

**Letter of Representation to the Energy Consents Unit, Scottish Government, from
Strathdearn Community Council – Highland Windfarm Application ECU00005082**

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Date: 08-06-2025	
Highland Wind Farm – ECU00005082	
Developer – Ampyr and ESB	
Site Description The site is located approximately 4.2 km west of Aviemore on Dalmigavie, Dunachton and Alvie Estates, with the turbines located on open upland peatland and montane habitats in the upper reaches of the River Dulnain and the River Findhorn. The River Dulnain flows north-easterly through the centre of the site (south of the proposed turbine area) and is part of the designated River Spey Special Area of Conservation (SAC). There are several water courses that intersect the site. The development will comprise 19 wind turbines with up to 230m tip heights and a total overall capacity of 163MW (including 30MW battery storage). The site is located within the designated Monadhliath Wild Land Area and close to the Cairngorms National Park boundary.	
Objections 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. Ampyr/ESB'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 negative impacts on nationally important peatland habitat and non-compliance with national peatland protection policy. 5. Ampyr/ESB has failed to conduct a robust assessment of Highland wind farm's impact on Golden Eagle. This assessment should include a comprehensive cumulative impact analysis, considering all existing, consented, and proposed developments within Natural Heritage Zone 10 that could affect this protected species. 6. Ampyr/ESB 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.	

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| <p>7. Ampyr/ESB 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.</p> |
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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.’*

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). The scoring matrix applied to each wind farm on page 7 of the May 2024 report **shows Highland receiving an overall score of 97 against a range of key criteria. This gave Highland an overall ‘High-Medium’ sensitivity rating, where ‘High-Medium’ is described as:**

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](#)

⁴ [Wind Farm Survey Report - 2024](#)

‘Several elements of the key criteria are subject to change from the development. The development would conflict with some aspects of the key criteria but may be able to be accommodated’.

Two of the key criteria scored ‘high’ sensitivity rating (Natural Heritage (incl. Ornithology) and Landscape Character), 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 impacts 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). **Highland wind farm had a score of 3.69.** Balnespick scored highest with a score of 4.64, with Clune by far the lowest at 2.67. **The results for Highland 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:

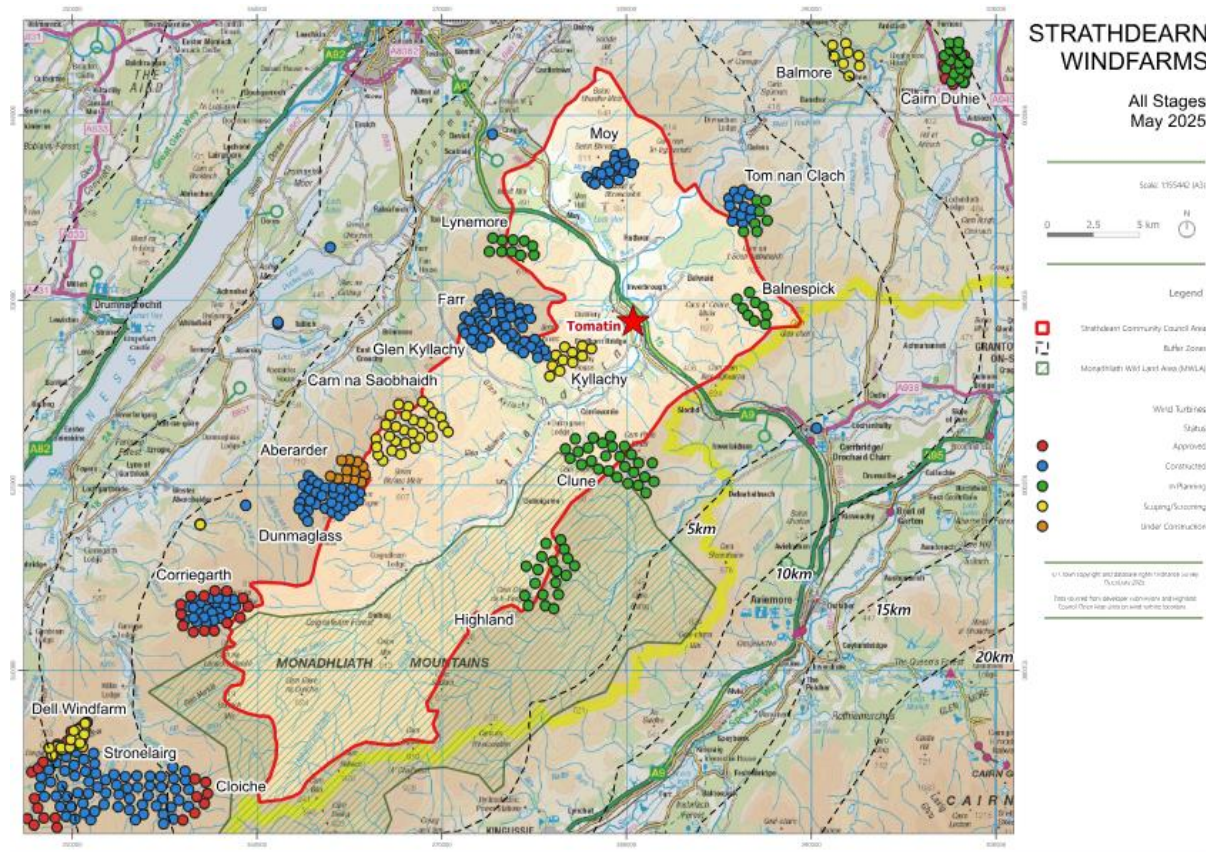
‘Many respondents express deep concern over the cumulative and disproportionate scale of the proposed developments, arguing that Strathdearn has already contributed significantly to renewable energy targets. They fear the area is being turned into a ‘sacrificial glen’, with little regard for the local 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.**

