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LYNEMORE WIND FARM

Planning Statement Addendum

Galileo 05 Limited

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Appendix 1 – Planning History Update

Document history

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EXECUTIVE SUMMARY

The Revised Proposed Development

- The Revised Proposed Development comprises 12 wind turbines, a Battery Energy Storage System (BESS) and associated ancillary infrastructure.
- The tip heights of the turbines have not changed from the Environmental Impact Assessment (EIA) Layout and would not exceed 200 m.
- The individual turbine generating capacity has not changed and is anticipated to be approximately 7.2 megawatts (MW). Accordingly, the maximum generating capacity for the wind turbines has reduced from 100.8 MW to 86.4 MW.
- The capacity of the BESS is unchanged from the EIA Layout and would be up to 50 MW.

Energy Policy

- Both the UK and Scottish Governments continue to be aligned to the requirement for the quick deployment of low-cost renewable energy to address the climate crisis and to ensure security and affordability of supply. In their policy and guidance, both Governments recognise onshore wind as one of the key technologies to deliver this requirement as an established, low-cost solution.
- The overall requirement to meet Net Zero continues to be a challenge and onshore wind continues to play a crucial role in meeting the energy generation and Net Zero targets to 2030 and beyond.

Relevant Considerations

- The only Adverse **significant** effects predicted by the AI Report relate to landscape and visual effects; whilst **significant**, these are considered to be localised and therefore acceptable. It should also be noted that that landscape and visual effects have reduced as a result of the Revised Layout.
- The effects predicted by the AI Report are either consistent with the EIA Report (i.e. unchanged) or secure an improvement as a result of design changes.
- NPF4 continues to be a relevant consideration for the Revised Proposed Development. It recognises, in Policy 11, that some landscape effects will occur and confirms that localised landscape and visual effects are generally acceptable.
- National Planning Framework 4 (NPF4) confirms the threshold for a national scale renewable energy development is 50 MW. Despite a reduction in generating capacity, the Revised Proposed Development remains above this threshold, providing a substantial contribution to Scotland's onshore wind renewable energy generation targets.
- The Revised Proposed Development is considered to comply with the Highland-wide Local Development Plan (HwLDP) and Inner Moray Firth Local Development Plan 2 (IMFLDP2).

- The Revised Proposed Development is not located within and does not impact on National Parks or National Scenic Areas, nor does it affect international or national designations.

- The Revised Proposed Development maximises biodiversity benefits; it will conserve, restore and enhance biodiversity and will provide **significant** biodiversity improvements.

- The Revised Proposed Development maximises socio-economic benefits.

- The Revised Proposed Development gains substantial weight in its favour when assessed against the Development Plan as a whole.

Summary of updated benefits secured by the Revised Proposed Development

Reduced Carbon Emissions

- The Revised Layout is predicted to deliver total emissions savings of 3,735,686 tCO2e against a fossil fuel mix of electricity over its 50-year operational life, or 1,682,692 tCO2e against a grid-mix of electricity.

Supporting Jobs

- During operation, the Revised Proposed Development is expected to directly and indirectly annually support 386.9 job years in Inner Moray Firth, 1060 job years in the Highlands and 1506.3 job years in Scotland.

Economic Benefits

- During the construction phase, it is estimated that the Revised Proposed Development could generate up to £29.8 million Gross Value Added (GVA) in Scotland, with approximately £9.4 million GVA directly benefitting the Highlands and £1.6 million GVA in Inner Moray Firth.

- During the 50-year operational lifetime of the Revised Proposed Development, it is estimated that operation and maintenance costs could generate up to £107.1 million GVA, of which £77 million would directly benefit the Highland's economy and £28.2 million GVA for Inner Moray Firth.

- Non-domestic rates would contribute directly to public sector finances – estimated at £856,127 per annum (c. £42.8 million over the project's operational lifetime) to The Highland Council (THC).

Community Funding

- The Applicant has committed to annual community funding of £5,000 per MW of installed capacity over the life of the project. Therefore, community funding would amount £420,000 per annum, totalling £21 million over the operational lifetime of the Revised Proposed Development.

Powering Homes

- The Revised Proposed Development would power the equivalent of 54,061 homes.

Environmental

- Enhancement of degraded peatland and heath habitats and such measures will provide enhanced opportunities for associated biodiversity including protected terrestrial mammal species, breeding waders, invertebrates and plant species which would not be possible without intervention.

- The Applicant has committed to the compensation for the loss of peatland habitat at a ratio of 1:10 lost to restored, in accordance with NatureScot guidance and a further 10% of the extent of priority peatland habitat resource within the Site for enhancement which is a combined total of 353.29 ha.

1 INTRODUCTION

1.1 Introduction

1.1.1 Stephenson Halliday Ltd has prepared this Planning Statement Addendum to accompany the Additional Information (AI) submitted to the Energy Consents Unit (ECU) for the proposed Lynemore Wind Farm.

1.2 Terminology

1.2.1 To ensure clarity and consistency throughout the Planning Statement Addendum, the following terms and descriptions as presented in **Table 1.1** are used throughout.

Table 1.1: Additional Information Terminology

Term	Definition
AI	Additional Information
Environmental Impact Assessment (EIA) Layout	The proposed layout as described within the EIA Report
EIA Proposed Development	The Proposed Development as within the EIA Report
Revised Layout	The revised layout as described within the AI Report
Revised Proposed Development	The Revised Proposed Development as described in the AI Report
Planning Statement	Refers to the Planning Statement submitted in the S36 Application in May 2025
Planning Statement Addendum	Refers to this document
the Site	Refers to everything within the application red line boundary, which includes the Site access

1.2.2 For clarity in terminology throughout this Planning Statement Addendum the revised scheme is referred to as 'the Revised Proposed Development' or 'Revised Layout', and the original layout is referred to as the 'EIA Layout.'

1.3 Background

1.3.1 The Applicant submitted a Section 36 (S36) application (the application) under the Electricity Act 1989 in May 2025 for consent for the proposed Lynemore Wind Farm. As originally submitted, the EIA Proposed Development comprised 14 turbines with tip heights of up to 200 m and a Battery Energy Storage System (BESS) with a proposed capacity of up to 50 MW, giving a total generating capacity of up to approximately 150.8 MW. The AI presents a Revised Proposed Development which is described below.

1.4 Description of the Revised Proposed Development

1.4.1 Following consideration of all consultation responses, the Applicant reviewed and reconsidered the EIA Layout taking advice from the technical team; and prepared a Revised Proposed Development with design amendments and improvements. The design drivers are listed in **Chapter 4: Design Evolution Update** of the AI Report and the Revised Proposed Development has undergone the following design changes, as stated in **Chapter 2: Updated Description of the Proposed Development** of the AI Report:

- Turbines have decreased from 14 to 12, removing turbines T04 and T05.
- Turbines T02, T06, T07, T11, T12 and T13 have been relocated.
- Track location and length have changed according to the new location of the turbines.
- The route of access from the A9 has been moved to the southeast. The distance from the track to the nearest properties has increased from approximately 35 m (including verge) to approximately 80 m, which in return has allowed for the length of track to be reduced and other environmental constraints such as forestry to be better avoided.
- The number of proposed construction compounds has been reduced from two to one.
- Of the 7 watercourse crossings proposed in the EIA Layout, 5 are removed and 2 different ones are proposed as part of the Revised Proposed Development, reducing the total number of water-crossings from 7 to 4.

1.4.2 Please refer to **Chapter 2: Updated Description of the Proposed Development** of the AI Report for full details on the design changes.

1.5 Site Surroundings Update

Other wind farms

1.5.1 Since the EIA cumulative baseline cut-off date (31 January 2025), four schemes within 15 km of the Revised Proposed Development have been submitted as new wind farm planning applications The four new applications are:

- Kyllachy (ECU00005153, 25/03511/S36) which would form an extension to the existing Glen Kyllachy and Farr wind farm within 10 km of the Revised Proposed Development.
- Clune (25/00847/S36, 25/03511/S36), located approximately 10 km south of the Revised Proposed Development.
- Balnespick (ECU00004904, 25/00629/S36), located approximately 10 km to the east of the Revised Proposed Development.
- Highland Wind Farm (ECU00005082, 25/01355/S36) located approximately 15 km to the south of the Revised Proposed Development.

1.5.2 Carn na Saobhaidh Wind Farm remains at the pre-planning stage along with a new pre-planning wind farm project, Glenkirk. Both are within 15 km of the Revised Proposed Development.

1.6 Structure of Planning Statement Addendum

1.6.1 The remainder of this Planning Statement Addendum is structured as follows:

- **Chapter 2** sets out the up-to-date policy position with regards to planning, climate change and energy policy, highlighting changes which have emerged since the submission of the original S36 application (May 2025).
- **Chapter 3** presents an updated assessment of the Revised Proposed Development against the Development Plan.
- **Chapter 4** provides a summary and conclusion.
- **Appendix 1** – Updated Planning History.

2 UPDATES TO THE PLANNING, CLIMATE AND ENERGY POLICY AND GUIDANCE

2.1 Introduction

2.1.1 The Planning Statement should be relied upon for policy and guidance relevant at the time of its publication (May 2025). This Planning Statement Addendum updates this position with new guidance and policy published since then.

2.2 Climate Change Legislation, Policy and Advisory Reports

International Context

The United Nations Emissions Gap Report 2025 (November 2025)

2.2.1 The United Nations Environment Programme (UNEP) prepare a yearly report on progress in limiting global warming well below 2°C and pursuing 1.5°C in line with the Paris Agreement. The UNEP Emissions Gap Report 2025 finds that available new climate pledges under the Paris Agreement have only slightly lowered global temperature rise over the course of this century, leaving the world heading for a serious escalation of climate risks and damages. The Report summary on the UNEP website states that:

"Reductions to annual emissions of 35 per cent and 55 per cent, compared with 2019 levels, are needed in 2035 to align with the Paris Agreement 2°C and 1.5°C pathways, respectively. Given the size of the cuts needed, the short time available to deliver them and a challenging political climate, a higher exceedance of 1.5°C will happen, very likely within the next decade.

