

Galileo Empower | Lynemore Wind Farm | ECU 00005105

ON REVISED DESIGN, REVISED SUBMISSION WITH ECU & ADDITIONAL INFORMATION

Formal Representation Objecting to Planning Application for Lynemore Wind Farm

Submitted to: Energy Consents Unit, Scottish Government

By: Strathnairn Community Council

Date: 06.04.26

Reference: ECU00005105

Development: Erection and Operation of Lynemore Wind Farm

Executive Summary

Strathnairn Community Council, respectfully object to the revised application by Galileo Empower for Lynemore Wind Farm under Section 36 of the Electricity Act 1989

1. On LVIA, and application of outdated guidance for 200m to tip of blade height
 2. On cumulative effect, construction traffic & local roads
 3. On BESS, peat/peat restoration & wildfires
 4. On LVIA, nocturnal environment & industrial lighting requirements
 5. On cumulative impact, clustering or coalescence & liveable communities, environment (human & natural), health & wellbeing, & wildlife.
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1. ON LVIA, AND APPLICATION OF OUTDATED GUIDANCE FOR 200m TO TIP OF BLADE HEIGHT

Background

SNCC recognise that the NPF4 and associated National & Regional Spatial Strategies has zoned the plateau from South Loch Ness to Aberdeenshire for onshore wind farms; under Strategic Renewable Electricity Generation and Transmission Infrastructure and to address the planning policy 'Climate Mitigation and Adaptation'.

More than this several wind farms are already operational in this area, and have been for up to 20 years; a number of which have returned 'benefit' (financial offsetting) to the local community - as 'host' or 'affected' communities - within the area which Strathnairn Community Council serves.

Of these windfarms in working in conjunction with the Local Authority (Highland Council & Planning Department) ALL windfarms to this area have to date had the following in common:

- Relatively carefully sited so as not to be visible from everywhere;
- Typically down from saddles or plateaus, or concealed by a neighbouring ridge or range or other permanent landscape feature, resulting in restricted view only;

- Reduced visibility from places of settlement, through topography, siting or screening (as above);
- Max height under 150m to the tip of the blade;
- Consequently no CAA, MOD or other light sources are introduced or required.

As part of the Planning Process all developers consult the following document:

- Scottish Natural Heritage produced 'Visual Representation of Wind Farms: Guidance'
- First published in 2006; revised in 2017.
- Still the valid form of 'assessment' in 2026.
- Now 9+ years old; and the maximum currency most documents have in planning terms (typically seen as 8-10 years).

How it is used:

- Scottish Natural Heritage's (now Nature Scot's) 'Visual Representation of Wind Farms: Guidance' is the documentation being used to guide: developers, planners, stakeholders, community, government.
- This method of assessment referred to is the *Zone of Theoretical Visibility* (ZTV).

At core the ZTV - extracted from here - sets up the principle methods of assessment as a planning aid.

What this means and how ZTV is assessed:

- Arguably it is not 'theoretical' but 'actual'; as can be ably demonstrated when you study the detail of live or past applications.
- Regardless – using the guidance of this document – the Highland Council have determined a distance of 45km from the structure, is the greatest distance any wind farm developer needs to take into account when scoping or planning for a wind farm development.
- This distance is based on what is considered to be the maximum distance a wind farm can be seen at; with increments of height change from 0m from the base to the tip of the blade (with a blanket exclusion at under 50m) then scaled at 20m height change increments and critically topping out at 150m from base to the tip of the blade.
- For the existing Farr Wind Farm of height 101m to the tip of the blade, this would have fallen to mid to upper range when considered on the scale.
- **SNCC firmly concludes at the time of production the authors could not perceive higher turbines - those exceeding 150m - seeking consent on land.**
- **More importantly this has never been revisited or revised to take into account next generation turbines of scale 150-250m to tip of blade currently seeking planning (to which the proposed Lynemore Wind Farm is now mid range).**

Why this is now an outdated form of assessment and must be revised

- At nearly 20 years old (first published in 2006); and even – with the later revision of 2017 – this document which sets up the form of measurement is now 8-10 years old.
- Critically, of the current Wind Farms scoping or seeking consent– in the intervening period - everything about turbines and on-shore wind development has changed.
- Consequently the methods of assessment need to be revisited and revised.

- **What is currently scoping or consenting is the next generation of turbines, currently all coming through at 200-250m; Lynemore Wind Farm falls to this.**

Of recent applications SNCC are a consultee to (with Lynemore Wind Farm included in this) changes are seen across:

- Siting > No longer carefully sited by landforms and away from ridgelines; plus sited to be clear of the 'wake' of each other as structures and with a greater diameter of blade, and therefore occupying more footprint.
- Height of structure > Now +50 to 100m greater than all previously consented levels in the Highlands; in part through technological advances (through Offshore wind technology); in part through perceived efficiency and demand (under the banner of climate change, economic development, job creation, energy security, energy export etc).
- Regardless of this wind farms currently seeking consent or scoping are still assessed, or turning to, the same – now wholly outdated – form of assessment.
- This needs to change; and fast.