⁵ [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 map⁶ showing these developments has been prepared by Strathdearn Community Council and is shown below.

Map showing wind farm developments in Strathdearn



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'.

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**

⁶ [Map showing wind farm developments in the Strathdearn area](#)

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 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 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.

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

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

b) Design, Landscape and Visual Impacts

74% 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:

*‘Significant concerns about the visual impact on the landscape. **Many highlight that the site is located within the Monadhliath Wild Land Area, which is highly valued for its natural beauty and remoteness.** The wind farm, including its infrastructure, is seen as an industrialisation of a pristine environment that will disrupt both local views and tourism. **The turbines, especially at 230m tall, are considered too large for the landscape, with the potential to spoil the natural beauty of the glen, Cairngorms National Park, and the Monadhliath mountains.***

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

Worries about the cumulative impact of windfarms in the area, which could result in a visual “clutter,” negatively affecting the unique qualities of the landscape and the sense of place. **The disruption of peatland, which is a vital carbon capture resource, and the associated infrastructure are also major concerns.** Furthermore, the proposed wind farm is **feared to diminish the attraction of the area for tourists, particularly those who come for the wilderness and the aesthetic value of the landscapes.** The additional aviation lighting required on tall turbines could further detract from the area’s dark skies, adding to the negative impact’.

In Ampyr/ESB’s EIA (Section 6.0.11) it states:

*‘The Proposed Development is located within the Monadhliath Wild Land Area (WLA). Although effects have been reduced through attention to design and through landscape and habitat enhancement measures, **given its location, the Proposed Development is judged to significantly alter landscape character in the eastern half of the WLA.**’*

In Sections 6.05 & 6.06 of the EIA, the effects on landscape are described as:

‘Significant effects are predicted on the landscape resource of the site itself during construction (major) and operation (major).

Significant effects on landscape character are predicted for the ‘Rolling Uplands – Inverness (221) Landscape Character Type. This is the Landscape Character Type in which the development is proposed. **Major (significant) effects on landscape character are predicted across the site and between Strathdearn and the southern edge of the Inverness Landscape Character unit (221), extending approximately 8km to the east and west of the proposed turbines.** Moderate (significant) approximately 10km to the north and 15km to the west’.

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 Monadhliath Wild Land Area (MWLA) covers the southern part of the Rolling Uplands AU and the Cairngorms National Park abuts the southern boundary of this AU. **The close 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.**

The Dava Moor study states that:

*‘While the extensiveness and simplicity of landform and landcover of much of this AU reduces susceptibility to larger wind turbines, **there are constraints relating to the Monadhliath WLA which covers part of this landscape and the close proximity of the Cairngorms National Park and the Braeroy, Glenshirra and Creag Meagaidh WLA.** In addition, the north-western edge of these uplands is of increased sensitivity because of the presence of pronounced smaller scale craggy hills and dramatic glens, the proximity of the Upper Farmed Strath AU and the Loch Ness and Duntelchaig SLA and long views from vantage points above Loch Ness’.*

The Dava Moor study identifies this area as having High-Medium Sensitivity to turbines over 150m in height and notes that further development risks:

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

- Cumulative impact on the upland landscape from existing wind farm clusters.
- Adverse visual effects on views from the A9/ railway corridor.
- Negative effects on the wildness and natural character of the CNP and MWLA