The report finds that this overshoot must be limited through faster and bigger reductions in greenhouse gas emissions to minimize climate risks and damages and keep returning to 1.5°C by 2100 within the realms of possibility – although doing so will be extremely challenging. Every fraction of a degree avoided means lower losses for people and ecosystems, lower costs, and less reliance on uncertain carbon dioxide removal techniques to return to 1.5°C by 2100.

Since the adoption of the Paris Agreement ten years ago, temperature predictions have fallen from 3-3.5°C. The required low-carbon technologies to deliver big emission cuts are available. Wind and solar energy development is booming, lowering deployment costs. This means the international community can accelerate climate action, should they choose to do so."

COP30 (November 2025)

2.2.2 The latest Conference of Parties (COP) was held in Belém, Brazil, in November 2025. It resulted in the 'Belem Package' of climate agreements. The COP30 website[1] states:

[1] https://cop30.br/en/news-about-cop30/cop30-approves-belem-package1

"One hundred and ninety-five Parties adopted the Belém Package this afternoon, demonstrating humanity's resolve to turn urgency into unity, and unity into action in tackling climate change. The 29 decisions approved by consensus include agreements on topics such as just transition, adaptation finance, trade, gender, and technology, renewing the collective commitment to accelerated action, and a climate regime more connected to people's lives…

… The approved decisions in the Belém Package include a commitment to triple adaptation finance by 2035, emphasizing the need for developed countries to significantly boost climate finance for developing nations. Parties concluded the Baku Adaptation Roadmap, which approves and establishes the work for 2026-2028, until the next Global Stocktake of the Paris Agreement."

2.2.3 The website also outlines:

"COP30 marked a major step forward in reshaping the international financial architecture to align with the urgency and scale of the climate crisis. The Parties took note of the Baku-to-Belém Roadmap to 1.3T, a framework build in collaboration with the COP29 Presidency to scale climate finance flows to at least USD 1.3 trillion annually by 2035, with a strong focus on public-private mobilization and improved access for developing countries, New commitments under the Mutirão Decision called for accelerating reforms in multilateral development banks, enhancing the role of concessional and grant-based finance, and scaling innovative instruments such as guarantees, blended finance, and debt-for-climate swaps. COP30 also launched the Global Climate Finance Accountability Framework to strengthen transparency, credibility, and trust in climate finance delivery, reflecting a broader shift from fragmented pledges to coherent, measurable, and equitable financial support."

UK Context

The Seventh Carbon Budget (CB7): Advice for the UK Government (February 2025)

2.2.4 In February 2025, the Climate Change Committee (CCC) published its advice to the UK Government for the Seventh Carbon Budget (CB7) covering the years 2038 to 2042. This recommends an emissions cap of 535 MtCO2e; an ambitious target which is stated as being deliverable provided action is taken rapidly. Electrification and low-carbon electricity supply makes up the largest share of reductions – 60% by 2040 – two of five routes outlined to meet CB7.

2.2.5 UK based renewable energy will provide the bulk of generation to achieve CB7 – and this *"requires twice as much electricity as today by 2040*" (page 12).

2.2.6 The CCC's Balanced Pathway requires a doubling of onshore wind capacity to 32 GW by 2040 (Figure 5.1b). This will require recent annual installation rates:

"…to treble this decade, requiring installation rates comparable to the annual roll-out rates previously sustained during the mid-2010s." (page 106).

2.2.7 The key values/drivers that underpin this pathway require a substantial and immediate increase in capacity in onshore wind rising from 16 GW in 2025 to 26 GW in 2030, 29 GW in 2035, 32 GW in 2040 and 37 GW in 2050 (page 208). Meeting 2050 levels conservatively require around 2% of UK land for onshore wind, with c. 98% of land around onshore turbines remaining available for other land uses (e.g., agriculture and pasture) (page 209).

Progress in reducing emissions – 2025 report to Parliament (June 2025)

2.2.8 The CCC's latest progress report, published in June 2025 outlines in the first paragraph of the Executive summary that:

"Climate change is here, now. Until the world reaches Net Zero CO2 emissions, with deep reductions in other greenhouse gases, global temperatures will continue to rise. That will inevitably lead to increasingly extreme weather, including in the UK."

2.2.9 Page 15 of the CCC Report outlines:

"To achieve the Government's ambition in the Clean Power 2030 Action Plan, total operational capacity of renewables will need to more than double by 2030.

– This will require a tripling in annual installations of both offshore and onshore wind and a four-fold increase in solar compared to the average rate seen since the start of this decade."

Scottish Context

Scotland's Carbon Budgets (May 2025)

2.2.10 On 21 May 2025, the CCC issued Scotland's Carbon Budgets, which is advice to the Scottish Government to inform the level of Scotland's four carbon budgets (2026-2045). It also presented the latest scientific research noting that "*the rate of Global temperature increase is unprecedented, reaching 0.26ºC per decade over 2014 to 2023*", noting that "*this continued warming means that the world is rapidly approaching the lower end of the Paris Agreement long-term temperature goal*" (page 21).

2.2.11 Box 1.1 (page 22) of Scotland's Carbon Budgets outlines the current estimates of human-induced long-term warming which are around 1.31ºC above pre-industrial levels and rising at 0.26ºC per decade. It notes short term variability and fluctuations, with the El Niño cycle late 2023/24 creating global average temperature anomalies of 1.5ºC above pre-industrial levels. Box 1.1 further emphasises that whilst it is still theoretically possible to return long-term warming to at or below 1.5ºC, deep and immediate emission cuts are required; the greater the overshoot the larger the climate risk/ tipping points and need for CO_2 removal measures/adaptation.

2.2.12 To respond to this threat, and in line with the Climate Change (Scotland) Act 2009, the CCC recommends (page 37) the following four carbon budgets for Scotland based on a Balanced Pathway; an ambitious but credible route to Net Zero for Scotland by 2045.

- *"57% lower than 1990 levels for the First Carbon Budget (2026 to 2030).*
- *69% lower than 1990 levels for the Second Carbon Budget (2031 t0 2035).*
- *80% lower than 1990 levels for the Third Carbon Budget (2036 to 2040).*
- *94% lower than 1990 levels for the Fourth Carbon Budget (2041 to 2045)."*

2.2.13 The CCC confirms (page 37) that meeting these budgets "*will depend largely on ramping up deployment of solutions that are available today*" - and that this will require "*immediate action, at pace and scale*" (page 9).

2.2.14 Electrification, and a low carbon electricity supply, is an essential component to meet Scotland's carbon budgets, as confirmed on page 47:

"Electrification delivers almost half of the total emissions reduction required throughout the Balanced Pathway. Electric technologies are now the clear low-carbon technology choice in many areas (including surface transport and home heating). They are available today and could be deployed rapidly in many key areas, provided the right incentives are put in place. Continuing to expand the supply of low-carbon electricity and the grid infrastructure to allow its use will be important to enable this to take place. Scaling up these immediate options is key to meeting all of Scotland's carbon budgets.

2.2.15 As well as assisting to reach Net Zero, with regards to energy costs, security of supply and improved resilience, it notes (page 16) that "*electricity supply requires upfront investment in renewables generation and grid infrastructure*". Noting that "*with much lower operating costs, this generates savings over time in our pathway."* On page 52 it also confirms that "*Delay to investment into decarbonisation will delay the realisation of benefits, including operating cost savings, improved resilience, and energy security".*

2.2.16 The Balanced Pathway includes tripling the capacity of variable renewables in Scotland (including onshore wind) from 15 GW in 2023 to 49 GW in 2035 to 66 GW by 2045 – providing 98% of electricity generation in 2035 (page 92).

2.2.17 Page 94 outlines the key actions for the Scottish Government to deliver the Balanced Pathway in electricity Supply, which includes measures to: *"urgently improve the planning process to approve large electricity infrastructure projects in Scotland, such as transmission lines and onshore wind farms."* There is also recognition of the opportunities for growth and employment through onshore wind (page 118).

The Climate Change (Scotland) Act 2009 (Scottish Carbon Budgets) Amendment Regulations 2025 (June 2025)

2.2.18 In response to the CCC's Scotland's Carbon Budgets Advice, the Scottish Government laid in Scottish Parliament the Climate Change (Scotland) Act 2009 (Scottish Carbon Budgets) Amendment Regulations 2025 in June 2025 which accepts the CCC's advice.

2.2.19 The Scottish Government Statement to Accompany The Climate Change (Scotland) Act 2009 (Scottish Carbon Budgets) Amendment Regulations 2025 outlines:

"The CCC expresses its carbon budgets as a percentage lower than Baseline, whereas the proposed Scottish carbon budgets are expressed as a percentage of the baseline multiplied by 5 (for the number of years comprising the carbon budgets). The expressions are inverse to each other, so the figures have been converted to the number of MtCO2e in order to demonstrate their equivalence."

2.2.20 The Climate Change (Scotland) Act 2009 (Scottish Carbon Budgets) Amendment Regulations 2025 came into force on 10 October 2025.

Scotland's Draft Climate Change Plan: 2026-2040 (November 2025)

2.2.21 The Scottish Government's Draft Climate Change Plan (CCP): 2026-2040, published on 6 November 2025, sets out the policies and proposals the Scottish Government will take forward to enable its carbon budgets to be met between 2026-2040.

2.2.22 It recognises the importance of tackling climate change, and it is stated in the Ministerial Foreword that Scotland is:

"already witnessing the devastating consequences of a warming planet, with floods, water shortages, heatwaves and wildfires becoming more common; these impact our communities and endanger lives and livelihoods across our country. Globally, the impact of more severe weather continues to cause water and food shortages, displacement of communities, and species loss at an unprecedented scale."

2.2.23 The Ministerial Foreword also recognises the key economic benefits from the energy transition:

"The number of green jobs in our economy continues to grow faster than all other regions of the UK according to PWC's Green Jobs Barometer. Likewise, between 1990 and 2023 our emissions halved while the economy grew by 67.4%; a thriving economy and falling emissions are not only compatible but go hand-in-hand."

