

**THE HIGHLAND COUNCIL**

**NORTH PLANNING APPLICATIONS COMMITTEE  
22 October 2013**

Agenda Item	6.1
Report No	PLN/091/13

**12/04781/S36 : Infinergy Limited – Limekiln Wind Farm  
Land 1137M South Of Creag Leathern, Limekilns Estate, Reay, Caithness.**

**Report by Head of Planning and Building Standards**

**SUMMARY**

**Description :** Windfarm (24 turbines) with a potential generating capacity of 75MW. A mix of turbines sizes is proposed with maximum tip heights of 139m (15 turbines) and 126m (9 turbines) together with associated infrastructure.

**Recommendation -** Raise no objection.

**Ward :** 04 - Landward Caithness.

**Development category :** Section 36 Application.

**Pre-determination hearing :** Not required.

**Reason referred to Committee :** 5 or more objections.

**1. PROPOSED DEVELOPMENT**

1.1 The application is for a wind farm with the potential to generate 75MW. It has been submitted to the Scottish Government for approval under Section 36 of the Electricity Act 1989. Should Ministers approve the development, it will carry with it deemed planning permission under Section 57(2) of the Town and Country Planning (Scotland) Act 1997. The Council is a consultee on the proposed development. Should the Council object to the development, Scottish Ministers will be required before determining the application to hold a Public Local Inquiry to consider the development.

1.2 The proposed development includes the following elements:

- 24 wind turbines (3MW each) offering a potential generating capacity of 75MW. A mix of turbines sizes is proposed with maximum tip heights of 139m (15 turbines) and 126m (9 turbines). Turbines may have internal or external transformers;
- Control building, substation compound and welfare facilities;
- Anemometer mast
- Underground cables between the turbines and the substation;

- 19.4km of new and upgraded site access tracks,
- construction compound (100m x100m);
- on-site concrete batching;
- Two borrow pits providing 140,000 m<sup>3</sup> of crushed rock:

- 1.3 The wind farm presents (roughly) as five rows of turbines running north to south, with the most northern / lowest turbines, No 19, 20, 21 and 22, being some 3km south of Reay Church / Reay Golf Club. A farm track and then forestry road provides access to the site area from the A836 Thurso – Tongue Road. The junction with the A836 is to be upgraded.
- 1.4 There are two potential delivery routes identified to bring the turbine components (abnormal loads) from Scrabster Harbour to the development site. The first, and preferred, route follows the A9 to the south towards Thurso, then, just before reaching Thurso, the vehicles would turn right and head west on the A836. After approximately 12km, the road bends right before entering Reay and then onto the minor road that leads to the site entrance to the north of the development site. The second proposed route option follows the A9 into Thurso before turning onto the B874. It follows the B874 before leaving it where it splits into a C-class road which leads to Isauld (east of Reay) on the A836.
- 1.5 Construction is anticipated to take 17 months. This would involve a full Construction and Environmental Management Plan (CEMD), a habitat Management Plan and a Forestry Management Plan to manage the programme of works through construction. 272 ha of trees are to be felled to facilitate both the construction of the development and to enable an early restructuring of the woodland.
- 1.6 The operational lifespan of the development is 25 years after which time the turbines will be decommissioned, with above ground facilities being removed, new access tracks being removed and the ground restored. Although not part of the current application the ES anticipates a grid connection that would comprise of a 132 kV overhead line, approximately 4km in length, from the control building / substation to the existing Dounreay substation.
- 1.7 The development is supported by an Environmental Statement (ES) under the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2000 (as amended). Additional information was provided within a later addendum to the ES. In association with the knowledge and expertise of statutory consultees there is sufficient information available on the case file to allow the Council to make a judgement on the application.

## **2. SITE DESCRIPTION**

- 2.1 The site is set within Limekiln Estate which is used for commercial woodland and as a sporting estate on its open moorland. The wind farm site is approximately 1,140ha currently used as a coniferous plantation. East of the site, the existing woodland to Broubster Hill is unaffected by the development and will continue under forestry management.