Ampyr/ESB's EIA (Section 6.0.12) describes visibility in the following terms:

*'Visibility is variable across the study area with the landform providing screening from many locations. **Major (significant) effects on views are predicted at four representative viewpoints and moderate (significant) effects at a further five representative viewpoints.** All of these effects are within approximately 20 km of the site. These effects are predicted for recreational receptors including hill walkers and users of the estate tracks within the more immediate context.*

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. Ampyr/ESB, in their EIA (Section 6.0.16) have attempted to review cumulative impact based on different scenarios:

*'In an alternative future cumulative baseline, which includes consented, proposed and scoping stage wind farms, **the combined influence of wind farms across the Study Area will increase. This will be most notable when scoping stage wind farms are factored into this theoretical future cumulative baseline.** The Proposed Development (Highland Wind Farm) will contribute to this. **The relationship between the Proposed Development, and the scoping stage Clune Wind Farm (should this wind farm be constructed) creates the most notable cumulative interactions.** The Proposed Development will be seen in the context of a larger number of wind farms, contained within the upland plateau of the Monadhliath, including Clune Wind Farm. However, it is not judged to increase the level of effect as identified in the 'primary' assessment. (The 'primary' assessment is the assessment undertaken in the current baseline, which takes account of operational wind farms).*

Ampyr/ESB seem to have concluded that another wind farm in the proximity of an existing operational cluster of wind farms is acceptable and *'not judged to increase the level of effect'*. **This is a judgement call by Ampyr/ESB, and one which Strathdearn Community Council strongly disagrees with.**

As discussed earlier, the grid connection for Highland wind farm will be subject to a separate application under Section 37 of the Electricity Act 1989. Scottish & Southern Energy Networks (Transmission) issued a public consultation document¹¹ in November 2024 that highlighted 5 potential overhead line (OHL) routes (shown in the map below). The route labelled 'OHL Deviation' is their preferred route. The OHL routing covers a distance of 12km, with sections totalling 3km of underground cable. SSEN's consultation document (page 11) describes the **key environmental constraints** to these routes running through the Wild Land Area as follows:

'Irreplaceable ancient woodland, irreplaceable blanket bog and Annex 1 woodland habitats are present across all the proposed routes. In addition, the proposed

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

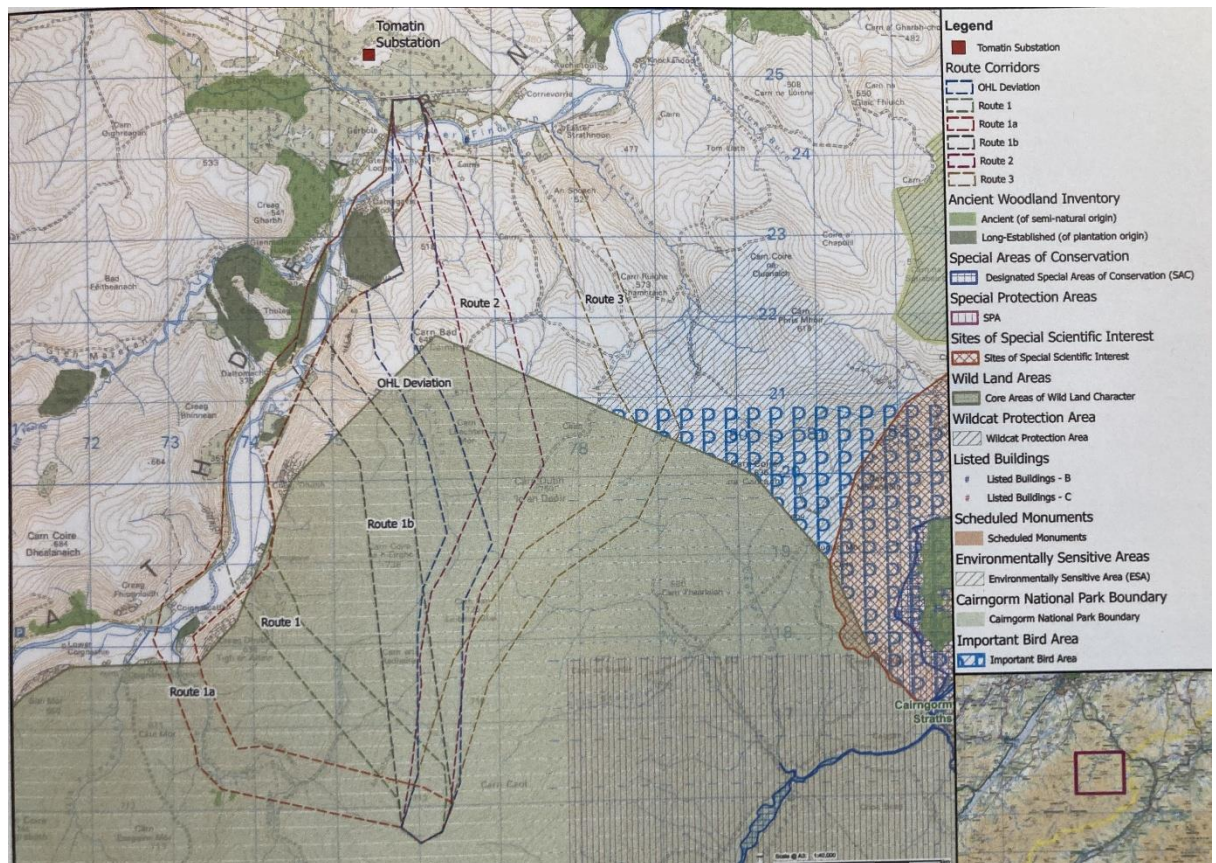
¹¹ <https://www.ssen-transmission.co.uk/globalassets/projects/highland-wind-farm-connection/highland-wind-farm-connection-consultation-booklet.pdf>

