

**Letter of Representation to the Energy Consents Unit, Scottish Government from
Strathdearn Community Council – Balnespick Windfarm Application ECU00004904**

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Date: 07-05-2025	
Balnespick Wind Farm – ECU00004904	
Site Description The site is located on Balnespick Estate approximately 5 km east of Tomatin and 6 km north-west of Carrbridge. The site is approximately 1,020 ha of upland moorland, currently managed as a sporting estate. There are two prominent hill features, separated by the Allt Loisgte watercourse. The development will comprise nine wind turbines with 200m tip heights and a total overall capacity of 74.8MW (including 10MW battery storage). It will be accessed from the B9007 via the existing access junction for the Tom nan Clach Wind Farm. The site is immediately adjacent to the Cairngorms National Park. A previous 26-turbine proposal for Balnespick, by developers Eurus Energy UK Limited, was rejected in 2013.	
Summary Of Our Objections 1. Significant adverse effects on landscape and visual impact both alone and in combination with the other twelve existing wind farms and five proposed wind farms associated with Strathdearn Community Council area. 2. The Environmental Impact Assessment (EIA) does not contain the necessary information to allow full assessment of direct, indirect, long-term and permanent cumulative impacts. 3. Contrary to Highland Council's spatial planning guidance on the basis that it would be inappropriate and have significant negative effects on scale, the built environment, landscape context, perceptual aspects, visual amenity, and landscape value. 4. The developer has failed to carry out a sufficiently robust assessment of the proposed development's impact on Golden Eagle and Golden Plover. This assessment must include a comprehensive cumulative impact analysis, considering all existing, consented, and proposed developments within Natural Heritage Zone 10 that could affect these protected species. Without such an analysis, the EIA falls short of the requirements under relevant environmental legislation and guidance. 5. The developer has failed to comply with Scottish Government policies on Biodiversity Net Gain. 6. The developer has significantly underplayed the level of visitor numbers currently accessing Strathdearn and taken no account of future visitor numbers associated with two nationally significant visitor attraction developments in the area.	

Summary of Potential Mitigations

Should Ministers be minded to grant permission for Balnespick Wind Farm, we would ask for the following mitigations:

1. At the very least, Ministers should take account of the cumulative impacts of windfarm siting, and the overdevelopment of this small rural/wild area into an industrialised landscape.
(We extend an invite to Ministers to visit our area before taking any decisions).
2. In the developer's EIA, they have chosen a reduced peatland restoration ratio of 1:9 instead of meeting NatureScot's minimum recommendation of 1:10. The developer should restore peatland at the full 1:10 ratio.
3. Removal or relocation of high-risk turbines to Golden Eagles, and inclusion and analysis of satellite-tagging data for Golden Eagles to inform turbine locations.
4. Revised collision risk and habitat loss assessments using current habitat baselines.
5. Carry out a comprehensive cumulative impact assessment for NHZ10.
6. Deliver compensatory enhancement measures designed to more than offset any predicted losses to notable habitats and species.
7. The developer should review their approach to tourism and recreation and complete a full and proper assessment of visitor numbers currently accessing the Glen and the future impact of two nationally significant visitor developments in the area. This should be included as a revised section within their EIA.
8. The developer should deliver a Dark Sky Lighting Mitigation Plan, including infra-red only lighting or radar-triggered obstacle lights (ACAS).
9. The developer should provide information and reassurance to the Community Council that the very real risk of fire associated with battery storage has been fully risk assessed, and solutions put in place to minimise such risk.
10. The Community Council understands why Community Benefit (CB) must sit outside the planning process and not be influenced by it. However, in good faith, we wish to negotiate and agree a comprehensive CB package with the developer that aligns with our Community Action Plan and maximises net economic impact, including community socio-economic benefits such as employment, associated business and supply chain opportunities.

1. The Community of Strathtearn

Strathtearn is the name of the area of the rural parish of Moy, Dalarossie & Tomatin, situated by the River Findhorn 15 miles south of Inverness. The Strath is approximately 22 miles long, from the headwaters at Coignafearn to Moy, and its southern limit is the Slochd Summit at 1315 ft on the A9. There are approximately 550 residents in Strathtearn, with Tomatin being the main village. Thousands of visitors come to Strathtearn each year by car or train or plane to experience wonderful peaceful surroundings, whilst millions pass through Strathtearn on the A9 (T) road and the Highland mainline railway.

The community has learned to live with wind farms on their door step and put to very good use the significant levels of community benefit that has come as a result. This letter of representation is not to say the Community Council is against wind farms; rather to ask you to pause for thought and listen to our very real concerns regarding the cumulative impact of further wind farm development in our area.

2. Community Consultations

Strathdearn Community Council carried out an online consultation in May 2024¹, seeking community views on the scope of the EIA for four of the applications (Highland, Clune, **Balnespick**, and Lynemore). This highlighted greatest concerns with Natural Heritage (incl. Ornithology) and Landscape & Visual Effects.