- 2.2 The site extends from 50m Above Ordnance Datum (AOD) along the northern boundary to 200m AOD on its southern boundary. The site follows a south to north alignment marked by the orientation of the low hill ridges and intermediate valleys with watercourses, which flow to the Pentland Firth. There is a central ridge which runs through the site, connecting the high points at Cnoc an Fhraoich (180m) and Cnoc an Airigh (140m). Reay Burn runs within the site and Sandside Burn outwith the site, both to the west of the central ridge. Achvarasdal Burn runs to the east of the ridge and marks the eastern boundary of the site.
- 2.3 The site is approximately 1.5km south of Reay, 2.8km south / southwest of Dounreay power station and 14.5km south west of Thurso. The nearest properties to the site are Loanscorribost (2km) Borlum House (2.1km to the nearest turbine), Blarmore (2.1km), and Achins (2.4km), all of which lie to the north of the site and south of the scattered settlement of Reay.
- 2.4 The site carries no nature conservation designations, but is used by a number of protected species (Otters, Voles, Bats, Pine Marten) and bird species including several linked with designated sites that lie adjacent close by. Such designated sites include the Caithness and Sutherland Peatlands Site of Special Scientific Interest (SSSI), Special Area of Conservation (SAC), Caithness and Sutherland Peatlands Special Protection Area (SPA) and Caithness and Sutherland Peatlands Ramsar site; Broubster Leans SAC / SSSI, East Halladale SSSI, Sandside Bay SSSI, Loch Caluim Flows SSSI and Red Point SSSI.
- 2.5 The site is not covered by any known international, national, regional or local landscape-related designations. In landscape character terms it is recognised as being part of low and sweeping hills with a blanket covering of coniferous woodland, close to open sweeping moorland to the south and agricultural land / small settlements on the coast to the north.
- 2.6 There are no statutory designated (Scheduled Monuments or Listed Buildings) cultural heritage assets present within the Limekiln wind farm proposal site. There are however approximately 25 other cultural heritage assets within the development site. These assets are largely related to the prehistoric period and include hut circles and associated clearance cairns, possible scooped settlements and a burnt mound. In addition to these there are a number of assets recorded from the First Edition Ordnance Survey maps, including a farmstead, limekiln and enclosure.
- 2.7 When assessing a wind farm development consideration of similar developments around the site is required. The list below presents the projects around this development site that are Operational, Approved or have been Submitted but are not yet determined. A plan highlighting these projects will be circulated with this report.

#### Built and / or Consented

Baillie Hill  
Forss 1 & 2,  
Causeymire,  
Boulfruch,

Wathegar 1,  
Flex Hill (Bilbster),  
Achairn,  
Burn of Whilk,  
Camster,  
Stroupster,  
Wathegar 2 and  
Strathy North.

Under consideration

Strathy South,  
Halsary  
Achlachan and  
Lyth.

**3. PLANNING HISTORY**

- 3.1 **23 November 2010** - Pre Application Meeting (Ref 10/04730/PREAPP).  
**1 December 2011** - Scoping Response provided by Energy Consent's Unit.

**4. PUBLIC PARTICIPATION**

- 4.1 Advertised : EIA development – advertised twice allowing 28 days for comment.

Representation deadline : 30 August 2013.

- 4.2 The Scottish Government's Energy Consent Unit has provided its data on public representations, collated in a different format to the Council. It highlights 562 Objectors and 17 Supporters including multiple entries from the same address point. Many of the objections are from parties local to Caithness. The Council has been copied into many of these responses and has recorded 420 representations including 418 objectors – see list appended to this report.

- 4.3 Considerations raised are summarised as follows:

- Visual Impact.
- Cumulative Impact
- Turbine size which will exceed the summit of Beinn Ratha
- Over development – with Baillie / Forss wind farms
- Landscape Impact / Scenery.
- Impact on the setting of Reay.
- Wildlife / valued Habitats
- Impact on local raptors.
- Traffic impact – damage to local roads.
- Shadow Flicker – low winter sun.
- Noise – local residential properties
- Adverse health effects from turbine noise.
- Adverse Tourist Impact

- Impact on old lime kiln.
- Adverse effect of recreational interests – golfers / cyclists
- Adverse effect on local walks and hill tops.
- Quality of ES - visual images.
- Adverse impact on peat lands
- Carbon Balance
- Alternative technology – wave power preferred / nuclear.
- Adverse economic impact.
- Necessity / Need.
- Cost to Bills / adding to Fuel Poverty
- Impact on property values

4.3 Letters of representation are available for inspection via the Council's eplanning portal which can be accessed through the internet [www.wam.highland.gov.uk/wam](http://www.wam.highland.gov.uk/wam). Access to computers can be made available via Planning and Development Service offices.