Why this matters, is no longer applicable and needs to be challenged?

Several reasons:

- Climate is changing; and with this so are local weather patterns.
- Over 2025, as well as wind resource to the area, by contrast there have been **many settled days** with **increased visibility** – with views easily extending beyond 45km - both at elevation and from low lying areas with open vistas (coastal settlements etc).
- Critically of these, no installed / operational onshore turbines exceed 150m in height; and yet those at less than 150m in height are still visible to the naked eye, as the crow flies, at the following distances:

From Beinn Bhuidhe Mhor summit; a hill accessed with the Strathnairn CC area and to the back of Inverness, Culloden direction and north of Moy Wind Farm. Summit at 548m; effectively half the height of a Munro, the following wind farms (not exhaustive but as a small sample only to give the range) are visible, some at all times, some depending on conditions.

> Moy Wind Farm @ 3km;

> Farr Wind Farm @ 11.5km;

> Loch Glas @ 38.5km;

> Beatrice Offshore Windfarm @ 80km (188m height from sea level to the tip of the blade)

SNCC objects to Lynemore Wind Farm citing the forms of design guidance as no longer meaningful with forms of measurement which should have been reassessed/recalibrated on account of significant increases/changes to structures, yet which are still being applied.

This guidance does not take account of the new heights and exposed siting which developers of next generation turbines favour, and which will interrupt skylines and dominate landscape. There is an unresolved conflict of interest as is at odds with what the SNH Guidance set out to do.

Lynemore Wind Farm falls to this category; and consent will set a precedent for all the rest.

The '**Visual Representation of Wind Farms: Guidance**' for example, increases in increments of 20m to 150m, excluding small scale domestic construction of turbines, and equally not anticipating ANYTHING which exceeds 150m.

In summary Lynemore Wind Farm is:

- No longer carefully sited, and is confirmed as visible and prominent from multiple viewpoints (as demonstrated across the Developer's LVIA and amended LVIA documents)
- Visible from all the VPs, from visits to other sites and landmarks, and from a study of the mapping supplied and updated by the Developer.
- Highly visible from the A9 North and South (gateways to and from Inverness & the Highlands); from NTS Culloden Battlefield and several other sites of historic interest (sites of cultural and historic interest); **ever-present** from the rural settlements of Daviot, Balnafaich, Farr, Moy and Tomatin, from the urban settlement of Inverness (i.e. both rural settlements and urban settings); from the whole of the Black Isle (with all associated south facing villages and towns, including Rosemarkie and Fortrose); from the Cairngorm National Park (from the mountain ranges within and including Munros).
- Proposed height 200m to the tip of the blade, and straddling the top of a 'Fiona', reaching the benchmark height for a 'Graham' (by recognised SMC categories), in springing from height of 560m at the base and reaching the height of a Graham to the tip of the blade.
- $T7 > 560\text{m Base} + 200\text{m Turbine} = 760\text{m}+$ (confirmed as just under 770m to tip of blade)
- $T8 > 560\text{m Base} + 200\text{m Turbine} = 760\text{m}+$ (confirmed as just under 770m to tip of blade)
- Corbetts (as defined by SMC) fall to height 762m to 914.4m / 2,500 to 3,000ft
- **Lynemore Wind Farm is now nearing or exceeding the start height of Corbetts**
- With structures which exceed 150m in height, light sources are introduced; both CAA and MOD lighting at minimum are required.

SNCC are therefore lodging an objection on account of negative LVIA & Proposed height @ 200m to the tip of the blade.

The developer states in their response to Community Councils & Public Representation that the '*layout has undergone multiple iterations to reduce visual prominence, including the removal of T4 and T5. This change notably lessens the visibility from Strathnairn, particularly the settled area of Farr, and reduces perceived dominance from key viewpoints*'.

SNCC strongly disagrees with this statement.

- The removal of 2 turbines alone does little to mitigate the LVIA and the associated and far reaching negative effect from multiple viewpoints; this is exacerbated further by no reduction from a proposed height of 200m to the tip of the blade.
- Furthermore the reduction in number of structures - from 14 to 12 - was in response to an objection made by SEPA regarding concerns over the siting of 1 or 2 turbines in areas of deep peat, rather than as a response or otherwise to engagement with the local communities.
- 200m to the tip of the blade, coupled with elevation on an elevated and prominent site, means this wind farm will be highly visible from surrounds. This is entirely at odds with consented or operational wind farms to the area.
- This contrasts greatly from the existing neighbouring windfarms, both in terms of respectful siting and significantly lower turbines operating at Farr (Nadara > 101m to tip of blade) and Moy's (Nordex > 20 turbines @ 126.5m to the tip of the blade) Wind Farms. Both gain the wind resource of the hill but are firmly set down from the saddle or plateau.



