of these effects and help you determine this proposal.
- **Kinveachy Forest Site of Special Scientific Interest (SSSI): The proposal could affect nationally important natural heritage interests and we therefore object to this proposal until further information is provided.**
- **White-tailed eagle: We object to this proposal until further information is provided to allow an accurate assessment of the collision risk and impact on the national population of this re-introduced protected species.**
- **Kinveachy Forest Special Protection Area (SPA) and SAC:** This proposal could be progressed with appropriate changes. However, because it could affect internationally important natural heritage interests, **we object to this proposal unless it is amended so that the works are done strictly in accordance with the changes detailed in our appraisal below.**

Appraisal of the impacts of the proposal and advice

1. Landscape and visual impacts

Our advice on this proposal will focus on the potential for significant effects 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 effects that need to be considered when determining the application.

Cairngorms National Park

The proposed development site lies within the Monadhliath, adjacent to the Cairngorms National Park (CNP) with the closest turbine sited approximately 0.9km from the CNP boundary.

The Monadhliath currently forms an elevated moorland skyline enclosing the western slopes of Strathspey and providing a backdrop from key slopes and summits of the Cairngorms National Park (CNP). The location of the proposed wind farm within the northeast Monadhliath would introduce visibility of turbines to lower lying areas of the Park for the first time. The proposal individually, and cumulatively with the proposed Balnespick Wind Farm, would significantly adversely affect five of the Special Landscape Qualities (SLQs) of the CNP during the day and associated 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 northwest 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.

Monadhliath Wild Land Area (WLA 20)

Although the site boundary overlaps slightly with the Monadhliath Wild Land Area (WLA 20), the nearest turbine would be approximately 0.1km from WLA 20 and no associated infrastructure would be sited within the Wild Land Area.

The proposal would introduce very obvious forms of human influence across a number of summits within WLA 20, detracting from the current awe-inspiring simplicity of the rounded hills. In addition, the turbines would introduce a new landmark feature at close proximity, providing orientation to views within the interior of the WLA, both along the glen floor and higher up the side slopes, substantially reducing the sense of risk. These effects would extend into the night as a result of the turbine lighting and would result in a significant effect on Wild Land Qualities (WLQs) 1 and 2.

We therefore advise that the proposed development would result in a significant effect on Wild Land Qualities (WLQs) 1 and 2 of WLA20. We provide further comments in Annex 2 to this letter.

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

2. Protected areas

a. European sites

River Spey Special Area of Conservation (SAC)

Turbines 1-8 are within the catchment of the River Spey SAC which is protected for its Atlantic salmon, sea lamprey, freshwater pearl mussel and otter populations.

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, the Scottish Government is required to consider the effect of the proposal on the SAC 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 the interests of this SAC through the risk of sediment release to watercourses, and on otters from the potential for disturbance. 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.

In relation to the risk of sediment release to watercourses:

To help you do this, we propose to carry out an appraisal to inform your appropriate assessment. To enable us to carry out this appraisal, the following information is required:

Assessment of the potential risk of peat and non-peat sediments (regolith) being released into watercourses connected to the SAC. This should include:

- **Within the River Spey catchment, further peat depth probing to be undertaken at a higher resolution, covering the requested micrositing limits around the proposed infrastructure. This information should be considered in the Peat and Landslide Hazard Risk Assessment (PLHRA).** This is to allow a finer scale assessment of the peat slide risk within the proposed micrositing limits.
- **Where areas of medium or high peat slide risk are identified within the 100m micrositing limit further assessment and details of appropriate location-specific mitigation will be required, so as to demonstrate how any risk to the SAC will be mitigated.** Where infrastructure is located close to the break in slope and use of the micrositing limit could alter the predicted direction it would travel, this should also be considered in the assessment.
- **Provision of a basic geomorphological assessment of the terrain (with accompanying map) which focuses on potential sediment sources in the vicinity of the proposed construction works, and on slopes that drain into tributaries of the SAC.**
- **Assessment of the risk to watercourses from both acute sediment release through localised slope failure events, and longer-term sediment release through erosion. Particular attention should be given to the proximity of any locally steep-sided glacial deposits to proposed excavations; steeper areas of hill slope to be crossed by new track construction/upgraded track and turbine foundations; and burn bank morphology, composition and stability at any watercourse crossings of tributaries draining into the SAC.**
- **Demonstration of how the findings of this assessment have influenced the layout and design of infrastructure and details of location-specific mitigation measures that will be deployed to minimise the risk of any sediments reaching the SAC.**

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

This additional information is required to clarify the peat slide risk, and to ensure that the applicants have assessed the risk from non-peat sediments, in order that these can be effectively mitigated. We requested assessment of these issues at scoping, and that the need for baseline surveys for freshwater pearl mussel, salmon and sea lamprey was considered in accordance with our guidance.

In addition, we note that the PLHRA has only considered the impact of landslide associated with the construction phase of the development and has not considered any risk that may arise from peatland restoration (although outside the footprint there are areas of restored peatland just to the west of turbine 8, and other areas of restoration are proposed between turbines 2 and 3 as part of the proposed Outline Habitat Management and Biodiversity Enhancement Plan (OHMBEP)). Peatland Action guidance on best practice for restoration of peatland and assessment of peatland instability during restoration should be considered, so that any risks arising from this can be mitigated[3].

Once this information has been provided, we will be able to give further consideration to this proposal.

In relation to disturbance to otters:
We advise that this proposal is also likely to have a significant effect on SAC otters through the potential for disturbance, particularly during the proposed OHMBEP works. We advise that on the basis of the information provided, if the proposal is carried out strictly in accordance with the following mitigation, our conclusion is that the proposal will not adversely affect the integrity of the site:

- **A Species Protection Plan for otters is to be agreed with the consenting authority in consultation with NatureScot. This should set out how impacts will be avoided and minimised, following the principles outlined in our standing advice at: https://www.nature.scot/doc/standing-advice-planning-consultations-otters.**

This is because the proposed development lies in close proximity to the SAC and the proposed habitat enhancement measures overlap with parts of the SAC. There is potential for disturbance to otters but this could be mitigated through an appropriate Species Protection Plan.

