

**Letter of Representation to the Energy Consents Unit, Scottish Government, from
Strathdearn Community Council – Lynemore Windfarm Application ECU00005105**

Energy Consents Unit	Strathdearn Community Council
5 Atlantic Quay	The Strathdearn
150 Broomielaw	Tomatin
Glasgow	Inverness
G2 8LU	IV13 7YN
Email: Econsents_Admin@gov.scot representations@gov.scot	strathdearncc@gmail.com strathdearnccsecretary@gmail.com
Date: 09-06-2025	
Lynemore Wind Farm – ECU00005015	
Developer – Galileo Empower UK Ltd	
Site Description The site is located on Lynemore Estate in the northern fringes of the Monadhliath Mountains, 2 km west of the A9 at Moy. The site is mostly open moorland, managed primarily for field sports. Carn na h-Easgairn (616m) is located within the southern edge of the site boundary. Areas of open deciduous woodland and commercial plantation lie to the north of the site. The development will comprise 14 wind turbines with up to 200m tip heights and a total overall capacity of 148MW (including up to 50MW battery storage). Access from the A9 to and through the site consists of 15.9 km of tracks, with 3.7km floated on deep peat.	
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. Galileo'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. Galileo has failed to conduct a robust assessment of Lynemore wind farm's impact on Red Kite, White-tailed Eagle and Golden Eagle. This assessment should include a comprehensive cumulative impact analysis, considering all existing, consented, and proposed developments within Natural Heritage Zone 10 (NHZ10) that could affect these protected species. 6. Galileo has failed to comply with Scottish Government policies on Biodiversity Net Gain. 7. Galileo 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.	

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| 8. Significant negative impacts on those residential properties located within 2 km of the nearest turbines. |
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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 Lynemore receiving an overall score of 83 against a range of key criteria. This gave Lynemore an overall ‘Medium’ sensitivity rating, where ‘Medium’ is described as: ‘Some elements of the key criteria are vulnerable to change from the development. There is some ability to accommodate the development in some situations without widespread or severe effects’.**

Landscape and Visual Effects scored a ‘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’.

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); **Lynemore wind farm had a score of 3.61.** Balnespick scored highest with a score of 4.64, with Clune by far the lowest at 2.67. **The results for Lynemore 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’.*

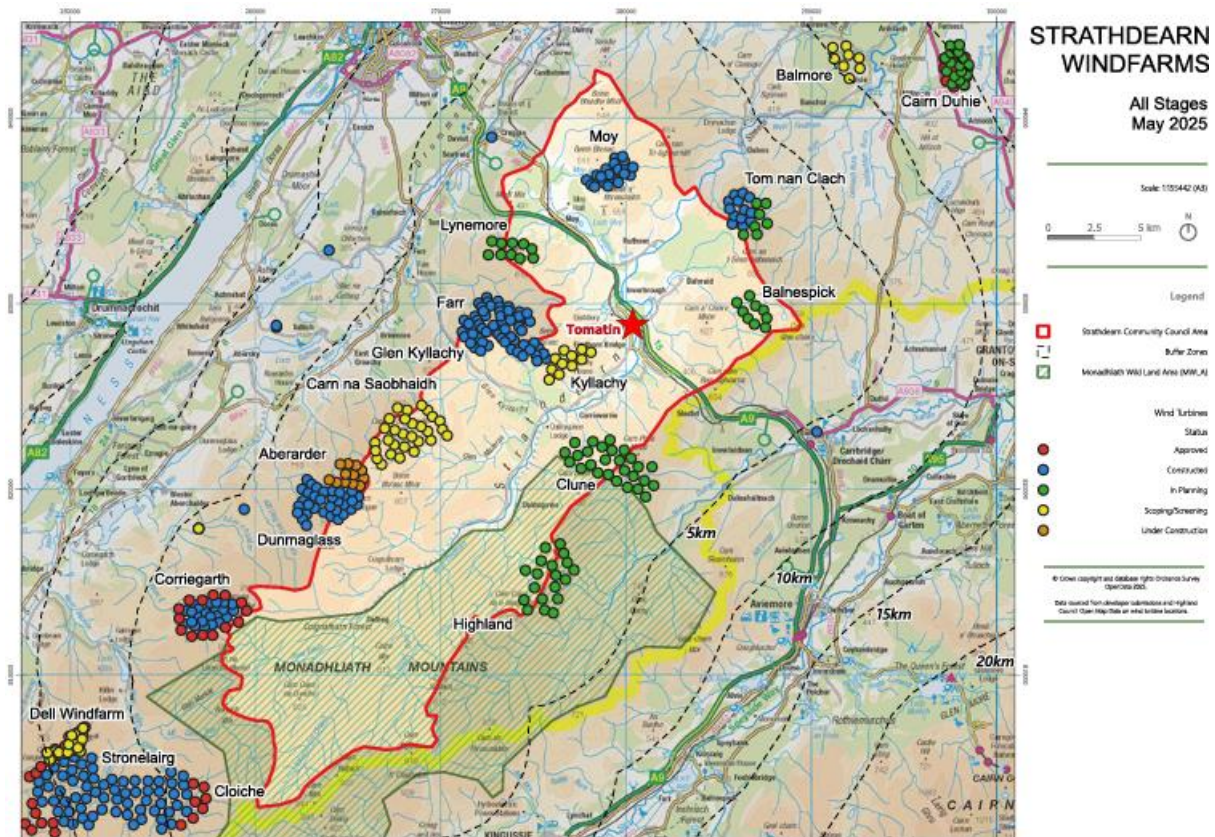
There are twelve existing wind farms in the Strathdearn Community Council area (with a surrounding 5km zone) with an installed capacity of 966MW, theoretically capable of supplying enough energy for 35% of all homes in Scotland. **The area is currently facing six further major wind farm development proposals** 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.**

The six further applications are: Balnespick - ECU00004904; Clune - ECU00005038; Highland - ECU00005082; Kyllachy - ECU00005153; Lynemore – ECU00005105; and Carn na Saobhaidh -

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

ECU00005191. A map showing these developments has been prepared by Strathdearn Community Council and is shown below.