## 5. CONSULTATIONS

### Consultations undertaken by the Planning Authority

- 5.1 Caithness West Community Council objects to this application. The objections are founded upon the development's impact on the landscape, its visual impact, its impact on the community (Reay) and cumulative impact arising with Baillie and Forss wind farms.
- 5.2 TECS – Environmental Health has no objection to this application. The noise assessment includes a background noise survey and predicted levels indicate that noise will not exceed 35dB(A) at any noise sensitive property. As the assessment has indicated that noise levels will meet the ETSU simplified level of 35dB LA90 this should be recognised within an appropriate condition attached to any consent.
- 5.3 Planning and Development Service's Historic Environment Team – (Archaeology) has no objection to this application. Important archaeological features have been preserved within the current forestry plantation. A planning condition should be attached to any consent to safeguard any other archaeology uncovered.
- 5.4 THC - Access Officer has no objection to the application. An access management plan should be secured as a planning condition to enhance the access resource in this area that includes the core path (CA11.03) Borlum Rock which provides a circuit through / around the site.
- 5.5 Planning and Development Service's Forestry Officer has no objection to this application. The approach to be deployed of integrating turbines within woodland is supported within the Council's Interim Supplementary Guidance on Trees, Woodlands and Development. The degree of impact on existing woodland is in conflict with the Scottish Government in respect of compensatory woodland planting. An appropriate level of additional tree planting should be secured by condition or legal agreement.

5.6 THC - TECS (Roads) has no objection to this application. Planning conditions should ensure some improvements are undertaken to local roads to ensure sufficient protection from construction traffic impact and a wear and tear agreement secured to protect the integrity of the local network.

### **Consultation Undertaken by Energy Consent Unit**

5.7 Scottish Environmental Protection Agency (SEPA) has no objection to the application. Should the development be supported planning conditions are requested to in relation to a requirement for a Construction and Environmental Management Plan (CEMP) to help minimise pollution and to secure appropriately designed water crossings within the development.

5.8 Scottish Water (SW) has no objections to the application.

5.9 Halcrow – (Peat landslide Assessment) has no objections to the application. Following assessment of the site, which indicates a low peat slide risk, a number of recommendations for good working practices are advanced for inclusion in a Construction and Environmental Management Plan.

5.10 Scottish Natural Heritage (SNH) has no objection to the application. It has advised however that the proposal will result in a range of significant adverse landscape and visual impacts, some of which are capable of mitigation by changes to the size, scale and design of the wind farm.

5.11 Transport Scotland – Trunk Road and Bus Operations (TS-TRBO) has no objection to the application. Two conditions are recommended for any approval of this project in the interests of road users and road safety.

5.12 Historic Scotland (HS) has no objection to the application. Overall, the effect of the proposed development on the setting of cultural heritage assets is no greater than slight adverse.

5.13 Defence Estates(MOD) has no objection but requests standard planning conditions requiring aviation lighting at cardinal points, notification on development commencement and final design information.

5.14 Highland and Islands Airport Limited (HIAL) has no objections to the application.

5.15 National Air Traffic Systems (NATS) has no objections to this application.

5.16 British Telecommunications (BT) has no objections to the application.

5.17 UK Fuel & Power Industry has no objection to the application with regard to their radio system for utility companies.

5.18 Visit Scotland has no objection to the application. It has requested that given the importance of tourism to the economy and Scotland's landscape in attracting visitors any potential detrimental impact must be identified and considered in full.