Kinveachy Forest Special Protection Area (SPA) and SAC

The proposed development site lies 0.6km from this SPA and SAC, with the nearest turbine around 1km from the boundary. The SPA is protected for breeding capercaillie and Scottish crossbill. The SAC is protected for its Caledonian forest and Bog woodland.

Although baseline conditions indicate that the wind farm itself would be unlikely to affect the features of the SPA and SAC, the proposed expansion of woodland into the wind farm site as part of the Outline Habitat Management and Biodiversity Enhancement Plan could create an increased risk of collision for capercaillie. In addition, although we recognise the potential benefits of woodland expansion, there are also potential risks to the Caledonian forest, particularly where planting is proposed, which have not been considered in the EIAR.

Our advice is that this proposal is likely to have a significant effect on the SPA capercaillie population and the SAC Caledonian Forest. Consequently, the Scottish Government, as competent authority, is required to carry out an appropriate assessment in view of the sites' conservation objectives for its qualifying interests. To help you do this, we advise that on the basis of the information provided, if the proposal is carried out

[3] See: https://www.nature.scot/doc/naturescot-research-report-1259-risk-based-approach-peatland-restoration-and-peat-instability.

strictly in accordance with the following changes, our conclusion is that the proposal will not adversely affect the integrity of the site:

i) **Turbines 1 and 2 should not be microsited closer to the SAC/SPA boundary (they are currently around 1km from the SPA/SAC boundary).**

ii) **If the wind farm is consented, the final Habitat Management and Biodiversity Enhancement Plan should be agreed with the consenting authority in consultation with NatureScot. The Plan should include the following mitigation:**

- **There should be no tree planting within 1km of the proposed turbines.**
- **Tree regeneration within 1km of the proposed turbines should be managed to ensure it does not increase the collision risk to capercaillie. Details of how this would be achieved should be included in the final Plan.**
- **There should be no additional fencing within the Plan area.**
- **A Species Protection Plan for capercaillie. This should set out the mitigation that would be in place to avoid the risk of disturbance to capercaillie during works associated with the Plan.**
- **Expansion of pine woodland within the combined regeneration and buffer zone around the core Caledonian Pinewood Inventory area should be achieved by natural regeneration.**

The appraisal we carried out considered the impact of the proposals on the following factors:

<u>Kinveachy Forest SPA</u>

- There is a likely significant effect for the following SPAs, protected for capercaillie, which are within dispersal distance of the proposed development: Darnaway and Lethen Forest SPA (located to the north-east of the proposed development); and Kinveachy Forest, Abernethy Forest, Craigmore Wood, Anagach Woods and Cairngorms SPAs (located to the east and south-east of the proposed development).
- The risk of collision and disturbance to capercaillie from the proposed wind farm itself is likely to be low, provided turbines are not microsited closer to the SPA. This is due to the existing baseline, including habitats on site, and distance and location of the proposed wind farm in relation to the above SPAs and capercaillie records.
- The proposed woodland expansion within the Outline Habitat Management and Biodiversity Enhancement Plan could however change this existing baseline through increasing habitat suitability within and closer to the proposed wind farm. This could increase the collision risk to capercaillie - although evidence suggests that capercaillie are likely to be displaced by operational turbines, there is also evidence that complete avoidance does not occur with observations from mainland Europe indicating that capercaillie collisions with turbine bases do occur. This risk would need to be mitigated by ensuring there is no increase in tree cover within 1km of the proposed turbines.
- Woodland management is proposed close to the SPA and other areas of suitable habitat for capercaillie. A Species Protection Plan would be required to set out the necessary mitigation to avoid the risk of disturbance to lekking and breeding capercaillie.
- There should be no additional fencing within the Plan area as fencing close to suitable capercaillie habitat could increase the risk of collision to capercaillie. We recommend instead that any woodland expansion proposals would need secured by an effective Deer Management Plan.

Kinveachy Forest SAC

- Scottish Forestry guidance is that opportunities for natural regeneration should be maximised in the core Caledonian Pinewood Inventory sites and their combined regeneration and buffer zone. Although expanding the Caledonian forest at this location through natural regeneration would be beneficial and in line with existing management for the SAC, we consider that it would be inappropriate to plant trees at this location due to risk of introducing pathogens such as *Dothistroma*, and introducing trees of an inappropriate genotype for the site.

b. Kinveachy Forest Site of Special Scientific Interest (SSSI)

The proposed development site includes part of this SSSI, with the nearest turbine around 0.1km from the SSSI boundary. The SSSI is protected for its breeding bird assemblage and native pinewood.

In relation to the breeding bird assemblage feature of the SSSI, there are natural heritage interests of national importance on the site, which could be affected by the proposal. We require further information (detailed below) to determine if the proposal will affect the integrity of the SSSI. We therefore object to the proposal until the further information detailed below is obtained from the applicant and considered by the Energy Consents Unit:

- **A further year of bird survey work is to be completed across the proposed development site, following the methods set out in our bird survey guidance at: https://www.nature.scot/doc/recommended-bird-survey-methods-inform-impact-assessment-onshore-windfarms.**

The breeding bird assemblage is a woodland bird assemblage. The applicants should note that this includes a range of woodland birds such as black grouse, osprey and red kite, and is not limited to capercaillie, Scottish crossbill and crested tit. We recommend that the applicants contact us to agree the scope of additional survey work required. Depending on the outcome of the initial results further survey work may be required. Following this, assessment of impacts will be required, which considers the potential for collision risk, disturbance and displacement. We will comment further once the additional information is available.

Our advice for the native pinewood feature is covered by the advice for the Kinveachy Forest SAC above.

c. The Slochd Geological Conservation Review (GCR) Site

Although the proposed wind farm itself will not affect this site, the EIAR has not assessed potential impacts from the Outline Habitat Management and Biodiversity Enhancement Plan which includes proposals for woodland expansion within the GCR site. This could obscure the "rock outcrops" which the GCR site is important for. Should woodland expansion be proposed within the Slochd GCR site we recommend that the final Habitat Management and Biodiversity Enhancement Plan includes the following mitigation:

- **Should the wind farm be consented, any proposals for woodland expansion within The Slochd GCR site should follow the mitigation and management measures outlined in NatureScot's *Geological Conservation Review Sites – Forestry and Woodland Standing Advice and Guidance*[4].**

[4] See: https://www.nature.scot/doc/standing-advice-and-guidance-forestry-and-woodland-planning-geological-conservation-review-sites-and.

