

**Letter of Representation to the Energy Consents Unit, Scottish Government, from
Strathdearn Community Council – Clune Windfarm Application ECU00005038**

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Date: 25-05-2025	
Clune Wind Farm – ECU00005038	
Site Description The site is located on Clune Estate on elevated, open and managed grouse moorland, located approximately 3km south of Tomatin. The highest point is 750m, at Carn Dubh'lc an Deoir. The site is divided by four burns that flow north into the River Findhorn: Allt Phris, Clune Burn, Allt Lathach, and Wester Strathnoon Burn. The development will comprise 26 wind turbines with 200m tip heights and a total overall capacity of 287.2MW (including 100MW battery storage). It will be accessed directly from the U2856 (Slochd – Tomatin road) via a new priority access junction and realigned railway bridge. The site is immediately adjacent to the Monadhliath Wild Land Area and close to the Cairngorms National Park boundary.	
Objection Strathdearn Community Council objects in the strongest terms possible to the Clune Wind Farm proposal. The Community Council is committed to listening to and reflecting the views of people living in our area and has carried out two community surveys (see section 2) that captured community views on all six wind farms proposed in our area. The community response could not be clearer - Clune wind farm is by far the least preferred option and, given such strong views, Strathdearn Community Council requests that Clune Wind Farm be refused planning permission. Our objections are summarised as follows: 1. Significant adverse effects on landscape and visual impact both alone and in combination with the other twelve existing wind farms and the other five proposed wind farms associated with Strathdearn Community Council area. 2. RES's Environmental Impact Assessment (EIA) does not contain the necessary information to allow full assessment of direct, indirect, long-term, and permanent cumulative impacts (associated with existing installations, planned new installations, and undetermined grid connections). 3. Contrary to Highland Council's spatial planning guidance on the basis that it would have significant negative effects on scale, the built environment, landscape value, visual amenity, and the setting of the Cairngorms National Park and the Monadhliath Wild Land Area. 4. Significant concerns regarding compliance with national peatland protection policy. 5. Several serious shortcomings in RES's moorland breeding bird survey work. A new survey spanning at least two full moorland breeding bird seasons is necessary. 6. Several flaws in RES's assessment of the impacts on key raptor species. A Moorland Raptor Survey over two breeding seasons is necessary.	

7. RES has failed to carry out a robust assessment of Clune wind farm's impact on Golden Eagle and White-tailed Eagle in particular. This assessment should include a comprehensive cumulative impact analysis, considering all existing, consented, and proposed developments within Natural Heritage Zone 10 that could affect these protected species.
8. RES has failed to comply with Scottish Government policies on Biodiversity Net Gain. A full Habitat Management and Biodiversity Enhancement Plan (HMBEP) based on quantifiable and mapped habitat impact assessments is required.
9. RES 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.

1. The Community of Strathdearn

Strathdearn 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 Strathdearn, with Tomatin being the main village. Thousands of visitors come to Strathdearn each year by car or train or plane to experience wonderful peaceful surroundings, whilst millions pass through Strathdearn 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

Scottish Government guidance on Local Place Plans¹ (2022) and Local Development Plans² is clear on the importance of working with and listening to communities: *'Local Place Plans offer the opportunity for a community-led, collaborative approach to creating great local places. They can support community aspirations on the big challenges for a future Scotland, such as responding to the global climate emergency and tackling inequalities. It is vital that local people have the opportunity to engage meaningfully and have a positive influence in the future planning of development in their areas.'*

Strathdearn Community Action Plan (2022-2027)³ *'sets out what people in Strathdearn, collectively, have decided should happen in our community over the next few years.'*

¹ <https://www.gov.scot/publications/circular-1-2022-local-place-plans/>

² <https://www.gov.scot/publications/local-development-planning-guidance/>

³ [Strathdearn Community Action Plan 2022-2027](#)

Strathdearn Community Council carried out an online consultation in May 2024⁴, 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 scoring matrix applied to each wind farm on page 7 of the May 2024 report **shows Clune receiving by far the highest score (115) against a range of key criteria. This gave Clune a ‘High’ sensitivity rating, where ‘High’ is described as:**

‘Key elements of the key criteria are highly vulnerable to change from the development. The development would conflict with several aspects of the criteria with severe and potentially widespread adverse effects likely to arise’.