The Community Council carried out a second more detailed and in-depth survey² using SurveyMonkey in March/April 2025. This considered all six applications (Highland, Clune, **Balnespick**, Lynemore, Kyllachy, and Carn na Saobhaidh) and sought views for each application on a range of criteria, including cumulative impacts. This resulted in a response rate of 33% (184 respondents). The survey also asked people to rank the 6 wind farm planning applications. Using a Likert Score out of 6 (scoring 1 as least preferred and 6 as most preferred), **Balnespick** scored highest with a score of 4.64 and Clune lowest with a score of 2.67. These results will be discussed in more detail in sections 3 and 4 below.

We presented our findings at a very well attended Open Day in Strathdearn Hall, Tomatin, on Saturday 26 April 2025.

3. Cumulative Impacts

69% of people responding to our survey were ‘Very Concerned’ about the cumulative impacts of further wind farm development in their area. Their views are summarised in the survey as follows:

‘Many respondents express deep concern over the cumulative and disproportionate scale of the proposed developments, arguing that Strathdearn has already contributed significantly to renewable energy targets. They fear the area is being turned into a ‘sacrificial glen’, with little regard for the local landscape, wildlife, tourism, or community well-being. The visual and environmental impact is a major issue, with turbines seen as industrialising a rural setting, ruining views, disrupting ecosystems, and destroying dark skies’.

There are twelve existing wind farms in the Strathdearn Community Council area (with a surrounding 5km zone) with an installed capacity of 966MW, theoretically capable of supplying enough energy for 35% of all homes in Scotland. The area is currently facing six further major wind farm development proposals which are each of such scale (Section 36, and by implication Section 37 developments of the Electricity Act 1989) that they will be decided by Scottish Ministers. If all were granted, this would increase the installed capacity for the Strathdearn CC area by up to a further 1,086MW (including battery storage), bringing the potential total installed capacity to 2,052MW. This equates to a massive 10% of Scotland’s 2030 target of installed onshore wind energy from a single small Glen in the Highland local authority area (enough energy to power approximately 70% of the homes in Scotland). Additionally, this would require an expansion to the Garbole substation and overhead wires to connect to the grid – subject to Section 37 applications. The Community Council is very concerned that the cumulative impact of overhead wiring required for all six applications has not been factored in by the developer.

¹ [Wind Farm Survey Report - 2024](#)

² [Strathdearn Wind Farms Survey Report - April 2025](#)

The six further applications are: Balnespick - ECU00004904; Clune - ECU00005038; Highland - ECU00005082; Kyllachy - ECU00005153; Lynemore – ECU00005105; and Carn na Saobhaidh - ECU00005191. A map³ showing these developments has been prepared by Strathdearn Community Council.

There is much uncertainty as to what the cumulative picture will look like moving forward with the applications currently in planning and with more pending. In Highland Council's Scoping Response they stated: 'It should be noted that there may be several similar applications in the area that are yet to be determined/concluded in the vicinity of the application, which may or may not help clarify the weight towards particular policy elements in the final planning balance'.....'The development will further extend the number of proposals of this type in the surrounding area, necessitating an appropriate cumulative impact assessment. It is considered that **cumulative impact will be a significant material consideration** in the final determination of any future application'.

The developer in their EIA submission has stated: 'Consideration has also been given to the overall totality of the cumulative landscape and visual effects when the Proposed Development is considered alongside the other operational and proposed developments. Collectively, the operational and proposed developments would serve to result in wind energy being seen as a noticeable feature in many views in the landscape of the wider study area to the west of the Site. The addition of the Proposed Development would serve to reinforce this pattern, albeit extending the significant visual and character effects into a separate area within the landscape' (EIA Section 6.11.18.)

Strathdearn Community Council has significant concerns that Scottish Ministers will be unable to fully determine these Section 36 applications individually, until the **cumulative impacts** gathered from all existing and planned renewable energy development Environmental Impact Assessments (EIA's) are fully recognised and examined together. The Community Council believes there is a lack of cross process transparency at Energy Consents Unit level regarding cumulative impacts across the EIAs that are carried out by individual developers.

The Community Council notes that the EIAs for all new developments are not yet fully public. This means that interactions between and across these developments could be undetermined. We are concerned therefore that, with existing installations, planned new installations, plus undetermined grid connections, the EIA's cannot contain the necessary information to allow full assessment of direct, indirect, long-term and permanent cumulative impacts. This is a key community concern and perhaps also for other statutory stakeholders.

The Community Council would draw your attention to the following:

In the Electricity Act 1989 - sections 36 and 37: applications guidance relating to EIA Reports. Planning Circular 1/2017: Environmental Impact Assessment Regulations Annex B: Information to Be Included in an EIA Report⁴

Regulation 4(3): Characteristics of the potential impact:

³ https://strathdearn.org/wp-content/uploads/2025/03/Strathdearn_Windfarms_Overview-4-scaled.jpg

⁴ [Annex B: Information to Be Included in an EIA Report - Planning Circular 1/2017: Environmental Impact Assessment regulations - gov.scot](#)

‘The description of the likely significant effects on the factors specified in regulation 4(3) should cover the direct effects and any indirect, secondary, **cumulative**, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development’.

Regulation 5: Information For Inclusion In Environmental Impact Assessment Reports:

‘The **cumulation of the impact** with the impact of other existing and/or approved development taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources’.