Sections 2.1.1 and 2.1.2 of the above guidance describes the mitigation and management measures that would be required to ensure that planting and natural regeneration does not affect the nationally important geological features of the site. These refer to the "crucial" and "context" areas of the GCR site. A map of these areas is provided in Annex 3 to this letter.

3. Wider Countryside birds

Due to shortfalls in the survey and assessment undertaken, we advise that there is insufficient information to assess the impacts of this proposal on Annex 1 birds in the wider countryside, in particular the Natural Heritage Zone (NHZ) 10 and national populations of white-tailed eagles.

- **In relation to white-tailed eagle, we therefore object to this proposal until further information is provided to allow an accurate assessment of the collision risk to white-tailed eagles.**

- **In relation to other Annex 1 birds in the wider countryside, we therefore advise that a further year of bird survey work is completed across the proposed development site following our guidance[5].**

Further advice for white-tailed eagles

The calculated annual collision rate for white-tailed eagle from this proposal is very high. It would seem likely that flights recorded are the adults from a nearby territory and their offspring, but the vantage point survey results do not indicate if the flights recorded were adult or juvenile birds. In addition, only one year of survey work has covered the south-eastern part of the site (our guidance recommends 2 years); contextual information from the Highland Raptor Study Group has not been obtained; and the timing of survey work over a limited temporal range means that collision rate could have been underestimated. **There is therefore insufficient information to assess the collision risk to white-tailed eagles.**

There is evidence from Europe that white-tailed eagle territories with 3km of operating wind farms have lower occupancy and lower productivity than nests beyond this distance. It is unclear whether this is the result of collision mortality to adults, which are then replaced by new birds, resulting in these territories becoming 'sinks'. We are only aware of one pair of white-tailed eagle within NHZ10. **The proposed development could therefore reduce the range of the recovering white-tailed eagle population.**

The predicted collision risk would also add significantly to a growing cumulative collision risk at a national level. Taking into account other recent wind farm applications, across Scotland the cumulative annual collision risk for white-tailed eagle is currently more than 14 birds per year. **This is likely to result in significant impacts on the growth rate of the national population of this re-introduced protected species, which will slow the rate of range expansion and hinder progress towards restoring its former range across Scotland.**

We advise that in the first instance the applicants contact the Highland Raptor Study Group to request desk study information on any white-tailed eagle territories within 6km of the site as well as any available satellite tag data. If satellite tag data is available we recommend that a Kernel Density analysis is undertaken to identify the core areas of use of any territories. Although this will not provide a collision risk estimate it will help to indicate how much the proposed development site is used by white-tailed eagle and the requirement for further survey work. At this stage we advise that one further year of vantage point survey work is likely to be required across the whole of the proposed development site, with an additional

[5] See: https://www.nature.scot/doc/recommended-bird-survey-methods-inform-impact-assessment-onshore-windfarms.

year (i.e. two further years in total) covering the south-east part of the site in which turbines 1 to 8 are located.

Further advice on Annex 1 birds in the wider countryside

There is currently insufficient information to assess the potential impacts to Annex 1 birds in the wider countryside. This is due to the survey limitations listed in Technical Appendix 8.1 of the EIAR, notably the lack of survey coverage outside the red line application boundary which does not follow our guidance; shortfalls in the timing of breeding bird surveys within the wind farm site itself; because the eight turbines in the south-east section of the proposed development site have only been covered by one year of survey work (contrary to our guidance which recommends two years of survey work); and because the applicants do not appear to have accessed data held by the Highland Raptor Study Group which could have aided their assessment. The timing of vantage point surveys during the 2023 breeding season also provides limited temporal spread and may have underestimated flight activity. **Given the scale of the proposal and sensitivity of this site we consider that survey undertaken to date is inadequate to complete an assessment of the impacts to Annex 1 birds in the wider countryside.**

For both of these issues, we recommend that the applicants contact us to agree the scope of survey work required. Depending on the outcome of the initial results further survey and assessment may be required. Assessment of impacts will be required to consider the potential for collision risk, disturbance and displacement both from the proposed development on its own (including the proposed OHMBEP) and in combination with other developments (at the NHZ10 scale). Again, we recommend that the applicants contact us to agree the scope of this assessment. We will comment further once the additional information is available.

4. 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, the information presented in the EIAR and our background knowledge of the location.

We are largely in agreement with the assessment carried out by the applicants, which indicates that most of the site has been modified for sporting or livestock purposes, and indicators of near natural condition are limited. The site does not appear to contain indicators of a high quality habitat within the development area, and we therefore advise that predicted impacts could be offset by adequate peatland restoration.

The EIAR indicates that there will be direct loss of 17.69ha of peatland habitats, and combined direct and with indirect losses of around 116ha. The Outline Habitat Management and Biodiversity Enhancement Plan provided with the application proposes peatland restoration through ground works and peatland enhancement through plug planting, but it lacks detail, the area of restoration proposed is not clear, and some of the methods proposed may not follow best practice. It therefore appears that the restoration proposed is currently not sufficient to offset the impacts to peatland habitats from the development. We would be looking for a plan for this site to follow our guidance[6] and for the amount of offsetting proposed to be in the region of 1:10.

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

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[7]. 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.

At scoping we advised that the EIAR should demonstrate that all survey, assessment and mitigation has followed our standing advice for protected species. It is not clear from the EIAR whether all survey work has followed our guidance (e.g. water vole surveys do not seem to have been done at the recommended time of year, and survey coverage for otters is unclear). There is also no consideration of mountain hare as a protected species, which we identified as a consideration at scoping. We recommend that all further survey work should follow the standing advice on our website, and should also cover areas proposed for habitat enhancement, see: https://www.nature.scot/professional-advice/planning-and-development/planning-and-development-advice/planning-and-development-protected-species.