The Community Council carried out a second more detailed and in-depth survey⁵ using SurveyMonkey in March/April 2025. This considered all six applications in the pipeline (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% (189 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), **Clune wind farm scored significantly lowest with a score of 2.67** and Balnespick highest with a score of 4.64. **A score of 2.67 across all questions and criteria shows the strength of feeling against Clune wind farm within the community.** 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**

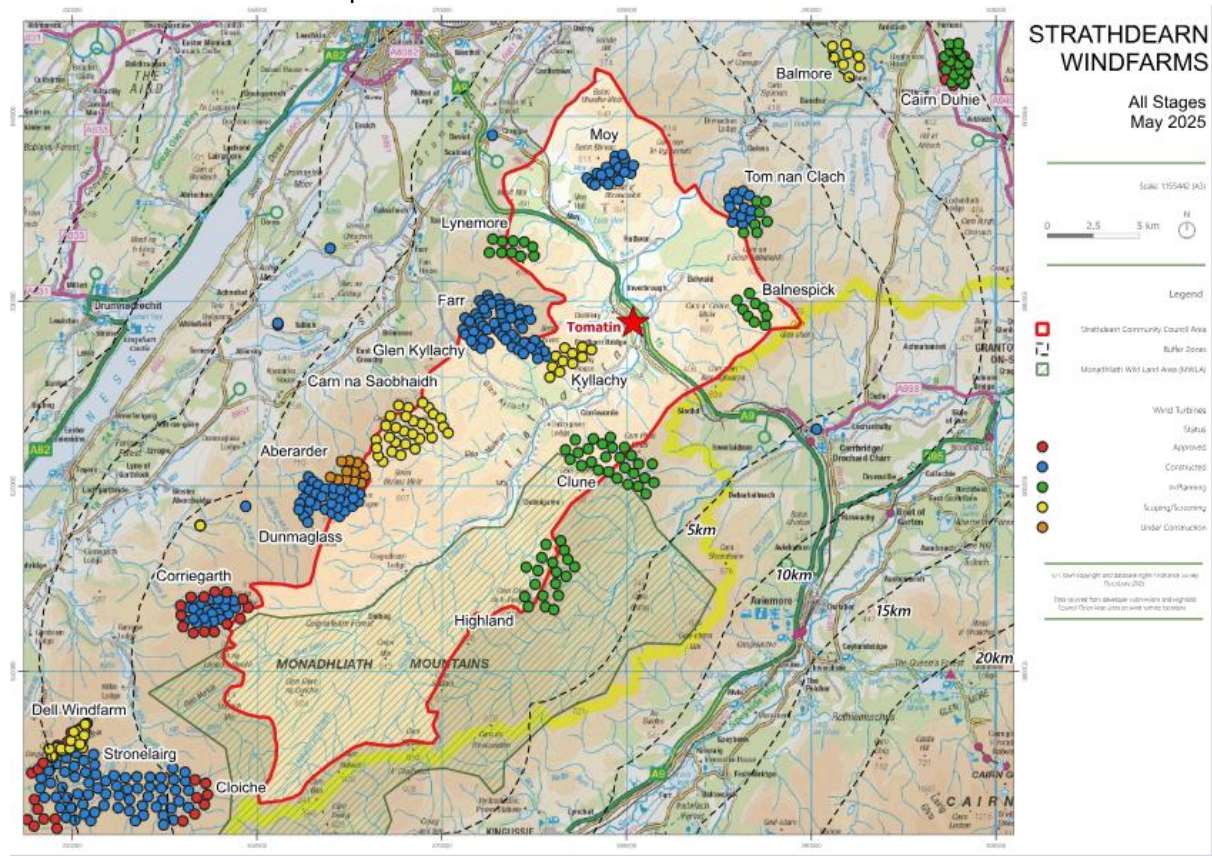
⁴ [Wind Farm Survey Report - 2024](#)

⁵ [Strathdearn Wind Farms Survey Report - April 2025](#)

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.**

The six further applications are: Balnespick - ECU00004904; Clune - ECU00005038; Highland - ECU00005082; Kyllachy - ECU00005153; Lynemore – ECU00005105; and Carn na Saobhaidh - ECU00005191. A map⁶ showing these developments has been prepared by Strathdearn Community Council and is shown below.

