Agenda item 12

Appendix 3

2025/0080/PAC (ECU00005082)

NatureScot comments

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Scotland's Nature Agency
Buidheann Nàdair na h-Alba

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

20 August 2025
Your ref: ECU00005082
Our ref: CDM179747

Dear Molly Greasley

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

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

This response contains our advice on landscape and visual impacts only, focussing on the Cairngorms National Park and the Monadhliath Wild Land Area (WLA) 20. As agreed, our advice on additional issues will follow in a separate response to be issued by 15 September 2025.

Summary

- **This proposal would 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 due to effects on the Cairngorms National Park.**
- **This proposal would result in significant adverse effects on all of the wild land qualities of the Monadhliath Wild Land Area (WLA 20) and would result in a substantial loss of wild land. We therefore object to this proposal due to effects on WLA 20.**

Appraisal of the impacts of the proposal and advice

Our advice on the landscape and visual impacts of this proposal will focus on the potential for significant effects on the Special Landscape Qualities (SLQs) of the Cairngorms National Park (CNP) and the Wild Land Qualities (WLQs) of the Monadhliath Wild Land Area (WLA 20). This should not however be interpreted as meaning there are no other significant effects that need to be considered when determining the application.

Landscape context
The proposed development of 19 turbines (including 14 up to 200m and five up to 230m to tip height) would be located to the south of the River Findhorn, on an area of elevated moorland within the Monadhliath uplands. Aside from a section of the lower access track, the proposal would lie entirely within the Monadhliath Wild Land Area 20 (WLA20) between the River Dulnain Valley to the south and

Strathdearn to the north. The closest turbine would be sited around 4.5km from the Cairngorms National Park boundary.

The Monadhliath comprises a long range of large rolling moorland - the landscape is homogenous and almost featureless with no distinct summits or patterns. Much of the area lies within WLA 20 for which the description states '*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, forming a '*visual backdrop and a more secluded hinterland to the landscape character areas within Strathspey*'[1], the backdrop seems '*to merge into an undulating skyline without any clearly identifiable features*'[2], appearing '*remote and formidable*'[3] from the closer, settled lower ground.

The proposed development lies within Landscape Character Type (LCT) 221 - Rolling Uplands – Inverness which 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 the 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[4] 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.

Cairngorms National Park

In accordance with our *Agreement on roles in advisory casework between NatureScot and Scottish National Park Authorities*[5] for proposals outside the Park, we will lead the provision of advice on the effects of this proposal on the National Park SLQs. A section of the proposed access would be sited within the National Park, and in this instance we have also provided advice on this aspect of the development.

The Monadhliath currently forms an elevated moorland skyline enclosing the western slopes of Badenoch and Strathspey and providing a backdrop from key slopes and summits of the Cairngorms National Park (CNP). The location of the proposed wind farm on the eastern 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 and Clune Wind Farms would significantly adversely affect five of the Special Landscape Qualities (SLQs) of the CNP both 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 proximity to the western boundary of the CNP it is considered unlikely that the significant effects could be notably reduced through a reduction in turbine height or

[1] Cairngorms National Park - Landscape Character Area The-Monadhliath-North
[2] NatureScot Landscape Character Type 221: Rolling Uplands Inverness
[3] NatureScot Landscape Character Type 125: Rolling Uplands - Cairngorms
[4] Figure 6.6 - Other Wind farm Developments 45km
[5] See: https://www.nature.scot/doc/agreement-roles-advisory-casework-between-naturescot-and-scottish-national-park-authorities.

number. We therefore consider that these effects are unlikely to be overcome through re-design or removal of turbines.

We provide more detailed advice on the effects on the Special Landscape Qualities in Annex 1 to this letter.

Monadhliath Wild Land Area (WLA 20)
Apart from a section of the access area, the proposal would be sited entirely within the Monadhliath Wild Land Area (WLA20). We are in agreement with the applicant's Wild Land Assessment, that **the proposed development would result in significant adverse daytime and night-time effects on all four of the wild land qualities, both individually and cumulatively with the proposed Clune Wind Farm. We consider that this would result in a substantial loss of wild land.**

These effects would result from the siting of the proposal within the interior of WLA 20, compounded by the vertical scale of the turbines and visible aviation lighting, and are not considered to be easily overcome by siting, design or other mitigation.

