Clune Wind Farm

Post Submission - Additional Information Report

October 2026

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1 Introduction

1.1 Background

Renewable Energy Systems Ltd (RES) (hereinafter referred to as 'the Applicant') has applied to the Scottish Ministers for Section 36 consent and deemed planning permission in terms of the Electricity Act 1989 and the Town and Country Planning (Scotland) Act 1997, to construct and operate Clune Wind Farm (hereafter referred to as the 'Proposed Development', located approximately 5.5km south of Tomatin in the Highlands. The Proposed Development comprises up to 26 turbines with a tip height of up to 200m.

The application was supported by an Environmental Impact Assessment (EIA) Report as required by The Electricity Works (Environmental Impacts Assessment) (Scotland) Regulations 2017 and submitted to the Scottish Ministers in March 2025 with the application (Reference: ECU00005038).

Following the submission of the Section 36 consent request for the Proposed Development, the Energy Consents Unit (ECU) consulted relevant statutory and non-statutory organisations as well as the public. Following the receipt of consultation responses, this Additional Information (AI) Report has been produced by the Applicant 2025 to address comments and holding objections received.

1.2 Purpose of this Additional Information Report

This further Additional Information (AI) Report responds to the consultee comments received to the original planning application submitted in March 2025.

It should be noted that there are no changes to the Proposed Development as outlined within the application.

The information set out in this AI Report is intended to be read in conjunction with the EIA Report. Reference will be made to the EIA and AI Report chapters, sections, associated appendices and figures where the original remains applicable.

1.3 Availability of the AI Report

In accordance with part 6 of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017, hard copies of the AI Report and supporting documents can be viewed at:

The Strathdearn Hub,
Tomatin,
Strathdearn,
IV13 7YN

Hard copies of the AI Report are available by request from:

Clune Wind Farm Project Team
Renewable Energy Systems Ltd,
Third Floor STV,
120 Govan Road,
Glasgow,
G51 1PQ

Email: Rebecca.Randall@res-group.com

The pdf files can be downloaded from http://www.energyconsents/scot/ and www.clune-windfarm.co.uk.

1.4 Representation to the AI Report

Any representations to the application should be made directly to the Scottish Government at:

Energy Consents Unit
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

Email: representations@gov.scot

Online: http://www.energyconsents.scot/

2 Responses to Comments Received

2.1 Responses to the March 2025 Submission

The responses to the submission of the March 2025 Report received from Consultees are summarised in **Table 2.1**.

Table 2.1: Consultation responses

Consultee	Consultation Summary Response
BT	No objection
Cairngorms Nation Park Authority	Objection
Defence Infrastructure Organisation (MOD)	No objection
Highlands and Islands Airport	No objection
Historic Environment Scotland	No objection
JRC	No objection
Moray Council	No objection
NATS	No objection
NatureScot	Objection
Network Rail	No objection
Scottish Water	No objection
Scottish Environment Protection Agency	Objection
Strathdearn Community Council	Objection
Strathnairn Community Council	Objection
The Highland Council	Objection
Transport Scotland	No objection

2.2 Responses to Comments on the September 2025

Table 2.2 provides a summary of consultee objections, recommendations and comments; and the Applicant's response.

Table 2.2: Responses to consultee objections, recommendations and requests for additional information