Reference: Moy Wind Farm as seen from Beinn Bhuidhe Mhor, overlooking Cairngorms. Note it does not interrupt the skyline.

On Moy Wind Farm | Although in close proximity to the cairn the wind farm is firmly set down from the plateau, through discreet siting and lower heights of structures. The resultant effect is that the views of Moy Wind Farm are highly restricted both near and far; whereas by

contrast Lynemore Wind Farm (in layout, siting and height of structures) from LVIA and other stated forms of assessment is entirely at odds with this rationale.

2. ON CUMULATIVE EFFECT, CONSTRUCTION TRAFFIC & LOCAL ROADS

The Developer states *“All construction traffic, including abnormal load route assessment will access the site directly from the A9 via the upgraded Lynebeg junction. The A9 Tomatin to Moy dualling project will be complete before construction begins, providing improved road capacity and safety. We note specific concerns relating to local roads raised by Strathnairn residents and confirm that Lynemore AILs and construction traffic will not use the B851 through Strathnairn.”*

Background

The A9 dualling project brings a perceived ‘welcome improvement’ to the area, and greater connectivity to the South (Perth and beyond). It also results in an improved road network, certainly from Aviemore to Inverness (in the foreseeable distance); and aligns with priorities cited under ‘National Developments’ within the Planning System.

At a local level, SNCC recognises that the Developer proposes that all construction access will be from the A9 North or South of the site alone, and therefore concludes this project will not directly or negatively impact local roads in any way.

Strathnairn’s experience

However, the improvements to the A9 are not extended to the exit junctions from the existing dualled sections of the A9 to Strathnairn.

Exiting the A9 - southbound - to reach Balnafaich or Farr involves a dangerous road crossing over dual carriageway on what will now be an improved and by default more highly trafficked road. Increased loading to the road, through the consenting of further major development projects, increases the risk to residents of Strathnairn - in exiting the A9 east or west. Locals will be battling increased volume of traffic including HGVs (out or back) capable of travelling on longer sections at higher speeds.

Highland Council have openly published a ‘South Loch Ness Roads Improvement Strategy’ (revised in 2014). The strategy proposes the twin tracking of the B851 with greater traffic calming on approach to existing settlements. This strategy has been in place for over a decade and to date very little has been realised; for consequently major energy infrastructure projects consents are being ‘issued’ prior to this being actioned.

This is not a ‘just transition’.

SNCC objects to the cumulative impact of the incoming wind farms, the increased demands they are placing on local roads and risk to residents who are dependent on them; Lynemore Wind Farm is included in this.

- **SNCC seeks a condition to be written into the application that supports the statement issued by the developer and precludes ANY stretch of the B851**

being used for the construction of this project should the development gain consent.