routes passes through the River Findhorn valley, which has the potential to support target ornithological species breeding sites’.

Highland Council’s Onshore Wind Energy Supplementary Guidance¹² is also clear stating that:

‘Additional overhead transmission lines should be avoided...’

Map showing potential overhead transmission line routes from Highland Wind Farm to Tomatin Sub-Station



It is astonishing and of huge concern to Strathdearn Community Council that a Section 37 application for Highland wind farm will come after any approval by Scottish Ministers, but also the fact that this publicly available transmission information is not included in Ampyr/ESB’s EIA.

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 Highland 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 Highland wind farm would be inappropriate and have significantly negative effects on scale, the built

¹² [Onshore Wind Energy Supplementary Guidance](#)

environment, landscape value, visual amenity, and the setting of the Cairngorms National Park and the Monadhliath Wild Land Area.

c) Roads, Transport and Access

66% 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:

*'Comments focus on disruption from construction, with heavy vehicles damaging narrow, single-track roads. **The creation of new access tracks will harm the landscape and environment, especially in the Monadhliath Wild Land Area, destroying moorland and fragile habitats. Increased traffic and congestion will strain the existing roads, making them hazardous for locals and visitors.***

*There are concerns about the need for new roads, as sufficient paths for walkers and cyclists already exist. The visual impact of these roads will spoil scenic beauty and damage recreational routes. **This, combined with traffic and infrastructure degradation, threatens the area's appeal for both residents and tourists, harming the local environment and economy.***

Ampyr/ESB's EIA (Section 11.4.32) states:

'A review of THC's online planning portal and Scottish Governments ECU portal was undertaken within Technical Appendix 11.1: Transport Assessment to identify any consented developments within the vicinity of the Proposed Development which would generate significant traffic within the same study area and should be included within the assessment.'

Section 11.4.33 goes on to say:

'No other onshore wind farm developments or other potentially significant traffic generating developments were identified that should be considered as part of any cumulative assessment of construction effects within this Chapter.'

Strathdearn Community Council is disappointed that Ampyr/ESB did not consider the impact of other wind farms, they know to be either proposed or at scoping stage, on roads, transport, and access. After all, Ampyr/ESB reflected on these other applications in their EIA (Section 6.0.16) when discussing overall cumulative impact of wind farms in attempting to show this impact in a more favourable way.

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 on visitor numbers 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 Highland wind farm site and the River Spey SAC via the River Dulnain. The River Findhorn Initiative's Management Plan¹³ 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 Highland wind farm would pose significant erosion and sedimentation risks.

In Ampyr/ESB's EIA (Technical Appendix 8.8) it states:

*'As the potential for LSE of the Proposed Development on the River Spey SAC have been screened in, then it is considered that **there is potential for other wind farm development and other major projects to act in-combination with the Proposed Development to result in effects on the integrity of the European site.***

The EIA (Section 8.11.58) does acknowledge that two other wind farms (Balnespick and Clune) fall within the River Spey SAC catchment area. These applications have now been submitted to the ECU:

'There are two other wind farm developments currently at the scoping stage that fall (either partially or entirely) within the River Spey SAC catchment: Clune Wind Farm (located 4.5km east/northeast of the Proposed Development) and Balnespick Wind Farm (located 15km northeast of the Proposed Development). As both schemes are at scoping stages there is no baseline information available for full consideration in cumulative terms.'