In the Highland-wide Local Development Plan (HwLDP), Policy 67 is key and sets out that renewable energy development should be well related to the source of the primary renewable resource needed for operation, the contribution of the proposed development in meeting renewable energy targets, and positive/negative effects on the local and national economy as well as all other relevant policies of the Development Plan and other relevant guidance. In that context Highland Council state, they will support proposals where it is satisfied that they are located, sited, and designed such as they will not be significantly detrimental overall, individually or **cumulatively** with other developments having regard to 11 specified criteria (as listed in HwLDP Policy 67). Such an approach is consistent with the concept of Sustainable Design (HwLDP Policy 28) and the concept of supporting the right development in the right place at the right time. Highland Council states that it is here where the policy conflict between HwLDP 67 and NPF4 Policy 11 would appear most pronounced; whereby support for wind farm development has until now been more qualified in the LDP, which gives greater weight to protecting landscape and natural resources, NPF4 on the other hand appears to give tacit support for renewable energy projects even at the expense of certain landscape and natural resources, with the exception of National Parks and NSAs, particularly where energy contributions are at a national development scale, by treating the twin climate and biodiversity crises, and security of energy supply, with greater urgency.

This is of great concern to Strathdearn Community Council given the scale and volume of development proposed in an area already saturated with wind farm development.

Strathdearn Community Council invites Ministers, case officers and others involved in any determination of these applications to visit the Strathdearn area and see the cumulative impacts for themselves prior to determining any of these six applications. If a visit is not possible, can we be reassured that at the very least, you take account of the cumulative impacts of windfarm siting, and the overdevelopment of this small rural/wild area into an industrialised landscape.

A detailed spreadsheet⁵ has been prepared by Strathdearn Community Council that summarises key aspects of each of the six new applications.

4. Key Planning Considerations

The key considerations in this case are:

- a) Compliance with Planning Policy
National Planning Framework 4 – key policies:

⁵ [Strathdearn Wind Farms 2024 - Detailed Spreadsheet Summarising All Six Major Applications](#)

- Policy 1 – Global climate and nature crises
- 3 – Biodiversity protection
- 4 – Impact – type, diversity, scale of development
- 5 – Peat disturbance
- 6 – Impact – woodlands
- 11 – Encourage and facilitate renewable energy development
- 14 – Improve qualities of the area
- 18 – Infrastructure improvements
- 20 – Soils and water management
- 25 – Local and regional wealth creation
- 29 – Benefits from tourism

Highland-wide Local Development Plan (HwLDP) – key policies:

- Policy 28 – Sustainable Design
- Policy 58 – Protected species
- Policy 63 – Water environment
- Policy 67 – Renewable energy

b) Design, Landscape and Visual Impacts

65% of people responding to our survey indicated the development would have a ‘Negative’ or ‘Very Negative’ impact on the landscape and visual impacts. Their comments are summarised as follows:

‘Negative comments about the Balnespick wind farm focus on its visual impact on the landscape. Many oppose the industrialisation of Highland moors and glens, citing concerns about pylons, roads, and turbines disrupting the natural beauty. The turbines could be visible from Tomatin, particularly from higher ground, diminishing the area’s rugged charm. The need for aviation lighting on taller turbines would increase light pollution, affecting the area’s prized dark skies. Overall, there is a strong desire to preserve the natural landscape, with concerns about visual and environmental damage to both the community and wildlife’.

The Proposed Development is located within Landscape Character Type (LCT) 221 – Rolling Uplands – Inverness, an area characterised by broad, rounded hills, expansive plateaux, and a strong sense of remoteness. According to the EIA (Section 6.11.9), the development will result in direct and significant effects within this LCT, as well as indirect significant effects extending up to 5 km to the west and into LCT 125 – Rolling Uplands – Cairngorms, within approximately 1 km of the site.

The developer acknowledges that the proposed turbines would create a ‘large and prominent change’ resulting in a high magnitude of change and a major, significant effect on landscape character (EIA Section 6.7.101).

The Dava Moor and Monadhliath Landscape Sensitivity Appraisal (LSA), commissioned by NatureScot and Highland Council (Dec 2021)⁶, provides useful context when assessing the landscape sensitivities in the area. The LSA guidance indicates that turbines over 150m in height are likely to contrast with smaller turbines within existing wind farms if sited close by. They would also overwhelm the limited vertical scale of the

⁶ Dava Moor, Nairn & Monadhliath Area Wind Energy Landscape Sensitivity Pilot Study. December 2021. Open Rolling Uplands-Sensitivity Assessment. Section 15. Pages 77-84.

rolling hills which surround Lochindorb and lie on the edge of the Spey valley. Lighting of turbines would also be likely to diminish the perception of wildness associated with this landscape (impacts from aviation lighting will be considered later).

This proposal is contrary to Highland Council's spatial planning guidance⁷. As such, Strathdearn Community Council believes it would be inappropriate and have significant negative effects on scale, the built environment, landscape context, perceptual aspects, visual amenity and landscape value. There is limited spacing relative to the existing wind farm at Tom nan Clach and the recently consented Tom nan Clach extension, and those further to the east.

The developer in their EIA has stated: 'It is acknowledged that wherever more than one wind farm is visible at any given location in the landscape, there will be a greater overall or cumulative effect on landscape character and visual amenity than if just one wind farm was visible in the landscape. Likewise, it is acknowledged that the more wind turbines that are constructed in any given landscape, the greater the magnitude of overall (or combined) change to the landscape character or views.' (EIA Section 6.10.47.)