- This extends to the supply of materials to / from any of the Quarries that are accessed off the B851 as this would result in an increased load to the B851 - no matter how short the journey - plus an increase of traffic at these (already) treacherous junctions which would firmly and negatively impact the community.
 - This also extends to Daviot Quarry for the safety of Daviot and Balnafaich's residents (who make up part of the community at Strathnairn).
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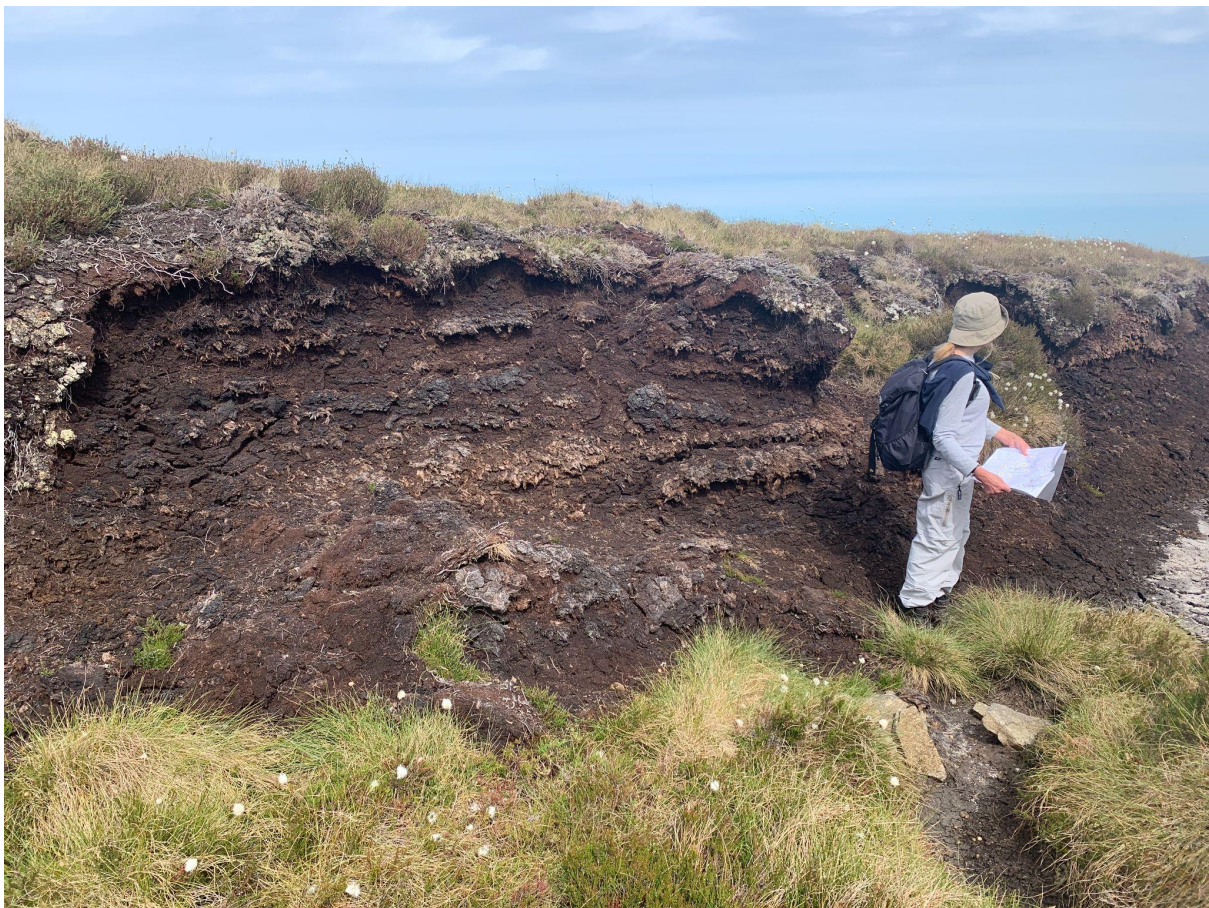
3. ON BESS, PEAT/PEAT RESTORATION & WILDFIRES

Background

Concerns have been raised by the local community on the proposed Battery Energy Storage System (BESS) & the potential for wild fires on the site.

These are not yet satisfied, and therefore SNCC object.

- Strathnairn has experienced two out-of-control wildfires in 2023 (Daviot) and 2025 (Ley's Brae/Tomfat) . The former on the Daviot Hills, and in very recent memory, led to significant losses of woodland, and equally risked property and lives in the community. [Daviot wildfire burns next to back garden amid power cuts - BBC News](#)
- The community is therefore within its right to be concerned over the introduction of ANY structure or specification which has the potential of increasing the risk of wildfires to the area, without an understanding of the bigger picture.
- The Highlands is served by an operational Scottish Fire Brigade, based in the centre of Inverness, with this service reinforced by many community based volunteer Fire Brigades, which support this. Trying to arrest the wild fire on Daviot took all of the remaining resource (both employed and volunteer fire fighters) and the good fortune of weather which followed (heavy rain) to extinguish it, with continual overnight operations and several days later. Crews were stretched to the limit and split between the Daviot wildfire and attending a second wildfire at Cannich; the latter started several days earlier but burned and then reared again for several weeks. [Cannich wildfire could be largest recorded in UK - BBC News](#). The pattern of the latter - extended burning period - was found to be owing to peat. The fire would appear to be doused, but retained heat under the surface, and when 'optimum' conditions returned it would reignite.
- Lynemore Wind Farm BESS is proposed to be sited up hill, accessed only by tracks, and with a known source of deep peat / fuel, with established flora (and fauna) - therefore shrubs - to the moorland or hill, and native woodland to lower levels.



Reference: Exposed deep peat on Carn Na Easgainn and the site of the proposed Lynemore Wind Farm.

On BESS (in other forms)

- Whilst a full investigation is yet to take place, early indications are that Glasgow's recent loss and widespread damage to the city centre was triggered by Battery Energy Storage.
- This - if nothing else - should 'hammer home' in the minds of decision makers, the potential for an out-of-control fire triggered by battery storage; albeit at a different scale of battery and an urban setting. [First minister pledges help with costs of 'horrific' fire next to Glasgow Central station | Glasgow | The Guardian](#)
- More pertinent to rural Highlands, was that arresting this fire in Glasgow and introducing a fire break, to prevent an escalation and even greater loss, was dependent on access to an 'unlimited' source of water; in this case the River Clyde.
- Locally, Lynemore Wind Farm's BESS is proposed to be located in a hard to access area - at elevation - which would not readily be reached by fire crews, and away from reliable sources of water.