Consultee Response to AI Report	Applicant Response
The Highland Council	
Landscape, Visual, and Cumulative Impacts The development would result in significant detrimental landscape and visual impacts, which includes cumulative effects. The proposed location, siting, scale, massing, and design are considered contrary to local design and placemaking policies. The wind farm would cause significant adverse effects on recreational receptors utilising surrounding routes and upland locations	**Appendix A** of this Report directly addresses the concerns raised that the Proposed Development will significantly and adversely affect the SLQs of the CNP.
Protected Species and Natural Heritage The proposal would have significant adverse effects on protected species, specifically highlighting the white-tailed eagle. There are significant concerns regarding natural heritage interests, including impacts on the River Spey Special Area of Conservation (SAC), the Kinveachy Forest Site of Special Scientific Interest (SSSI), and the Kinveachy Forest Special Protection Area (SPA) and SAC. The Council concluded that the mitigation measures currently proposed do not adequately address these impacts	**Appendix B** of this report directly addresses the concerns raised regarding white-tailed eagles. **Appendices C, D and G** addresses the concern of the impact on the SAC. **Appendices B and F** addresses concerns raised regarding the SSSI and SPA.
Habitats, Peat, and Soils The development would have a detrimental impact on local habitats, and the application currently provides insufficient restoration and enhancement measures. There would be a detrimental impact on peat and soils, with the proposed restoration and enhancement measures deemed insufficient to mitigate the damage.	**Appendix C, D and F** - By combining rigorous avoidance strategies, a zero-waste Peat Management Plan, and targeted restoration of currently degraded and drained land, the Proposed Development aligns directly with NPF4 Policies 3, 5, and 11. The EIAR assesses the residual magnitude of effect on peat and carbon-rich soils as "negligible and not significant"
Local Road Network	**Appendix E** of this Report directly addresses this concern.

Consultee Response to AI Report	Applicant Response
The project will create "significant adverse impacts on the local road network." The mitigation presented is considered inadequate, which is contrary to infrastructure and energy policies at both national and local levels.	
NatureScot	
Cairngorms National Park (CNP) and Wild Lands Landscape Impacts: The proposal, sited on the elevated moorland of the Monadhliath adjacent to the park, would introduce wind turbines to lower-lying areas of the CNP for the first time. NatureScot concludes this will result in significant adverse effects on five Special Landscape Qualities (SLQs) during the day, with aviation lighting extending these effects into the night. They consider these impacts unlikely to be resolved by reducing turbine height or numbers. Wild Land Area (WLA 20): While the turbines sit just outside the Monadhliath WLA, their scale and proximity would significantly impact the wild land qualities, diminishing the "awe-inspiring simplicity" of the hills and introducing prominent human influence and night-time lighting.	**Appendix A** of this Report sets directly addresses the concerns raised that the Proposed Development will significantly and adversely affect the SLQs of the CNP. **Appendices A** of this Report also indicates how NatureScot had previously confirmed during pre-application consultation that WLA 20 could be scoped out of the assessment because the proposed development lies outside its boundary. As a result, the applicant did not produce a specific Wild Land Assessment. The report notes that the wildness characteristics of the surrounding landscape were still considered in the broader assessment of landscape effects.
Protected Areas (Holding Objections) NatureScot requires further information before they can fully assess the impacts on the following sites: River Spey Special Area of Conservation (SAC): Turbines 1-8 sit within this catchment. NatureScot requires a detailed assessment of the risk of peat and non-peat sediment release into watercourses, and how this will be mitigated, to protect species like Atlantic salmon and freshwater pearl mussel. They also identified a risk of disturbance to otters. Kinveachy Forest SSSI: Further bird survey work is needed to determine the impact on the nationally important breeding woodland bird assemblage.	**Appendices C, D and G** addresses the concern of the impact on the SAC. **Appendices B and F** addresses concerns SSSI and SPA .