2.2.24 The CCP includes the five-year carbon budgets set out in The Climate Change (Scotland) Act 2009 (Scottish Carbon Budgets) Amendment Regulations 2025. The CCP includes over 150 policies and proposals across sectors to deliver these budgets.

2.2.25 The section on Energy supply in Annex 2 – Sectoral Annexes states that "*achieving emissions reduction for the energy generation sector means moving to an electricity system in which the residual amount of unabated gas is displaced by low carbon and renewable sources. To deliver this target, whilst ensuring a safe and secure supply, we must grow our renewables capacity, including from offshore and onshore wind, and solar*."

2.3 Energy Policy

UK Context

Onshore Wind Taskforce Strategy (DESNZ, July 2025)

2.3.1 The Onshore Wind Taskforce Strategy (OWTS) was published by the UK Government in July 2025. It notes that Scotland's onshore wind capacity has increased significantly from 2.5 GW to 10.3 GW between 2010 and 2024, showing a strong commitment to clean energy. Notwithstanding, to achieve the goal of decarbonising the power sector by 2030, the OWTS identifies that Great Britain needs 27-29 GW of onshore wind capacity, which will require a step-change in delivery throughout the UK.

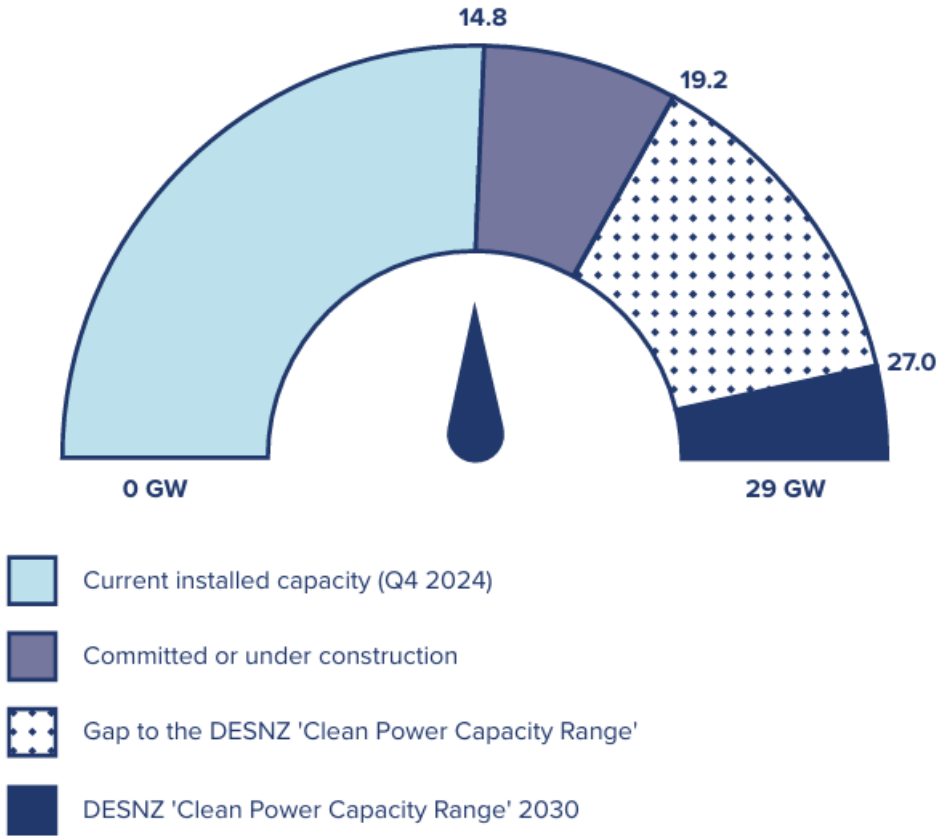
2.3.2 The OWTS also demonstrates the socio-economic benefits of onshore wind development, with the sector directly supporting 6,600 full-time equivalent (FTE) jobs and indirectly supporting 13,100 FTE jobs, generating £191 million per year in exports. Meeting the Government's 2030 targets could deliver up to 45,000 direct and indirect jobs in Great Britain, highlighting significant economic opportunities of the sector.

2.3.3 Overall, the OWTS shows how onshore wind development plays a vital role in the overall strategy to combat climate change, promote sustainable energy, and drive economic growth. It sets a highly supportive context for future consent applications for onshore wind such as that being proposed in this S36 application.

2.4 Progress towards Energy and Emissions Targets

2.4.1 As detailed in **Section 2.3**, the UK Government have set a goal to decarbonise the power sector by 2030 which requires 27-29 GW of installed onshore wind capacity. The OWTS confirms that as of Q4 2024 the onshore wind capacity in Great Britain is 14.8 GW, with 16 GW in the UK. Figure 3 of the Onshore Wind Taskforce Strategy detailed below (Planning Statement Addendum **Figure 2.1**) demonstrates there is 4.4 GW of committed or under construction onshore wind, therefore at least between 7.8 GW and 9.8 GW of installed capacity of onshore wind is needed in the next 5 years.

Figure 2.1: Onshore wind capacity needed for 2030 Clean Power mission (OWTS)



2.4.2 **Table 2.1** presents the updated position based on the key targets discussed above and in the Planning Statement, where there has been an update.

Table 2.1: Updated progress against key energy and emissions targets for Scotland.

Target	Timescale	Source	Current Position
50% of the energy for Scotland's heat, transport and electricity consumption to be supplied from renewable sources	2030	Scottish Energy Strategy: The future of energy in Scotland (2017)	The Q2 2025 Energy Statistics for Scotland outline that in 2023, Scotland generated the equivalent of 29.5% of total final energy consumption from renewable sources.
Minimum installed capacity of 20 GW of onshore wind in Scotland by 2030	2030	Onshore Wind Policy Statement (2022)	10.421 GW grid-connected in Q3 2025.

Energy Statistics for Scotland Q3 2025

2.4.3 In relation to grid connected onshore wind capacity, there was 10.421 GW in Q3 2025 (Scottish Energy Statistics Hub, 2025). In the same quarter, there was 18.190 GW in the pipeline (10.547 GW in planning, 5.606 GW awaiting construction, 2.038 GW under construction). The largest part of the pipeline forms applications in planning and there is no certainty all these applications will receive consent and be constructed.

Scottish Greenhouse Gas Statistics 2023

2.4.4 The Scottish Government's Scottish Greenhouse Gas Statistics 2023 were published on 10 June 2025 and confirmed that greenhouse gas (GHG) emissions reduced by 51.3% between 1990 and 2023.

Conclusion on Climate Change, Energy and Targets Overview

2.4.5 It is clear that while progress has been made, an accelerated deployment of onshore wind is required to meet the onshore wind targets set by both the UK and Scottish Governments and the GHG emissions reduction targets. It has also been demonstrated there is a clear need for onshore wind developments post 2030.

2.5 Planning Policy

Development Plan

2.5.1 The relevant adopted Development Plan has not changed since the publication of the Planning Statement which is the National Planning Framework 4 (NPF4), the Highland-wide Local Development Plan (HwLDP) and associated Supplementary Guidance and the Inner Moray Firth Local Development Plan 2 (IMFLDP2).

2.5.2 However, there has been an update to timescales for the preparation of a new single Highland Local Development Plan (HLDP) to replace the current four LDPs. The revised timeline is for the HLDP to be submitted for examination in 2028 with adoption expected in 2029. In terms of progress to date, the Highland Council (THC) have drafted part of their formal Evidence Report, which when complete, will be submitted to Scottish Ministers in 2026.

3 ASSESSMENT OF THE REVISED PROPOSED DEVELOPMENT

3.1 Introduction

3.1.1 The assessment made in the Planning Statement remains largely relevant. This Planning Statement Addendum provides an update based on the Revised Layout.

3.2 Schedule 9 of the Electricity Act 1989

3.2.1 The assessment outlined in the Planning Statement is still accurate and up to date in this respect.

3.3 Principle of the Revised Proposed Development

3.3.1 The Revised Proposed Development remains categorised as a National Development in NPF4; the principle of development has been established, and its need does not require to be demonstrated again. Notwithstanding, it is useful to note that the Revised Proposed Development would make a substantial contribution towards renewable energy and GHG emissions reduction targets.

3.3.2 **Chapter 2** of this Planning Statement Addendum sets out new key relevant Energy and Climate Change policy and confirms the critical need for the deployment of renewable energy development to address renewable energy and GHG emissions reduction targets to meet Net Zero by 2045.The Revised Proposed Development would power the equivalent of **54,061**[2] homes. This context helps demonstrate the contribution the Revised Proposed Development will make to Scotland and the UK's overarching energy targets.

3.3.3 The Revised Proposal Development will also help secure the transition from fossil fuels, the green recovery from the coronavirus pandemic and other global economic shocks and biodiversity / socio-economic benefits - all recognised benefits of onshore wind development.

3.3.4 In summary, the principle of the Revised Proposed Development is established and remains aligned with international, UK, national and local climate change and energy policy. The Revised Proposed Development will help meet the legally required Net Zero target and renewable energy generation targets.

3.4 Development Plan

3.4.1 The Development Plan policies have not changed and are listed in the Planning Statement. The assessment against the Development Plan in the Planning Statement found that the limited **significant** landscape and visual effects were considered to meet the policy tests as

[2] Based on the energy output from the Wind Farm over the lifetime derived from the carbon calculator (9,460,800 MWh) (**AI Technical Appendix 13.1**) this would result in an annual electricity generation of 189,216 MWh, which, when divided by the average household electricity consumption of 3,447.8 KWh (Subnational Electricity Consumption Statistics, Department for Energy Security and Net Zero, 2025), would power the equivalent of 54,061 homes in Scotland.

outlined in NPF4 Policies 4 and 11. The EIA Layout accorded with NPF4 in all other regards and that the EIA Proposed Development met the requirements of the IMFLDP2. It also met the requirements of the HwLDP where they are compatible with NPF4. The Planning Statement concluded that the Proposed Development was in accordance with the Development Plan when read as a whole.