SNCC therefore object to the introduction of BESS to the saddle of Carn Na Easgainn and away from areas of ready access / the A9. The current and amended proposal - as it stands - is on and near known areas of deep peat.

Furthermore the developer - if consent is gained - looks to improve the health of peatlands, which although rightfully challenged by other consultees on account of likelihood of success

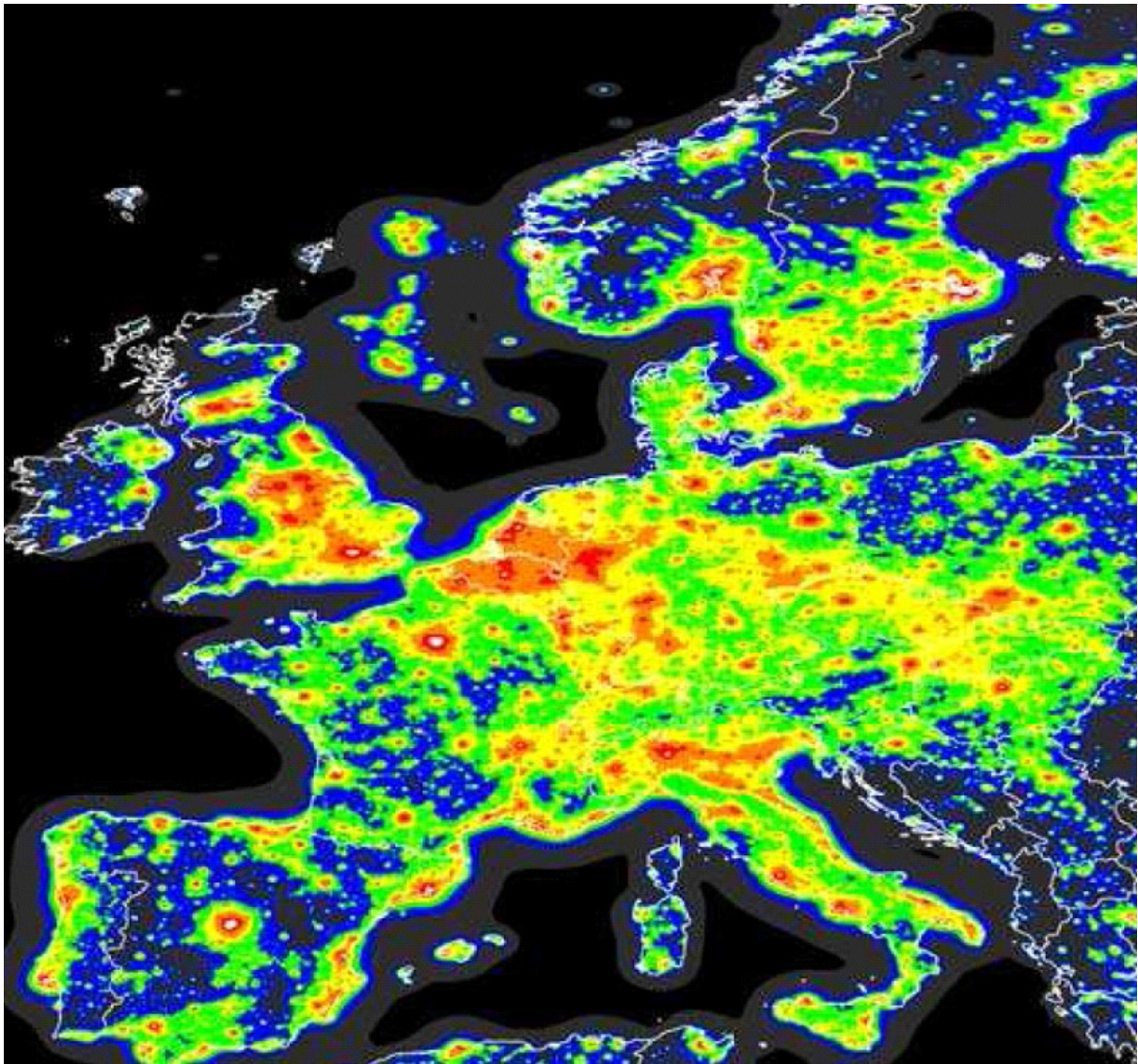
rates is required to address nature restoration. Knowing all of this, SNCC object to the inclusion of BESS, and secondly to locating this system uphill.

Introducing structures/BESS to peatlands and sources of vegetation which if they fail are highly flammable, at elevation, remote to access and will contribute to spread of fires, make demands on local fire fighting services, is entirely at odds with restoring peatlands/biodiversity, therefore SNCC object.