Bats

Some of the guidance referenced in the bat assessment is now out of date and the proxy weather data source is some distance from the site. Despite these short comings, we agree that under the current baseline conditions bat activity levels would be expected to be low over the site most of the time, but there could be activity spikes during warm summer nights. 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. Proposed habitat enhancement measures could also increase the site suitability for bats and management may be required to reduce the collision risk to bats. For further advice see: https://www.nature.scot/doc/bats-and-onshore-wind-turbines-survey-assessment-and-mitigation.

Scottish wildcat

Apparently suitable areas of scrub exist in riparian areas within the proposed development site, and there are wildcat records in the wider area. We therefore 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 construction 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[8] it should be assumed that it is denning or resting within the scrub unless further survey work is undertaken to establish the frequency and timing of activity as evidence the location is not used for resting. The applicants should

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

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

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.

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 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.

The Outline Habitat Management and Biodiversity Enhancement Plan suggests mountain hare control for woodland management. As mountain hare are a protected species a licence would be required from NatureScot if this is proposed. We advise that control should not be considered unless monitoring shows that hares are having a measurable effect on natural regeneration.

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

Annex 1 – Cairngorms National Park

Assessment Baseline

The proposed development would be situated just outside the north-western boundary of the Cairngorms National Park, to the west of the A9 and south of Strathdearn, across an area of elevated moorland that forms part of the north-eastern Monadhliath mountains.

The Monadhliath comprise a long range of rolling moorland hills and plateaux with summits of 550 to 850m AOD. The landscape is homogenous and almost featureless, with no distinct summits or patterns. Much of the area lies within the Monadhliath Wild Land Area (WLA 20) for which the description reads: '*The hills appear stunning in their simplicity, openness and immense scale, offering from their tops elevated views across a succession of sweeping landform horizons that often seem to continue infinitely in every direction'.* The Cairngorms National Park boundary follows the eastern ridge of the hills. Described as forming a '*visual backdrop and a more secluded hinterland to the landscape character areas within Strathspey'*[9]*,* the backdrop seems '*to merge into an undulating skyline without any clearly identifiable features*'[10], appearing '*remote and formidable*[11]*'* from the closer, settled lower ground.

The Landscape Character Type (LCT) description for host LCT 221 – Rolling Uplands – Inverness identifies: *'a strong sense of openness and exposure'* from hilltops and plateaux and an uninhabited interior with *'a strong perception of remoteness'* forming an extensive area of rolling hills *'extending far beyond the district boundary and into the Cairngorms National Park'* where the LCT merges across the boundary into LCT 125 – Rolling Uplands – Cairngorms. The open nature of this landscape affords a high level of intervisibility across the hills, WLA 20 and Cairngorms National Park, which are of a high sensitivity to wind development.

LCT 221 accommodates a number of existing wind farms. Operational and consented wind farms[12] broadly form five clusters, the majority of which are located in visually discreet lower-lying basins. Dunmaglass Wind Farm is an exception due to the location of turbines on more elevated ground resulting in increased prominence from the Monadhliath WLA. The closest operational wind farms to the proposal are Farr and Glen Kyllachy although, from the edge of the Park, Farr, Glen Kyllachy and Dumnaglass have a limited influence appearing as relatively distant and compact features in the wider landscape. This is illustrated from Viewpoint (VP) 8 – Carn Sleamhuinn[13], VP 10 – Track near Geal Charn Mor[14], and VP 16 – Carn an Fhreicaedain Summit[15]. At 5.8km, Tom nan Clach is the closest operational wind farm to the Park boundary, however, like Moy, it appears as a relatively compact feature in the wider landscape due to its height (125m to blade tip) and partial screening from landform.

From higher elevations within the Park interior where operational wind farms are visible, existing wind farms are perceived as distant features (as shown by VP 22 - Cairn Gorm Mountain Railway Café[16], VP 23 –

[9] See: https://cairngorms.co.uk/wp-content/uploads/2019/09/CD026-Cairngorms-Landscape-Character-Assessment-Report_reduced.pdf.
[10] NatureScot Landscape Character Type 221: Rolling Uplands Inverness
[11] NatureScot Landscape Character Type 125: Rolling Uplands - Cairngorms
[12] See EIAR Figure 5.12
[13] See EIAR Vol. 2b Figure 5.24-h
[14] See EIAR Vol. 2b Figure 5.26-h
[15] See EIAR Vol. 2b Figure 5.32-h
[16] See EIAR Vol. 2b Figure 5.38-h.

Braeriach summit[17], VP 17a Meall a' Bhuachaille[18] and VP 24 Creagan a Chaise[19]. On the whole, operational and consented wind farms have a relatively limited influence both individually and cumulatively on the SLQs of the Park due to their distance, heights (all below 150m to blade tip), lack of turbine lighting and interspersed pattern of development. From the majority of locations at lower elevations in the LVIA study area no operational wind farms are currently visible, as shown by the cumulative ZTVs (Figures 5.13a-j) and VP 3 – Core Path Lbs114 (by Insharn)[20], VP 12- A9 near Carrbridge[21], VP 14 – Carrbridge[22], VP 18 - Achnahannet[23] and VP 20 - Braes of Balnagowan, Nethy Bridge[24].

Wind farms in planning at the time of the assessment included Ourack which has since been consented (25th March 2025), and Lethen which has been refused (23rd February 2024). With regards to emerging applications, we note that scoping stage Highland and Balnespick Wind Farms are now at application. Balnespick 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 Cairngorms National Park (CNP)
The applicant has provided an assessment of the effects on the SLQs of the CNP which broadly follows our guidance[25]. This used the Cairngorms National Park Landscape Character Areas to define sub-units within their 20km study area[26].

The applicants considered there to be localised significant effects on the following SLQs: ***SLQ 32 - Dark skies*** (from LCA 90: Cairngorms Central Massif and LCA 81: North Monadhliath); ***SLQ 30 - Grand Panoramas and framed* views** (from grouped LCAs 20: Boat of Garten to Craggan and 23: Dulnain Strath); and ***SLQ 29 - Layers of receding ridgelines*** (from grouped LCAs 20: Boat of Garten to Craggan and 23: Dulnain Strath).