Strathdearn Windfarms Map



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'***

⁶Map showing wind farm developments in the Strathdearn area

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.** Indeed, the developer (RES) in their EIA submission for Clune (Section 5.4.3) has scoped several elements out of their assessment, including:
'The cumulative effect of the Proposed Development in the context of scoping stage wind farms, with the exception of Highland Wind Farm'. In their EIA (Section 5.5.68) the RES states: 'there is inadequate design information to include certain schemes that are at the scoping stage in the cumulative assessment, and as a result, with the exception of Highland Wind Farm, they are not considered further in the detailed assessment of the LVIA'

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 Report⁷:

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

*'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

⁷ [Annex B: Information to Be Included in an EIA Report - Planning Circular 1/2017: Environmental Impact Assessment regulations - gov.scot](#)

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 spreadsheet⁸ 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:

- 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

⁸ [Strathdearn Wind Farms 2025 - Detailed Spreadsheet Summarising All Six Major Wind Farm Applications](#)

b) Design, Landscape and Visual Impacts

80% 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:

*'A significant number of respondents expressed strong opposition to the proposed wind farm, citing overwhelming concerns about its visual and environmental impact on the surrounding landscape. Many feel the development would irreversibly damage the area's natural beauty, including views from Tomatin village, the Glen, and the Monadhliath Wild Land Area. **Concerns were raised about cumulative effects, as Tomatin is already encircled by existing and proposed wind farms, leading to a sense of over-industrialisation.** Opponents highlighted the disruption to wildlife habitats, peatland, and dark skies, as well as potential noise, strobing, and light pollution from aviation lighting. Many residents and visitors value the Glen for its tranquillity, recreational opportunities, and tourism appeal, all of which they fear would be compromised. The development was seen as poorly placed, too close to homes, and indicative of a pattern where local voices and environmental priorities are overlooked in favour of corporate gain.'*

The Dava Moor and Monadhliath Landscape Sensitivity Appraisal (LSA), commissioned by NatureScot and Highland Council (Dec 2021)⁹, provides useful context when assessing the landscape sensitivities in the area. The Clune wind farm lies within the Rolling Uplands (The Monadhliath) Assessment Unit (AU). It is adjacent to the Cairngorms National Park (CNP) and borders the Monadhliath Wild Land Area (MWLA). **The Dava Moor study identifies this area as having High-Medium Sensitivity to turbines over 150m in height** and notes that further development risks:

- Cumulative impact on the upland landscape from existing wind farm clusters.
- Adverse visual effects on views from the A9/ railway corridor and nearby settlements like Tomatin.
- Increased visual intrusion on the approach to Inverness.
- Negative effects on the wildness and natural character of the CNP and MWLA

The study also states:

'Significant infill of the presently generous spaces between developments should be avoided as this would result in wind turbines having a more dominant effect from surrounding valued landscapes and popular hill summits'.

And that:

'Additional overhead transmission lines should be avoided...'

RES, in their EIA (Section 5.10.6, Table 5.14) shows that Clune wind farm would have a significant visual effect on 24 of their 41 receptors/ viewpoints. The table differentiates between day and night-time effects but includes both day and night-time effects at 8 locations, including the village of Tomatin.

The number of wind farms already constructed, and the additional six seeking ECU consent, have already been discussed under cumulative impacts in section 3 and shown on the map of wind farm developments in the Strathdearn area¹⁰. Simply from a

⁹ Dava Moor, Nairn & Monadhliath Area Wind Energy Landscape Sensitivity Pilot Study. December 2021. Open Rolling Uplands-Sensitivity Assessment. Section 15. Pages 77-84.

