

Mr Peter Wheelan
The Highland Council
Glenurquhart Road
Inverness
IV3 5NX

Date: 10 May 2019
Our ref: CNS/REN/WF/INV/Lochluichart Extension II

By email: epc@highland.gov.uk

Dear Mr Wheelan

LOCHLUICHART WIND FARM EXTENSION II TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017

Thank you for your e-mail of 14 April 2019 requesting our comments on the above proposal. If consented the turbines would form part of a cluster of wind farm developments which also include the following constructed wind farms; Corriemoilie, Lochluichart and Lochluichart Extension I. Our advice below is set out within the context of these existing developments.

1. SUMMARY

The key issues associated with this application are:

- The proposal would introduce turbines into an area where previous mitigation has sought to minimise the landscape and visual impacts of the existing wind farm developments in the area. The introduction of turbines into this area would therefore overturn the mitigation which was applied to the earlier proposals in this cluster.
- This proposal will result in significant landscape and visual impacts on the A835, an important and popular tourist route and a gateway to the west coast of Scotland.
- Carbon rich soils, deep peat and priority peatland habitats are a nationally important environmental interest. Further information is required to determine whether the proposal will affect these interests. We therefore object to this proposal until further clarifications as set out below are provided.

2. ADVICE

2.1. Landscape and Visual Impacts

Visual Amenity from the A835

The proposal would introduce visibility of turbines along a stretch of the A835 which is largely unaffected by existing wind farms. This visibility would particularly affect road users

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travelling east, where the proposed turbines would draw the eye and detract from views to Ben Wyvis which forms a key landscape feature along this part of the route. The A835 is an important tourist route, linking Inverness to Ullapool and the scenic west coast with this part of the route specifically identified as a key gateway to the west coast in The Highland Council's Strategic Framework.

Visual impacts along this section of the A835 have previously been minimised through mitigation and the design of the existing wind farms which has kept turbines well back from the road. The proposed application would overturn the mitigation put in place at these previous wind farms.

We advise that the design integrity of the existing wind farms are maintained and the proposed turbines are relocated further back from the road.

Views from popular mountain summits

The proposed development is surrounded by both nationally and regionally important landscapes.

Views from elevated locations are largely restricted to mountain summits, the majority of which lie within Wild Land Areas, where the proposed developed will appear as an extension to the existing wind farms in the area. When seen from Ben Wyvis, one of the country's most popular mountains due in part to its accessibility, and Beinn a' Chasteil the proposed turbines do not fit neatly with the existing wind farms and result in the cluster appearing to sprawl to the north. This has the effect of eroding the design integrity of the existing wind farms by not matching the density and spread of their layout. The proposed layout could be improved by better matching the existing wind farms in terms of density.

Our siting and design guidance¹ advises that wind farm extensions *“Design objectives and principles should echo those of the original wind farm. Extensions should use turbines which are compatible with those in the existing wind farm, including aspects of scale, form, colour, and rotation speed. Generally, the design rationale of the original wind farm development should not be eroded.”*

The likely landscape and visual impacts of the proposal could be mitigated by improvements to the design of the wind farm.

2.2. Habitats and Ecology

Carbon rich soils, deep peat and priority peatland habitats

Scottish Planning Policy 2014 recognises carbon rich soils, deep peat and priority peatland habitat as a nationally important mapped environmental interest. Our Carbon and Peatland map 2016 identifies where the most important areas are likely to be located.

Our 2016 Carbon and Peatland Map shows that 7 out of the 9 proposed turbines are located in an area recognised as class 1, the most valuable. The detailed peat depth mapping within the EIAR shows at least 3 of the turbines are located on deep peat in excess of a metre deep and 6 turbines are located on M17 blanket bog habitat type.

However the EIAR appears to provide some conflicting information as to the location of the blanket bog and wet heath habitats. The phase 1 habitat map (figure 11.1) and the national vegetation classification map (figure 11.2) show blanket bog and wet heath in different locations.

As the proposal could adversely affect a nationally important natural heritage resource **we therefore object to the application until further clarification on the location of these habitats has been provided.**

¹ Siting and Designing Wind Farms in the Landscape, Version 3a, SNH 2017

Ornithology and Protected Areas

Prior to wind farm development in the area red throated divers occupied and bred successfully for a number of years. After the existing wind farms were constructed activity reduced but has partially recovered with diver number increasing and they have been present for each of the last 5 years, although they have so far failed to breed successfully. The surveys undertaken for the proposed wind farm are 4 years old and activity has continued to increase it that time period. We therefore do not consider the additional turbines will adversely impact directly on the diver population in the area.

We advise that a post construction monitoring program similar to the one currently in place around the existing turbines is implemented for the proposed extension.

Impacts on protected areas are not significant. Details of protected areas within the wind farm study areas can be found on the Sitelink website²

3. Concluding remarks

We ask to be advised at the earliest possible stage about any proposed modifications, conditions or legal agreements relevant to our interests.

Should you have any queries about this letter, please contact Matt Burnett at matt.burnett@nature.scot or 01738 458540

Yours sincerely

Ben Leyshon

Operations Manager
South Highland

² <https://sitelink.nature.scot/home>