There is a significant risk that WLA 20 may not retain either the strength in the range of its qualities or sufficient extent of area to merit its retention as a Wild Land Area should Highland Wind Farm be consented.

We provide more detailed advice in Annex 2 to this letter.

We have considered other interests and taken them into account in reaching our conclusion on this proposal. The advice in this letter is provided by NatureScot, the operating name of Scottish Natural Heritage.

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.

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

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[6]. SLQs were considered in groups following the headings set out in *The Special Landscape Qualities of the Cairngorms National Park Commissioned Report*[7], with the assessment reporting that some aspects of the SLQs would be altered by the proposal, as summarised below:

SLQ Group	SLQs scoped into the assessment	Aspects of SLQs altered by the proposal
1 - General Qualities	SLQ 1 Magnificent mountains towering over moorland, forest and strath. SLQ 2 Vastness of space, scale and height. SLQ 3 Strong juxtaposition of contrasting landscapes. SLQ 4 A landscape of layers, from inhabited strath to remote, uninhabited upland.	*'Vastness of space, scale and height*' '*A landscape of layers, from inhabited strath to remote, uninhabited upland'*
2 - The Mountains and Plateaux	SLQ 10 The surrounding hills	*'wild and untamed appearance'*
3 - Moorlands	SLQ 14 Extensive moorland, linking the farmland, woodland and the high tops	'*exhilaration of wide open spaces'*
4 - Wildlife and Nature	SLQ 24 Dominance of natural landforms. SLQ 27 Wild land. SLQ 28 Wildness	'*wildness*'
5 - Visual and Sensory Qualities	SLQ 29 Layers of receding ridge lines. SLQ 30 Grand panoramas and framed views. SLQ 32 Dark skies	'*grand panoramas'* '*layers of receding ridge lines'*

The applicant's assessment found no significant effects on the SLQs as a result of the proposed development. Whilst we are not agreement with this conclusion, the assessment has identified some effects on the underpinning landscape elements (aspects) which we do agree with (albeit at times related to different SLQs we consider to be more closely reflective of those elements).

We also consider some of the SLQ groupings used in the applicant's assessment to be inappropriate, particularly the grouping of SLQ 32 Dark Skies with SLQ 29 Layers of receding ridge lines and SLQ 30 Grand panoramas. SLQ 32 encompasses a very different experience and in our view, merits consideration on its own. We also note that the SLQs listed under the General Qualities heading describe a wide range of landscapes, experiences and interactions across the Park, with varying degrees of sensitivity to wind farm development, and therefore could have benefited from more focussed analysis.

[6] See: https://www.nature.scot/doc/special-landscape-qualities-guidance-assessing-effects.
[7] Commissioned Report No. 375, see https://www.nature.scot/doc/naturescot-commissioned-report-375-special-landscape-qualities-cairngorms-national-park.

The applicant's assessment is largely focussed on effects from elevated areas of the Park; the Cairngorms central massif, Strathdearn Hills and the Monadhliath ridge along the north-west boundary. The low-lying areas north of Meall a' Bhuachaille (where the ZTV indicates visibility) were not included in the assessment. The applicant noted there to be "*large areas of coniferous forest, on the lower ground nearer the River Dulnain, which will limit visibility in practice*."[8] Whilst woodland and forestry does feature in this landscape there are also swathes of pasture, wetland, riparian woodland and scattered settlement. Viewpoint (VP) 17[9] illustrates open areas of farmland and wetland across Strath Dulnain. Annex A does not include fieldwork photography from this area and VP 17 was not included as an assessment point in the SLQ assessment. Although we agreed with the draft list of SLQs to be scoped into the assessment, on receiving more detailed information at application stage, we consider there would be likely significant effects on SLQ 6 *Landscapes both cultural and natural* and SLQ 10 *The surrounding hills*, in part from this low-lying area. We have provided a detailed appraisal of these qualities in our appraisal below.

Proposed access within CNP
Access is proposed via an existing track which will require upgrading with approximately 1.5km of new track also proposed. Including the section of new track, the extent of access works would span approximately 8.1km within the CNP. We are broadly in agreement with the applicant's assessment of impacts from the proposed access within the CNP, which found adverse effects to be localised and not judged to be significant on the expression of the SLQs.