Map showing wind farm developments in the Strathdearn area



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 (EIAs) 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 EIAs 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 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 Report⁶:

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.

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

⁶ [Annex B: Information to Be Included in an EIA Report - Planning Circular 1/2017: Environmental Impact Assessment regulations - gov.scot](#)

impacts of windfarm siting, and the overdevelopment of this small rural/wild area into an industrialised landscape.

A detailed spreadsheet⁷ 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

71% 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:

‘Many argue that the **turbines’ proximity to the A9 would spoil the natural beauty of the Highlands, with their size and visibility detracting from scenic views around Loch Moy and Tomatin. The turbines are described as intrusive and would harm the region’s appeal as a tourist destination known for its unspoiled landscape.**

*Critics also **worry about the environmental damage**, particularly from siting turbines on Class 1 peatland, which could disrupt carbon capture and wildlife habitats. The need for aviation lights would affect the area’s dark skies, which are valued by residents and visitors. **Overall, many feel that Strathdearn is already overdeveloped with wind farms, and this project would further harm both the local landscape and tourism industry’.***

⁷ [Strathdearn Wind Farms 2025 - Detailed Spreadsheet Summarising All Six Major Wind Farm Applications](#)

The Dava Moor and Monadhliath Landscape Sensitivity Appraisal (LSA), commissioned by NatureScot and Highland Council (Dec 2021)⁸, provides useful context when assessing the landscape sensitivities in the area. The Lynemore wind farm lies within the Rolling Uplands (The Monadhliath) Assessment Unit and immediately adjacent to the boundary of the Strath in Rolling Uplands AU. **The Dava Moor study identifies the Rolling Uplands as having High-Medium Sensitivity to turbines over 150m in height and the Strath in Rolling Uplands as having High Sensitivity to turbines over 50m.**

The proximity of Lynemore wind farm to the Strath in Rolling Uplands AU is of great concern to Strathdearn Community Council. The Dava Moor study states that: *'The small to medium scale of this narrow strath, which is additionally influenced by the presence of settlement, and the strong sense of seclusion and naturalness that can be experienced in the upper reaches of the Findhorn, **increase susceptibility to larger wind turbines.** The Monadhliath WLA lies close to the upper strath and policy features around Moy are also of value. **There would be a High sensitivity to turbines >50m high.***

The Dava Moor study describes The Rolling Uplands (The Monadhliath) AU as follows: *'Turbines over 150m could fit with the scale of this landscape but **could contrast with smaller turbines within operational wind farms if sited close-by and seen in key views from surrounding vantage points.** Avoidance of higher and more prominent ridges could minimise potential for height differentials to be appreciated. **Lighting of turbines would extend and intensify effects on the dark skies which are a key quality of this area** with significant effects potentially occurring on the experience associated with the WLAs and on views from the CNP'.*

The study goes on to say:

*'**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'.*

The study highlights the importance of maintaining open space between clusters of wind farms to reduce their impact on surrounding sensitive landscapes, such as the Cairngorms National Park (CNP) and the Monadhliath Wild Land Area. The larger Lynemore turbines are likely to reduce open space and make wind farms more visually dominant in key viewpoints and add to the sense of 'encirclement' around Tomatin. Additionally, these larger turbines may stand out significantly if placed near smaller existing ones, creating a stark contrast in scale.

The original scoping for Lynemore wind farm had an array of 10 wind turbines. However, Galileo's EIA (Sections 2.7.6 and 2.7.8) describes 14 turbines and the negative increased impact this will have on the closest residences. This is described as follows:

*'The layout comprised 14 turbines as it **included consideration of an additional 4 turbines to the east in the new area available.***

*'The addition of the four turbines to the southeast increased the horizontal field of view of the development, particularly from the closest residences at Lynemore Cottage and game-keeper's Cottage. However, the turbines were better set back with a good degree of intervening screening from residences. **The greatest visibility of these***

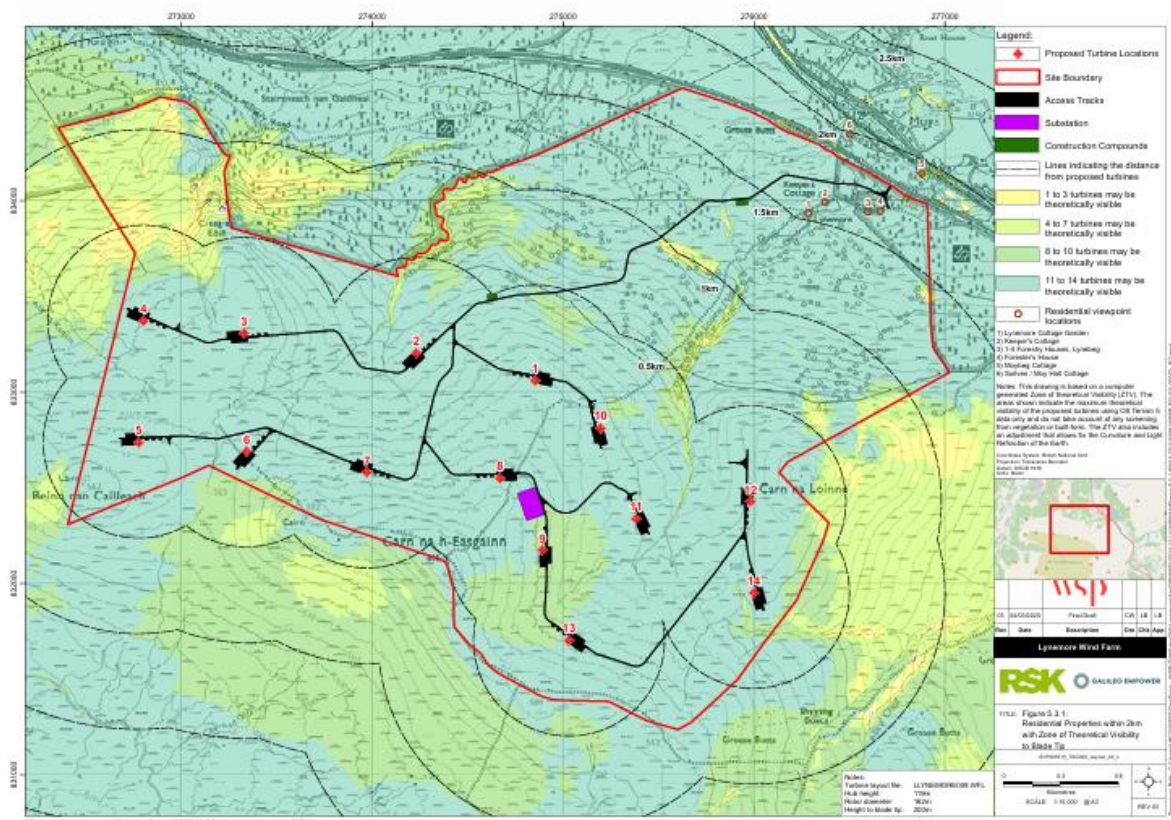
⁸https://www.highland.gov.uk/download/downloads/id/25661/dava_moor_nairn_and_monadhliath_wind_energy_landscape_sensitivity_study_-_final_report_december_2021.pdf