¹⁰ [Map showing wind farm developments in the Strathdearn area](#)

glance at this map, one can see how Tomatin has the potential to be encircled by a ring of steel from no fewer than seven separate wind farms.

Strathdearn Community Council has felt relatively secure that wind farms would not (indeed could not) be developed along the east side of Strathdearn due to the proximity of the Cairngorms National Park and the Monadhliath Wild Land Area. They have a real concern that, should Clune wind farm be granted permission, this will give developers carte blanche to seek permission for further developments along the eastern side of the Glen.

Strathdearn Community Council believes that Clune wind farm should be refused as it would be inappropriate and have significantly negative effects on scale, the built environment, landscape value, visual amenity, and the setting of the Cairngorms National Park and the Monadhliath Wild Land Area.

c) Roads, Transport and Access

73% of people responding to our survey indicated the development would have a 'negative' or 'very negative' impact on their area. Their comments are summarised as follows:

'Many respondents voiced strong concerns about the negative effects of road and access track construction associated with the proposed wind farm. Key issues included significant disruption from heavy construction traffic, noise, dust, and visual scarring of the landscape, particularly in an area valued for its natural beauty. Locals feared the narrow, single-track roads and existing poor infrastructure would be unable to cope with the increased load, leading to congestion, road damage, and safety risks.'

'The creation of large, visible access tracks and construction yards was seen as environmentally damaging, with worries about long-term disturbance to wildlife and fragile peatland. Some felt that the area already offers sufficient access for walkers and cyclists, and that any new tracks would bring more harm than benefit, both during and after construction.'

RES's EIA (Section 10.9.23) carried out an assessment of the impact on road users (U2856) and Core Path and NCN users:

'The assessment suggests that the following receptors are considered likely to experience Significant effects in accordance with the EIA Regulations, prior to the application of mitigation measures:

- *U2856 Users;*
- *Core Path / Path Users; and*
- *NCN Users'.*

The above example is one of many that Strathdearn Community Council could select from RES's EIA that shows RES reflecting only on its own application and not giving any consideration to the other five wind farm applications in the pipeline and potential tourism developments in the area.

Strathdearn Community Council has been meeting with each of the six developers individually and indeed hosted a joint developer day in 2024 in The Strathdearn (community 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

In the Highland-wide Local Development Plan, Policy 63, Water Environment, it states: *'In assessing proposals Highland Council will consider associated Area Management Plans'.*

Hydrological connectivity exists between the Clune wind farm site and the River Spey SAC via the River Dulnain. The River Findhorn Initiative's Management Plan¹¹ shows cumulative hydrological changes to rivers impacting highly vulnerable Atlantic salmon, freshwater pearl mussels, and other fish populations. 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 excavation, construction, and drainage alterations from Clune wind farm would pose significant erosion and sedimentation risks.

Highland Council's Onshore Wind Energy Guidance¹² 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 systems.** According to RES's figures, there will be an unavoidable and permanent loss of 20.91 hectares of blanket bog - an irreplaceable habitat under the Biodiversity Net Gain (BNG) Regulations 2024.

In RES's EIA (Technical Appendix 9.1) it states:

'The Carbon and Peatland Map 2016'¹³ indicates that much of the southern and central extents of the Proposed Development are located within Class 1 peatland which are considered nationally important carbon-rich soils, deep peat and priority peatland habitats and areas likely to be of high conservation value. Within the north-western extent of the Proposed Development there are localised Class 1 deposits close to Carn a' Gharbh Choire.'

Strathdearn Community Council believes that the Clune wind farm proposal raises significant concerns regarding compliance with national peatland protection policy.

The available evidence paints a clear picture of a site characterised by:

- Class 1 peatland dominates the southern and central parts of the site. This classification represents deep peat, carbon-rich soils, and priority peatland habitats of likely high conservation value.