NatureScot Appraisal of Effects on the SLQs of the Cairngorms National Park
Across the north-west of the CNP existing wind farms have a relatively limited influence. From the Strathdearn Hills operational wind farms Glen Kyllachy, Farr, Moy and Tom na Clach appear as discernible features in views (e.g. VP 1 - Carn Glas-Choire[10]) however, they do not significantly affect the CNP SLQs. Tom nan Clach Wind Farm is the closest to the boundary (at approximately 5.8km), and appears in views out from the Park as a relatively compact feature in the wider landscape due to its height (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 SLQs.

Further south along the Monadhliath, the closest operational wind farms are Corriegarth, Dunmaglass, Glen Kyllachy, Farr and Stronelairg. Sited approximately 2.5km from the CNP, Stronelairg adversely affects the wildness SLQ across the south-western boundary area of the CNP, although there is very limited visibility of this scheme from the north-east beyond Carn Ballach along the Monadhliath. From this area, operational wind farms appear as relatively distant and compact features in the wider landscape (e.g. VP 3 - Geal-charn Mor[11] , VP 11 - Carn Sgulain[12]) due to their heights (below 150m to blade tip), distance, and general containment within upland basins.

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 5 - Cairn Gorm[13], VP 8 - Sgor Gaoith[14] and VP 16 - Carn Dearg Mor[15]). On the whole, operational and consented wind farms have a relatively limited influence

[8] SLQ Assessment, A6.4.15
[9] Figures 6.29a-f - Viewpoint 17 - A938 Carrbridge Achnahannet Junction
[10] Figures 6.13a-f - Viewpoint 1 - Carn Glas Choire
[11] Figures 6.15a-h - Viewpoint 3 - Geal-charn Mor
[12] Figures 6.23a-f - Viewpoint 11 - Carn Sgulain
[13] Figures 6.17a-f - Viewpoint 5 - Cairn Gorm
[14] Figures 6.20a-f - Viewpoint 8 - Sgor Gaoith
[15] Figures 6.28a-f - Viewpoint 16 - Carn Dearg Mor

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 ZTV[16] and VP 2 - A938 Carrbridge[17], VP 9 - B790 Near Loch Insh[18] and VP 17 - A938 Carrbridge Achnahannet Junction.

Wind farms in planning at the time of the applicant's assessment included Ourack which has since been consented (25th March 2025), and Lethen which has been refused (23rd February 2024). Clune and Balnespick wind farms are now full applications and are considered in our advice.

We consider that the proposed development is likely to result in significant effects on the following SLQs:

- **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 SLQ 6 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 SLQ 10 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*".

The large, flat-bottomed u-shaped valley of the Strathspey and Badenoch corridor (LCT 127 Upland Strath) contains the River Spey and is predominantly an agricultural landscape featuring a series of settlements, transport infrastructure, estates, policy landscapes and large areas of woodland and forestry which underpin the cultural elements of SLQ 6. The strath is flanked on either side by low, rounded hills, many with rocky outcrops that form foothills to the Monadhliath in the west and the Cairngorm massif in the east. These uplands appear remote and uninhabitable, in part due to the lack of development, evoking the sense that they are '*under the dominion of nature*' and contributing to the expression of SLQs 6 and 10. The LCT 127 description states "*the views to the neighbouring mountain ranges are characteristic, and emphasise the contrast between the strath and these uplands*"[19].

The ZTV[20] shows a swathe of visibility across the hills on the east side of the strath opposite the Monadhliath. These hills rise up from the strath in tiers, with the Monadhliath appearing as a long ridgeline without any distinct features from lower hills such as Meall Buidhe (627m AOD), Castle Hill (728m AOD) and Creag Ghiuthsachan (603m AOD). Higher summits reveal the Monadhliath's extensive interior of broad