Turbines would be visible from Tomatin and the distillery, and highly visible from multiple points in Cairngorms National Park and to A9 (T) users.

'It has been assessed there would be a significant visual effect at three of the 24 representative viewpoints during daylight hours and two of the representative viewpoints during the hours of darkness.' (EIA Section 6.11.11.)

The EIA goes on to state there would be 'High sensitivity to turbines > 150m.' (EIA Section 6.7.62.)

c) Roads, Transport and Access

59% of people responding to our survey indicated the development would have a 'negative' or 'very negative' impact on their area. Negative comments focus on the disruption caused by increased traffic during construction. Heavy machinery would cause congestion and safety concerns on small, single-track roads already in poor condition. This would worsen road conditions, making travel difficult for residents, workers, and visitors. Additionally, the construction phase would create long-term damage to infrastructure, disrupting commuting and local travel, particularly for those who rely on these roads for work'.

'The visual and environmental impact of new access tracks is also a concern. Many believe existing walking and cycling routes are sufficient, and the creation of new tracks would scar the landscape, especially in sensitive areas. These unsightly tracks would harm wildlife and detract from the area's natural beauty'.

According to the developer's EIA (Section 11.5.4): 'The traffic effects during the operational phase of the Proposed Development will be low, with two to three vehicles per week for maintenance purposes, far below the recognised thresholds for triggering a formal transport assessment. As such, the effects during the operational phase are scoped out of the assessment'.

⁷ Dava Moor, Nairn & Monadhliath Area Wind Energy Landscape Sensitivity Pilot Study. December 2021. Open Rolling Uplands-Sensitivity Assessment. Section 15. Pages 77-84.

The EIA (Section 11.6.27) goes on to state: ‘Transport Assessment guidance advises that only those projects with extant planning permission or local development plan allocations within an adopted or approved plan require to be included in any assessment. Those projects in scoping or at the application stage should not be included in cumulative assessments as they have yet to be determined. When considering traffic impacts specifically in relation to the construction phase of a project, the potential traffic impact is highly speculative and as such, cannot be included in the assessment’.

The EIA (Section 11.6.32) gives us even more cause for concern as it states: ‘The review did not identify any other wind farms or related planning applications that should be considered as a committed development and included within any cumulative assessment’.

Strathdearn Community Council has been meeting with each of the six developers individually and indeed hosted a joint developer day last year in Strathdearn Hall, Tomatin. This further fuels the Community Council’s fears that each developer is pushing hard to have their application in first and not take account of the other five applications we know to be in the pipeline or indeed any other major plans for the area. Proposals for the distillery and Braemore Estates are examples that would impact the north end of Tomatin, and both developments could have a major impact on roads/access and increased numbers of people wishing to visit Strathdearn. Visitor numbers to the distillery are estimated to increase to 100,000 and Braemore Estates has plans for a ‘House of Bruar’ style development, estimating 500,000 visitor numbers. See further details later under ‘Tourism and Recreation’.

d) Water, Flood Risk, Drainage and Peat

HwLDP Policy 63, Water Environment – ‘In assessing proposals Highland Council will consider associated Area Management Plans’. The River Findhorn Initiative has such a Management Plan⁸ in place, showing cumulative hydrological changes to rivers impacting highly vulnerable Atlantic salmon and other fish population. They express significant concern about extinction events of unique resident trout populations. They also have concerns about how the cumulative effect of hard surfaces and drainage changes, impact an already unresilient river system.

Where impacts on peat cannot be avoided, NatureScot’s current recommendation is that restoration to achieve offsetting should be in the order of 1:10 i.e. 1ha loss of peatland should result in measures to restore 10ha of peatland. In the developer’s EIA, they have chosen a reduced restoration at 1:9 ratio instead of meeting NatureScot’s minimum recommendation. If this application is granted, we believe the developer should restore the site to 1:10 ratio.

Highland Council’s Onshore Wind Energy Guidance notes that impacts on peat should be avoided, for example, by careful siting of the windfarm components to avoid deep peat and avoid altering hydrological regimes. (Peat. Section 4.3.b).⁹ According to the developer’s figures, there will be an unavoidable and permanent loss of 12.32ha and permanent habitat change to 54.48ha of bog habitats. Published priority peatland

⁸ [River Findhorn Initiative Management Plan 2021-2026](#)

⁹ [Onshore Wind Energy Supplementary Guidance](#)

mapping by NatureScot (Carbon and Peatland Map 2016)¹⁰ indicates that most of the site comprises Class 1 peatland, which is nationally important carbon rich peatland habitat. We believe this site should be fully restored without the permanent loss of 66.8ha of nationally important peatland.

e) Natural Heritage (including ornithology)

57% of people responding to our survey indicated the development would have a ‘high’ or ‘severe’ impact on wildlife in their area. Their concerns include:

‘The destruction of habitats, particularly for nesting birds, and the risk of bird strikes, especially for raptors like Golden Eagles, White-tailed eagles, and other migrating species. Many argue that the cumulative impact of this and other developments in the region would severely harm biodiversity, particularly Golden Plover, which is already in decline. The disturbance to wildlife, combined with habitat destruction and the potential for increased collision risks with turbine blades, is seen as an unacceptable trade-off for renewable energy generation.