four turbines would be from the southeast (on the A9 north of Tomatin and Sustrans NCR7 at Tomatin) and the north and northeast on the A9’.

Highland Council’s Onshore Wind Energy Supplementary Guidance (OWESG)⁹ states that Highland Council considers community separation for consideration of visual impact to be:

‘An area not exceeding 2km around cities, towns and villageswith an identified settlement envelope....The extent of the area will be identified by the planning authority...’

The map below (taken from Galileo’s EIA, Figure 5.3.1) shows the proximity of turbines to six residential dwellings at the small settlement of Lynebeg - all dwellings within 2km of at least four of the turbines.



Galileo’s EIA (Section 5.1.4) states:

‘There would be significant visual effects on the views experienced by people within a localised area including road and rail users (on parts of the A9, B9154, B861 and Inverness to Perth rail line) and residents viewing from elevated areas near Balnafoich in Strathnairn and Leachkin in Inverness. The views from some recreational routes would be significantly affected, including part of General Wade’s Road heritage path and Sustrans National Cycle Route 7 near Tomatin and some Core Paths. There would be no significant effects on views from Munros or Corbetts. There would be cumulative and significant effects on the views from three other walked hill summits (Carn a’ Choire Mhoir, Carn nan Tri-tighearnan and Carn na Lair)’.

⁹ Onshore Wind Energy Supplementary Guidance

Galileo's EIA (Section 5.8.20) goes on to say:

*'The Proposed Development would **contribute to a significant, cumulative visual effect at six of the assessment viewpoints** (Viewpoints 4, 7, 8, 10, 11 and 16), three of which (Viewpoints 8, 10 and 11) are **also significantly affected by other existing and consented wind farms**. Viewpoint 13 would also be **significantly affected by the Proposed Development only in combination with two other existing wind farms – Farr and Glen Kyllachy**.'*

The EIA (Section 5.15.10) further states:

*'The **views from Balnafoich on the western side of Strathnairn would be significantly affected** as illustrated by Viewpoint 4'.*

These cumulative visual effects described by Galileo are significant but, critically, do not include the other five wind farms of concern to Strathdearn Community Council (Clune, Balnespick, Kyllachy, Highland, and Carn na Saobhaidh). Galileo's EIA (Section 5.7.1) states that:

*'At the time of writing, there are five scoping stage wind farms within 15 km which have been included in the viewpoint wirelines but **not in the cumulative assessment due to their uncertainty and the potential for multiple layout changes during pre-application**.'*

Strathdearn Community Council continues to be very concerned and frustrated with developers submitting applications in isolation from each other and ignoring the significant cumulative effects this will obviously have on the Strathdearn area.

Strathdearn Community Council considers the additional four turbines to be unacceptable given the negative impact on visibility they will have for the closest residences.

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

c) Roads, Transport and Access

63% 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 residents express **concerns about the environmental impact, including damage to fragile upland habitats and peatlands**. There is also a strong sentiment that **the new tracks will be unsightly, scar the landscape, and degrade the character of the hills**. The existing infrastructure, particularly single-track roads, is considered inadequate to handle the construction and operational traffic, leading to further deterioration of the terrain. The additional traffic from wind farm construction is seen as a nuisance, particularly for locals and visitors, with **worries about congestion, road damage, and the impact on wildlife**. Many argue that existing walking and cycling tracks are sufficient, and the new roads and tracks will not offer enough benefits to justify the environmental harm'.*

In Highland Council's Scoping Response to the ECU dated 5 August 2024 (Section 3.105) they state:

'This proposal could have a significant negative impact on public access during construction and operation'.

There are **multiple and significant negative impacts on public access** because of this development. **Section 'b' of this letter deals with these in more detail under 'Visual Impacts'.**

In addition to the above (Section 3.80), Highland Council stated:

'The implications of other committed developments in the area should be identified and determined. This should comprise other committed developments that have the potential to influence traffic levels on the proposed construction access route(s), including other energy generation and distribution schemes proposed in the area.....It is important to recognise that the public roads serving this site are heavily influenced by tourist traffic during the busier summer season. Any submission should recognise this and clearly set out how this has been recognised in the assessment process'.