The applicant found no significant landscape and visual effects beyond 20km, ascertaining that effects on the SLQs would be contained within, and limiting the SLQ assessment study area to, a 20km radius. We consider the limiting factors identified in the assessment, namely distance and influence of operational wind energy in the baseline, to be over-estimated in the applicant's assessment. The turbine height and proximity of the proposal to the Park would represent a substantial shift in the wind development baseline around the north-western edge of the CNP.

While we agree with some of the conclusions relating to significant adverse effects on SLQ 32 and SLQ 30, we consider that the applicants assessment underplays the significance and extent of day and night-time effects on a number of SLQs of the CNP.

We also note that a number of the photomontages do not meet the standards set out in our guidance as the baseline photography has been undertaken in conditions of poor visibility. These include VPs 8, 10, 15,

[17] See EIAR Vol. 2b Figure 5.39
[18] See EIAR Vol. 2b Figure 5.33-h
[19] See EIAR Vol. 2b Figure 5.40-h
[20] See: EIAR Vol. 2b Figure 5.19
[21] See EIAR Vol. 2b Figure 5.28-h.
[22] See EIAR Vol. 2b Figure 5.30
[23] See EIAR Vol. 2b Figure 5.34
[24] See EIAR Vol. 2b Figure 5.36-f
[25] See: https://www.nature.scot/doc/special-landscape-qualities-guidance-assessing-effects.
[26] See: https://cairngorms.co.uk/wp-content/uploads/2019/09/CD026-Cairngorms-Landscape-Character-Assessment-Report_reduced.pdf.

18, 19 and 23. In terms of effects resulting from visible aviation lighting we note that the LVIA focuses solely on the effects of aviation lighting on visual amenity. We consider that aviation lighting affects both landscape and visual receptors. It would have been helpful for the LVIA to identify which of the SLQs that would be notably affected during the day, would progress into night-time effects or otherwise. We consider this a notable omission from the assessment.

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

From the ZTV[27] provided, the proposed turbines would be visible across large swathes of lower lying Strathspey, the Dulnain Strath, Abernethy (albeit much of this latter area is heavily wooded) and from elevated areas including the Cromdale Hills, Strathdearn Hills[28], Monadhliath, the Craiggowrie - Meall a' Bhuachaille ridge, Creag Dubh (848m OAD) and key summits and north-west facing slopes of the Cairngorms central massif. **The location and height of the proposed development represents a substantial shift in prominence and proximity of wind farms which have an impact on the SLQs 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' Buachaille ridge, and lower slopes and foothills of the Strathdearn Hills[29] and the Cairngorms massif[30] where the lower lying landscapes exhibit 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. 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

[27] See Figure 5.6c Blade Tip ZTV with Viewpoints.
[28] Identified as a Cairngorms National Park (CNP) Landscape Character Area, the Strathdearn Hills 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.
[29] Creag a' Bhainne (591mAOD), Carn a' Chuàille (566m AOD), Carn nan Eagan (532m AOD), Creag na h-Iolaire (552m AOD) and Beinn Mhor (471m AOD)
[30] Creag Dhubh (848m AOD), Carn Eilrig (742m AOD) and Castle Hill (728m AOD)

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 from the Craiggowrie - Meall a' Bhuachaille ridge (VP 17), the foothills of the Strathdearn Hills, the Cromdale Hills (VP24), Creag Dhubh, Carn Eilrig and Castle Hill. From these areas the Monadhliath mountains (largely outside of the Park) appear as a series of undulating rolling hills, without any distinct focal points. Clune Wind Farm would be much closer to the Park than existing wind farms which appear from these locations as distant features closely associated with the landforms north and west which are outside the Park. Due to its height and siting, Clune Wind Farm would appear as a prominent vertical feature in an area of undeveloped upland moorland that has a strong horizontal emphasis, at distances of 8-29km, and 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, as shown from VP 17 and VP 24.

The ZTV shows a swathe of visibility across the low-lying CNP Landscape Character Area (LCA) 'Dulnain Strath'[31]; "*This area is largely self-contained with views of adjacent character areas being limited by intervening hills, although the Monadhliath hills provide a setting to the strath to the west*." No existing wind development is visible from this area. Views to the Monadhliath are foregrounded by flat pastures and riparian woodland and are experienced from the A938 and road from Balnaan to Carrbridge south of the River Dulnain, as well as from the Highland Trainline and A9 (VP12). At a distance of 8.3km, VP12 shows in the view to the west key characteristics of the SLQs; the underlying hills of undeveloped upland moorland in contrast with the settled floodplain. We are in agreement with the LVIA considering the proposed "*man-made structures contrast with the well-expressed key characteristics in the view westwards*", and its conclusion finding significant visual effects from VP12 and the trainline. We consider resulting effects on the SLQs to be adverse though note that receptors would be travelling at speed along the A9 and from the trainline and the proposed development would be seen in oblique views from these transport corridors.

The SLQs are well expressed across the Dulnain Strath east of the A9; the strath opens up and the Strathdearn Hills form a rugged backdrop as they rise steeply to the north, and the Monadhliath provides a simple skyline to the west, and west of the A9 into the foothills of the Monadhliath around Kinveachy Forest and from Carn Lethendry where 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 Monadhliath and Strathdearn Hills appear, unmoderated by higher summits and without visibility of the Cairngorms central massif, to be of considerable height and make a substantial contribution to the '*untamed, wild appearance of the area'*.

Where visible from these lower lying areas, the turbines would introduce a large scale vertical man-made focal point into the western area of undeveloped uplands. The turbines would introduce a prominent change to the undeveloped skyline and visible towers would encroach on the sense of containment provided by the hills. This effect would be heightened when the turbines would be seen in silhouette against the light evening sky as the sun sets in this direction. We consider the introduction of the proposed turbines sited on the open moorland hills, including some fully visible towers, would incur a substantial change to the current pattern of development and would erode the distinction between the cultural (settled strath) and natural (moorland hills) landscapes and diminish the contribution this part of the Monadhliath makes to the '*wild, untamed appearance of the area'*.

[31]See: https://cairngorms.co.uk/wp-content/uploads/2019/09/CD026-Cairngorms-Landscape-Character-Assessment-Report_reduced.pdf.