4. ON LVIA, NOCTURNAL ENVIRONMENT & INDUSTRIAL LIGHTING REQUIREMENTS

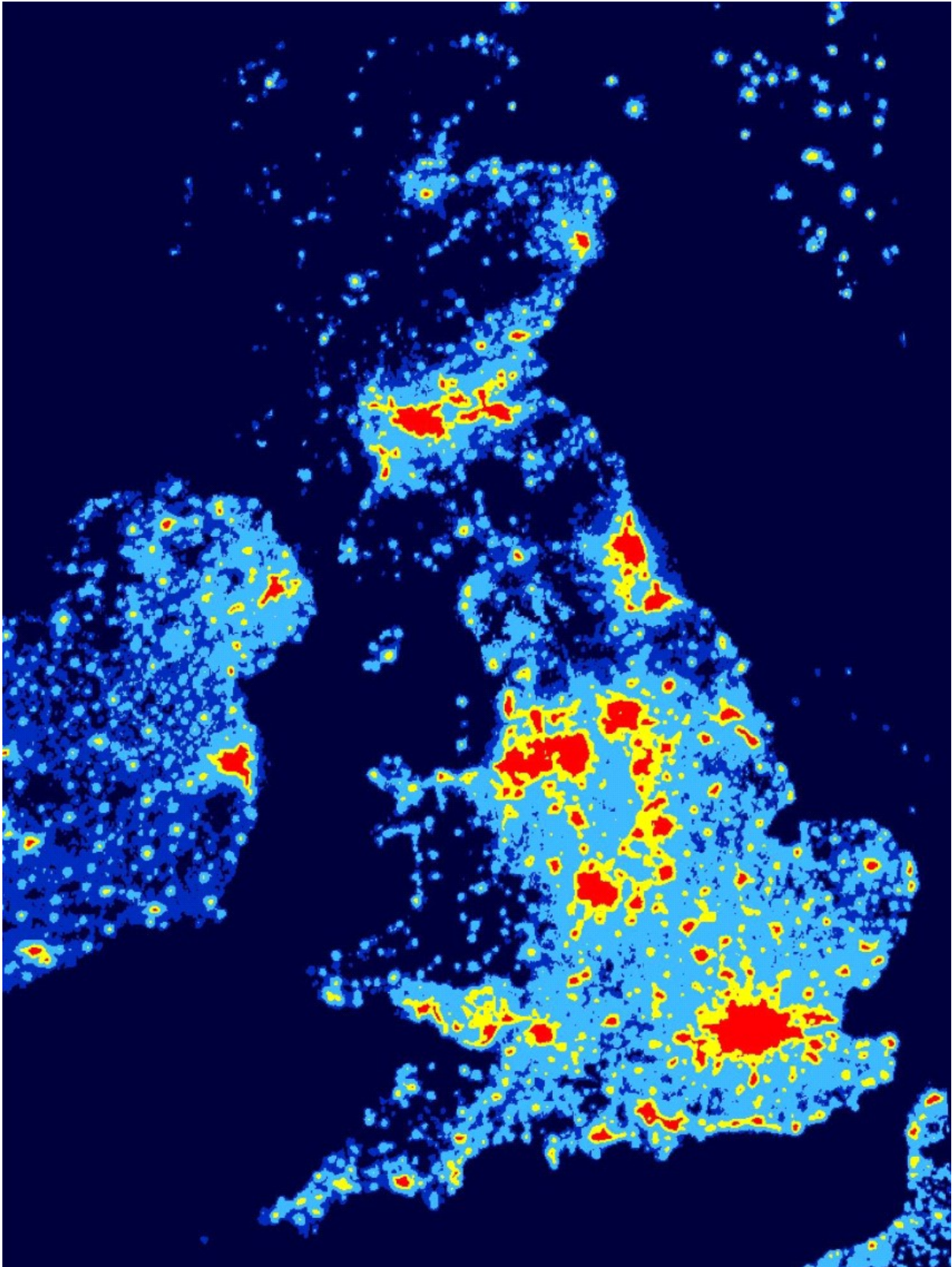
Background

Scotland has some of the largest remaining areas of dark sky in Western Europe. Dark skies are found in rural areas that are free of urban light pollution. From a city centre location, like Inverness, individuals might see fewer than 100 stars with our naked eyes. Under a dark sky individuals can see over 1,000 stars; even our own galaxy - The Milky Way - stretching across the sky.



(Picture Credit: www.cpre.org.uk)

Dark Sky places are areas or sites that have been officially recognised for their low levels of light pollution and good public access. The communities of South Loch Ness (Stratherrick & Foyers, Strathnairn and Strathearn) all currently experience Dark Skies.



(Picture Credit: www.cpre.org.uk)

What is changing and why this is a concern

With increased turbine height comes turbine lighting; a legal requirement of the Civil Aviation Authority (CAA) and Ministry of Defence (MOD). This kicks in for structures which exceed

150m in height. Turbines at Lynemore Wind Farm are proposed to be 200m to the tip of the blade.