Strathdearn Community Council is disappointed that Galileo did not consider the impact of other wind farms, they know to be either proposed or at scoping stage, on roads, transport, and access.

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 considered on its own 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 on visitor numbers in section 'f' of this letter, 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'.***

The site is located within two primary catchments - the River Findhorn catchment to the east and the River Nairn catchment to the north-west. The majority is within the wider River Findhorn catchment and its sub-catchments.

The River Findhorn Initiative's Management Plan¹⁰ shows cumulative hydrological changes to rivers impacting highly vulnerable Atlantic salmon, freshwater pearl

¹⁰ [River Findhorn Initiative Management Plan 2021-2026](#)

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 Lynemore wind farm would pose significant erosion and sedimentation risks.

Highland Council's Onshore Wind Energy Guidance¹¹ 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.**

In Highland Council's Scoping Response to the ECU, dated 5 August 2024 (Section 3.87) they stated:

*'In order to protect peatland and limit carbon emissions from carbon rich soils a Peatland Management Plan (PMP) should be provided. **The PMP should demonstrate that proposals:***

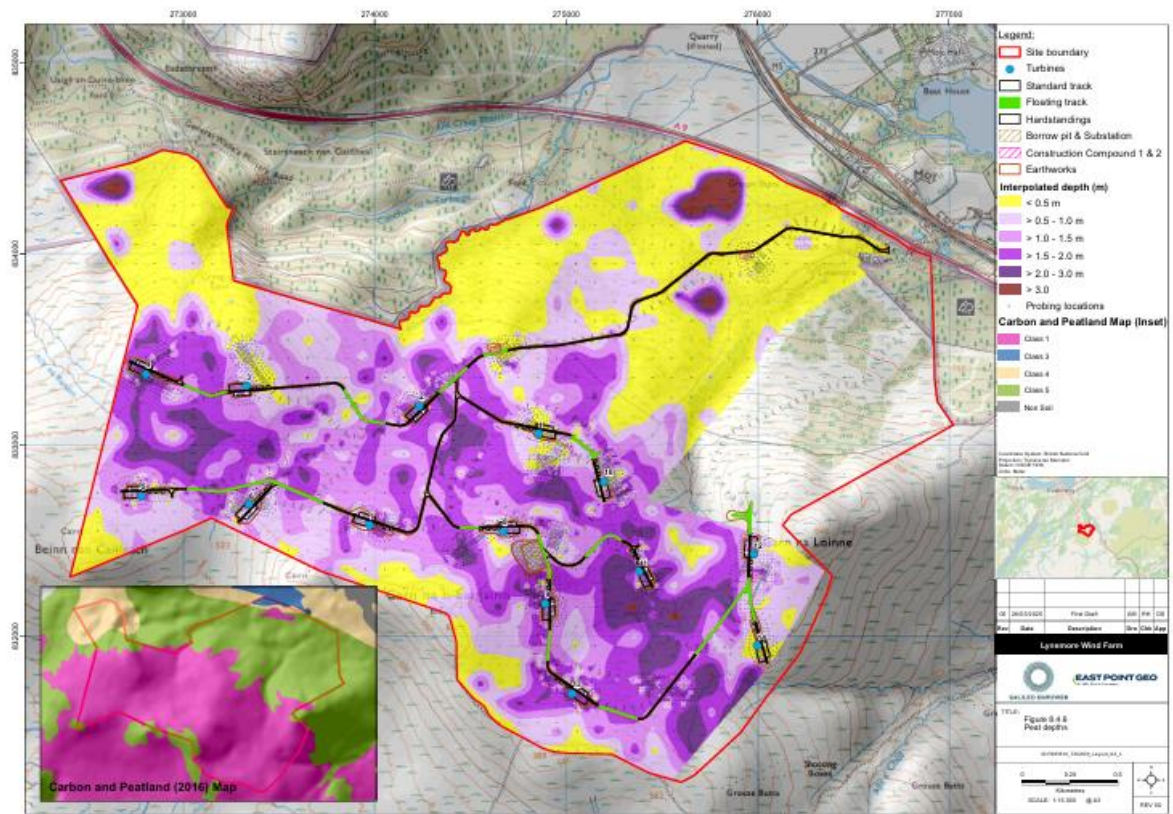
- ***Minimise the total area and volume of peat disturbance.***
- ***Clearly demonstrate how the infrastructure layout design has targeted areas where carbon rich soils are absent or the shallowest peat reasonably practicable. Avoid peat > 1m depth'.***

NatureScot's Carbon and Peatland Map 2016¹², 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"**.

The map below (taken from Galileo's EIA, Appendix 8.4) shows the locations of each turbine, **with all 14 turbines located in Class 1 Peat.**

¹¹ [Onshore Wind Energy Supplementary Guidance](#)

¹² [NatureScot Carbon and Peatland Map 2016](#)



In Galileo's EIA (Appendix 8.3: Outline Peat Management Plan) it states:

'Peat is present across 77% of the survey area and there are areas where peat is several metres deep. The infrastructure has avoided the deepest areas of peat where possible with peat >1.0m depth present across 42.36% of the Proposed Development infrastructure'

Impacts to blanket bog habitats in Galileo's EIA are assessed as **moderate adverse and significant**. Section 6.7.43 of the EIA states:

'Blanket bog is extensive within the Site, totalling 599ha (either alone or as the dominant habitat within a mosaic). The scheme will result in losses of 47.591 ha, comprised of 26.631ha direct loss and 20.96ha indirect loss. Losses are equivalent to approximately 8% of blanket bog habitats present within the Site.'

Based on guidance from NatureScot (2023)¹³, M17 and M19 blanket bog communities are classed as priority peatland and are communities where **impacts from development have the potential to raise issues of national interest**.