3.4.2 Following the design changes, the AI Layout is considered to secure improvements to the design and layout of the Revised Proposed Development, further limiting its effects and increasing mitigation measures. The conclusion of this Planning Statement Addendum is therefore predominantly consistent with the Planning Statement. The assessment below confirms how the Revised Proposed Development complies with the Development Plan.

3.5 NPF4

3.5.1 This focuses upon the key determining policy, Policy 11. Other relevant NPF4 policies are also considered. Aspects of the policy assessment in the Planning Statement that have not changed since the original May 2025 submission are not included here; the Planning Statement Addendum should be read in conjunction with the Planning Statement as originally submitted.

Policy 11 Energy

Maximising net economic impacts

3.5.2 Policy 11 (c) relates to maximising net economic impact, particularly at a local and community level. Based on the proposed installed capacity of the Revised Proposed Development and applied regional and national statistics, **Chapter 12: Socio-economics, Land use, Tourism and Recreation** in the AI Report assessed the Revised Proposed Development's socio-economic impact as follows:

- During the construction phase, it is estimated that the Revised Proposed Development could generate up to £29.8 million GVA and 462.9 job years across Scotland, with approximately £9.4 million and 157.8 job years of this total directly benefitting the Highlands and £1.6 million GVA and 16.7 job years in Inner Moray Firth.

- It is estimated that over the Revised Proposed Development's 50-year lifetime, operation and maintenance costs could generate up to £107.1 million GVA and 1506.3 job years for Scotland, of which £77 million GVA and 1060 job years directly benefit the Highlands economy and £28.2 million GVA and 386.9 job years for Inner Moray Firth.

- Non-domestic rates would contribute directly to public sector finances – estimated at £856,127 per annum (c.£42.8 million over the project's operational lifetime) to THC.

3.5.3 The initiatives proposed by the Applicant set out in **Chapter 12** of the EIA Report remain in place to ensure that the socio-economic impacts are maximised. **Chapter 12** of the AI Report confirms this commitment from the Applicant. Beyond, the proposed Community Wealth Fund which will deliver £5,000 per MW of installed capacity over the lifetime of the project, the local community will have the opportunity to acquire up to 10% shared ownership of Lynemore Wind Farm.

3.5.4 More widely, the Applicant is interested in working with community councils, stakeholders and businesses to develop an approach that maximises local economic impact and employment.

3.5.5 In order to make sure that local contractors can take advantage of construction and supply chain opportunities, the Applicant has created a Contractor Registration Form (which is available on the project website) where businesses can lodge their interest and keep updated on the project.

3.5.6 The Revised Proposed Development is considered to maximise the net economic impact, including local and community socio-economic benefits.

Project Mitigation and Design to demonstrate how impacts are addressed

3.5.7 Policy 11 (e) requires the applicant to demonstrate how the following impacts are addressed through mitigation and design.

3.5.8 **Chapter 4** of the AI Report provides an overview of the design iterations and design mitigation process undertaken for the Revised Proposed Development. The design of the Revised Layout was influenced by the following factors:

- Impact on peat.
- Landscape and visual impact.
- Ornithology impacts.
- Concerns raised at consultation stage.

3.5.9 Additional baseline data gathered by technical disciplines was reviewed by the project team and discussed at a design workshop. This helped to develop a Revised Layout which avoided and / or minimised the potential to increase adverse effects compared to the EIA Layout.

3.5.10 The Revised Layout Design Drivers are:

- To respond to the landscape and visual issues and opportunities identified by consultees and other stakeholders through the EIA process.
- To respond to other environmental and technical constraints identified through consultation, both within and around the Site, including matters such as peat.
- To arrange the turbines to minimise **significant** adverse visual effects on sensitive receptors, viewpoints and achieve a harmonious composition when viewed on the skyline from locations in the northern part of the study area.
- To minimise the adverse visual impacts from visible aviation lighting attached to the turbines.

3.5.11 Following the review and revision of the EIA Layout, a more refined design has been developed, informed by an improved understanding of potential environment effects.

3.5.12 The Revised Proposed Development has a reduced number of turbines from 14 to 12 as well as other changes which are summarised in **Chapter 1** of the Planning Statement Addendum and detailed in **Chapter 2** of the AI Report.

3.5.13 The reduction in turbine numbers is considered to achieve an appropriate balance between minimising environmental effects and maintaining commercial viability, while also significantly contributing to renewable energy generation targets.

3.5.14 The Applicant engaged with consultees to understand better their concerns and to understand their perception of the proposed changes in design.

3.5.15 The Revised Proposed Development has reduced the landscape and visual effects. This is detailed further in **Table 3.1**.

3.5.16 **Table 3.1** provides an overview of how each of the impacts detailed in Policy 11e) have been considered in the Revised Proposed Development.

Table 3.1: NPF4 Policy 11 e) Impacts

Impact	How the Impact has been addressed
(i) Impacts on communities and individual dwellings, including residential amenity, visual impact, noise and shadow flicker	**Visual Impact and Residential Amenity** **Chapter 5: Landscape and Visual** of the AI Report states that there would be no change to the levels of effect and significance reported in **Technical Appendix 5.3** of the EIA Report. Of the six properties assessed within 2 km (and illustrated in **AI Figures 5.3.1-7**) **significant** visual effects were assessed at two groups of the properties (Keeper's Cottage and 1-4 Forestry Houses). The change to the route of the site access would increase the separation distance from property groups 1 and 2 (shown in **Figure 5.3.1** of the AI Report, moving from within 200 m to the north, to beyond 400 m to the south. The route would also move from the north of property groups 3-4 to the south as illustrated in **Figure 5.3.1** of the AI Report. It remains the case that there would be no instances where the Residential Visual Amenity Threshold would be reached and no instances where the visual effects, (although **significant** in some cases) would be so severe as to be considered as "overwhelming views in all directions"; "unpleasantly encroaching" or being "inescapably dominant from the property" as exampled in the RVAA guidance. There are no changes to the assessment in relation to the night-time effects which is that none of the properties would experience **significant** night-time visual effects. **Noise** **Chapter 11: Noise and Vibration** of the AI Report finds that construction noise impact from the Revised Proposed Development has reduced from moderate to short term minor adverse at the nearest high-sensitive receptors, which translates to short-term minor adverse effect, considered **not significant** in EIA terms. Change in noise levels from construction traffic remain negligible and **not significant** in EIA terms. Vibration impact has reduced from minor to negligible adverse effects which remains **not significant** in EIA terms. Operational effects from the Revised Proposed Development are considered **not significant** in EIA terms, with marginal reduction in noise levels from the EIA predicted at some receptors. **Shadow Flicker**

Impact	How the Impact has been addressed
	Chapter 13: Other Issues of the AI Report provides an updated study area and shadow flicker assessment for the Revised Layout. It finds that the Revised Proposed Development would not alter the impact assessment or conclusions presented in the EIA Report which is that based on the 'realistic worst case scenario' no significant effects are predicted and therefore no mitigation is required. **Conclusion** It has been demonstrated above that as a result of the Revised Layout; there has either been an improvement or no change from what was assessed in the EIA Report. Therefore, there the original conclusion in the Planning Statement in terms of residential amenity remains. Taking account of the above conclusions of the AI Report, the Revised Proposed Development is considered to protect residential amenity and has fully addressed the requirements of Policy 6e)i).
(ii) Significant landscape and visual impacts, recognising that such impacts are to be expected for some forms of renewable energy. Where impacts are localised and/or appropriate design mitigation has been applied, they will generally be acceptable	**Chapter 5: Landscape and Visual** of the AI Report provides a revised Landscape and Visual Impact Assessment (LVIA) for the Revised Layout. The receptors named below are described in that chapter. Landscape Impacts It finds that **significant** landscape effects resulting from the Revised Proposed Development would affect part of the *Rolling Uplands, Inverness* Landscape Character Type (LCT) within 1-3 km. The Revised Proposed Development is located within this LCT and due to the reduction in turbine numbers there would be a corresponding reduction in the direct effects on this landscape and its associated elements and characteristics. Due to the Revised Proposed Development, there would be **no significant** effects on the *Farmed Strath – Inverness* LCT - *Stratherrick, Strathnairn* Landscape Character Area (LCA). This is a change from the EIA Layout. Visual Impacts In summary, **significant** visual effects resulting from the Revised Proposed Development would be limited to localised areas within 10.5 km from the revised turbines. **Significant** visual effects include the views from some residential properties at Balnafoich on the western side of Strathnairn as illustrated by Viewpoint 4 (**AI Report Figure, 5.22a-f)**; views from parts of transport routes (including the A9, B9154, and the main railway line from Inverness to Perth)

Impact	How the Impact has been addressed
	and parts of recreational routes (including Core Path IN27; Heritage Paths 1, 2, and 3; and part of the Sustrans National Cycle Route 7). Notably the Revised Proposed Development would lead to reduced and **non-significant** visual effects from Inverness (including the area of Leachkin as illustrated in Viewpoint 16 of the AI Report and previously assessed as significant); the B861 in Strathnairn, also previously assessed as significant; and reduced visual effects on views from Culloden Battlefield and associated core paths; and views from Loch Duntelchaig, and Loch Ruthven Nature Reserve. Landscape Designations No landscape designations were assessed as significantly or moderately affected by the Proposed Development and this remains the same for the Revised Proposed Development. **Relevant considerations for assessing whether an effect is localised** There are several useful precedents regarding localised effects of onshore wind applications. The precedents already mentioned in the Planning Statement have not been repeated here but are still relevant. The below precedent is new since the previous May 2025 submission. • **Ladyfield Renewable Energy Park (ECU Reference: ECU00003291).** The Scottish Ministers concluded in paragraph 78 on page 12 that "*the proposed Development will have some significant landscape and visual impacts but overall, these would remain relatively localised with the majority of significant effects occurring within 10km of the proposed Development*." This additional precedent decision demonstrates that whilst determining significant landscape and visual impacts is a balancing exercise, the landscape and visual effects of the Revised Proposed Development, which are contained within a 10.5 km radius, should be considered to be localised and assessed accordingly. Policy 11 makes it clear that even where effects are not found to be localised, they can still be found to be generally acceptable where appropriate design mitigation has been applied. It has been demonstrated in **Chapter 4: Design Evolution Update** of the AI Report, the Revised Proposed Development has been subject to an iterative design process, with landscape and visual design drivers identified to guide the design review process. Therefore, it is concluded that effects are both localised and benefit from additional design mitigation.