¹¹ [River Findhorn Initiative Management Plan 2021-2026](#)

¹² [Onshore Wind Energy Supplementary Guidance](#)

¹³ [Scotland's Soils - Soil Maps](#)

- Peat depths up to 4.7 meters have been recorded, which increases the environmental and carbon risk of disturbing such soils.
- Despite guidance from NatureScot (2023)¹⁴ and Highland Council's Onshore Wind Energy Guidance¹⁵, the Clune layout directly overlaps with areas of deep peat.
- RES's proposal includes the loss of 20.91 hectares of blanket bog - an irreplaceable habitat under the Biodiversity Net Gain (BNG) Regulations 2024.

e) Natural Heritage (including ornithology)

67% of people responding to our survey indicated the development would have a 'high' or 'severe' impact on wildlife in their area. Their comments are summarised as follows:

*'Many respondents expressed deep concern over the potential negative effects of the development on local wildlife. The area is widely recognised for its rich biodiversity, particularly its populations of birds of prey such as Golden Eagles, White-Tailed Eagles, Red Kites, and Buzzards, all of which are seen as being at significant risk due to habitat disruption and collision with turbine blades. Construction-related activity, such as access track building and increased vehicle movement, was seen as likely to cause habitat destruction, nesting disturbance, and long-term ecosystem disruption. Several respondents emphasised the region's ecological sensitivity and **accused the project of undermining the integrity of the Monadhliath Wild Land Area and surrounding peatlands, potentially causing irreversible environmental damage and undermining the area's appeal to wildlife enthusiasts and tourists**.'*

In addition, 62% of people responding to our survey indicated the development would have a 'high' or 'severe' impact on the natural environment.

'The proposed wind farm development raises significant concerns about its detrimental effects on the natural environment. The construction of roads, turbine bases, and other infrastructure will disrupt delicate ecosystems, including peatlands, watercourses, and local wildlife habitats. Many respondents expressed alarm over the disturbance of peat, which is a critical carbon sink, warning that this could release large amounts of CO2 into the atmosphere, potentially negating any climate benefits of the wind farm. The construction process itself is expected to damage soil and water quality, with the risk of pollution from chemicals, concrete, and diesel fumes entering the surrounding environment, including the River Findhorn, which is already under stress. The disturbance of natural drainage patterns and the removal of vital habitats for species like birds of prey could have long-lasting ecological consequences. Many raised concerns about soil erosion, water contamination, and the cumulative impact of such industrial development on this sensitive landscape. The addition of turbines, especially with their required lighting, would also detract from the area's natural beauty and the dark skies, further harming both local wildlife and tourism'

¹⁴ [Scotland's Soils - Soil Maps](#)

¹⁵ [Onshore Wind Energy Supplementary Guidance](#)

Impact on Breeding Birds

NatureScot guidance on moorland breeding birds¹⁶ clearly states that moorland breeding bird surveys must follow an adapted method, with four visits at least 7 days apart during the breeding season (mid-April to early July).

According to RES's EIA (Technical Appendix 8.1):

- In 2021, only 2 out of 12 compartments (compartments 4 and 6) were surveyed according to guidance.
- In 2022, none of the 12 compartments met the survey standard.
- In 2023, none of the 3 new compartments met the standard either.

RES attempted to extend the survey window into August, citing poor weather and access limitations. However, this fails to account for early breeding behaviour or abandoned attempts, which are key data points for accurate assessment.

RES further stated that some observations took place from vehicles or at a distance. This is insufficient to detect ground-nesting birds or accurately identify territories in complex moorland habitats.

Strathdearn Community Council believes that a new, fully compliant survey spanning at least two full moorland breeding bird seasons is essential to enable fully informed decisions to be made on RES's application for Clune wind farm.

White-tailed Eagle

Surveys carried out by RES did not align with guidance recommending early morning and evening surveys to capture peak raptor activity. The surveys effectively started too late and ended too early.

White-tailed Eagle is a highly protected, red-listed species known to be vulnerable to turbine collisions. RES predicts a collision mortality of 1 Eagle per year, claiming this to be insignificant. Clune wind farm site is near a recently established breeding pair, and loss of even one bird could harm population recovery.

RES did not use available long-term satellite tracking data to strengthen impact assessments.