Strathdearn Community Council believes that the Lynemore wind farm proposal raises significant concerns regarding compliance with national peatland protection policy. Despite guidance from NatureScot (2023) and Highland Council's Onshore Wind Energy Guidance, the Lynemore layout directly overlaps with areas of deep peat. 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.

¹³ [Scotland's Soils - Soil Maps](#)

- Peat depths up to 3.0 meters in different parts of the site, which **increases the environmental and carbon risk of disturbing such soils.**
- Galileo's proposal includes **the loss of 47.591 hectares of blanket bog** - an irreplaceable habitat under the Biodiversity Net Gain (BNG) Regulations 2024.

e) Natural Heritage (including ornithology)

60% 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:

*'The construction and operation of **turbines pose risks, including bird strikes for species like Golden Eagles, Red Kites, Buzzards, and Golden Plover. Disruption to breeding grounds, foraging habitats, and migration paths is also a major issue.** The infrastructure required, such as roads, threatens ecosystems and species like mountain hares and small mammals. **The cumulative effect of multiple wind farms in the area could worsen these impacts, reducing biodiversity.** Noise pollution from turbines is also expected to harm bats and other sensitive species. **There are concerns over insufficient studies on the environmental effects and long-term harm to wildlife and habitats.***

In addition, 58% of people responding to our survey indicated the development would have a 'high' or 'severe' impact on the natural environment.

*'**Strong concerns about the environmental impact** of the proposed wind farm, particularly on the natural landscape and wildlife. Critics **highlight the destruction of delicate peatlands, natural drainage systems, and the surrounding habitats, which will lead to soil erosion, water contamination, and habitat loss.** The construction of roads and turbine bases is seen as an industrialisation of the area, with potential long-term damage to soil, water quality, and local ecosystems. There are **also concerns about increased noise pollution**, particularly from turbine operations and construction traffic, and the negative effects on bird species like Red Kites, Buzzards, and Golden Eagles. **Overall, the sentiment is that the negative impacts, including peatland degradation, carbon release, and disruption to wildlife, far outweigh any potential benefits.***

Ornithological Surveys

Galileo state that a suite of baseline ornithology surveys was undertaken over two years to inform the impact assessment. Surveys were undertaken during the period September 2022 to August 2024 and comprised wader and raptor species, namely Golden Plover, Dunlin, Curlew, Red Kite, White-tailed Eagle, Golden Eagle, and Short-eared Owl.

Red Kite

The latest published estimates suggest there are no breeding pairs of Red Kite in NHZ10. Despite a slow population expansion in the north of Scotland, **concerns remain about the impact of development and ongoing persecution.**

In Galileo's EIA (Sections 7.11.22, 7.11.23 & 7.11.25) it states:

'The search area has not been extended further to include all wind farm projects in the north of Scotland as this is not considered proportionate given the large area this covers, and because NHZ 21 is believed to hold the large majority of the north of Scotland population.'

'The cumulative collision estimate for red kites has been calculated as 2.760 individuals per annum'.

'Collision impacts as a result of the Proposed Development cumulatively with other relevant projects are predicted to have a Small adverse impact on red kite during the operational phase and a Non-significant effect is concluded'.

Galileo's assessment in their EIA predicts 2.76 annual fatalities in NHZ10 **but does not account for the five other wind farm planning applications** either already lodged with the ECU (Balnespick, Clune, and Highland) or soon to be lodged (Kyllachy, and Carn na Saobhaidh). **The combined effect of these developments could significantly hinder population growth of Red Kite, particularly in NHZ10.** The developer's EIA concentrated almost entirely on NHZ21 (where most of the north of Scotland Red Kite population is concentrated) but failed to consider the full cumulative effects across all affected areas. **This oversight in assessing the broader impacts raises concerns about Galileo's approach to Red Kite conservation in the north of Scotland.**

White-tailed Eagle

White-tailed Eagles are afforded the highest degree of legal protection under Schedules 1, A1 and 1A of the Wildlife and Countryside Act 1981 as well as Annex 1 of the EU Birds Directive.

Galileo, in their EIA (Section 7.11.11) predict an average collision risk of 0.385 White-tailed Eagles per year (0.166 in 2023 and 0.603 in 2024) **which is the highest predicted annual collision risk for this species out of all the wind farms considered in the cumulative impact assessment undertaken for NHZ 10.** In Section 7.11.29 they go on to state:

'Collision impacts as a result of the Proposed Development cumulatively with other relevant projects are predicted to have a Small adverse impact on white-tailed eagle during the operational phase and a Non-significant effect is concluded'.

Once again, the developer's cumulative assessment for NHZ10 of 0.906 White-tailed Eagle fatalities per annum does not include the other five applications either submitted to the ECU (Balnespick, Clune, and Highland) or soon to be submitted (Kyllachy, and Carn na Saobhaidh). **Clune on its own predicts a notable collision risk of 1 White-tailed Eagle per annum. Galileo describes this as not significant; something that Strathdearn Community Council strongly disagrees with.** There are only a few White-tailed Eagles nesting in NHZ10 and **any additional losses could jeopardise the continued recovery of the local population.** It should also be noted that White-tailed Eagle is particularly susceptible to collision partly due to their flight pattern.