Again, the cumulative impact is not fully understood and, as such, makes it impossible for anyone (ECU or Strathdearn Community Council) to make an informed decision. The Community Council finds it very frustrating that the cumulative impacts are not at all transparent and **implores Ministers to at least discuss this key element with them before making any decisions on this application or any of the other pending applications.**

Highland Council's Onshore Wind Energy Guidance¹⁴ 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.**

NatureScot's Carbon and Peatland Map 2016¹⁵, confirms that the turbine area and access tracks lie on Class 1 peatland, identified as "nationally important carbon-rich soils, deep peat and priority peatland habitat".

¹³ [River Findhorn Initiative Management Plan 2021-2026](#)

¹⁴ [Onshore Wind Energy Supplementary Guidance](#)

¹⁵ [NatureScot Carbon and Peatland Map 2016](#)

In Ampyr/ESB's EIA (Technical Appendix 9.6), peat probing surveys found a maximum depth of 5.0 m recorded in the centre of the turbine area. According to Ampyr/ESB's figures, **there will be a permanent loss of 87.77 ha of blanket bog, a nationally and internationally recognised habitat, classed as irreplaceable** under the Biodiversity Net Gain (Irreplaceable Habitats) Regulations 2024¹⁶. Despite the presence of this sensitive and internationally significant habitat, infrastructure such as turbines, tracks, and hard standings are sited directly on them.

Strathdearn Community Council believes that the Highland 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 covering the turbine area and access tracks.** This classification represents deep peat, carbon-rich soils, and priority peatland habitats of likely high conservation value.
- Peat depths up to 5.0 meters recorded in the centre of the site, which **increases the environmental and carbon risk of disturbing such soils.**
- Despite guidance from NatureScot (2023)¹⁷ and Highland Council's Onshore Wind Energy Guidance, the Highland layout directly overlaps with areas of deep peat.
- Ampyr/ESB's proposal includes **the permanent loss of 87.77 hectares of blanket bog** - an irreplaceable habitat under the Biodiversity Net Gain (BNG) Regulations 2024.

e) Natural Heritage (including ornithology)

68% 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:

*'Significant concerns regarding **the impact of the proposed wind farm on local wildlife, particularly bird populations. There are fears that construction and the presence of turbines will disrupt breeding and mating grounds, particularly for rare species like Golden Eagles, Red Kites, and other raptors.** The risk of bird strikes is a major concern, with many species such as Golden Eagles and curlews potentially being killed by turbine blades. The area is seen as a vital habitat and migration corridor for various birds, and the proposed wind farm would disrupt these pathways. Additionally, the construction process and infrastructure, including roads and access tracks, would degrade habitats, affecting not just birds, but also other species like mountain hares and insects. **There is also worry that the wind farm will cause irreversible damage to delicate ecosystems, such as peatlands, and that the cumulative impact of multiple wind farms in the area will further harm wildlife populations. The overall sentiment is that the development would have a destructive impact on biodiversity, with little potential for positive outcomes.***

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

¹⁶ [Onshore Wind Energy Supplementary Guidance](#)

¹⁷ [Scotland's Soils - Soil Maps](#)

*'Concerns about the environmental impact in the area. **Key issues include disruption to local ecosystems, soil erosion, and degradation of peatlands, which are crucial for carbon storage.** The construction of infrastructure, such as roads and turbine bases, would reduce available wildlife habitats, increase sedimentation in rivers, and potentially pollute water systems, including the Findhorn River, which supports endangered Atlantic salmon. The release of chemicals from concrete, soil disturbance, and the potential for groundwater contamination are additional concerns. Some comments also emphasize the adverse effects on the carbon sink function of moorlands and the risk of increasing CO2 emissions during construction. The cumulative effects of multiple wind farm developments in the region could further exacerbate these problems, making it harder for the natural environment to recover. Additionally, **the industrialisation of the area is seen as incompatible with the preservation of its pristine, wild landscape, potentially leading to a loss of biodiversity, including the risk of collision for birds of prey like Golden Eagles and Red Kites**'.*

Ornithological Surveys

With the permission of Coignafearn estate, Strathdearn Community Council has included a section from their letter of objection to Highland wind farm that deals with ornithological surveys. The extract, which we fully endorse, reads as follows:

***'No ornithological survey work has taken place on Coignafearn by the developer** and the developer could not have comprehensively scanned the required 2km or 6km buffer zones from within their site boundary as claimed. This is not a 'small section' as the developer states. The area that the developer should have surveyed on Coignafearn is approximately 800ha of the 2km buffer zone and 4,500 ha of the 6km buffer zone. We have not calculated areas of other adjacent land holdings that the developer may have not had access too. **We are aware of regular Golden eagle roosts on the land we manage adjacent to the proposed windfarm site,** which is frequently used by birds hunting or traversing the area and we have knowledge that tracked birds have roosted there through our engagement with tracking experts and collaboration in research. We made this point at scoping and wish also to note that we are aware that merlin, peregrine and probably short-eared owl have bred adjacent to the site on land within the required buffer zones that has not been surveyed by the developer or included in their assessment.*

***This is a national scale project requiring an adequate EIA that has not adequately surveyed the immediate area around its proposed boundary** which has implications for the assessment and in particular the assessment relevant to NHZ10. **The developer does not have two seasons of complete baseline bird survey work to determine likely impacts** on the site and the surrounding area to inform a planning decision through an adequate Environmental Impact Assessment (EIA) and we wish to maintain an objection on this basis. The figures quoted by the developer should be considered with these factors in mind and we certainly do not believe that they are an overestimate as the developer claims. Information from satellite tags from a number of species including eagles in NHZ10 spanning a period much longer than the 72 hours undertaken by the developer is commercially available and it is very disappointing that they have not used this information as part of their site assessment to provide a more comprehensive picture as part of their baseline assessment of potential impact'.*

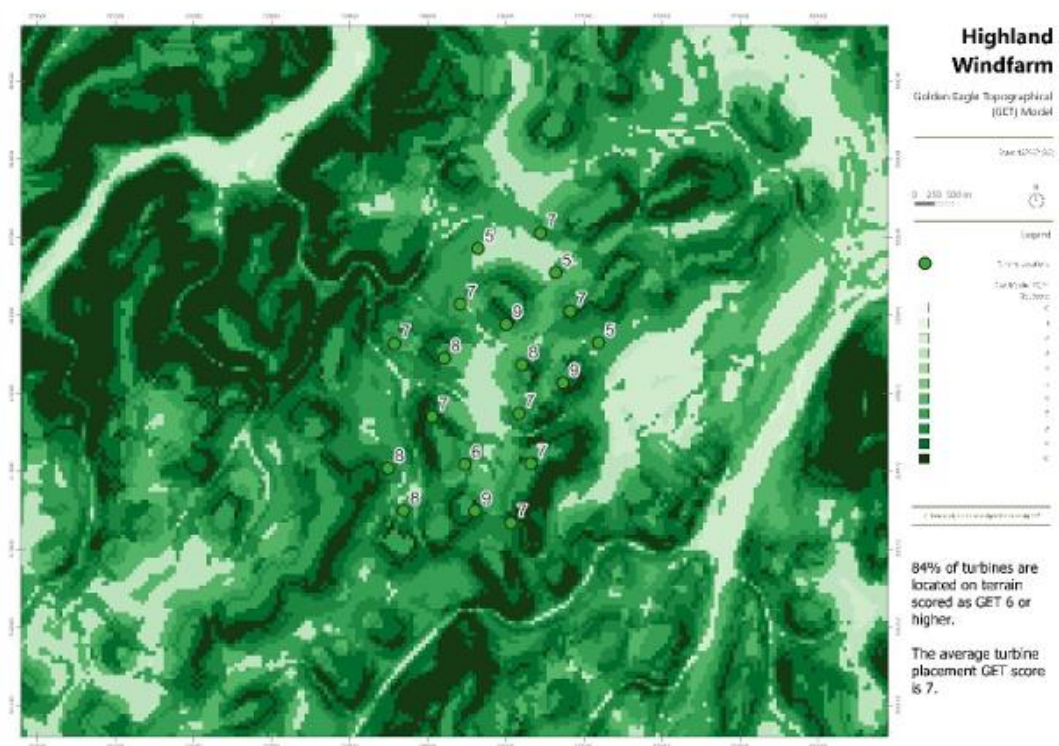
Golden Eagle GET Modelling

The NHZ10 population of Golden Eagles in Scotland is vital for breeding and non-breeding birds. Despite high prey availability, the area is deemed to be in an unfavourable condition due to low breeding pair occupancy and high sub-adult mortality, largely because of illegal persecution. However, the population is recovering locally, particularly in the Monadhliath region.