Consultee Response to AI Report	Applicant Response
Kinveachy Forest SPA and SAC: The proposal could progress with appropriate changes to mitigate risks to capercaillie and Caledonian forest. NatureScot stipulates that turbines 1 and 2 must not be microsited closer to the boundary, and that habitat enhancement plans must avoid tree planting or additional fencing within 1km of turbines to prevent increased collision risk for capercaillie	
Protected Species (Holding Objection) White-tailed Eagle: NatureScot objects until further survey data and assessment is provided. They highlight that the calculated annual collision rate is "very high" and could significantly impact the growth rate and range expansion of the national population of this re-introduced species.	**Appendix B** of this report directly addresses the concerns raised.
Cairngorms National Park Authority	
Significant Adverse Effects on Special Landscape Qualities (SLQs) The proposed development situated on elevated moorland just outside the park, which would introduce turbine visibility to lower-lying areas of the National Park for the very first time. The CNPA, informed by NatureScot, concludes this would cause significant harm to five SLQs: - SLQ6 (Landscapes both cultural and natural) & SLQ10 (The surrounding hills): The wind farm would blur the visual distinction between the inhabited lower straths and the uninhabited natural moorlands, diminishing the "wild, untamed appearance" of the surrounding hills. - SLQ30 (Grand panoramas and framed views): The sheer vertical scale and proximity of the turbines would disrupt scenic views from key summits and routes inside the park, such as the Lairig Ghru pass. - SLQ32 (Dark skies): The required bright red aviation lighting on the turbines would be incongruous with the existing lighting patterns and erode the characteristic pitch-black skies across the park. - SLQ28 (Wildness): The turbines would create a massive man-made focal point that diminishes the perceived vastness of the moorland, negatively impacting the sense of tranquillity and wildness during both the day and night.	**Appendix A** of this Report directly addresses the concerns raised that the Proposed Development will significantly and adversely affect the SLQs of the CNP.

Consultee Response to AI Report	Applicant Response
Cumulative Impacts When assessed alongside the concurrently proposed Balnespick Wind Farm (located 9.5km away), the CNPA argues the combined developments would fundamentally redefine the northern and western boundaries of the park. This cumulative presence would intensify the erosion of the park's wild character and worsen the impacts on panoramic views and dark skies.	**Appendix A** of this Report sets out the updated an updated cumulative assessment: This accounts for several newly submitted wind farm applications in the area, specifically Kyllachy, Highland, Balnespick, and Lynemore.
Scottish Environment Protection Agency	
Impact on Near-Natural Peatland SEPA has formally objected to the current layout of the wind farm because it negatively impacts near-natural peatland habitats. According to the developer's Peatland Condition Assessment, the development will impact three areas of near-natural habitat located near turbines T1, T8, and T9.	**Appendix G** of this report presents an updated Peatland Condition Assessment.

Appendix A – Updated LVIA Report

Appendix B – Ornithology Update

Appendix C – Habitats, Peat, and Soils

Comprehensive data gathered for the EIAR demonstrates that the baseline environment across the site is already heavily modified. The project layout has been meticulously designed to avoid deep peat, and the proposed Outline Habitat Management and Biodiversity Enhancement Plan (OHMBEP) will actively improve the condition of the existing habitats.

The Baseline: Habitats and Peat are Already Degraded

Contrary to concerns regarding the loss of pristine habitats, site-specific surveys confirm the baseline environment is heavily modified by existing land uses. The Peatland Condition Assessment confirms unequivocally that there is no near-natural peatland present on the site. The site is currently an actively managed grouse moor subject to frequent muirburn, artificial drainage, and heavy grazing by both sheep and deer. The peatland is strictly categorised as either "Modified" or "Drained".

Avoidance Through Evidence-Based Design

The assertion that there will be a detrimental impact on soils ignores the extensive embedded mitigation and design evolution the project underwent.

Extensive Probing: Over 2,204 peat depth probes were conducted across the site.

Avoiding Deep Peat: The design iteratively evolved to specifically target areas where peat is shallowest or absent. Approximately 72% of all probes recorded a peat depth of less than 1m (and 42% recorded a depth of less than 0.5m). The layout successfully avoids areas of deep peat (>1m) to fundamentally minimise disturbance from the outset.

Robust Peat Management and Restoration Measures

The Council deemed the restoration and enhancement measures "insufficient," but the application includes highly detailed, actionable plans to safeguard and improve the site.