Strathdearn Community Council believes that RES has failed to meet legal obligations under the Birds Directive and Habitats Regulations to protect Annex 1 species like White-tailed Eagle.

Golden Eagle Topographical (GET) Model and Habitat Quality

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

RES states in their EIA (Technical Appendix 8.4) the following:

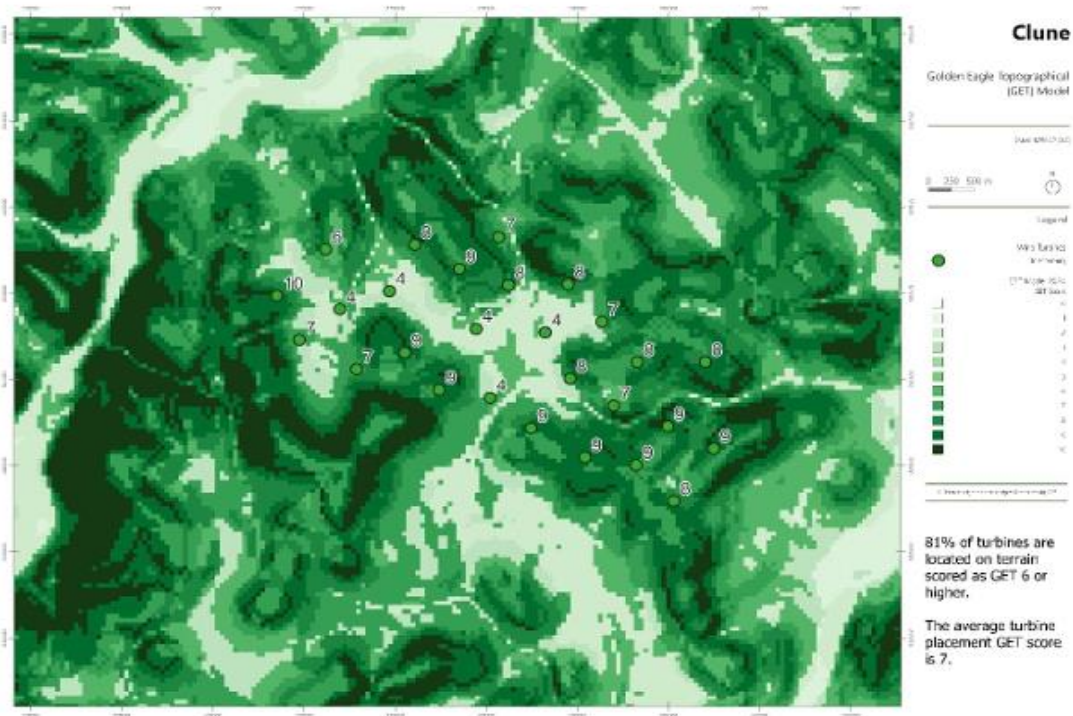
'The results of the GET model shows an area with moderate to high suitability for Golden eagle. However, within this, there is variability, with the ridge around Cam Dubh'lc an

¹⁶ [Recommended bird survey methods to inform impact assessments of onshore wind farms](#)

Deoir having the highest suitability. Much of the area around this, which contains a majority of the turbines, is of lower suitability, but suitability is greater through the south-east of the Proposed Development. In terms of displacement effect, the largest area of loss would be in that south-east area of the Proposed Development, which encompasses an area of approximately 2.35 km² of moderate highly suitable eagle habitat’.

Golden Eagle Topographical (GET) modelling identifies a disproportionate use of high-quality habitat by foraging Golden Eagles. A higher GET score corresponds to higher predicted Eagle use. However, lower-scoring areas are still used, albeit less intensively (see Image 1 below showing the GET model map for Clune).

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



While it is acknowledged that Golden Eagles in Scotland often avoid wind turbines, fatalities still occur. At the time of writing, Strathdearn Community Council has been made aware of seven Golden Eagle and nine White-tailed Eagle collisions with wind turbines in Scotland since 2015. Of these, two Golden Eagles and five White-tailed Eagles were in NHZ10.