[16] Figure 6.4.2 - AELSQ 6.4.2 - Cairngorms National Park - CZTV Operational and Under Construction Wind Farms and Highland Wind Farm
[17] Figures 6.14a-h - Viewpoint 2 - A938 Carrbridge
[18] Figures 6.21a-f - Viewpoint 9 - B790 near Loch Insh
[19] NatureScot Landscape Character Type 127: Upland Strath.
[20] Figure 6.4.1 - TA 6.4 - AELSQ 6.4.1 - Cairngorms National Park - with Blade Tip Height 200m - 230m ZTV

rolling moorland plateau. With height, existing wind farms start to become visible, although they appear as relatively small and distant features due to the turbine heights (all below 150m), distance and partial containment by landform. From both higher and lower hills, the Monadhliath form a rugged mountain backdrop, contributing to the '*wild, untamed appearance of the area*', strongly expressing SLQ 10. Whilst the landscape elements underpinning SLQ 6 are well expressed across this area, the presence of coniferous plantations extending up the foothills slightly blurs the distinction between the settled strath and bare, undeveloped upland in some places (e.g. VP 4 - Meall a' Bhuachaille[21]). The contrast is more strongly expressed from higher summits to the south, such as Creag Dhubh (848m AOD) and VP 8 - Sgor Gaoith, where the Monadhliath is more impactful in scale and simplicity above the complex settled strath floor.

From the eastern hills opposite, Highland wind farm would appear as a prominent vertical feature in an area of open moorland and would introduce an incongruous built element to the bare, uninhabited uplands. At distances of 15-25km, all 19 turbines would be visible on the skyline from the lower hills and would appear partially back-clothed by dark moorland hills from higher summits. Due to their height and siting, the turbines would appear much closer than existing wind developments, diminishing the dominance of nature in the vast rolling upland (e.g. VP 8) and, with some full towers visible, would encroach on the containment provided by the hills (e.g. VP 16 Carn Dearg Mor). The proposal would appear as a more incongruous manmade feature than the forestry and, as reported in the SLQ assessment, would "*alter the juxtaposition or layering between inhabited strath to remote, uninhabited upland*"[22].

LCT 127 describes the strath as "*generally broad and open, interrupted only by a gently curving spur of predominantly wooded, low hills separating the Spey and Dulnain rivers*." This area to the north of the low-lying hills is further defined within the detailed CNP Landscape Character Assessment as the Dulnain Strath Landscape Character Area (LCA): "*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 farm development is visible from this area. From the A938 and road from Balnaan to Carrbridge south of the River Dulnain, as well as from the Highland Trainline and A9, westward views are foregrounded by pastoral farmland, scattered properties and areas of woodland which contrast to the bare upland backdrop of the Monadhliahth (see VP 17). Carrbridge is the largest settlement in the Strath, from where outwards views are intermittent in places due to screening from trees, built elements and landform, so that the influence of the surrounding hills is limited. As a result, where visible the bare uplands form an important contribution to the expression of SLQs 6 and 10 (e.g. VP 2 – A938 Carrbridge).

The ZTV shows visibility across the Dulnain Strath LCA and its side hills (Beinn Mhor (471m AOD) and the foothills of the Strathdearn Hills[23]) where views are gained overlooking the settled pastoral strath contrasting with the bare, rolling upland. The ZTV also shows areas of visibility further up the Dulnain River to the west of the A9 around Carn Lethendry and Dalnahaitnach; there the Monadhliath and Strathdearn Hills appear to be of considerable height unmoderated by higher summits, and without visibility of the Cairngorms central massif, they make a substantial contribution to the '*untamed, wild appearance of the area*'. Where visible from these lower lying areas, side slopes and foothills, 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 simple skyline and, with some towers visible, would diminish the scale and 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. We consider the introduction of the proposed turbines sited on the open moorland hills, including some towers fully visible, would incur

[21] Figures 6.16a-f - Viewpoint 4 - Meall a Bhuachaille
[22] SLQ Assessment, Column C/D, page 12
[23] Creag a' Bhainne (591mAOD), Carn a' Chuàille (566m AOD), Carn nan Eagan (532m AOD), Creag na h-lolaire (552m AOD).

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*'.