Impact	How the Impact has been addressed
	In summary, it is considered that the localised effects should be considered acceptable given this policy requirement, particularly given further design mitigation improvements to landscape and visual impact.
(iii) Public access, including impact on long-distance walking and cycling routes and scenic routes;	**Chapter 5: Landscape and Visual** of the AI Report in terms of visual effects on views from recreational routes outlines that there are reduced effects as a result of the Revised Proposed Development. These are: • Core Paths on elevated western edge of Inverness – Reduced to **not significant** due to reduction in turbine numbers and improved composition as illustrated in **Viewpoint 16** of the AI Report. • Core Paths around Culloden (IN08.12, IN08.13, IN08.25, IN08.28, IN09.01, and IN09.02) – Reduced from Moderate to No View and **not significant** as illustrated in **Viewpoint 12** of the AI Report. • Heritage Path HP1 – General Wade's Military Road, Moy to Inverness - Reduced in number of turbines and horizontal extent from Substantial to Substantial to Major (reducing further as forest is restocked). Approx. 6.8km of the route would be affected, reducing to 4.5km when accounting for forestry. • Great Glen Way / Loch Ness 360 Trail - No change to the assessment although there is a reduction in the number of turbines and improved composition as illustrated in **Viewpoint 16** of the AI Report. The assessment remains the same for all other visual effects on views from recreational routes which have been assessed as outlined in **Chapter 5: Landscape and Visual** of the AI Report. There has been no change to the assessment in **Chapter 12: Socio-Economics** of the EIA Report therefore the wording in the Planning Statement remains. **Chapter 12: Socio-Economics** of the AI Report notes that the access tracks created during project construction can be long-term assets for outdoor recreation, providing improved routes for hillwalking, mountain biking and horse riding. It has therefore been demonstrated that consideration has been given to the requirements of Policy 11e)iii).

Impact	How the Impact has been addressed
(iv) Impacts on aviation and defence interests, including seismological recording;	**Chapter 13: Other Issues** of the AI Report concludes that the Revised Layout proposed by the Applicant does not change the predicted effects on aviation set out in the EIA Report which are predicted to be negligible, adverse and **not significant** in EIA terms. The mitigation proposed is the same as outlined in the EIA Report. It has therefore been demonstrated that impacts on aviation and defence interests have been considered and are acceptable subject to the mitigation measures detailed in **Chapter 13: Other Issues**.
(v) Impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised;	Telecommunications effects were scoped out of the EIA. The Revised Layout results in no change to this. Therefore, the conclusion in the Planning Statement remains unchanged. It is considered there are no unacceptable impacts on telecommunications and broadcasting installations, and transmission links are not likely to be compromised.
(vi) Impacts on road traffic and on adjacent trunk roads, including during construction;	**Chapter 10: Traffic and Transport** of the AI Report outlines that it is not predicted the Revised Layout would cause any additional effects upon any of the receptors along the proposed transport routes to those predicted in **Chapter 10: Traffic and Transport** of the EIA Report. The only impact of the Revised Layout on identified receptors would be a decrease in traffic volumes predicted relating to a 18% reduction in construction material quantities during the construction period. This results in a reduction in the percentage change in traffic flows of 1.87% across the study network. This decrease in traffic volumes compared to the baseline does not change the conclusions and effects presented in the EIA Report. The impact on road traffic and on adjacent roads, including during construction has been considered and is **Not Significant** in EIA terms.
(vii) Impacts on the historic environment;	**Chapter 9: Archaeology and Cultural Heritage** of the AI Report finds that the Revised Layout would not result in any additional impact not already considered in the EIA Report. The only identified change to effects predicted from the EIA Layout is the avoidance of previously identified direct (physical) impacts upon MHG23810 Perth-Inverness, General Wade's Military Road as a result of the re-location of the proposed Site Access and the proposed Construction Compound. No direct (physical) impacts upon any known heritage assets are therefore anticipated as a result of the Revised Proposed Development.

Impact	How the Impact has been addressed
	Following implementation of the proposed programme of archaeological mitigation of construction phase impacts upon hitherto unknown heritage assets (archaeological potential') there would be no residual physical effects on heritage assets. No additional mitigation for the Revised Proposed Development is required to that identified for the EIA Layout. It has therefore been demonstrated that consideration has been given to the requirements of criterion vii.
(viii) Effects on hydrology, the water environment and flood risk;	**Chapter 8: Hydrology, Geology, Hydrogeology and Peat** of the AI Report considers the potential significant effects on important hydrological, hydrogeological, geological and peat features associated with the Revised Proposed Development. The assessment is based on baseline data from the EIA report plus additional field surveys undertaken for the Revised Proposed Development. Based on the on changes in the Revised Layout, the following effects were identified for consideration in the AI: • Erosion, sedimentation and pollution of watercourses; and • Direct effects during construction on the peat resource due to the excavation of peat. **Chapter 8** of the AI Report concludes that the effects on Hydrology, Geology, Hydrogeology and Peat associated with the Revised Proposed Development are not considered to have changed from the EIA Layout, which considered all aspects to be Minor (**not significant**). Two turbines have been removed from the Revised Proposed Development to avoid impact on peat, and seven turbine hardstandings have been moved to avoid deeper areas of peat. One of the reasons for the relocation of the Access Route was also to cross fewer areas of deep peat. As a result, the total volume of peat calculated to be excavated reduced from 3.1% of the total peat volume in the survey area for the EIA Proposed Development to 2.89% for the Revised Proposed Development. The removal of some infrastructure and avoidance of some areas of deeper peat has therefore led to a reduction in effect on the peat resource and the effect remains Minor (**not significant**). The reduction in the number of watercourse crossings and continued avoidance of watercourse buffers will reduce the impact of construction on the watercourses. There are no Groundwater Dependent Terrestrial Ecosystems (GWDTEs) that are considered to be groundwater dependent that are hydrologically connected to the Revised Development. Regarding Peat Landslide Hazard Risk Assessment (PLHRA), risks are lower for the Revised Layout compared to the EIA Layout because the majority of the source zones in the EIA

Impact	How the Impact has been addressed
	PLHRA were associated with crane-loaded floating track, however the Revised Layout has largely removed floated tracks in these areas. The exception is Source Zone 3, which has a Moderate likelihood and therefore some additional mitigation as specified in the EIA Appendix 8.4 is required. Based on the revised calculations, risks are lower for the Revised Layout than for the EIA Layout. The effects from sediment release, alteration of natural flow and potential pollution therefore all remain Minor (**not significant**). The only mitigation measures required in addition to those recommended in the EIA report are: • the requirement to identify the exact location of the Lynemore Cottage private water supply (PWS) so that it can be appropriately protected even though there is unlikely to be any effect • micrositing of infrastructure in the vicinity of modified peat with near natural features retained to avoid the near natural features. The additional mitigation, micro-siting, monitoring and management plans recommended in the EIA Report apply to the Revised Development and will maintain the significance of effects of the proposal on the hydrology and hydrogeology of the site to be Minor. It is therefore considered the Revised Proposed Development has considered the effects on hydrology, the water environment and flood risk and meets the requirements of criterion viii.
(ix) Biodiversity, including impacts on birds;	**No significant** adverse effects are identified by the AI Report under **Chapter 6: Ecology and Biodiversity** and **Chapter 7: Ornithology**. **Ecology** **Chapter 6: Ecology and Biodiversity** of the AI Report concludes that the Revised Proposed Development would **not** give rise to any **significant** adverse direct and/or indirect effects on important ecological features (IEFs), and that the potential for adverse effects has reduced relative to the adverse effects predicted for the EIA Layout. Due to reduced scale and improved locations of infrastructure in the Revised Proposed Development, the magnitude of impacts on blanket bog and semi-natural broad-leaved woodland has reduced. The assessment of the Revised Proposed Development does not change the conclusions of the EIA Report and therefore the updated assessment in **Chapter 6: Ecology and Biodiversity** concludes that there would be **no significant** residual adverse effects upon

Impact	How the Impact has been addressed
	ecological features, either alone or cumulatively with other projects (see criterion xiii) of this table. The outline Habitat Enhancement and Management Plan (OHEMP) has been updated as part of the AI (**AI Technical Appendix 6.5**). The principal change relates to the recalculation of the extent of direct and indirect habitat loss. The OHEMP focuses on conserving, restoring and enhancing the overall condition and connectivity of bog habitats within the Site. These measures will also provide enhanced opportunities for associated biodiversity including protected terrestrial mammal species, breeding waders, invertebrates and plant species which would not be possible without intervention. This together with habitat creation and management of opportunities for associated species, will improve connectivity for wildlife over an extensive area beyond the footprint of the development. In relation to the recalculation noted above, the Applicant has committed to the compensation for the loss of peatland habitat at a ratio of 1:10 lost to restored, in accordance with NatureScot guidance and a further 10% of the extent of priority peatland habitat resource within the Site required for enhancement which is a combined total of 353.29 ha. As stated in the OHEMP (**AI Technical Appendix 6.5**), it is expected that 220 ha of restoration will be achieved onsite, with the outstanding 133.29 ha to be delivered offsite via a 'Peatland Restoration Agreement', to be secured through an appropriately worded planning condition. The Revised Proposed Development would secure **significant** biodiversity enhancements. **Ornithology** **Chapter 7: Ornithology** of the AI Report states that potential impacts on birds have been reassessed for the Revised Proposed Development, and a comparison made to the impacts previously concluded for the EIA Layout. The assessment has been undertaken for the same key species, termed 'important ornithological features' (IOFs) (curlew, dunlin, golden eagle, golden plover, red kite, short-eared owl, white-tailed eagle). In terms of disturbance and displacement impacts, where they have been predicted, they have been reduced for all IOFs for the Revised Proposed Development when compared to the EIA Proposed Development. The effect would remain unchanged from those concluded in for the EIA Proposed Development with a negligible (which is the lowest category) adverse impact predicted and **non-significant** effects concluded for all IOFs. Regarding collision impacts, the collision risk is now lower than for EIA Layout for the five IOFs assessed (dunlin, golden eagle, golden plover, red kite and white-tailed eagle). Collision