As daylight fades the key characteristics which underpin these SLQs 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 development would represent a substantial change in its scale and proximity to the Park, introducing visibility of wind energy development to lower lying areas of the Park where there are currently no wind farms visible. From elevated and lower lying areas of Strathspey, turbines would appear across an area of uninhabited upland moorland and would dilute the contrast in landscape character, eroding the current distinction between the cultural (settled strath) and natural (moorland hills) landscapes.

The proposal would diminish the sense that surrounding hills are *'under the dominion of nature'* and reduce the contribution of this part of the Monadhliath 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 states 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 outward views (e.g. VP 22 and VP 23) 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) 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.

The ZTV shows large swathes of visibility of the proposal across the central massif including summits Braeriach (1296m OAD, VP 23), Cairn Gorm (1244m OAD, VP 22), Sgoran Dubh Mor (1111m OAD), Ben Macdui (1309m OAD), and Bynack Mor (1090m OAD). Whilst Farr and Glen Kyllachy Wind Farms appear in a similar portion of the panorama from some places where this quality is well expressed, Clune Wind Farm would substantially extend the lateral and vertical limit of wind development across this part of the Monadhliath and detract from the 'grand panoramas' experienced from the central massif. The proposed development is both larger in size and located much closer to the Park than operational wind farms and would have the effect of foreshortening the perceived depth and scale of the underlying Monadhliath mountains in the middle distance of western views (see VP 22 and VP 23).

The experience of this SLQ is not limited to a few key summits. From Speyside the hills rise in tiers, the ZTV[32] shows large swathes of visibility of the whole array across the ascents of Braeriach via Sron la Lairig and Cairn Gorm via Fiacaill a Choire Chaise and Sron an Aonaich. Journeys via corries, valleys and ridges offer changing views north and west sometimes unfolding with height gained or framed by landform. 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

[32] See: EIAR Figure 5.6c – Blade Tip ZTV with Viewpoints

instead. Visibility of the proposal also reaches the north-west facing corries of Braeriach and Cairngorm where towering walls form 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 Monadhliath 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 and, with up to 16 turbines visible, would appear as a dominant focus on the horizon.

The spectacular gash or 'glacial trough' of the Lairig Ghru is a sheer, narrow mountain pass that splits Braeriach and the Cairntoul from Cairn Gorm and Ben Macdui. Its steep sides channel views in a north-west/south-east direction, severely limiting sight of outer landscapes. When traversed south to north, a strip of the Monadhliath forms the only other horizon in the gap between the massifs before a wider view of Rothiemurchus is revealed. The hub-height ZTV[33] indicates there would be visibility of the development on this horizon from the highest point of the Lairig Ghru (835m AOD) descending towards Rothiemurcus over approximately 4.5km. For approximately 1km of the journey, up to 16 hubs would be visible. The proposed development would appear in the central view, framed on either side by steep mountains and would distract from the simple, dramatic composition of the iconic Lairig Ghru pass.[34]

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 including the Lairig Ghru, due to the vertical scale and proximity of the turbines.

SLQ 32. Dark Skies

The SLQ description states *"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. There is a clear separation between land and sky. This SLQ can be found to varying degrees across the study area (not just in the Cairngorms Dark Skies Park).

There would be visibility[35] across Strathspey, Strath Dulnain and Abernethy of up to ten lights from the north-west slopes of the Cromdale Hills, Monadhliath, and the central Cairngorm massif. 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

[33] EIAR Figure 5.7c Hub Height ZTV with Viewpoints

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

[35] EIAR Figure 5.15 ZTV of Turbine Hub Lighting

from the Strathdearn Hills, Cromdale Hills (VP 24[36]), and edge of the Monadhliath (VP 8[37], VP 10[38], VP 16[39]). 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 Cairngorm Massif and the Meall a' Bhuchaille-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, ten turbine lights would be visible from Carn Sleamhuinn (VP 8 (Fig. 5.24-h)), Cairn Gorm (VP22), Braeriach (VP23) and Creagan a Chaise (VP24), representing a substantial change to the baseline. The Hub Lighting Intensity ZTV[40] illustrates that lighting intensity would be highest across these elevated locations, and 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). As VP 17b from Craiggowrie (Fig. 5.33b-k) illustrates, nine lit hubs would be visible on the skyline, adding a new layer of obvious bright red lights to the uplands, incongruous with the current development pattern of lighting contained to the straths and would erode 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. Seven lit hubs would be visible on the skyline from this area, resulting in substantial change to the experience at night, as the red lights would appear as a distracting feature, drawing attention away from the appreciation of dark skies. On the peripheries and within some smaller settlements, the quality can be well expressed as the baseline photography from the VP12 (A9 near Carrbridge) illustrates. The LVIA night-time assessment describes VP 12 as 'a dark landscape with very few sources of artificial lighting' and we are in agreement with the assessment concluding that there would be significant effects resulting from the four turbine lights visible at a lower intensity (22cd-420cd)[41].

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 of this SLQ states 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."*

The Monadhliath are characterised by expanses of broad rolling hills and plateaux, of a similar size and without any distinct focal points or summits. The description for host LCT 221 – Rolling Uplands – Inverness identifies: '*a strong sense of openness and exposure'* from hilltops and plateaux and an uninhabited interior with '*a strong perception of remoteness'* forming an extensive area of rolling hills '*extending far beyond the*

[36] EIAR Vol 2b - Figure 5.40-h VP24 - Creagan a Chaise
[37] EIAR Vol 2b - Figure 5.24-h VP8 - Carn Sleamhuain
[38] EIAR Vol 2b - Figure 5.26-h VP10 - Near Geal Charn Mor
[39] EIAR Vol 2b - Figure 5.32-h VP16 - Carn an Fhreiceadain Summit
[40] See EIAR Figure 5.16 Hub Lighting Intensity ZTV
[41] Table 5.13 Turbine Lighting Intensity (Candela) at Viewpoints

district boundary and into the Cairngorms National Park' where the LCT merges across the boundary into LCT 125 – Rolling Uplands – Cairngorms. The high level of wildness across this area is further reiterated by its inclusion within WLA 20. There is a high level of intervisibility across the LCTs, WLA and CNP boundaries which follow the ridgelines and are not so discernible on the ground. Therefore, the landscape beyond the Park boundary, including WLA 20, contributes to the experience of SLQ 28 from the eastern hills of the Monadhliath. Whilst there are some obvious signs of management in these views such as hill tracks, bothies and muirburn there remains a moderately high perception of remoteness and an overarching dominance of nature in this large-scale landscape. Existing wind farms are also present in views however, as described in the LVIA, they appear relatively distant and small scale and do not significantly affect the experience of the extensive hills and plateaux; the SLQ is strongly expressed within the Park along the eastern Monadhliath.