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.**

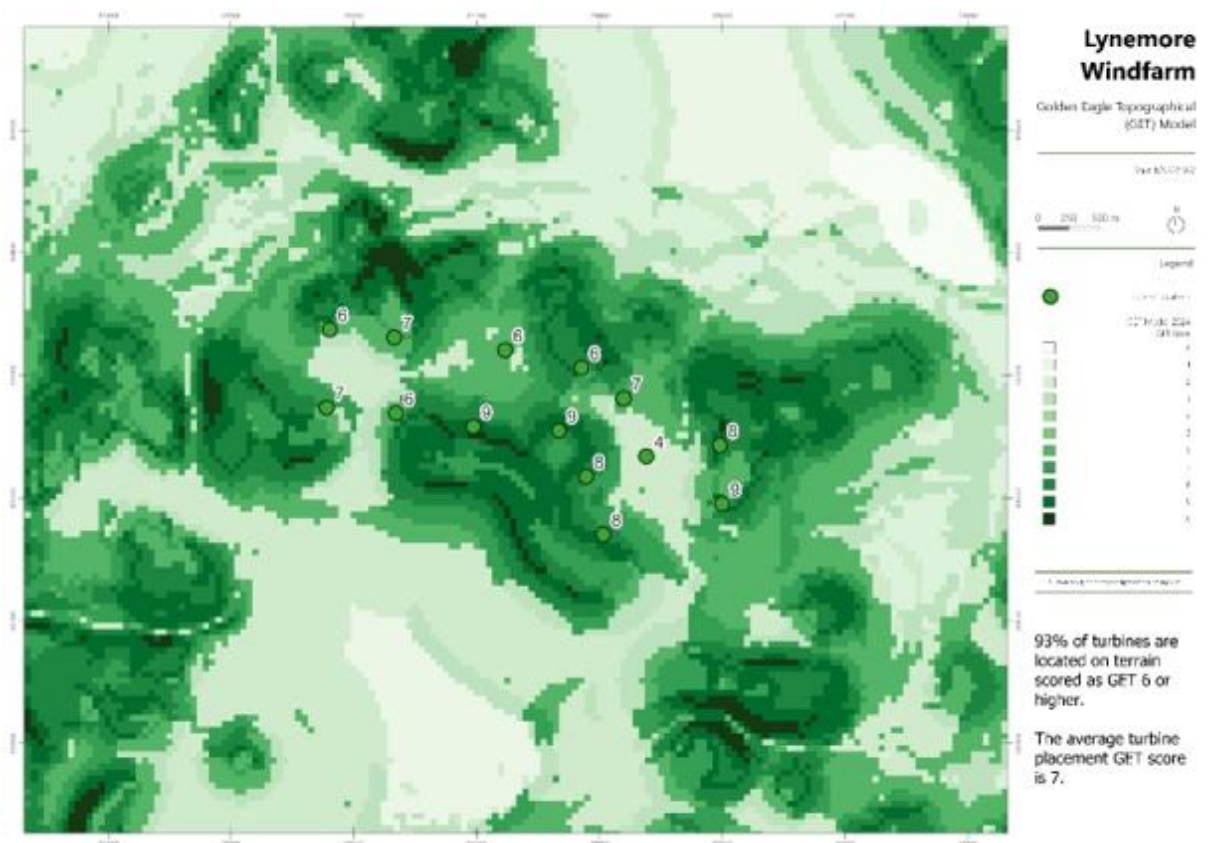
In their EIA (Section 7.8.57) Galileo stated:

'Disturbance and displacement impacts as a result of the Proposed Development are predicted to have a Negligible adverse impact on the baseline golden eagle population'

during the construction and operational phases and a Non-significant effect is concluded’.

Golden Eagle Topographical (GET) modelling predicts Eagle foraging areas, with higher scores indicating more frequent use. At the time of writing, Strathdearn Community Council has been made aware of seven Golden Eagle and nine White-tailed Eagle collisions in Scotland since 2015. **Of these, two Golden Eagles and five White-tailed Eagles have been in NHZ10.** (Image 1 below shows GET scores for Lynemore wind farm).

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



Strathdearn Community Council believes the GET model should have been used by Galileo 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.** Strathdearn Community Council is very concerned that the Strathdearn area already hosts several windfarms which are impacting on Eagle activity and survival (**we have covered this in detail in each of our other letters of representation for Balnespick, Clune and Highland wind farms**). Infilling between existing schemes, as is the case with Lynemore, removes foraging habitat and further restricts Eagle movement across the landscape. **To mitigate this, turbines in high-scoring areas (scoring 8-10) 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 Lynemore. Galileo has failed to provide an adequate environmental impact assessment, particularly regarding key species such as Red Kite, White-tailed Eagle, and Golden Eagle. In addition, **the developer has not fully demonstrated that mitigation efforts will compensate for the loss of blanket bog.** The proposed compensation measures fall well short of the recommended 1:10 ratio (as per Nature Scot’s recommendations i.e. 1 ha loss of peatland should result in measures to restore 10 ha of peatland). This would require 475.9 ha - far exceeding what is outlined in Galileo’s Habitat Enhancement Management Plan (EIA, Technical Appendix 6.5).

Strathdearn Community Council is concerned that there is insufficient evidence the project will achieve the required biodiversity improvements or that the proposed mitigation measures are enough to counteract its ecological impact.

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 negative comments highlight concerns about the wind farm’s potential impact on tourism, **particularly the visual effect on the landscape. Many respondents feel that the turbines, especially along the A9, will spoil scenic views that are crucial for attracting tourists to the region.** The turbines’ presence at the entrance to Strathdearn and the surrounding area is seen as particularly problematic, as it could detract from the natural beauty that tourists visit for. **There are worries that the visual and noise pollution from the wind farms will deter outdoor activities like hiking, mountain biking, and cycling, which are popular in the area.** Additionally, some fear that the area could become less attractive to visitors due to the industrialisation of the landscape, with a few comments suggesting it would harm the local economy by driving tourists away’.*

In Galileo’s EIA (Sections 12.5.12, 12.5.16, & 12.6.6) it states:

‘While consideration will be given to individual tourism assets, it is considered that there is no potential for significant effect on the overall tourism economy’.

‘Overall, as there is minimal evidence that any adverse impacts are imposed upon tourism by the presence of wind farms, the effects of the Proposed Development on tourism is scoped out of this assessment’.

‘Given that Tourism and Recreational impacts are not a material consideration, tourism and recreational assessments will be conducted using a more holistic approach to that of a conventional EIA assessment. This will involve considering tourism within the context of a tourism economy, as opposed to individual receptors’.