In addition, 53% of people responding to our survey indicated the development would have a ‘high’ or ‘severe’ impact on the natural environment. Their issues include:

‘The disturbance of soils, water, and air quality, with particular emphasis on the degradation of peatlands, potential watercourse contamination, and soil erosion from infrastructure development. The construction of roads and turbine bases will negatively affect local ecosystems, and the use of concrete and industrial fluids poses a threat to the environment. There are fears about increased vehicle pollution, noise, and the long-term damage to the integrity of the natural surroundings, including carbon sink destruction and the impact on biodiversity. Additionally, the industrialisation of the area could damage sensitive habitats, including peat bogs, and lead to lasting ecological consequences for local wildlife, such as Golden Eagles. The cumulative impact of multiple wind farm developments is expected to worsen these environmental issues over time’.

The Environmental Impact Assessment (EIA) documentation submitted in support of the proposed development highlights multiple instances where the developer has failed to meet the minimum survey requirements outlined in NatureScot guidance. These survey standards are not optional targets - they represent the baseline necessary to facilitate an *appropriate assessment* under the Habitats Regulations and to support robust decision-making for nationally significant projects.

Key deficiencies include:

1. Incomplete Viewpoint (VP) Surveys (EIA Section 8.5.40):
 - Only 30 hours of survey effort per VP were completed during the 2020–2021 non-breeding season, falling short of the 36-hour minimum requirement set out in SNH (2017) guidance.
 - This failure significantly limits confidence in baseline data for wintering bird use of the site, which could result in underestimating potential impacts on key species.
2. Delayed Breeding Raptor Surveys (EIA Section 8.5.43):
 - First survey visits in 2024 were delayed to late April due to access issues, despite most breeding raptors initiating courtship and territorial displays from March.

¹⁰ [NatureScot Carbon and Peatland Map 2016](#)

- Although later visits were completed in line with guidance, the absence of March data could have resulted in missed territorial activity or early nest establishment.
- 3. Delayed Breeding Eagle Surveys (EIA Section 8.5.44):
 - Surveys commenced after the recommended initial period (January 8–18 to early March per Hardey et al., 2013), starting only in mid to late March.
 - While the developer claims that the timing is not a significant limitation, this assertion is unsubstantiated and dismisses the critical early-season behaviours (territorial establishment and courtship) essential for accurate site usage assessments.
- 4. Limited Survey Area Accessibility (EIA Section 8.5.33):
 - Only 45% (2020) and 35% (2021) of the survey area was directly accessible for Black Grouse and raptor surveys.
 - Although the developer claims activity in inaccessible areas would have been detected, this assumption lacks verification and contravenes the precautionary approach that is central to ecological assessment.

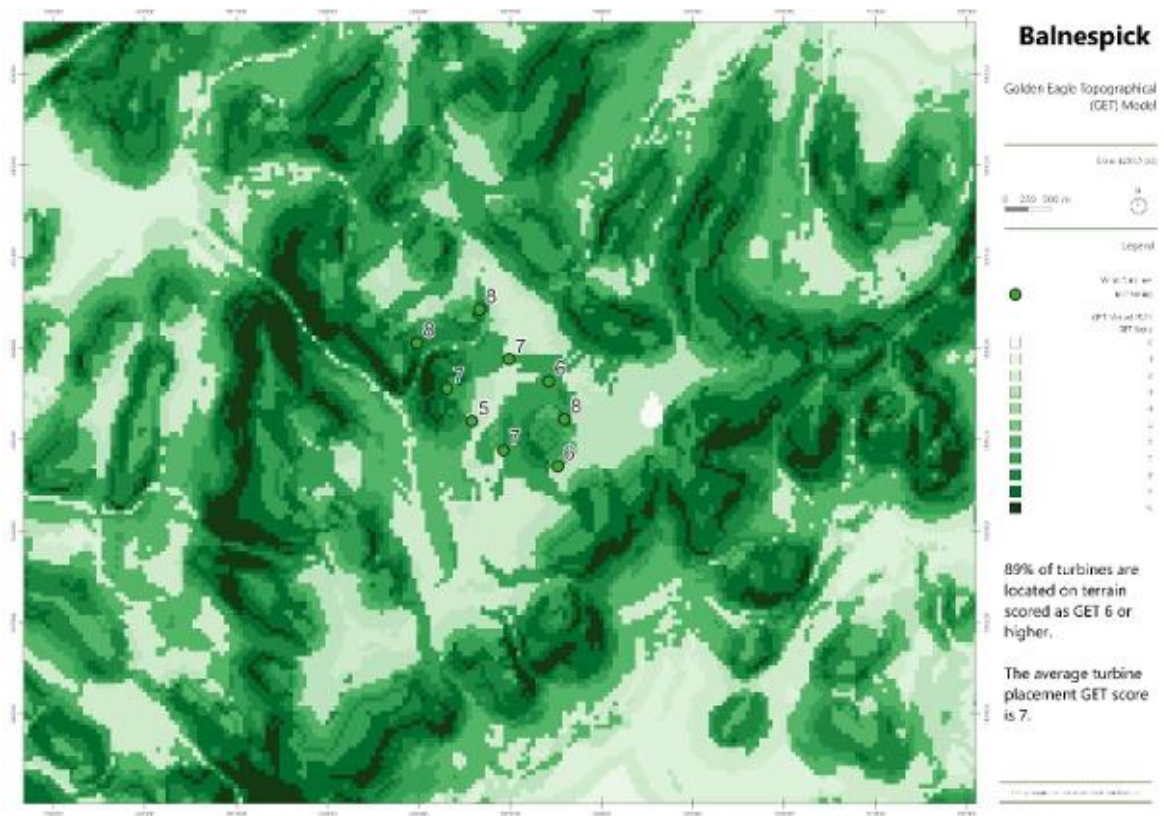
These are not minor omissions but fundamental gaps that compromise the integrity of the baseline data and therefore the validity of the EIA's conclusions. NatureScot's survey guidance provides minimum requirements to ensure potential impacts, particularly to protected bird species such as Golden Eagles and breeding raptors, are properly understood and mitigated. The justification offered by the developer does not negate the fact that key seasonal windows were missed, and survey coverage was incomplete. Given the national scale of the proposed development and the known sensitivity of ornithological receptors in the area, the Community Council believes it would be inappropriate to consent the project in the absence of a complete and compliant baseline dataset. Strathdearn Community Council recommends that full surveys be conducted in accordance with NatureScot guidance before any further assessment or decision-making proceeds.