Impact	How the Impact has been addressed
	impacts of the Revised Proposed Development have been determined as being of negligible magnitude and **non-significant**. This is the same conclusion as the EIA Report. It has therefore been demonstrated that the Revised Proposed Development has considered biodiversity, including impacts on birds and has therefore met the requirements of criterion ix.
(x) Impacts on trees, woods and forests;	**Chapter 12: Other Issues** of the AI Report outlines that the Revised Layout reduces the net tree felling area from 4.29 ha, proposed in the EIA Report, to 0.74 ha. The effect on ancient semi natural woodland is minimal with the proposed removal of approximately six birch trees. The Revised Layout considerably reduces the amount of felling required to install the access track infrastructure and construction compound, therefore there is a significant reduction in impact on the woodland resource when comparing the Revised and EIA layouts. **No significant** adverse direct or indirect effects on forestry are anticipated because of the Revised Layout. It should be noted that because of the reduced area of felling, the area of compensatory planting is also reduced to 0.74 ha in line with the Scottish Government's Policy on the Control of Woodland Removal. It has therefore been demonstrated that the impacts on trees, woods and forests have been considered as part of the design process.
(xi) Proposals for the decommissioning of developments, including ancillary infrastructure, and Site restoration;	This aspect remains unchanged from the EIA Report and therefore remains as outlined in the Planning Statement.
(xii) The quality of Site restoration plans including the measures in place to safeguard or guarantee availability of finances to effectively implement those plans	This aspect remains unchanged from the EIA Report and therefore remains as outlined in the Planning Statement.
(xiii) Cumulative impacts	Where relevant, the technical chapters have considered cumulative impacts, as summarised below: **Landscape and Visual** **Chapter 5: Landscape and Visual** of the AI Report has considered four new applications (previously identified in the EIA Report as pre-planning schemes) within 15 km of the Revised

Impact	How the Impact has been addressed
	Proposed Development which are Kyllachy Wind Farm, Clune Wind Farm, Balnespick Wind Farm and Highland Wind Farm. **Chapter 5: Landscape and Visual** of the AI Report concludes significant landscape and cumulative effects resulting from the Revised Proposed Development would affect part of the *Rolling Upland, Inverness* LCT within 1-3km. Due to its location, to the north of, and close to the Farr and Glen Kyllachy cluster the Revised Proposed Development would not materially add to the cumulative effects of the existing and consented wind farms already influencing this LCT as a whole. In relation to cumulative visual impacts, there has been no change to what was assessed in the EIA. **Chapter 5: Landscape and Visual** of the AI Report outlines that **significant** visual and cumulative effects include the views from some residential properties at Balnafoich on the western side of Strathnairn as illustrated by **Viewpoint 4** of the AI Report; views from parts of transport routes (including the A9, B9154, and the main railway line for Inverness to Perth) and parts of recreational routes (including Core Path INV27.02, Heritage Paths 1,2 and 3; and part of the Sustrans National Cycle Route 7). **Ecology** **Chapter 6: Ecology and Biodiversity** of the AI Report notes that Kyllachy Wind Farm and Clune Wind Farm have been submitted into planning in the period since the EIA Report was submitted for the EIA Layout. Bats were not assessed as an IEF for Kyllachy Wind Farm, and predicted impacts to bats for Clune Wind Farm were assessed as of negligible magnitude and **not significant**. No cumulative impact assessment was carried out for the EIA Layout due to negligible impacts being predicted for bats. The Revised Proposed Development is also assessed as having negligible operational phase impacts with regards to bats, and as such, there will be no detectable increase in effects cumulatively with the predicted effects of any other proposed developments within the 10 km zone of influence. **Ornithology** **Chapter 7: Ornithology** of the AI Report has considered the cumulative impact in terms of disturbance and displacement and collision risk. The cumulative assessment has included four additional proposed projects (Balnespick Wind Farm, Clune Wind Farm, Highland Wind Farm and Kyllachy Wind Farm).

Impact	How the Impact has been addressed
	In terms of disturbance and displacement, the inclusion of the four additional proposed projects would not substantially change the original conclusions for the EIA Proposed Development which were negligible and **non-significant** effect for all IOFs. In terms of collision risk, for dunlin and golden plover the cumulative collision estimate is lower for the Revised Proposed Development than calculated for the EIA Proposed Development and the negligible impact and **non-significant** remains the conclusion of the assessment. For golden eagle, the cumulative collision estimate has increased from 1.172 to 1.689 birds per year as a result of the additional proposed projects. The Revised Proposed Development contributes to less than 1% of this total. It is important to note that the contribution of the Revised Proposed Development to cumulative collision impacts on the regional golden eagle would be indiscernible. For red kite, the cumulative collision estimate has increased from 2.760 to 3.545 birds per year, as a result of the additional proposed projects. The increase can be attributed to the proposed Clune Wind Farm (0.681), which contributes to c.20% of the overall total. The Revised Proposed Development contributes to less than 5% of the total. The cumulative assessment for the EIA Proposed Development referred to the research undertaken by Sansom et al. (2016b) which found that more than five collisions per year would be needed to limit population growth in the north Scotland red kite population (the core part of this population being found in NHZ 21, which is included in the cumulative impact assessment for this species). The original conclusion in the EIA Report of a small adverse cumulative collision impact is considered to still be applicable, and a **non-significant** effect is concluded. Although the collision risk for the Revised Proposed Development decreased for white-tailed eagle, the cumulative collision estimate has increased from 0.906 to 1.842 birds per year, as a result of the additional proposed projects. Over 50% of this total is a result of inclusion of the proposed Clune Wind Farm. The Revised Proposed Development contributes to 17% of the total. However, when considering the apparent proportional risk of new projects, it should be acknowledged that this is a reflection of changing baseline conditions within the region, which has seen the white-tailed eagle population increase since some of the projects included in the cumulative impact assessment were constructed. **Chapter 7: Ornithology** of the AI outlines the cumulative mortality risk is highly precautionary as at least some of the additional wind farm projects now included in the cumulative impact assessment are likely to be subject to layout changes before being consented (where granted). As with the EIA Proposed Development, this is still considered to represent a small adverse

Impact	How the Impact has been addressed
	and **non-significant** effect at a national population scale, as the additional level of mortality would not be sufficient to cause population decline. **Cultural Heritage** **Chapter 9: Archaeology and Cultural Heritage** of the AI Report identifies **no significant** operational setting effects upon heritage assets, including cumulative effects. **Transport** The cumulative assessment within the EIA report concluded that the predicted effects were substantially below the 30% IEMA threshold. **Chapter 10: Traffic and Transport** of the AI Report concludes that "*the reduction in construction vehicle movements associated with the Revised Layout does not materially change the original assessment conclusion*." **Noise** **Chapter 11: Noise and Vibration** of the AI Report confirms that the assessment of operational noise undertaken inherently includes the assessment of cumulative effects; **non-significant** effects of operational noise therefore translate to **not significant** cumulative effect. **Climate Change** There has been no change to the climate change cumulative assessment as part of the AI Report. Therefore, the text in the Planning Statement remains relevant. **Summary** Whilst there have been some changes to the cumulative assessment when considering the additional cumulative projects, there has been no overall change in terms of significant cumulative effects. With the exception of landscape and visual, no other **significant** cumulative effects have been identified for the Revised Proposed Development. The Revised Proposed Development has addressed the requirement to consider cumulative effects as required by criterion xiii.

Balancing the impacts and considering Significant effects against renewable energy generation and greenhouse gas emission reduction targets

3.5.17 Part e) of Policy 11 continues by stating: *"that in considering these impacts, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets."*

3.5.18 The only residual **significant** adverse effects are Landscape and Visual effects, which have reduced as a result of the Revised Layout, as summarised in **Table 3.1** above and detailed within **Chapter 5: Landscape and Visual** of the AI Report. The predicted localised nature of the effects are generally considered to be acceptable under NPF4 Policy 11.

3.5.19 **Chapter 13: Other Issues** of the AI Report states that the Revised Proposed Development would deliver **significant** beneficial effects for the reduction of GHG emissions and contribution to long-term climate change mitigation.

3.5.20 The Revised Proposed Development's projected operational life of 50 years, its total GHG savings are 3,735,686 tCO2e against a fossil fuel mix of electricity over its 50 year operational life, or 1,682,692 tCO2e against a grid-mix of electricity. The carbon payback period for the Revised Proposed Development will be 7.0 years against a grid mix of electricity generation and 3.4 against a fossil fuel mix of electricity generation.

3.5.21 The Revised Proposed Development is anticipated to provide enough electricity to power the equivalent of **54,061** households in Scotland annually.

3.5.22 Therefore, there is no aspect of the Revised Proposed Development which would be unfavourable in terms of the consideration against the potential impacts identified in Policy 11. The meaningful contribution of the Revised Proposed Development towards renewable energy generation and GHG emissions targets weigh heavily in its favour.

3.5.23 **Table 3.2** provides an assessment against the other relevant NPF4 policies.