Strathdearn Community Council believes the GET model should have been used by RES during the project design phase. This would have allowed for strategic turbine placement, avoiding areas with high GET scores (i.e., scores of 8–10) where Eagle use is most concentrated. Avoiding these areas would significantly reduce the risk of collision. **Removing or relocating turbines from the south-east section of the site would likely decrease collision risk, given the proximity to an active White-tailed Eagle territory.**

Enhancing Biodiversity

The developer notes in their EIA (Chapter 7, Ecology) that:

‘A Habitat Management and Biodiversity Enhancement Plan (HMBEP) will be produced and agreed with NatureScot and The Highland Council post consent. This would detail measures to compensate for the significant residual effects of habitat loss, where possible, associated with the Proposed Development and provide significant biodiversity enhancement, in accordance with National Planning Framework 4 (NPF4). An Outline HMBEP is provided in Technical Appendix 7.5.’

The developer has deferred creating a detailed HMBEP until after planning consent, instead submitting only an outline HMBEP.

f) Tourism and Recreation

77% of people responding to our survey indicated the development would have a ‘negative’ or ‘very negative’ impact on tourism and recreation in the area. Their comments are summarised as follows:

‘Many expressed concerns about the visual impact of the turbines, which would dominate the landscape and spoil the natural beauty that attracts tourists. The Strathdearn region, known for its scenic views, wildlife, and outdoor activities like hiking, mountain biking, and birdwatching, would be fundamentally altered by the construction of large wind farms. The turbines, along with their infrastructure and maintenance vehicles, are viewed as an eyesore that would detract from the area’s appeal, especially in places like the Monadhliath Wild Land Area, which is a popular destination for visitors seeking an unspoiled natural environment’.

‘The introduction of noise, light pollution from turbine warning lights, and the industrialisation of the landscape would diminish the area’s charm, potentially deterring wildlife tourists, including birdwatchers who frequent the region for sightings of rare species like Golden Eagles. The infrastructure required, such as access roads and the turbines themselves, would disrupt the tranquillity of the area, making it less attractive for tourists seeking peace and natural beauty. As a result, many fear that tourism, which is vital to the local economy, would be severely impacted, with visitors choosing other destinations that maintain their unspoiled landscapes’.

In the developer’s Scoping Report, they proposed to scope socioeconomics and tourism out of their EIA Report. The EIA (Chapter 10 – Transport and Access) does give a breakdown of traffic volumes associated with roads and access but lacks any conviction in linking this information to local tourism and recreation. **This is of real concern to Strathdearn Community Council whose own research has highlighted the increasing numbers of visitors to Strathdearn and the potential for this to increase significantly in the coming years.**

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.

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 Strathdearn 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

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.

Strathdearn Community Council believes that RES has taken little cognisance of 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, RES 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

64% of people responding to our survey indicated the development could have a 'high' or 'severe' impact on noise pollution in the area. Their comments are summarised as follows:

*'Many of the negative comments express significant concern about the impact of noise from both the construction and operation of the wind farms. **Residents fear that the noise, including the whirring of turbine blades, will be intrusive, particularly during calmer days or when the wind is coming from certain directions, such as the south and southwest.** Some people report already noticing the noise from nearby wind farms like Moy and Farr, and fear that additional turbines will exacerbate the problem, especially as the proposed location is closer to populated areas like Tomatin.'*

*'**There are worries about the cumulative effect of noise pollution from multiple wind farms, with some residents noting that the existing turbines already create noticeable disturbances, especially in winter when there is less vegetation to block sound.***

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.

57% of people responding to our survey indicated the development could have 'high' or 'severe' impact on shadow flicker in the area.

'The negative comments about blade flicker focus on significant visual disruption, particularly for residents in Tomatin and nearby areas. Many worry that the turbines will cause constant flickering, especially during winter, spring, and autumn, when the sun is

low. This will affect properties to the north-west, with the sun behind the turbines for much of the day’.

‘Residents express concerns about the impact on mental health, with flicker being irritating and potentially harmful, especially for those with conditions like epilepsy or migraines. It could also disrupt outdoor activities, creating unease and reducing tranquillity’.