Clune Wind Farm would form a large and prominent change that would diminish the perceived extensiveness of the vast upland moorland by bringing wind farm development into the immediate upland landscape. The influence and visual intrusion of the large-scale human infrastructure would diminish the overarching dominance of nature to a degree that the character would be redefined. These effects would be greatest whilst looking along the edge of the Park where the whole array is visible, including a number of full towers from base to blade-tip, within 10km (VP 10 (Figure 5.26-h).

The ZTV also shows visibility where the LCT continues into the Strathdearn Hills. Where the A9 corridor is screened in southwest views from the Strathdearn Hills, the smooth rolling moorlands appear to continue uninterrupted into the rolling mass of the Monadhliath. The operational Tom nan Clach Wind Farm is located to the north of the Strathdearn Hills within LCT 221 but is partially screened by landform and, at 125m to blade tip, appears as a relatively compact feature in the wider moorland landscape. Overall, there is an overarching dominance of nature in this large-scale landscape and a moderately high perception of remoteness; SLQ 28 is well expressed. Where visible from the east of Carn nam Bain-tighearna (634m AOD) to Carn Glas Choire (659m AOD), Clune Wind Farm would form a large and prominent change, in both vertical and horizontal extent, diminishing the perceived extensiveness of the vast rolling moorland hills and eroding the current dominance of nature, by creating an obvious man-made focal point in views along the edge 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 differentiating between land uses becomes challenging as light fades. Other characteristics are strengthened, such as the apparent lack of development as features such as hill tracks and bothies becoming less visible. The strength of this SLQ would increase with the reduction in natural light as features which currently weaken it, such as (unlit) wind farms, are no longer noticeable and the susceptibility of the SLQ to this proposal would heighten. This quality is well expressed and moderately susceptible to change along the eastern Monadhliath at the edge of the Park and the Strathdearn Hills. The proposed turbine lighting would add a new layer of obvious bright red lights, to a remote upland devoid of this type of lighting. Between 5 and 10 lights would be visible from the ridge of hills at the edge of the Park across around 17km southwest and 11km northeast. The introduction of turbine lights would reduce the current sense of tranquillity and wildness from these parts of the Park to a degree that is considered significant.

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

Cumulative Effects

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

Cumulative scenario with Balnespick Wind Farm in the baseline

Balnespick Wind Farm application (ECU00004904) proposes up to 9 turbines (200m to blade tip) on the Strathdean Hills (0.6km from the CNP). The addition of Clune Wind Farm 9.5km to the south-west of Balnespick 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 ten Clune lights in addition to the five Balnespick lights as seen by sensitive receptors from key summits of the Cairngorms massif, Meall a' Bhuachaille ridge and the Strathdearn Hills, affecting the experience of dark skies and, from the latter area, the sense of wildness. Between Carn nam Bain-tighearna and Carn Glas-choire the addition of Clune would also reduce the perceived extensiveness and naturalness of the Strathdearn Hills in south-western views, where Balnespick would affect this experience in journeys north-east. From lower areas, Clune would introduce a vertical man-made focal point to the western ridgeline and when seen with Balnespick on the northern skyline, this would intensify the erosion of contrast between the settled strath and uninhabited upland of the surrounding hills.

The addition of Clune Wind Farm would intensify significant adverse effects found on the SLQs 6, 10, 28, 30 and 32 as a result of Balnespick Wind Farm.

Annex 2 - Monadhliath Wild Land Area (WLA 20)

We recognise that there has been a significant policy shift in relation to Wild Land since NPF4 was adopted on 13 February 2023. The final sentence of Policy 4(g) is particularly relevant to the consideration of the effects of the Clune Wind Farm proposal on WLA 20. In particular the latter part which states that *"effects of development outwith wild land areas will not be a significant consideration"*. However, what is of overall importance is that all likely significant landscape and visual impacts, including cumulative effects, resulting from a proposed development are identified to the decision maker, and that *'project design and mitigation will demonstrate how significant impacts are addressed'*[42]. We therefore consider that there is merit in carrying out a wild land assessment for developments outwith wild land, not only to identify effects on the Wild Land Qualities (WLQs) but also as an aid to inform the design and to minimise adverse effects on the qualities through mitigation where possible. Although this was highlighted to the applicant a wild land assessment with accompanying VPs have not been included in the application.

The EIAR LVIA found some significant effects on the Rolling Uplands – Inverness LCT (221) which extends across WLA 20. Landscape effects are considered to be significant within 10km of the development, and to the north-east would be significant up to 15km. We agree with the LVIA that the proposed development would extend the influence of wind farm development south and east within the LCT and would "*increase the influence of wind farm development on the wildness attributes of parts of the LCT to the south of the Proposed Development, where the Proposed Development is apparent at closer range than Tom nan Clach Wind Farm*". Due to the lack of detailed narrative within the LVIA to allow understanding of the effects on the WLQs, we have deemed it necessary to undertake an appraisal of effects on WLA 20. Our appraisal will focus on the influence of current operational and consented wind farm development and the qualities we consider would most likely be significantly affected by the proposal, which are WLQ 1 and WLQ 2.

NatureScot Appraisal of Effects

Around WLA20, the current pattern of wind farm development[43] consists of five main clusters largely (with the exception of Dumnaglass Wind Farm) located in visually discreet lower-lying basins. In reviewing the baseline, we consider there may be some attrition of the qualities in the western extent of WLA20, particularly affecting the perceived extensiveness, open immense scale and simplicity of the rounded hills in views from the WLA. This attrition of WLA 20 is in part due to the cumulative effects of wind farm development which have been constructed since this area was identified. In contrast, the influence of constructed wind development on the interior and eastern extent of WLA 20 is limited; where existing wind development is visible in outward views, it tends to be partially screened by landform, appearing as a relatively distant and compact feature in the wider landscape (VP 8 and VP 10). The cumulative ZTVs (a-h)[44] demonstrate a substantial area of the WLA with no visibility of existing and consented wind development. Glen Kyllachy and Farr Wind Farms, despite their close proximity to the WLA, appear relatively distant and small scale having little influence on the WLQs. The eastern half of the WLA maintains a sense of simplicity and openness across which WLQs 1 and 2 are well expressed.