Table 3.2: Assessment against other relevant NPF4 policies

Policy	Assessment
Policy 1 Tackling the Climate and Nature Crisis	Climate – Contributions to GHG emissions reduction: The Revised Proposed Development is predicted to have a total GHG emissions saving of 1,682,692 tCO2e against a grid mix of electricity generation. The electricity generated would power the equivalent of **54,061** homes annually. The Revised Proposed Development would deliver **significant** biodiversity enhancements as detailed in **Chapter 6: Ecology and Biodiversity** of the AI and the OHEMP (**AI Technical Appendix 6.5**). Therefore, it is considered that the Revised Proposed Development would meet the requirements of Policy 1 and **significant** weight should be afforded to the Revised Proposed Development's contribution to tacking the climate and nature crises.
Policy 3 Biodiversity	National scale development is required to demonstrate that the proposal will conserve, restore and enhance biodiversity, including nature networks as well as future management. This is achieved by the Revised Proposed Development. The OHEMP has been updated in relation to a recalculation of the extent of direct and indirect habitat loss however the primary aim and principles remain the same as provided with the EIA Proposed Development. The Applicant has committed to the **significant** biodiversity enhancements described in **Chapter 6: Ecology and Biodiversity** of the AI Report. **Chapter 7 Ornithology** and **Chapter 6: Ecology and Biodiversity** of the AI Report conclude that **no significant** residual effects are predicted to occur upon any important ornithological or ecological species, habitat or feature as a result of the Revised Proposed Development. The final HEMP is expected to provide **significant** beneficial effects associated with the Revised Proposed Development in the long term, particularly when contrasted with a future baseline, which accords with and gains positive support from meeting the requirements of Policy 3.
Policy 4 Natural Places	There has been no change since the EIA assessment, therefore the Revised Proposed Development remains compliant with Policy 4.
Policy 5 Soils	Regarding criterion a)i) of Policy 5, **Technical Appendix 8.3: OPMP** of the EIA Report remains relevant and details how the mitigation hierarchy has been followed in first avoiding and then minimising the amount of disturbance to soils. In terms of criterion a)ii), **Chapter 8: Hydrology, Geology, Hydrogeology** of the AI Report predicts that effects on erosion will remain Minor (**not significant**). Regarding soil compaction, **Technical Appendix 8.3: OPMP** of

Policy	Assessment
	the EIA Report states that "*transport of peat to temporary storage areas, restoration areas or designated spoil areas will be by low ground pressure vehicles to avoid excessive compaction of the peat.*" Criterion c)ii) confirms that renewable energy development proposals on peatland will be supported. Turning to criterion d)i), a detailed, site-specific assessment has been undertaken as part of **Chapter 8: Hydrology, Geology, Hydrogeology and Peat** of the AI Report. This was based on the baseline conditions described in the EIA Report, together with additional information obtained since on peat depth, peat condition, the interaction of infrastructure with peat, GWDTEs, watercourse crossings and watercourses buffers. This satisfies criterion i) of Policy 5d). In terms of criterion d)ii), the likely effects of the Revised Proposed Development on peatland have been described in **Table 3.1** under Policy viii), concluding that the effect on the peat resource remains Minor (**not significant**). The Revised Proposed Development therefore complies with this criterion. Regarding criterion d)iii), the likely net effects of the Revised Proposed Development on climate emissions and loss of carbon have been assessed in **Chapter 13: Other Issues** of the AI Report, in addition to the Policy 1 Assessment above, confirming the lifetime emissions savings of the Revised Proposed Development and therefore its compliance. A peat management plan has been produced as part of **Technical Appendix 8.3: Outline Peat Management Plan (OPMP)** of the AI Report. **Technical Appendix 8.3: OPMP** of the EIA Report details the careful project design that has taken place and demonstrates that adverse impacts are first avoided and then minimised through best practice in accordance with the mitigation hierarchy and remains relevant. Finally, appropriate plans required for restoring and or enhancing onSite peatland are described under criterion ix) of **Table 3.1**. Overall, the Revised Proposed Development complies with all the criteria of Policy 5 and is therefore assessed to be compliant with this policy.
Policy 6 Forestry, Woodland and Trees	The impact on forestry, woodland and trees has been addressed in **Table 3.1** under criterion x). In the Revised Layout, due to the relocation of the access track infrastructure and the construction compound, the effect on ancient semi natural woodland is even smaller than the EIA Layout, with the proposed removal of approximately six birch trees. **Chapter 13** of the AI Report outlines that compensatory planting would take the form of Scots pine, birch and common alder in the area shown on **Figure 13.6** of the AI Report. In accordance with Policy 6, the OHEMP would secure improvement to woodland and tree cover in suitable locations according with the requirements of c).

Policy	Assessment
	Taking the above measures and agreement to an appropriately worded condition and the very small loss of ancient woodland, the Revised Proposed Development is considered to be acceptable.
Policy 7 Historic Assets and Places	**Chapter 9** of the EIA Report had previously provided detailed assessment of the EIA Layout against all relevant requirements of Policy 7 and confirmed full compliance. As detailed in **Table 3.1** above, **Chapter 9** of the AI Report finds that the Revised Layout would not result in any additional impact not already considered in the **Chapter 9** of the EIA Report. Therefore, the Revised Proposed Development remains compliant with NPF4 Policy 7.

3.6 Highland-wide Local Development Plan (HwLDP)

3.6.1 The majority of the requirements from policies relevant to the Revised Proposed Development in the HwLDP have been addressed under the assessment of NPF4. **Table 3.3** below provides a list of relevant HwLDP policies and describes whether they are compatible with NPF4. Full policy requirements are set out in Appendix 2 of the Planning Statement and have not changed.

Table 3.3 Assessment against relevant HwLDP policies

Policy	Reporting of inconsistency with NPF4	How addressed
Policy 28 - Sustainable Design	Compatible except where it states significant effects will not comply with the LDP and will only be supported where no alternatives exist. Policy 11 sets out prevailing policy regarding the key considerations and recognises that in considering effects, significant weight should be given to renewable energy and greenhouse gas emissions targets.	The requirements of Policy 28 are met through **Chapter 4: Design Evolution Update** of the AI Report, which provides a description of the design iteration process used to limit environmental effects. **Table 3.1** of this Addendum is also relevant. The 'Maximising net economic impacts' section of this Planning Statement Addendum, read alongside **Chapter 12** of the AI Report, confirms that the Revised Proposed Development seeks to maximise socio-economic benefits. **Table 3.1** under criterion ix) also confirms the environmental protection of ecological and ornithological interests including associated habitat enhancements as proposed in the OHEMP (**Technical Appendix 6.5** of the AI Report). The Revised Proposed Development is considered to comply with all compatible elements of the policy and defers to NPF4 regarding the tests where significant effects are predicted.
Policy 30 - Physical Constraints	Compatible	The assessment carried out in the Planning Statement remains relevant, therefore the Revised Layout remains compliant.
Policy 31 - Developer Contributions	Compatible	The assessment carried out in the Planning Statement remains relevant, therefore the Revised Layout remains compliant.
Policy 51 - Trees and Development	Compatible	The requirements of this Policy have been considered under **Table 3.1** under criterion x) and in **Table 3.2** under Policy 6. No further consideration is required. The Revised Proposed Development is considered to comply with this policy.
Policy 55 - Peat and Soils	Compatible	The Revised Proposed Development is considered to be compliant with this policy without further assessment, as that has been carried out in **Table 3.1** under criterion viii) and **Table 3.2** under Policy 5.
Policy 57 - Natural, Built and Cultural Heritage	Where application of the policy requirements would potentially lead to a different assessment by a decision maker to those made under NPF4	NPF4 policy is considered to prevail in the minor areas of identified incompatibility. However, **no significant** adverse effects are predicted for

Policy	Reporting of inconsistency with NPF4	How addressed
	and could give rise to a different assessment outcome, then policy is considered to be incompatible. Having reviewed the policy against NPF4 it is considered to be partially incompatible as refers to effects of development close to but not within Wild Land areas, the policy test for 1 and support for Fragile communities. With regard to Wild Land Areas, NPF4 is clear that a buffer will not be applied around Wild Land Areas. The policy test for 1 requires no unacceptable impacts, whereas NPF4 will consider this in the overall planning balance giving significant weight to renewable energy generation and greenhouse gas reduction targets. No such balance exists within this policy. For 2 with regard to the test which confirms effects can be outweighed by social or economic benefits, it does not allow effects to be outweighed by environmental benefits as recognised in NPF4. Additionally, 2 requires in addition to effects being outweighed that it must also support fragile communities, which is not a policy test required by NPF4. Criteria 3 is not considered to be relevant to the Proposed Development.	natural or built heritage as previously assessed in **Table 3.1** under criteria ix) and vii) and **Table 3.2** under Policies 3, 5 and 7. Furthermore, the Revised Proposed Development will secure national level environmental benefits and secure **significant** biodiversity enhancements. The Site is not located in a Wild Land Area. NPF4 prevails in this regard and does not require a buffer around Wild Land areas, no further consideration on Wild Land is required. Accordingly, the Revised Proposed Development is considered to comply with Policy 57.
Policy 58 - Protected Species/ Policy 59 - Other Important Species/ Policy 60 - Other Important Habitats	Materially compatible except for the policy test for Policy 58, which does not include the required planning balance to give significant weight to renewable energy generation and greenhouse gas reduction targets, as required by NPF4.	The Revised Proposed Development would not give rise to significant adverse effects on protected or other important species as assessed previously under **Table 3.1** under criterion ix) and **Table 3.2** under Policy 3. The Revised Proposed Development accords with the requirements of Policies 58, 59 and 60, and through the OHEMP measures will secure

Policy	Reporting of inconsistency with NPF4	How addressed
and Article 10 Features		**significant** biodiversity improvement to the benefit of a wide range of habitats and species.
Policy 61 – Landscape	Policy 61 Landscape is considered to be incompatible with NPF4 as it clearly sets out that new development will take account of landscape capacity studies. This is no longer relevant, as the locational requirements for renewable energy are now set out in NPF4 and relates to the sensitivities and reasons for designation and overall integrity. Furthermore, Policy 61 provides no balance to the assessment of impacts. For example, compared to the assessment against NPF4 Policy 11, there is no provision to confirm that where just localised effects are experienced or where the scheme has been appropriately mitigated, that this will be considered in the balance against the significant weight afforded to the contribution to targets. As stated above, where the application of each policy requires a different assessment which might result in a different outcome, then it cannot be compatible.	The text in the Planning Statement remains relevant.
Policy 63 - Water Environment/Policy 64 - Flood Risk;	Compatible	The Revised Proposed Development has fully considered the water environment and flood risk within **Table 3.1** under criterion viii), which demonstrates that the requirements of Policies 63 and 64 are met. The EIA Layout had been assessed to comply with these policies in the Planning Statement. The aspects of the Revised Layout relevant to these policies have not changed. Therefore, the Revised Layout remains compliant.
Policy 67 - Renewable Energy Developments	Where different criteria apply and a different assessment could be made by the decision maker, then it is considered that the two policies cannot be compatible.	Each of the criteria has been assessed under **Table 3.1** above (with the exception of tourism), such that it is considered that the Revised Proposed Development accords with Policy 67. The remainder of the policy assessment remains consistent with the assessment outlined in the Planning Statement.