Whilst the Developer has brought in some welcomed mitigating measures, they simply don't go far enough; and could equally be resolved by a reduction in height of structures to sub 150m to eliminate them altogether.

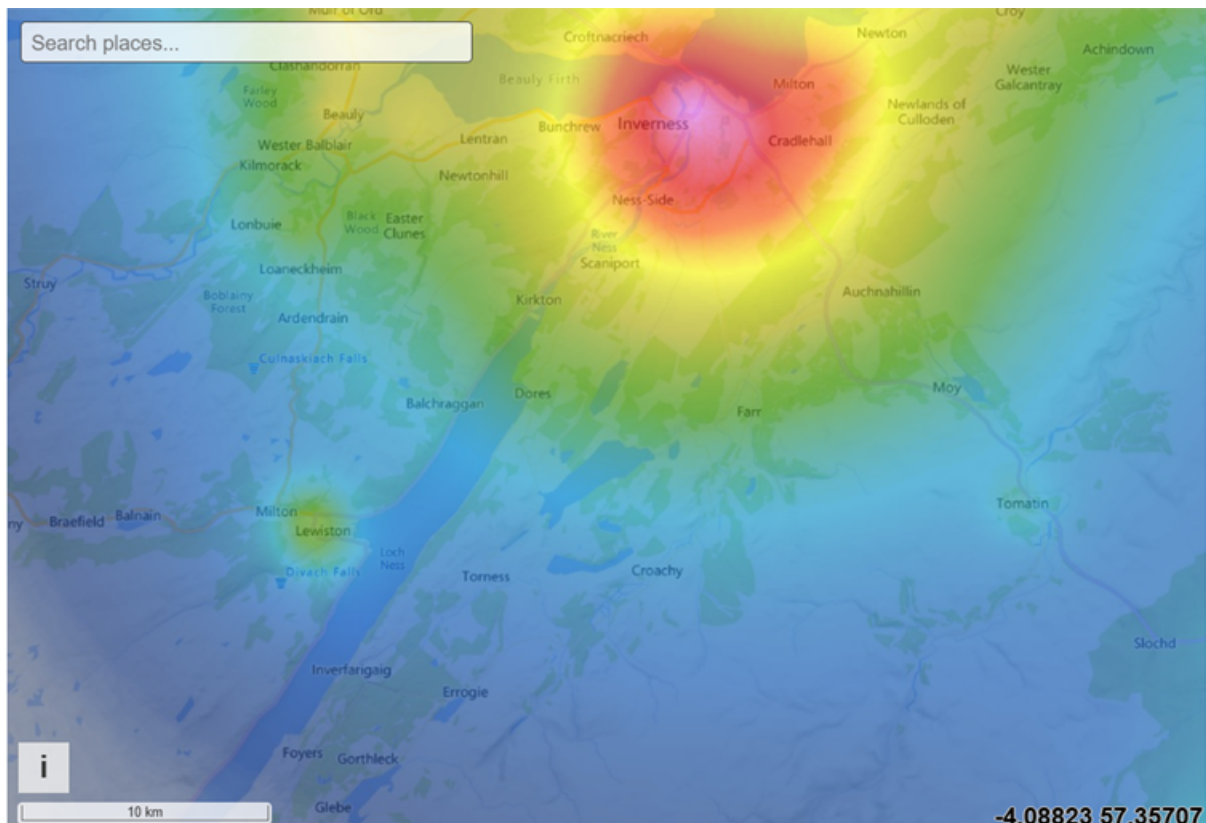
Introducing nocturnal light sources, which Lynemore Wind Farm will do (however greatly they are modified) negatively impacts and indefinitely changes the property of night skies and perceived darkness for these South Loch Ness rural communities. More than this - if passed at heights which exceed 150m - it will set the precedent and a new benchmark for other incoming wind farms, which will forever change the levels of darkness.

Strathnairn

Strathnairn, a recognised rural community, is closer in proximity to Inverness than the neighbouring community council area of Strathdearn; but both are considered as the 'host' or 'affected' communities to Lynemore Wind Farm.

For Strathnairn as a community, and differing to Strathdearn, they are not totally exempt from sources of industrial light pollution; and this is reflected in at least one earlier representation from an individual / local. Given the proximity to Inverness (and therefore an urban setting), a study of light maps clearly show that a spillage of pollution radiates out - as expected - and more locally the same can be experienced from Daviot Quarry.

However what these have in common is that the light polluting source radiates from a single direction North (NE & NW); to date nothing impinges on the darkness to the South (SE & SW) which only improves and increases (darkens) when you move away from the urban setting from Bortle 4 to Bortle 3 or lower. This happens at approx 10-12 miles radius from Inverness.



Light Pollution Map 1 | Highlighting the cityscape of Inverness at core, as a built-up urban centre with full and radiant light pollution; and the relative darkness associated with the rural settings of Strathnairn plus Stratherrick & Foyers.