The proposed development would represent a substantial change as a result of its scale and proximity to the Park, introducing new visibility of wind energy development to lower lying areas of the Park. From elevated areas to the east of the Badenoch and Strathspey corridor, the low-lying Dulnain Strath and its surrounding hills, the turbines would appear as an incongruous feature across an area of bare 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. VPs 5-8) 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 generally 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 Sgor Gaoith (1118m AOD, VP 8), Braeriach (1296m OAD, VP 7), Cairn Gorm (1244m AOD, VP 5), Sgoran Dubh Mor (1111m AOD), Ben Macdui (1309m OAD, VP 6[24]) and Bynack Mor (1090m AOD). Whilst Dunmaglass, Farr and Kyllachy Wind Farms appear in a similar portion of the panorama from some places where this quality is well expressed, Highland would substantially extend the lateral and vertical limit of wind farm 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. Whilst we agree with the LVIA identifying significant adverse visual effects from Sgor Gaoith (VP 8) at 20.2km, we consider these effects would be significant from summits beyond 20km due to its prominence; sited on an elevated plateaux, with turbine heights of 200-230m to blade tip most towers are fully visible, and the array stands in contrast with the dark moorland backdrop (see VP6).

[24] Figures 6.18a-f - Viewpoint 6 - Ben Macdui

There would be significant adverse effects on SLQ 30 *Grand Panoramas and framed views* as appreciated from a number of summits within the Cairngorm massif 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).

As light fades, the strength of the quality increases particularly where light sources are only notable from A95 and A9 corridors, occasional lights from scattered buildings and intermittent headlights such as from the Strathdearn Hills (VP 1) and the edge of the Monadhliath (VP 3). Whilst 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. Settlements Aviemore, Kingussie and Newtonmore constitute small clusters of light sources visible from outer summits and west facing slopes of the Cairngorms central massif and lower hills around Strathspey. These settlements are contained to low-lying areas and have 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, up to eight turbine lights would be visible[25] from the Craiggowrie-Meall a' Bhuachaille ridge (VP19[26]), the Monadhliath (VP 3[27]), the Cairngorms central massif (VPs 5-8), the Strathdearn Hills (VP1) and west facing slopes across Strathspey and Badenoch (VP 16), representing a substantial change to the baseline. The lighting intensity would be highest across these elevated locations as shown in figure 6.2.2[28], 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 19 illustrates, seven 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. Up to eight 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 VP 2 – A938 Carrbridge illustrates. Five aviation lights would be visible from Carrbridge, appearing beyond and above both the lower lying settled landscape and the surrounding hills. They would have the effect of extending areas of artificial lighting and intruding on the experience of dark skies

[25] Figure 6.2.1 - TA 6.2 - A6.2.1 - Aviation Lighting ZTV - Nacelle Lighting and Figure 6.2.2 - TA 6.2 - A6.2.2 - Aviation Lighting ZTV - Nacelle Lighting
[26] Figures 6.31a-f - Viewpoint 19 -Craiggowrie Dusk
[27] Figures 6.15a-h - Viewpoint 3 - Geal-charn Mor
[28] Figure 6.2.2 - TA 6.2 - A6.2.2 - Aviation Lighting ZTV - Nacelle Lighting

appearing as a distraction, drawing attention away from the appreciation of the stars and moon on clear nights.

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 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. To the north-east of Carn Ballach along the eastern Monadliath, SLQ 28 remains well expressed as visibility of operational wind farm Stronelairg is limited, and other existing wind farms appear as relatively distant and small scale.

Highland 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 (e.g. VP 3[29] and VP 11 - Carn Sgulain).

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. Existing wind farm Tom nan Clach is sited to the north of the Strathdearn Hills within LCT 221 but is partially screened by landform and, at 125m to blade tip, it 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), we anticipate that Highland Wind Farm would diminish the perceived extensiveness of the vast rolling moorland hills, and erode the current dominance of nature, by creating an obvious man-made focal point in views along the edge of the Park. Along the Strathdearn Hills we consider effects would be significant to approximately 15km.

[29] Figures 6.15a-h - Viewpoint 3 - Geal-charn Mor

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. 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. Up to eight lights would be seen within 15km from the ridge of hills at the edge of the Park between Carn Ballach (920m AOD) and Carn Sleamhuinn (676m AOD) (approximately 30km), and from the Strathdearn Hills to the northeast. The introduction of the turbine lights would reduce the current sense of tranquillity and sense of 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

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 Highland Wind Farm 4.3km to the south of Clune would extend the presence and influence of wind farm development experienced from key summits and lower slopes surrounding the Cairngorms central massif, and from the eastern Monadhliath Hills. We consider that where visible from elevated areas, Highland would read as a separate wind farm and is likely to appear larger and have a greater effect given the closer proximity to those elevated areas, resulting in additional cumulative effects on SLQ28 Wildness during the daytime and extending into hours of dusk, dawn and darkness; SLQ 6 Landscapes both cultural and natural; SLQ 10 The surrounding Hills; SLQ 30 Grand panoramas; and SLQ 32 Dark skies.