Galileo has based these conclusions on a few studies, the most recent by Biggar Economics in 2021. However, none of these studies focussed on a relatively small area

like Strathdearn, surrounded by twelve existing wind farms and with a further six proposed.

In their EIA (Figure 5.11), Galileo lists key visitor attractions within 15km of Lynemore wind farm, including Culloden Battlefield, The Caledonian Canal, and Inverness Golf Club; but unbelievably the list does not include Tomatin Distillery. This significant oversight on behalf of the developer is of real concern to Strathdearn Community Council. The developer, quite rightly, lists the proximity of the National Cycle Route, Core Paths and other significant recreational routes but downplays their significance in terms of visual impact. This is strongly refuted by Strathdearn Community Council, whose views are detailed in section 'a' of this letter under 'Visual Impacts'.

The lack of recognition of Tomatin (and Strathdearn) as a visitor attraction 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:

Visibility and proximity to the A9 (T), Highland mainline railway, and National Cycle Route will be immense. Annual average daily flow in 2023 at count point 20726 at Allt na Slanaich, beside Lynemore, was 10,453 vehicles. The Highland Mainline has an hourly service in each direction between Inverness and Perth.

Visual impact compromising the 'Birch Walk' which takes many walkers and cyclists along the east side of Loch Moy. Since restoration in 2018 by the Strathdearn community in partnership with Forestry & Land Scotland, this all ability walk has become recognised as one of the top 10 walks in the Inverness area. **As proposed, the turbines will dominate the backdrop to the classic view across Loch Moy** with its Scheduled Monument 11446: Isle of Moy, fortified island and laird's house and Eilean nan Clach crannog.

Carn na h-Easgairn (616m), a hill within the Lynemore wind farm redline area, is the most accessible Graham to the city of Inverness and is a popular ascent. A Graham is a hill in Scotland that stands between 2,000 and 2,500 feet (610–762 meters), with a drop of at least 150 meters (492 feet) on all sides. This prominence rule ensures that each Graham is an independent summit, not just a subsidiary top of a larger hill. There are 231 listed Grahams, and they offer walkers, runners, cyclists and skiers incredible variety and adventure.

Lynemore turbines would directly overlook the historic Stairsneach nan Gaidheal which lies between Creag an Eoin and Meall Mor, is the site of the Rout of Moy battle, and carries the historic military road to Inverness and now the A9(T). Stairsneach nan Gaidheal means the Threshold of the Gaels and is the symbolic and physical 'threshold' between the Highlands and the more settled ground around the Moray Firth. Just to the west lies Beinn nan Cailleach, meaning Hill of the Old Women, where a set of large erratic glacial boulders (the Old Women) sit on the skyline as watchers over the Stairsneach nan Gaidheal. It seems **likely that Lynemore would irreversibly compromise the setting of both these historic locations.**

It should be noted that the Moy Country Fair is held in the grounds of Moy Hall for two days every August. **The Fair attracts approximately 15,000 visitors, in part due to the**

setting beside Loch Moy and the backdrop of the hills to the west where Lynemore wind farm would be located.

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 Galileo’s EIA for Lynemore wind farm, they describe the creation of a range of direct and indirect economic benefits including employing local businesses and contractors wherever feasible.

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 Galileo 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, Galileo 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

52% 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:

Negative comments: ***'Residents express frustration over the constant noise from turbines, especially during specific wind directions, which can be heard for miles. The cumulative noise from multiple wind farms in the area is expected to be disruptive, especially in quiet, rural areas like Moy and Tomatin. Noise from the turbines, as well as from construction and transport activities, is seen as detrimental to residents' peace, sleep, and overall well-being, with some worrying about health impacts. There are also concerns about the impact on wildlife and the failure of current noise mapping to accurately reflect the actual noise experience, particularly when combined with other ongoing infrastructure projects like the A9 dualling'***

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. In addition, Highland Council state in their Scoping Response to the ECU dated 5 August 2024 (Section 3.64):

'The noise assessment must take into account the potential cumulative effect from any other existing or consented or, in some cases, proposed wind turbine developments. Where applications run concurrently, developers and consultants are advised to consider adopting a joint approach with regard to noise assessments'

Noise and vibration will have significant impacts on those properties closest to the development, as stated by Galileo in their EIA (Sections 11.7.3, 11.7.4 and 11.7.6):

'For the activities closest to northern receptors i.e., Keeper Cottage and Lynebeg properties, works including forestry felling, earthworks and Site access track construction works are predicted to result in noise levels of up to 75 to 81 dB. However, it should be noted that the period when this activity is closest to the respective receptor would represent a very short-term duration (likely to be less than 4 weeks), and noise levels will diminish as track work progresses, moving the activity further from the respective property'

'In terms of vibration, the new access track works will likely involve vibratory ground compaction at a distance as close as 35-45 m from receptor properties to the north of Site'

'In addition to on-site activities, construction traffic passing to and from the Site will also represent a potential source of noise to surrounding properties'

43% of people responding to our survey indicated the development could have 'high' or 'severe' impact on shadow flicker in the area; with 31% indicating it would have 'no' or 'little' effect. Their comments are summarised as follows:

Negative comments: ***'Concerns about the disruptive effects of turbine blade flicker on both residents and wildlife. The flicker is seen as particularly problematic for residents in areas such as Ruthven, Moy, and Melfort Estate, with potential adverse impacts on sleep, mental health, and overall wellbeing. The flicker is also described as a distracting and irritating visual stimulus, particularly for those spending time outdoors, and may have a negative effect on wildlife, disorienting animals and affecting'***

*flight paths. Additionally, there are **worries about potential driver distractions on the A9** and the lack of tree cover in certain areas, which could exacerbate the impact of the flicker. The cumulative effect of multiple turbines is seen as a significant concern’.*

Positive comments highlighted ‘**that turbine blade flicker effects are likely to be minimal due to the distance between housing and turbines.** While certain weather conditions, such as low winter sun, could create temporary flicker effects, these are expected to be distant and not significant. Additionally, **travellers on the A9 may be more exposed to flicker in specific locations, but overall, it is considered a limited issue’.**

Again, properties closest to the turbines are most at risk from shadow flicker according to the developer’s EIA (Sections 13.5.1 and 13.5.14):

‘Following a baseline review of all regularly occupied buildings as obtained from OS AddressBase Plus data, there are two properties (residential) within 11 rotor diameters of the nearest turbines. Therefore, a shadow flicker assessment has been prepared.