Policy	Reporting of inconsistency with NPF4	How addressed
	Having assessed the policy for compatibility with NPF4, it is considered to be materially compatible, except in some areas noted below. The exclusion of the NPF4 requirement to balance the effects and give significant weight to the contribution towards greenhouse gas reduction and renewable energy generation targets and recognition that some developments will result in significant effects, particularly on the landscape which if localised and/or include appropriate mitigation will generally be acceptable. Policy 67 of the HwLDP provides a need to balance considerations with the contribution towards renewable energy generation targets but does not consider greenhouse gas emissions reduction targets. Policy 67 of the HwLDP also seeks to take account of any positive or negative effects on the economy. However, it is inconsistent with NPF4 in confirming the weight to be attached to those considerations. NPF4 Policy 11e) confirms that such weight is to be significant and attached to both renewable energy generation targets and on greenhouse gas emissions reduction targets. Furthermore, the HwLDP includes a test which would lead to a different assessment to NPF4 as it requires "*the Council will support proposals where it is satisfied that they are located, sited and designed such that they will not be significantly*	

Policy	Reporting of inconsistency with NPF4	How addressed
	detrimental overall, either individually or cumulatively with other developments". Policy 67 of the HwLDP also links in the Onshore Wind Energy: Supplementary Guidance (OWESG) which it confirms will seek to steer proposals through its area of search and criteria for assessment. The area of search which would inform the Council as to whether the proposal satisfies their policy is directly relates to SPP which NPF4 now supersedes, and this creates further incompatibility with this policy compared to NPF4.	
Policy 69 - Electricity Transmission Infrastructure	Compatible.	The text in the Planning Statement remains relevant
Policy 72 – Pollution.	Compatible.	The text in the Planning Statement remains relevant
Policy 77 Public Access	Compatible	An overall assessment of impacts is provided in **Table 3.1** under criterion iii). As confirmed in the Planning Statement, where public access is limited for safety or security reasons, appropriate alternatives will be put in place. No further assessment is considered necessary.
Policy 78: Long Distance Routes	Compatible	There will be no direct effects and effects on their setting have been fully considered in **Table 3.1** under criteria ii) and iii).

3.7 Inner Moray Firth Local Development Plan 2 (IMFLDP2)

3.7.1 It is considered that the following IMFLDP2 policies are those most relevant to the Revised Proposed Development. **Table 3.4** provides and assessment against the relevant IMFLDP2 policy impacts.

Table 3.4: Assessment against relevant IMFLDP2 policies

Policy	Reporting of Inconsistency with NPF4	How Addressed
Policy 1: Low and zero carbon development	Compatible	This is a general policy relevant to all types of development and is not directly applicable to renewable energy development, which is in itself seeking to move towards low and zero carbon development. Notwithstanding this, a carbon calculator has been undertaken which sets out the payback period for the Revised Proposed Development and confirms that this will be 7.0 years against a grid mix of electricity generation and 3.4 against a fossil fuel mix of electricity generation. **Paragraph 3.5.20** of the Planning Statement Addendum confirms the GHG emissions savings of the Revised Proposed Development. The Revised Proposed Development is considered to meet with the policy requirements and aims of this policy.
Policy 2: Nature protection, restoration and enhancement	Compatible	The requirements of this policy have been fully addressed in **Tables 3.1 and 3.2** and the Revised Proposed Development is considered to accord with this policy.
Policy 9: Delivering Development	Broadly compliant where relevant	The impacts of the Revised Proposed Development on existing infrastructure and community facilities have been considered in terms of transport and access and socio-economic effects under **Table 3.1** and are considered to comply with the requirements of this policy.
Policy 14: Sustainable Transport Policy	Broadly compliant where relevant	The relevant parts of this policy relate to a requirement to confirm a proportionate assessment of the transport impacts has been undertaken, where required. The requirement for transport assessment and mitigation measures proposed are addressed in **Table 3.1**. The Revised Proposed Development is considered to meet the relevant parts of this policy.

4 SUMMARY AND CONCLUSION

The Revised Proposed Development

4.1.1 The Revised Proposed Development is for up to 12 wind turbines (a reduction from 14) with tip heights of up to 200m, a BESS of up to 50 MW and associated ancillary infrastructure.

4.1.2 The individual turbine generating capacity is anticipated to be approximately 7.2 MW (unchanged from previously), with the total installed capacity for the Revised Proposed Development in excess of 50 MW making it a National Development.

4.1.3 The Revised Proposed Development seeks permission to operate for 50 years, after which it would be decommissioned, dismantled and removed.

4.1.4 The Revised Proposed Development will make a significant contribution to meeting the Net Zero emissions target. Based on the evidence within the AI Report, the Revised Proposed Development would result in **significant** beneficial effects, enabling the savings of 3,735,686 tCO2e against a fossil fuel mix of electricity, or 1,682,692 tCO2e against a grid-mix of electricity over its 50-year operational life.

4.1.5 The Revised Proposed Development is anticipated to provide enough electricity to power the equivalent of **54,061** households in Scotland per annum.

Relevant Considerations

4.1.6 The only residual adverse significant effects predicted by the AI Report relate to landscape and visual effects and, whilst **significant**, are localised in nature and acceptable with regards to NPF4.

4.1.7 **Chapter 5: Landscape and Visual** of the AI Report conclude there would be reduced **significant** landscape and visual effects, compared to the EIA Layout. There would no longer be any **significant** effects on the Farmed Strath – Inverness LCT - Stratherrick, Strathnairn LCA. In addition, the Revised Proposed Development would lead to reduced and **non-significant** visual effects from Inverness and the B861 in Strathnairn, both previously assessed as **significant**.

4.1.8 NPF4 recognises that significant landscape effects are to be expected for some forms of renewable energy and confirms that landscape and visual effects which are localised and/or appropriate design mitigation has been applied are generally considered to be acceptable (Policy 11 as discussed in **Table 3.1**).

4.1.9 The Revised Proposed Development does not impact on National Parks or National Scenic Areas, nor does it impact on international or national designations.

4.1.10 The Revised Proposed Development maximises net economic benefits and will deliver **significant** biodiversity enhancements.

4.1.11 The Revised Proposed Development gains significant weight in its favour when assessed against the Development Plan.

Conclusion

4.1.12 It is therefore considered it has been demonstrated that the Revised Proposed Development is the right development in the right place. It is therefore respectfully requested that S36 consent and deemed planning permission is granted.

APPENDIX 1: PLANNING HISTORY UPDATE

This appendix provides an update to the appendix with the same name in the Planning Statement.

Besides the Proposed Development, the Site has been subject to the planning applications found in **Table 1.**

Table 1: Onsite planning history

Reference	Description	Location	Decision/ Status
25/02533/FUL	Formation of a borrow pit for use in the Tomatin to Moy A9 dualling project	Land 405M NW Of Lynemore Moy Tomatin	Application Permitted on 16 December 2025

Table 2 provides an update to the planning history within 500 m of the Site.

Table 2: Update to the planning history of applications within 500 m of the Site.

Reference	Description	Location	Decision / Status
25/04373/SCRE	Construction and operation of a new 275 kV indoor Gas Insulated Switchgear (GIS) double busbar and two additional 275/132 kV Super Grid Transformers (SGTs)	Land 900M NW Of Asgard Tomatin	Screening Application EIA not required on 11 December 2025
25/03511/S36 ECU00005153	Kyllachy Wind Farm - 13 turbines up to 180m blade tip with overall capacity exceeding 50MW, Battery Energy Storage System (BESS) up to 22MW capacity and associated infrastructure. This case will be determined by the Energy Consents Unit. Please visit Energy Consents Unit at https://www.energyconsents.scot/ApplicationSearch.aspx?T=2 using reference number ECU00005153	Land 6000M W Of Findhorn Bridge At Glen Kyllachy Tomatin (It should be noted that although this red line boundary (RLB) is only 30 m from that of the Revised Proposed Development at its closest point due to the shape of the Kyllachy access route, the distance between the nearest proposed turbines is c. 4.8 km)	Under Consideration since 16 September 2025
25/02713/FUL	Conversion of derelict cottages to house, erection of garage and garden room	Acre Cottage Moy Tomatin Inverness IV13 7YG	Application Permitted on 23 September 2025

Lastly, a search was undertaken to update the planning history of notable energy projects within 25 km of the Site. This is displayed in **Table 3**.

Table 3: Planning history update of notable energy projects within 25 km of the Site.

Reference	Description	Location	Decision / Status
25/04677/SCOP	Glenkirk Wind Farm - Generating station consisting of the erection, operation and subsequent decommissioning of up to 13 wind turbines (blade tip height up to 230m) and associated infrastructure	Land 2130M NE Of Balvraid Lodge Tomatin	Under Consideration since 5 December 2025