Golden Eagle Topographical (GET) modelling predicts eagle foraging areas, with higher scores indicating more frequent use. (The image below shows GET scores for Highland wind farm). Though Golden Eagles tend to avoid turbines, recorded collisions indicate that risks still exist, with multiple fatalities in NHZ10 since 2015. **In their EIA, Ampyr/ESB underestimate this threat, citing fewer incidents than were actually reported.**

The GET model should have been used to inform turbine placement to avoid high-risk areas for Eagles, but as Ampyr/ESB has proposed in their EIA, 84% of turbines are in areas scored 6 or higher. This means they are more likely to be used by Eagles, thus increasing collision risks.

Image 3. Highland wind farm turbine location GET scores



Strathdearn Community Council believes the GET model should have been used by Ampyr/ESB 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. **To mitigate this, turbines in high-scoring areas should be removed or relocated.**

Enhancing Biodiversity

In National Planning Framework 4, Policy 3 it 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’.

This requirement for development projects to demonstrate measurable biodiversity enhancements has not been met by Ampyr/ESB. The developer has failed to provide an adequate environmental impact assessment, particularly regarding key species such as Golden Plover, Dunlin, Merlin, and Golden Eagle.

There is insufficient evidence that the project will achieve the required biodiversity improvements or that the proposed mitigation measures are enough to counteract its ecological impact. One key concern is the projected loss of 27% of the breeding Dunlin population in NHZ10. These incredible birds serve as indicators of the health of peatlands, which are critical habitats for so many species. Maintaining healthy Dunlin breeding populations helps ensure the ecological integrity of these habitats and contributes to the overall diversity of the area. **A projected loss of 27% of the breeding Dunlin population gives huge cause for concern.**

f) Tourism and Recreation

71% 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:

*‘The proposed wind farm will significantly harm tourism and recreation in the area. **The scenic beauty and natural remoteness of Strathdearn, which attract visitors for activities such as hiking, cycling, and wildlife watching, would be spoiled by the industrialisation of the landscape.** Visitors come to enjoy the wildness and the chance to see rare species like eagles, but the presence of turbines, construction traffic, noise, and visual pollution will likely deter tourists. The development is seen as damaging to the area’s unique character, which is a major draw for tourism. **Many fear that the wind farm will ruin the vistas, degrade the natural environment, and reduce the appeal of the area for visitors seeking an unspoiled, scenic experience.** Some worry that the visual and noise impacts will diminish local pride and harm the economy by discouraging visitors’.*

In Ampyr/ESB’s Scoping Report, they proposed to scope socioeconomics, tourism, and recreation out of the EIA Report. However, they have included a report by Biggar Economics¹⁸ on socio-economics that includes a section on tourism and recreation, which concentrates on visitor numbers in Scotland, Highland, and the Spey valley.

Section 7.1.2 of this report states:

Tourism data was not available for the Local Area, however a range of statistics are available on visitor numbers and visitor spend for Highland and Scotland, including the Great Britain Day Visitor Survey, the Great Britain Tourism Survey and the International Passenger Survey’.

¹⁸ [Highland Wind Farm - Economic Impact Assessment of Report \(1\).pdf](#)

Due to Ampyr/ESB's lack of knowledge regarding visitor numbers in the Strathdearn area, and an assumption about what motivates people to visit Tomatin Distillery, they have concluded the following (Section 7.1.2, Socio-Economics Report):

*'Tourists interested in gin and whisky tasting experiences and tours are likely to explore attractions such as Kinrara Distillery, Scottish craft gin producer offering gin tasting experiences and shop, Tomatin Distillery and Visitor Centre Whisky a distillery and shop and the Cairngorm Brewery a craft brewery offering tasting experiences. **The motivation to visit these attractions is likely to be associated with tasting experiences therefore** is likely that the Proposed Development won't affect these features, and therefore **the impact has been assessed as negligible.***

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.

The Findhorn Watershed Initiative (a landscape-scale restoration initiative, focused on the health, resilience and integrity of ecosystems across the catchment) has described the Upper Findhorn catchment area as 'Raptor Valley' and a popular destination for wildlife tourism.

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, putting it on a par with The National Galleries of Scotland, The Burrell Collection, and Urquhart Castle.

In Ampyr/ESB's EIA they describe the creation of a range of direct and indirect economic benefits including:

- Local jobs during construction
- A range of contracts available for tender, with local companies encouraged to apply

- The potential for local jobs, once the wind farm is operational.

Strathdearn Community Council's experience thus far with other operational wind farms is not positive in terms of creating local (local to Strathdearn) jobs and using local contractors.