Golden Eagle Topographical (GET) Model and Habitat Quality

Golden Eagle is listed under Annex 1 of the EU Birds Directive (Directive 2009/147/EC).

The GET Model (see map below) indicates high-quality foraging habitat (GET 6+) around the proposed development. 18.8% (60.56 ha) of the exclusion zone within the turbine array contains GET 6+ habitat. Whilst eagles show turbine avoidance behaviour, collisions still occur (Nature Scot reported 7 Golden Eagle and 9 White-tailed Eagle deaths in Scotland since 2015, including 5 in NHZ10). It should be noted that 89% of turbines are sited on land scored GET 6+, with some on even higher-value foraging areas (scores of 7–8).

Image 1. Balnespick GET model showing scores for each turbine position.



The Community Council has specific concerns about three turbines in the northwest (GET 7, 8, 8) adjacent to even better habitat and suggest these be removed or relocated. Strathdearn Community Council recommends that GET modelling be used proactively to avoid siting turbines in high risk zones (GET 7-10).

Golden Plover

Golden Plover is listed on Annex I of the European Birds Directive.

The applicant's Moorland Breeding Bird Surveys (MBBS) identified 14 breeding territories within 500 m of the development area, indicating a high local density. The NHZ10 baseline used by the developer for comparison is 20 years out of date and does not reflect the 9.61% national decline in breeding Golden Plover recorded between 1995–2022 (BTO BBS data)¹¹. Population estimates used by the developer therefore underestimate the relative impact of displacement.

The developer also cites older studies (e.g. Pearce-Higgins et al. 2009, 2011, 2012) suggesting minimal displacement at operational wind farms. However, these have been superseded by more robust research. Sansom et al. (2016)¹² conducted a BACI study that found:

¹¹ [BTO BBS Data](#)

¹² [Negative impact of wind energy development on a breeding shorebird assessed with a BACI study design](#)

- 79% reduction in Golden Plover abundance within the wind farm area during operation, with no similar declines in buffer or control zones
- Displacement up to 400 m from turbines
- No indication that this was due to reduced breeding success or habitat degradation—strongly suggesting behavioural avoidance.

This newer study directly contradicts the developer's claim that displacement during operation is minimal.

The EIA assesses the loss of 14 pairs in isolation, as a small percentage of a dated population estimate. It does not account for:

- Ongoing national and NHZ10 declines
- Cumulative losses from other wind farm developments consented or under application since 2005
- The real risk that these displaced pairs will not relocate successfully but will be lost from the breeding population.

The Community Council believes that a robust cumulative impact assessment is required before this development can be appropriately assessed.

Enhancing Biodiversity

Under the National Planning Framework 4 (NPF4), Policy 3 sets out clear and strengthened requirements for development proposals to deliver 'positive effects for biodiversity'. Specifically, for national and major developments, or those subject to Environmental Impact Assessment (EIA), Policy 3b(17) states that 'proposals will only be supported where it can be demonstrated that they will conserve, restore, and enhance biodiversity, including nature networks, such that the site and surrounding environment are left in a demonstrably better state than without the intervention'.

In this case, the developer has failed to provide an adequate ecological assessment, particularly in relation to Golden Plover and Golden Eagle. There is insufficient evidence that the proposal will deliver the required level of biodiversity enhancement or that the mitigation proposed is sufficient to offset anticipated impacts. In fact, for a range of rare and specialist upland species and habitats, the evidence suggests that they will be significantly worse off should the proposal proceed. We believe the application fails to meet the requirements of Policy 3b¹³ of NPF4.

If this application is given approval, Strathdearn Community Council would request the following mitigation as a minimum:

- Removal or relocation of high-risk turbines.
- Inclusion and analysis of satellite-tagging data for Golden Eagles to inform turbine location.
- Revised collision risk and habitat loss assessments using current habitat baselines.
- Comprehensive cumulative impact assessment for NHZ10.
- Compensatory enhancement measures designed to more than offset any predicted losses to notable habitats and species.