The addition of Highland Wind Farm would result in adverse cumulative effects on SLQs 6, 10, 28, 30 and 32 as a result of Clune Wind Farm.

Cumulative scenario with Balnespick Wind Farm in the baseline

Balnespick (ECU00004904) wind farm would comprise a development of up to 9 turbines (200m to blade tip) on the Strathdearn Hills (0.6km from the CNP). The addition of Highland Wind Farm 15.8km to the south-west of Balnespick would intensify the presence and influence of wind farm development from elevated areas surrounding Strathspey 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. The worst-case scenario of aviation lighting would include visibility of eight Highland 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 Highland Wind Farm would also reduce the perceived extensiveness and naturalness of the Strathdearn Hills in south-western views, where Balnespick Wind Farm would affect this experience in journeys north-east. From lower areas, Highland 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 Highland Wind Farm would intensify significant adverse effects found on the SLQs 6, 10, 28, 30 and 32 as a result of Balnespick Wind Farm.

The proposal individually and cumulatively with Balnespick and Clune would significantly adversely affect five of the SLQs of the CNP both during the day and extending 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 proximity to the western boundary of the CNP it is considered unlikely that the significant effects 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.

Annex 2 - Our appraisal of effects on the Monadhliath Wild Land Area (20)

The advice here considers the experience of the proposed development from within the Monadhliath Wild Land Area (WLA20), and its wild land qualities (WLQs), both during daytime and at dawn, dusk, dark and during periods of low light.

The current pattern of wind farm development[30] consists of five main clusters largely located in visually discreet lower-lying basins to the north and west of WLA 20. Dunmaglass wind farm is an exception due to the location of turbines on more elevated ground. In reviewing the baseline, we consider that WLA 20 has been subject to attrition in part by the cumulative effects of wind farm development which has been constructed since this area was identified. This is indicated in the Cumulative ZTV[31], which shows visibility of existing wind farm development in the western extent of the WLA. This does not, however, convey their overall influence on the attributes and perceptual responses of the WLA.

We consider there may be some attrition of the wild land qualities in the western extent, particularly affecting the perceived extensiveness, open immense scale and simplicity of the rounded hills in views from the WLA[32]. In contrast, the influence of constructed wind farm development on the interior and eastern extent of WLA 20 is limited; where existing wind farm 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 (e.g. VP 3[33] and VP 11[34]). Visible aviation lighting is currently absent from the baseline and the consented schemes within 30km.

The applicants have undertaken a Wild Land Assessment for WLA 20, which has scoped in all four of its Wild Land Qualities (WLQs):

- *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*
- *WLQ 2 An extensive, simple interior with few human artefacts, contributing to a perceived 'emptiness' and a strong sense of naturalness, remoteness and sanctuary*
- *WLQ 3 A hill range in which many types of recreation take place, but its large, remote interior maintains a sense of sanctuary, challenge and risk*
- *WLQ 4 Long, narrow glens cutting into the hill and plateau edges which are remote, but facilitate access*

The assessment reports that there would be significant effects as a result of the proposed development on WLQ 1 and WLQ 2 within 10km, WLQ 3 across the development site, and WLQ 4 within around 5km, from the River Dulnain (VP 10[35]) and Feithlinn Valley. The assessment considers the effects likely to extend into dusk, dawn, dark and during periods of low light and concludes that the proposed development "*is likely to significantly alter the eastern half of the WLA*". **We are in agreement with the significance of effect reported, and that as summarised by the applicant in Technical Appendix 6.2 "*the Proposed Development***

[30] Figure 6.6 - Other Wind farm Developments 45km
[31] Figure 6.3.3 - TA 6.3 - WLA 6.3.3 - Wild Land Area 20 - Cumulative ZTV - Operational Consented Wind Farms and Highland Wind Farm
[32] The CZTVs provided indicate areas of existing and consented wind farm visibility. From those areas, visibility may range from a single blade tip visible to visibility of multiple turbines including towers.
[33] Figures 6.15a-h - Viewpoint 3 - Geal-charn Mor
[34] Figures 6.23a-f - Viewpoint 11 - Carn Sgulain
[35] Figures 6.22a-j - Viewpoint 10 - River Dulnain (southern bridge crossing)

is likely to alter the integrity of the eastern half of the WLA"[36]**. Whilst we avoid use of the term 'integrity' in the context of WLAs, we concur with its meaning here, that the WLA would be compromised.**

Whilst we agree with the significance of effects identified, we consider the likely extent of effects to be underestimated, as detailed below.