Effects on WLQ 1 - A range of massive rounded hills and plateaux that are awe-inspiring in their simplicity, openness and immense scale, and offer panoramic views to distant mountain ranges

The ZTV (Fig. 5.10c) shows visibility of 17-26 turbines from the elevated areas in the eastern part of the WLA where the hills have a uniform rolling character and are largely devoid of human artefacts. Although there are no viewpoints from the WLA interior, VP10 and VP16 are located at the margins and illustrate views across the WLA to the proposal. The LVIA viewpoint assessment from VP10 concluded that due to its

[42] NPF4: Policy 11(e)ii
[43] Figure 5.12 Cumulative Wind Farms
[44] Figures 5.13a-j Cumulative ZTVs

proximity and scale "*the Proposed Development will redefine the character of the view".* In northern views from the WLA, the proposal would diminish the perceived extensiveness of the WLA and create a new man-made focal point to an area characterised by its natural homogeneity. The proposal would introduce very obvious forms of human influence across a number of summits within 15km, detracting from the current awe-inspiring simplicity of the rounded hills. **We consider that there would be a significant effect on WLQ 1 as a result of the proposal.**

Effects on WLQ 2 - An extensive, simple interior with few human artefacts, contributing to a perceived 'emptiness' and a strong sense of naturalness, remoteness and sanctuary

This quality is well expressed across the upper valley of the River Dulnain and interior hills and plateau of WLA20 where the landform and vegetation is simple and there is a lack of human artefacts and access tracks, contributing to a perceived '*emptiness'* and naturalness, and a sense of tranquillity and sanctuary. These areas would be highly susceptible to new and obvious forms of development. Without viewpoints from interior straths and hills, which we recommended at scoping, it is difficult to assess the nature and level of effects on WLQ2. Based on the ZTV, the proposal would however introduce widespread visibility across the interior hills and upper Strath Dulnain which currently possess a strong sense of sanctuary and tranquillity. The introduction of industrial scale infrastructure with moving elements would in our view be likely to substantially reduce the sense of sanctuary and solitude.

The perceived 'emptiness' of the WLA interior makes navigation difficult and increases the sense of risk. The proposed turbines would introduce a new landmark feature at close proximity, providing orientation to views within the interior both along the glen floor and higher up the side slopes, substantially reducing the sense of risk. Significant effects would be likely across interior locations including central hills and Upper Strath Dulnain, which we consider to be key areas where WLQ 2 is well expressed. **We consider the Proposed Development would result in significant adverse effects on WLQ 2.**

Effects of aviation lighting

Visible aviation lighting is currently absent from the baseline existing and consented schemes. A reduced lighting scheme has been agreed with the CAA; ten of the turbines are proposed to be fitted with medium intensity steady red aviation lighting. The proposed aviation lighting would introduce a new effect of man-made development at dawn, dusk, dark and during periods of low light. This would draw attention to the new structures which would otherwise not be visible after dusk, especially where they are seen to flash (due to rotor blades moving in front of them), and provide clear points of reference in the landscape, aiding navigation and reducing the sense of risk and tranquility.

We consider significant adverse daytime effects on WLQ1 and WLQ2 would be likely to extend into significant adverse night-time effects where the aviation lights (when visible) would introduce night-time lighting into an open upland area devoid of this type of lighting.

We consider that there would be significant effects both daytime and night-time on WLA 20. On review of the information available we consider that the mitigation measures proposed do not fully address *'how design, siting or other mitigation measures have been and will be used to minimise significant impacts on the qualities of the wild land'*[45] and more widely, *'project design and mitigation will demonstrate how…significant landscape and visual impacts (are addressed)'*[46]. In particular, the siting and vertical scale of the development and associated visible aviation lighting.

[45] NPF4: Policy 4(g)
[46] NPF4: Policy 11(e)ii

Annex 3: Map showing crucial areas of the Slochd GCR site

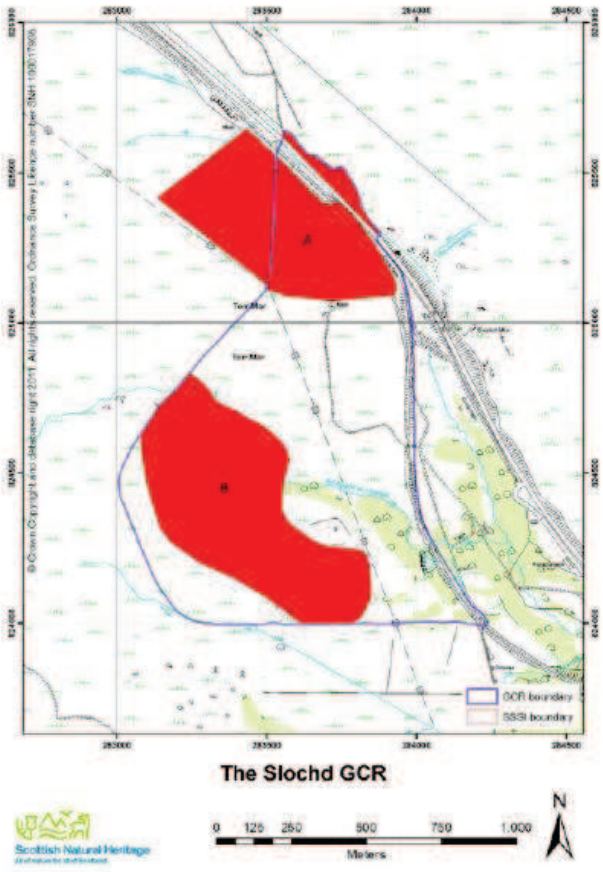

Figure taken from the Earth Science Site Documentation Project (2011) showing the crucial areas of the site are labelled A and B. NatureScot can provide a copy of this report to the applicants on request.