Peat Management Plan (PMP): Technical Appendix 9.2 provides a strict, site-specific PMP. It details exactly how acrotelmic and catotelmic peat will be handled, stored, and kept wet to prevent degradation. All excavated peat will be beneficially reused on-site to reinstate track verges, turbine bases, and restore borrow pits; absolutely no surplus peat will be generated.

Habitat Management and Biodiversity Enhancement Plan (HMBEP): Technical Appendix 7.5 outlines the proposed peatland habitat restoration and enhancements. Because the baseline peat is currently drained and modified by muirburn , the HMBEP

actually presents a significant opportunity to restore these degraded areas into a functioning, carbon-sequestering peatland system.

Conclusion

By combining rigorous avoidance strategies, a zero-waste Peat Management Plan, and targeted restoration of currently degraded and drained land, the Proposed Development aligns directly with NPF4 Policies 3, 5, and 11. The EIAR correctly assesses the residual magnitude of effect on peat and carbon-rich soils as "negligible and not significant".

Appendix D – Peat Instability and Sediment Risk

NatureScot has raised concerns regarding potential impacts on the River Spey Special Area of Conservation (SAC). Safeguarding internationally important and sensitive species, including Atlantic salmon, freshwater pearl mussels, and otters, remains a critical priority for the Proposed Development.

The detailed assessments and mitigation strategies requested by NatureScot have been comprehensively documented within the Environmental Impact Assessment Report (EIAR). The following section provides further context to directly address this consultation response and outline the robust environmental safeguards embedded in the project design

Peat Instability and Sediment Risk Assessment

The risk of peat and sediment release has been thoroughly evaluated. A dedicated Peat Landslide Hazard Risk Assessment (PLHRA) was conducted, which concluded that with the implementation of appropriate mitigation measures, the risk of peat instability across the site is considered "insignificant". Furthermore, the project layout was specifically designed to avoid areas of deep peat (greater than 1m) to fundamentally reduce disturbance from the outset.

Robust Mitigation to Protect Water Quality

To prevent both peat and non-peat sediment from entering the tributaries of the River Spey, strict good practice measures will be enforced through the Construction Environmental Management Plan (CEMP). Key sediment control mitigations include:

- Watercourse Buffers: A strict 50m buffer from watercourses will be maintained for infrastructure (where technically feasible) and for all stockpiled materials to prevent runoff into the aquatic environment.
- Sediment Trapping: Runoff entering excavations will be directed through settlement lagoons, silt fences, and sediment traps to filter out coarse materials and suspended solids before any indirect discharge into the surrounding drainage system.
- Water Separation: Clean and dirty water will be separated on-site, ensuring dirty water is properly filtered.
- Expert Oversight: An Ecological/Environmental Clerk of Works (ECoW) will be appointed to continuously monitor the site, conduct regular visual inspections of watercourses downstream of work areas, and ensure water quality is sustained.

2.3 Collaborative Water Quality Monitoring

The project commits to a stringent water quality monitoring program before, during, and immediately after the construction phase. The detailed water quality monitoring plans will be developed in direct consultation with NatureScot, SEPA, and local fishery boards (FNLRT and FDSFB) to ensure their specific concerns are actively monitored.

Addressing Otter Disturbance

While Chapter 9 focuses on the hydrological and hydrogeological measures that protect the habitat and water quality necessary for otters and their prey, the specific biological assessments regarding direct disturbance to otters are comprehensively covered in other sections of the report. The EIAR explicitly states that potential direct and indirect impacts on the River Spey SAC, including ecological disturbance, are assessed in Chapter 7: Ecology and Technical Appendix 8.3 (the Shadow HRA).

Conclusion

Because of the rigorous, site-specific embedded mitigations and best practice construction techniques proposed, the EIAR assesses the magnitude of impact on high-sensitivity receptors like the River Spey SAC as negligible. Consequently, the overall significance of the effect on the SAC and its qualifying species is assessed as "negligible and not significant".