WLQ 1 and WLQ 2

We consider effects on WLQ 1 and WLQ 2 are likely to be more extensive than reported by the applicants.

WLQ 1 and WLQ 2 are highly sensitive to development of this type. The description of WLQ 1 states that "*From the tops (…) there is a strong sense of remoteness and views pass over an arresting succession of sweeping, elevated hill horizons that seem to extend far into the distance with no obvious interruption or limits"* and WLQ 2 states that "*The simplicity of the landform and vegetation across the hill and plateaux interior, combined with a lack of dominant foci, conveys a sense of 'emptiness'. This simplicity, and the vast extent over which it occurs, appears awe-inspiring*".

The applicant concludes that "*From the western half of the WLA (beyond around 10km) the experience of the wild land qualities from this part of the WLA is not judged to be notably different. This is due to the increased distance from the Proposed Development, and the existing influence of wind farms to the immediate north and west of the WLA. South of the ridge which defines the north-western edge of the CNP, visibility will be limited*." We note that this conclusion is not supported by a detailed baseline description of the influence of existing and consented wind farm development on the WLQs, or assessment points beyond 10km to the west. We also consider this appears to be at odds with the LVIA which identifies significant night-time and daytime effects on the host Landscape Character Type (which WLA20 is within) up to 15km to the west, stating the proposal would *"further alter certain perceptual characteristics such as the 'openness and exposure' and 'strong perception of remoteness'*."[37]

Whilst there may be some attrition across the western part of the WLA as a result of wind farms to the north and west, we consider that turbines of 200-230m sited within the upland interior would likely appear as prominent, incongruous features beyond 10km, affecting the perceived 'emptiness', naturalness and awe-inspiring simplicity of the hills, as well as reducing the areas perceived extensiveness, which we anticipate to be well expressed in views from the west.

WLQ 3

Contrary to the applicant's assessment, we consider the effects on WLQ 3 would extend beyond the development site. WLQ 3 describes the physical challenge of negotiating burns, bogs and peat hags to reach the remote interior which possesses a strong sense of sanctuary and solitude.

As a result of new large-scale vertical infrastructure, the sense of solitude and sanctuary would be diminished. This would affect the sense of fulfilment in reaching these currently remote areas and result in **adverse effects on WLQ 3 across the eastern half of the WLA**.

Cumulative effects

<u>Cumulative scenario with Clune Wind Farm in the baseline</u>

If consented, Clune Wind Farm (ECU00005038) would be sited on the north-eastern boundary of WLA 20 and have significant adverse daytime and night-time effects on WLQs 1 and 2, as set out in our response to the application[38]. Sited within WLA 20, the proposed Highland Wind Farm would extend the effects further

[36] Technical Appendix 6.2:Aviation Lighting Assessment – Effects on the Monadhliath WLA A6.2.86
[37] Chapter 6 – LVIA, Table 6.10 Page 6.34
[38] NatureScot response to Clune Wind Farm dated 27 June 2025.

west across the WLA and substantially intensify the influence of wind development in the east. **In a scenario in which Clune Wind Farm is consented, we consider there would be additional significant cumulative effects on WLA 20 as a result of Highland Wind Farm.**

The proposed development would result in significant adverse individual and cumulative daytime and night-time effects on all of the wild land qualities of the Monadhliath Wild Land Area (WLA 20). These effects would result from the siting of the proposal within the interior of WLA 20, compounded by the vertical scale of the turbines and visible aviation lighting, and are not considered to be easily overcome by siting, design or other mitigation. Taking consideration of the WLA as a whole, there is a significant risk that WLA 20 may not retain either the strength in the range of its qualities or sufficient extent of area to merit its retention as a Wild Land Area should Highland Wind Farm be consented.