*‘In the ‘worst-case’ scenario model, Receptors 1 and 2 were the only residential receptors within the ZPSF were **predicted to experience shadow flicker effects greater than 30 hours per year’.***

In Galileo’s EIA (Section 13.5.11) it goes on to state:

*‘Within the UK, **there is no formal guidance on the amount of shadow flicker that is considered the limit beyond which amenity effects are significant.** European countries do have guidance on shadow flicker; however, these vary from one country to another. Guidance from Northern Ireland, Germany and Belgium suggests a shadow flicker limit not exceeding 30 hours per year or a maximum of 30 minutes on any given day as the thresholds for potential significant effects.’*

However, Galileo also modelled what they called a ‘realistic scenario’ and based on this scenario (that included for example hours of sunshine) concluded (in Section 13.5.21 of their EIA) that:

*‘Shadow flicker effects from the turbines in the Proposed Development are assessed as Not Significant, no additional mitigation is required. **As such it is expected that there will be no residual effects of Shadow Flicker’.***

Strathdearn Community Council finds this conclusion most unsatisfactory and believe that Galileo should deliver mitigation measures based on their worst case scenario modelling. They should also remove, as a minimum, the four turbines closest to residential dwellings. In addition, 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

50% of people responding to our survey indicated the development could have a ‘high’ or ‘severe’ impact on lighting and dark skies; with 27% indicating it would have ‘no’ or very little’ effect. Their comments are summarised as follows:

Negative comments: ‘emphasise significant concerns about the impact of turbine lighting on the dark sky experience. **Lighting on the turbines, particularly the flashing aircraft warning lights, is seen as a major disruption to the natural night sky**, ruining opportunities for stargazing, such as viewing the Northern Lights and the Milky Way. Many residents and visitors cherish the clear, dark skies, and the introduction of artificial lights would negatively affect both the local environment and wildlife, especially nocturnal creatures. **The lighting could also lead to a psychological impact on residents, transforming the area from a rural haven to an industrialised space.** There is a particular emphasis on the loss of natural beauty, as well as the increasing light pollution already visible from nearby urban areas like Milton of Leys and Westhill’.

Galileo’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.**

In Galileo’s EIA (Section 13.7.1, Table 13.22) they state:
‘The development falls within Low Flying Area 14 (LFA 14), an area within which fixed wing aircraft may operate as low as 250 feet or 76.2 metres above ground level to conduct low level flight training. **The addition of turbines in this location has the potential to introduce a physical obstruction to low flying aircraft operating in the area’.**

Section 13.7.21 of the EIA goes on to state:
‘Radar line of sight modelling has determined that all turbines in the Proposed Development will be within line of sight of the Inverness Airport Thales STAR 2000 and Terma Scanter 4002 PSRs. **This has the potential to generate false plots on the radar display and to reduce the probability of detection of genuine aircraft targets in the airspace above the Proposed Development’.**

The Dava Moor, Nairn and Monadhliath Area Wind Energy Landscape Pilot Study¹⁴ 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 Highland Council’s Scoping Response to the ECU, dated 5 August 2024 (Section 3.34) they stated:
‘They would also note that **“Hours of Darkness” is a more useful term than “Night Time” for this assessment.** In the Highland summer, it is not very dark at night and in the Highland winter, it is dark until mid-morning and again from mid-afternoon, “Night”

¹⁴https://www.highland.gov.uk/download/downloads/id/25661/dava_moor_nairn_and_monadhliath_wind_energy_landscape_sensitivity_study_-_final_report_december_2021.pdf

as a descriptor carries connotations of fewer people at large and moving around the landscape, which may not be appropriate in this location’.

It is of concern to Strathdearn Community Council that Galileo has chosen to ignore this advice and proceed with a ‘night time’ assessment in their EIA, presumably as this better fits the case they wish to make.

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

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. Galileo 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. Galileo 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.
5. Galileo should remove, as a minimum, the four closest turbines to residential dwellings.
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. Galileo should deliver a Dark Sky Lighting Mitigation Plan, including infra-red only lighting or radar-triggered obstacle lights (ACAS).
8. 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 Galileo 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 Lynemore wind farm application in isolation, ignoring the cumulative impact of existing windfarms and the other five pending applications. We ask that key officials from the ECU and Ministers tasked with decision making for wind farms accept our invitation to visit our area and see for themselves what we are talking about. **The Community Council is not against wind farms and recognises the importance of Scotland achieving its 2030 targets but, as our surveys clearly point out, most people living in our community believe that enough is enough.**

We understand why Community Benefit (CB) must sit outside the planning process and not be influenced by it. However, in good faith, if this application is consented, Strathdearn Community Council would wish to negotiate and agree a comprehensive CB package with Galileo that aligns with our Community Action Plan¹⁵ and maximises net economic impact, including community socio-economic benefits such as local employment, associated business and supply chain opportunities.

Strathdearn Community Council has carefully reviewed all information produced by each developer and widely consulted our community. **We have summarised our objections to Lynemore wind farm (page 1 of this letter) and included potential mitigations (page 22) that we would request be mandated should Ministers move to approve this application.**

¹⁵ [Strathdearn Community Action Plan 2022-2027](#)