The site lies within the rolling uplands landscape character type, which consists of large, smooth rounded hills with summits of a similar height. The Community Council believes

¹³ <https://www.gov.scot/publications/scottish-government-draft-planning-guidance-biodiversity/>

this will extend beyond Spatial Framework for Onshore Wind Energy May 2020 - Inner Moray Firth LDP Area.

Proximity to the National Park, where wind energy development sited closer to the boundary (and/or larger turbines) could breach the containment provided by the higher ridge and pronounced summits which form a distinctive backdrop to the Spey valley.

Wildlands raptor monitoring initiative (Jan 2025)¹⁴ shows clear visuals of radio tagged raptors and their movements between the National Park and the Monadhliath's – noting the regular flight paths of Hen Harrier and Golden Eagle.

f) Tourism and Recreation

57% of people responding to our survey indicated the development would have a 'negative' or 'very negative' impact on tourism and recreation in the area.

'Negative comments highlight concerns that the wind farm will spoil the natural beauty of Strathtearn, potentially deterring tourists who come for its pristine landscapes, wildlife, and tranquillity. Visitors approaching from the south may be greeted with a "wall of turbines" upon entering, which could detract from the area's appeal and reduce tourism. The industrialisation of the landscape is seen as a major deterrent, with the turbines viewed as eyesores that disrupt the wild, scenic charm that attracts tourists. Additionally, the potential for light pollution from aviation lights, noise, and visual pollution could make the area less attractive for activities like hiking, cycling, and wildlife viewing. The cumulative effect of multiple wind farms could further diminish the area's appeal, as tourists seek to enjoy nature rather than view industrial structures. Concerns also extend to the long-term impact on tourism, with fears that the area's landscape will no longer be a draw for visitors'.

According to the developer's EIA (Section 13.6.39): 'Tourism data are not available for the Local Area. However, a range of statistics are available on visitor numbers and visitor spend for Highland and Scotland'.

The Community Council believes this to be a lazy approach to better understanding the local area and visitor numbers. Our own research has captured the following information -

Activities in the area include - sporting activities (shooting, stalking, fishing), walking, sightseeing, wildlife watching and photography, cycling (on and off road), wild swimming, paragliding, and cross country skiing.

Càrn Glas-choire is the highest point of the plateau where turbines will be located. Its height makes it a 'Fiona' (a new name for what were previously called Grahams). The Walkhighlands website notes 437 of their subscribers have climbed this hill. It is likely many other people who are not subscribers have walked, cycled or skied to the summit making it attractive to numbers at least in the 1000s.

Tomatin Distillery reported a 40% increase in visitor numbers in recent years. In 2022, the distillery welcomed 35,000 visitors, and together with people visiting the Strathtearn Hub, the area has seen visitor numbers increase to an estimated 80,000 (excluding A9 and rail travellers). The Glen Road does not have a traffic counter. Cycle counters on

¹⁴ [A Treasure and a Challenge](#)

NCR 7 capture 9000 annual cycle movements at the north end of Tomatin and 5000 at the south, at the Slochd summit, estimating about 4000 cyclists are using the Glen Road from Farr.

Glen Road estimated use:

- Wildlife Tour Minibuses - 5 times a week for 40 weeks carrying 8 passengers (1600)
- Casual day trippers out for a run in the car – 100 per week for 50 weeks carrying two passengers (10,000)
- Cyclists (4000)
- Overnight guests - bed capacity in self-catering pods and lodges = 100, annual occupancy 40%, (14,600)

There are ongoing plans for further development of the distillery with visitor numbers estimated to increase to 100,000. In addition, Braemore Estates has plans for a 'House of Bruar' style development, estimating 500,000 visitor numbers.

The EIA (Section 13.7.46) states: 'Tomatin Distillery Visitor Centre is located 7 km from the Proposed Development. The motivations for visiting the Distillery, such as an interest in the production of whisky and whisky tasting, would not be affected by the Proposed Development. Therefore, the effect on tourism has been assessed as negligible'.

This statement shows at best a misunderstanding of what motivates people to visit an area and share in the wider benefits such a trip can offer. Many people will simply come to visit the distillery and try some 'whisky tasting' but our experience and number extrapolations show this not to be the case for many other people.

Strathdearn Community Council believes the developer has significantly underplayed the level of visitor numbers currently accessing Strathdearn and taken no account of future visitor numbers associated with two nationally significant visitor attraction developments. The cumulative impact of five other potential wind farm developments is also ignored. As such, the developer should review their approach to tourism and recreation and complete a full and proper assessment as part of a revised EIA.

g) Noise and Shadow Flicker

46% of people responding to our survey indicated the development could have a 'high' or 'severe' impact on noise pollution in the area. 37% said it would have 'low' or 'little' impact.

'There is fear that the noise will affect sleep, health, and wildlife. The noise, described as a constant hum or whirring, is seen as disruptive to daily life, potentially causing sleep disturbances and increased stress for residents. The cumulative effect of multiple wind farms is expected to intensify the problem. Positive comments suggest the proposed wind farm is situated in a location away from residential areas, reducing the potential for significant noise pollution. The development is positioned downwind of Tomatin, which further minimises the impact on the village. Additionally, newer turbine models are quieter'.