Appendix E – Local Road Network

The Highland Council has raised objections regarding potential "significant adverse impacts on the local road network" and the perceived inadequacy of the proposed mitigation. The data and comprehensive mitigation strategies outlined in Chapter 10 of the EIAR demonstrate that the local road network has ample capacity to accommodate the Proposed Development, and that robust, enforceable measures will be implemented to protect both the infrastructure and its users

Contextualising the "Significant Adverse Impacts"

While the percentage increase of traffic on the U2856 may appear high as a standalone figure, it is a function of the road's currently low baseline HGV traffic, rather than an overwhelming volume of new vehicles. The assessment provides important context regarding road capacity and the temporary nature of the impacts:

- The maximum traffic impact is short-lived, peaking in months 14 and 15 of a 23-month construction programme. During this peak, the development will generate 172 vehicle movements per day (70 HGVs and 102 cars/LGVs). Across a flat 12-hour working day, this equates to roughly 14 total movements, or just six two-way HGV movements per hour.
- A theoretical road capacity review using The NESA Manual confirms that even with the addition of peak construction traffic, the U2856 will retain 98.36% of its spare capacity. The A9 will retain between 60.49% and 87.68% spare capacity. The report concludes that there are absolutely no road capacity issues to accommodate the construction traffic.
- Assessing the "Worst-Case" Scenario: The traffic generation figures assume a worst-case scenario where 100% of stone and aggregate materials are imported to the site. In reality, a significant amount of material will be won from on-site borrow pits, which will further reduce the actual number of HGV movements on the local network.

The Adequacy of Proposed Mitigation

To address the concern that mitigation is "inadequate," Chapter 10 outlines a highly detailed, multi-tiered mitigation strategy. These measures are not merely suggestions; they are standard, enforceable protocols that will be secured via planning conditions.

- A comprehensive CTMP will be agreed upon with the Council prior to works commencing. This will actively manage traffic through restricted working hours (0700 to 1900, Monday to Saturday), a Staff Travel Plan to encourage car-sharing and minibus use, the sheeting of lorries to

prevent debris, and the adoption of voluntary reduced speed limits on the U2856.

- Directly addressing concerns about infrastructure damage, the applicant commits to entering a formal agreement under Section 96 of the Roads (Scotland) Act 1984. Video footage will record the pre-construction condition of the access route to establish a baseline. Any damage caused by construction traffic that poses a hazard will be repaired immediately, and routine road sweeping will be employed to keep the carriageway safe and clear.
- The movement of large turbine components will be strictly managed via an AIL Transport Management Plan. Convoys will be limited in size, travel during off-peak times, and be accompanied by Police Scotland escorts and civilian pilot cars. Advance warning signs and community liaison protocols will ensure local residents and businesses are informed well in advance.
- Outdoor Access Management Plan (OAMP): To protect vulnerable road users (pedestrians and cyclists), an OAMP will separate path users from construction traffic wherever possible. It includes provisions for temporary diversions, dedicated crossing points where path users have the right of way, and mandatory toolbox talks for drivers regarding speed control and interactions with cyclists and equestrians.

Conclusion

Chapter 10 concludes that while pre-mitigation effects were assessed as significant for some receptors (such as U2856 users and Core Path users), the implementation of the CTMP, AIL Transport Management Plan, and OAMP reduces all residual transport and access effects to "Minor" and "Not Significant". Because the impacts are minimal, short-term, and backed by robust financial and procedural guarantees to protect local infrastructure, the Proposed Development is in alignment with both national and local infrastructure policies.

Appendix F – Outline Habitat Management and Biodiversity Enhancement Plan Update

Appendix G – Peatland Condition Assessment

Appendix H - Response to Ironside Farrar PLHRA Stage 1 Checking Report

Appendix I – Grid Route Assessment

Appendix J – Assessment of Related Infrastructure – Raigbeg Rail Bridge Replacement

Appendix K – Review of Acoustic Assessment Against ARWTN