Consenting 200m+ high turbines - i.e any structures of a height which exceeds 150m - to the plateau that straddles South Loch Ness to Aberdeenshire will change this aspect of the environment forever, and contribute to a loss of dark skies from rural settings.

Lynemore Wind Farm falls to this; and in its siting introduces an industrial light source to the South East, where previously there has been none.

A loss of dark skies has a negative effect on human health and the environment which supports biodiversity/wildlife. SNCC can cite many sources of reference, but will point to an internationally recognised one. [DarkSky International | Protecting the night skies for present and future generations](#)

As such SNCC's earlier objection holds over this matter; it remains an objection to Lynemore Windfarm on account of turbines at height 200m which introduce industrial lighting sources - however modified - and compromise dark skies for current and future generations, change the rural landscapes and natural environment and will contribute to a loss of habitat/conditions which support nocturnal species.

This development - if consented - will also set a precedent which allows industrial lighting to be introduced to these rural landscapes, where previously there was none.

5. ON CUMULATIVE IMPACT, CLUSTERING OR COALESCENCE & LIVEABLE COMMUNITIES, ENVIRONMENT (HUMAN & NATURAL), HEALTH & WELLBEING & WILDLIFE

The Developer states *“Lynemore does not lead to clustering or coalescence. The design maintains clear separation from other wind farms and avoids sensitive glens, preventing the area from feeling dominated by turbines.”*

and

‘We strongly believe that Lynemore represents a balanced contribution without placing an unfair burden on local communities’.

SNCC disagrees with this statement and objects.

Background

Whilst each incoming application needs to be considered in its own right, the **cumulative impact** - and the impact on host communities - of operational, consented wind farms or wind farms in the planning process firmly needs to be taken into account.

Coupled with this is the effect of clustering; to be clear, the physical proximity or otherwise between developments, which needs to be understood in the practicality of the developments during construction phase, and in the resultant visual impact.

Nadara’s operational and neighbouring Farr Wind Farm, is shortly to be coming to the planned end of its operational life. Already the developers/owners have approached SNCC about a potential extension to life and extension to site.

Glen Kyllachy is in the planning system seeking approval. Contrary to what the developer claims, these 3 wind farms alone, 1 (of 3) already operational (Farr) and 2 new developments seeking consent (Lynemore and Glen Kyllachy) are all in close proximity to each other. This will result in clustering in layout/design affecting landscapes, environment, lives - and cumulative impacts through construction of multiple projects all in close proximity of each other - if permissions are given to any/all.

Moy Wind Farm, at only a slightly greater distance from Lynemore and is fully visible from all the same approaches to Carn Na Easgainn, and Glenkirk has been resurrected.

That puts a minimum of 5 windfarms in close proximity to each other with all the associated negative effects on landscape, noise, roads, human health, ecology and wildlife; also extends to communities that may have to endure constructing 3 side by side.

Furthermore to this area alone 3 (including Lynemore Wind Farm) will coalesce.

Cumulative impacts will be significant, if given consents are given to all, and particularly if constructed together. There would result in an overloading on local communities (lives, roads, environment, landscapes), and simultaneously the communities will be forever changed (landscape, environment).

Strathnairn alone, has the potential to be a host community to 3 operational windfarms, 3 consented, and a further 6 live applications are now in planning (at some stage). Local lives will be affected for a generation or more, and landscapes forever changed. Strathdearn is no different, with 8 live applications in planning (at some stage); all with an increase of scale (height) and size (of site).

Contrary to the developer's statement, cumulative impact is a reality (for many known and illustrated reasons) and equally coalescence will be the outcome (for many of the developments); from South Loch Ness to Moray and onto Aberdeenshire.

This applies to Lynemore Wind Farm; if consented it will deliver on both counts.

There is a conflict in policy between energy generation and nature restoration/protection; and equally individual policies are in conflict.

'Livable communities' etc are thoroughly compromised for host communities through cumulative impacts and (physical and visual) clustering of projects.

This is not exclusive to a human impact; when the cumulative impact also results in windfarm coalescence and is on a migratory path this impacts on the flight path for and home to, many birds and other forms of wildlife.

SNCC consider that the cumulative impacts and that clustering has not been fully understood, for these host communities, and objects.

CURRENT / INDIVIDUAL REPRESENTATIONS FROM THE WIDER COMMUNITY

Of the past representations made by individuals, for confirmation, SNCC have been contacted to say these still stand. However, of these, there are several individual representations to reinforce an existing representation or make new comments based on the additional information / revised design.

Owing to the change in the system made by the ECU - between the original and revised applications - SNCC can not be certain of the receipt of these; and therefore look for these to be lodged/acknowledged, and will forward for inclusion on the system/portal.