Strathdearn Community Council believes that Ampyr/ESB 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 largely ignored. As such, Ampyr/ESB 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

53% of people responding to our survey indicated the development could have a 'high' or 'severe' impact on noise pollution in the area; with 25% indicating it would have 'no' or 'little' effect. Their comments are summarised as follows:

Negative comments: *'Residents and visitors in the area are particularly worried about the constant hum of the turbines, which could disturb their peace, sleep, and overall health, especially during the day for shift workers. **There are concerns that noise levels will increase with additional turbines, especially given the landscape's ability to carry sound, particularly from the south and south-west winds. The cumulative effect of multiple wind farms is seen as exacerbating the issue,** with existing turbines already contributing noticeable noise, especially in winter when vegetation provides less sound insulation. Additionally, the noise from construction and traffic during the build phase is expected to worsen the situation'.*

Positive comments: *'Highlight that while wind farms do generate noise, it is generally not significant enough to cause major issues. **The site is considered distant from communities, and newer turbine models are quieter than older ones.** Regular noise monitoring would be required to ensure acceptable levels, although the cumulative effects of multiple large turbines remain less certain'.*

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.

44% of people responding to our survey indicated the development could have 'high' or 'severe' impact on shadow flicker in the area; with 35% indicating it would have 'no' or 'little' effect. Their comments are summarised as follows:

Negative comments: *'Concerns about its disruptive effects on both residents and wildlife. **There are fears that the strobing effect will disturb the natural tranquillity of the area,** with some residents experiencing mental health impacts, including those with existing conditions like seizures. **Outdoor enthusiasts worry about the impact on their experience, with the flicker being both distracting and unsettling. There is also concern about the cumulative effect of multiple turbines exacerbating these issues'.***

Positive comments highlighted *'**the distance from where people lived limiting the impact'.***

In Ampyr/ESB's Scoping Report, the developer stated that shadow flicker would be scoped out of their EIA. Strathdearn Community Council has checked the EIA and there appears to be no mention of this. Given the level of concern within our community, **Strathdearn Community Council 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

53% 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:

*'Concerns that the wind farm would introduce significant light pollution, particularly from turbine warning lights, disrupting the natural beauty of the night sky. The lights would impact residents, visitors, and wildlife. There is also **concern that the wind farm would degrade the dark sky environment, especially in the Strathdearn area and Cairngorms National Park, which are valued for their remoteness and dark skies.** The introduction of artificial lights would spoil the rural and natural atmosphere, detracting from the area's appeal for stargazing and the enjoyment of clear night skies.'*

Ampyr and ESB's application involves turbines of 230m 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 Study¹⁹ 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'***

In Ampyr/ESB's EIA (Section 6.0.19) it states:

'Significant night time effects are predicted from the eastern half of the Monadhliath WLA. Whilst there are no specific recorded dark sky 'attributes' for the WLA, the proposed aviation lighting is likely to extend effects associated with the Proposed Development into dusk, dawn and during the hours of darkness'

Section 6.0.20 goes on to say:

'Significant night time effects are predicted for the host Rolling Uplands LCT, however, there are no specific key characteristics related to dark skies for this LCT. The proposed aviation lighting is likely to extend effects associated with the Proposed Development into dusk, dawn and during hours of darkness on key landscape

¹⁹ Dava Moor, Nairn and Monadhliath Area Wind Energy Landscape Sensitivity Pilot Study, Final Report, Carol Anderson Landscape Associates, Dec 2021

characteristics, where these can still be appreciated, and perceptual qualities such as the sense of remoteness’.

And in Section 6.0.22 it says:

‘Significant visual effects (including cumulative) are predicted under the 200cd (and 2000cd) brightness scenario at Viewpoint 3: Geal-charn Mor. This is due to the darker outlook experienced in views to the north-west towards the site, and the viewing distance of 7.2 km. Due to the elevated nature of the view, and taking into account the viewing angle, the lights will also be seen at their full intensity (1800 to 2280cd (or 180 to 228cd when dimmed to 10% during clear weather conditions))’.

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 Mitigation Measures

If the Energy Consents Unit are minded recommending Ministers consent this application, our objections remain but we propose that 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 inclusion and analysis of satellite-tagging data for Golden Eagles to inform turbine locations.
3. Ampyr/ESB 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. Ampyr/ESB should deliver a Dark Sky Lighting Mitigation Plan, including infra-red only lighting or radar-triggered obstacle lights (ACAS).
5. Ampyr/ESB 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 very 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 would wish to negotiate and agree a comprehensive CB package with Ampyr/ESB 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.

6. Conclusions

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 Highland 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 objections to Highland wind farm (page 1 and 2 of this letter) and included potential mitigations (page 19) that we would request be mandated should Ministers move to approve this application.**