Highland Council's expectation is that all proposals will seek to achieve noise limits at sensitive locations that are at the lower end of the range indicated in national guidance.

43% of people responding to our survey indicated the development could have ‘low’ or ‘little’ impact on shadow flicker in the area. 38% said it would have ‘high’ or ‘severe’ impact.

‘Positive comments regarding blade flicker suggest the impact will be minimal due to the distance between the turbines and nearby housing. The effects are expected to be temporary, particularly in certain weather conditions like low winter sun, and may primarily affect travellers on the A9 rather than residents. Overall, the consensus is that blade flicker will have a limited impact in this location. Negative comments express concerns about its impact on residents and wildlife. Some residents fear that the visual stimulus will be distracting, disorienting, and damaging to their mental health, especially for those who spend a lot of time outdoors. Additionally, the cumulative effect of flicker across multiple wind farms is seen as worsening the situation’.

Shadow flicker was scoped out of the EIA by the developer.

h) Aviation

44% of people responding to our survey indicated the development could have a ‘high’ or ‘severe’ impact on lighting and dark skies. 36% said it would have ‘no’ or ‘little’ impact.

‘Negative comments focus on the significant impact that lighting on wind turbines would have on Strathdearn’s dark skies. Many residents express concern that the introduction of warning lights on turbines would disrupt the natural night sky, affecting both the enjoyment of stargazing and the local wildlife. The lights could obscure views of celestial features like the Milky Way, making it feel more like an industrial area than a rural retreat. There is a strong sense that the lights would detract from the unique natural beauty of the area, which is prized by both locals and visitors. The cumulative effect of multiple illuminated turbines would likely ruin the dark sky environment, and many residents believe this would be one of the most severe impacts of the proposed wind farms. Positive comments regarding dark skies suggest that the impact on nighttime lighting may be minimal. There is a general belief that the wind turbines themselves won’t be excessively illuminated, with only necessary warning lights on the upper surfaces. However, there is some uncertainty about the specifics’.

The application involves turbines of 200m tip height, which will legally require visible aviation lighting. These lights, typically high-intensity red beacons, will introduce a constant source of nocturnal light pollution, visible across vast distances in this relatively undisturbed rural Highland landscape, where dark skies and minimal human intervention contribute to its sense of remoteness and natural value.

The Dava Moor, Nairn and Monadhliath Area Wind Energy Landscape Pilot Study¹⁵ concluded: ‘The 149.9m high threshold has been principally determined because of the requirement for visible aviation lighting on turbines over that height and the potential landscape and visual effects of this. Lighting of turbines would extend and intensify effects on the dark skies which are a key quality of this area. Most of Scotland’s upland landscapes are not expansive in terms of their extent and an overwhelming or dominant effect on scale would be likely to occur whether turbines were 150m or 250m’.

¹⁵ Dava Moor, Nairn and Monadhliath Area Wind Energy Landscape Sensitivity Pilot Study, Final Report, Carol Anderson Landscape Associates, Dec 2021

The proposal would create significant visual effects from three of the 24 representative viewpoints during daylight, and two during night-time hours (EIA Section 6.11.11). Cumulatively, the development reinforces an increasing pattern of visual and character effects from wind farms in this landscape, which the EIA concedes will extend the existing significant cumulative effects further into currently less affected areas (EIA Section 6.11.18; 6.10.47).

Should Ministers move to grant this application, Strathdearn Community Council recommends that a Dark Sky Lighting Mitigation Plan be mandated, including infra-red only lighting or radar-triggered obstacle lights (ACAS).

5. Conclusions

People living in the Strathdearn Community Council area are surrounded by a high volume of existing wind farms. Significant Community Benefit has been delivered as part of these developments and the funds have been invested wisely in the local area. However, many people living in the community now believe that the Strathdearn area has delivered more than its fair share in helping reach the Scottish Government's renewable energy targets. Should the six applications currently seeking approval be granted, this would more than double the installed capacity from this small area of the Highlands. Combined with existing wind farms in the Strathdearn area, this would create enough energy to power approximately 70% of the homes in Scotland, as well as delivering 10% of Scotland's 2030 target.

Strathdearn Community Council strongly urges Ministers not to view this Balnespick wind farm application in isolation, ignoring the cumulative impact of existing windfarms and the other five pending applications. We ask that key officials from the ECU and Ministers tasked with decision making for wind farms accept our invitation to visit our area and see for themselves what we are talking about. The Community Council is not against wind farms and recognises the importance of Scotland achieving its 2030 targets but, as our surveys clearly point out, most people living in our community believe that enough is enough.

We understand why Community Benefit (CB) must sit outside the planning process and not be influenced by it. However, in good faith, if this application is consented, Strathdearn Community Council would wish to negotiate and agree a comprehensive CB package with the developer that aligns with our Community Action Plan¹⁶ and maximises net economic impact, including community socio-economic benefits such as local employment, associated business and supply chain opportunities.

The Community Council has carefully reviewed all information produced by each developer and widely consulted our community. We have summarised our objections to this development (page 1 of this letter) and included several potential mitigations (pages 1 and 2) that we would ask to be mandated should Ministers grant approval.

¹⁶ [Strathdearn Community Action Plan 2022-2027](#)