Some comments highlight safety risks for drivers on the A9, where flicker could cause distractions. **Overall, blade flicker is seen as a significant negative effect, particularly for those living or working nearby’.**

The developer’s EIA (Section 12.4.14) states:

‘There is no standard Scottish or UK guidance relating to a limit for shadow flicker, and this remains the case. The only guidance providing additional recommendations is the Northern Irish PPS 18 (2009) guidance which recommends that for properties within 500m of the turbines, shadow flicker should not exceed 30 hours per year or 30 minutes per day. The assessment has therefore adopted a criterion of 30 hours of shadow flicker in one year as a significance threshold’.

As a result, the developer goes on to state (Section 12.4.19 and 12.4.20):

‘The Proposed Development is expected to have no impact on amenity due to shadow flicker. No mitigation is therefore proposed for the Proposed Development in relation to shadow flicker’.

Strathdearn Community Council does not agree with this summary and strongly encourage, as a matter of urgency, the development of new UK guidance on shadow flicker to provide reassurance to residents who have real concerns regarding a range of health issues.

h) Aviation

58% of people responding to our survey indicated the development could have a ‘high’ or ‘severe’ impact on lighting and dark skies. Their comments are summarised as follows:

*‘The negative comments on dark skies focus on the significant disruption caused by turbine lights, especially aviation warning lights. **These lights are seen as detrimental to the rare and precious dark skies in Strathdearn and Tomatin.** Concerns include the loss of opportunities to enjoy natural night-time views, such as star-gazing and the aurora, as the lights would create a city-like skyline effect. The lights are also feared to disrupt local wildlife, particularly nocturnal insects, and **could psychologically impact residents by transforming the area from rural tranquillity to an industrial atmosphere. The presence of multiple illuminated turbines would severely detract from the area’s natural beauty and sense of place’.***

RES’s 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. They may also have an impact on RAF low flying training within this area.

The Dava Moor, Nairn and Monadhliath Area Wind Energy Landscape Pilot Study¹⁷ 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**'.*

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. Summary of Potential Mitigations

In reflecting the clear views of our community, Strathdearn Community Council strongly objects to the Clune wind farm proposal. If ECU are minded to recommend Ministers consent this application our strong objections remain but we propose the following mitigation measures and obligations be imposed through condition and legally binding commitments that clearly address community disbenefits.

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.
(Strathdearn Community Council extends an invite to Ministers and officials to visit our area before taking decisions on any of these wind farm applications).
2. Removal or relocation of high-risk turbines to Golden Eagles and White-tailed Eagles, and inclusion and analysis of satellite-tagging data for Golden Eagles to inform turbine locations.
3. RES should review their approach to tourism and recreation and complete a full and proper assessment of visitor numbers currently accessing Strathdearn and the future impact of two nationally significant visitor developments in the area. This should be included as a revised section within their EIA.
4. RES should deliver a Dark Sky Lighting Mitigation Plan, including infra-red only lighting or radar-triggered obstacle lights (ACAS).
5. RES 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.
6. As a matter of urgency, new UK guidance on shadow flicker should be developed to provide reassurance to residents who have real concerns regarding a range of health issues.
7. 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 RES that aligns with our Community Action Plan and maximises net economic impact, including community socio-economic benefits such as local employment, and associated business and supply chain opportunities.

¹⁷ Dava Moor, Nairn and Monadhliath Area Wind Energy Landscape Sensitivity Pilot Study, Final Report, Carol Anderson Landscape Associates, Dec 2021

6. Conclusions

Strathdearn Community Council objects in the strongest terms possible to the Clune wind farm proposal and asks the ECU to refuse planning consent.

People living in 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 Clune 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.

Strathdearn Community Council has carefully reviewed all information produced by each developer and widely consulted our community. **We have summarised our reasons why we believe Clune wind farm should be refused permission (page 1 and 2 of this letter) and included potential mitigations (page 16) that we would insist be mandated should Ministers go against our recommendation and approve this application.**