- 5.19 The British Horse Society has no objection to the application. Information is supplied to help info parties of the needs of horse riders. Access routes need to be maintained even through construction phase.
- 5.20 Mountaineering Council for Scotland has no objection to the application.
- 5.21 Crown Estates has no objection to this application.
- 5.22 Marine Scotland has no objections to this application. It notes the range of mitigation offered through construction which will safeguard fishery interests.
- 5.23 Association of Scottish Fishery Boards has no objection to the application. Best practice guidance must be followed during construction. It recommends water quality surveys be undertaken 12 months prior to construction. The removal of brash from watercourse and their buffers should be avoided between October – May during Fish Migration / spawning periods.
- 5.24 Caithness District Salmon Fishery Board has no objection to this application.
- 5.25 Royal Society for the Protection of Birds (RSPB) has no objection to the application. It does however hold some serious concerns regarding the long term impact on Annex 1 habitat - blanket bog and proposals for re-planting of trees in this location.
- 5.26 John Muir Trust is content not to submit any representation on the application.

## 6. DEVELOPMENT PLAN POLICY

- 6.1 The following policies are relevant to the assessment of the application: -

### Highland Wide Local Development Plan 2012

- 6.2
- |           |  |
|-----------|--|
| Policy 28 | Sustainable Development                              |
| Policy 29 | Design, Quality and Place Making                     |
| Policy 51 | Trees and Development                                |
| Policy 52 | Principle of Development in Woodland                 |
| Policy 53 | Minerals   |
| Policy 55 | Peat and Soils                                       |
| Policy 57 | Natural, Built and Cultural Heritage                 |
| Policy 58 | Protected Species                                    |
| Policy 59 | Other Important Species                              |
| Policy 60 | Other Important Habitats                             |
| Policy 61 | Landscape  |
| Policy 64 | Flood Risk   |
| Policy 67 | Renewable Energy including significant effects on: - |
- Natural, Built and Cultural Heritage
  - Other Species and Habitat Interests
  - Landscape and Visual Impact
  - Amenity at Sensitive Locations
  - Safety and Amenity of Individuals and Individual Properties

- The Water Environment
- Safety of Airport, Defence and Emergency Service Operations
- The Operational Efficiency of Other Communications
- The Quantity and Quality of Public Access
- Other Tourism and Recreation Interests
- Traffic and Transport Interests

Policy 72      Pollution  
 Policy 77      Public Access

### **Caithness Local Plan (March 2006)**

6.3 The general policies of the Caithness Local Plan have been superseded by the policies of the Highland wide Local Development Plan (HwLDP).

## **7. OTHER MATERIAL POLICY CONSIDERATIONS**

### **Scottish Government Planning Policy and Guidance**

7.1 The Scottish Government has recently consulted on an updated policy statement However it is SPP (February 2010) which requires to be considered in the determination of the current application. It contains a number of subject specific policy statements which are relevant to this application, including:-

- Rural Development
- Landscape and Natural Heritage
- Wild Land
- Transport
- Renewable Energy

7.2 In addition to the above, the Scottish Government sets out further advice on Renewable Energy in a number of documents and web based information including: -

- National Planning Framework for Scotland 2
- PAN 56 – Planning and Noise
- PAN 58 – Environmental Impact Assessment
- PAN 60 – Planning for Natural Heritage
- 2020 Routemap for Renewable Energy
- Onshore Wind Turbines (Updates July 2013)
- Wind Farm developments on Peat Lands (June 2011)

### **Interim Supplementary Guidance: On-shore Wind Energy (March 2012)**

7.3 The site falls within: -

- Stage 2 - Areas with potential constraint for wind energy development".
  - Proximity to Settlement Development Area (SDA).
- Area of Search - Proposals to be assessed against Policy 67 / HwLDP



## **Highland Renewable Energy Strategy (HRES) (May 2006)**

7.4 While superseded in part by the Interim Supplementary Guidance above, HRES is still relevant as a strategy document for renewable energy. Relevant policies to the current application, not otherwise superseded the above noted Supplementary Guidance, include:

- Policy H1 Education and Training
- Policy K1 Community Benefit
- Policy N1 Local Content of Works

## **8. PLANNING APPRAISAL**

8.1 The Scottish Government will assess and determine this application under the Electricity Act 1989. Should Ministers approve the development, it would carry with it deemed planning permission under Section 57(2) of the Town and Country Planning (Scotland) Act 1997.

8.2 The determining issues for the Council as planning authority responding to this consultation are:

- Does the proposal accord with the development plan?
- If it does, are there any material considerations for not approving the proposed development?
- If it does not accord, are there any material considerations for approving the proposed development?

### **Assessment**

8.3 To address the determining issues, the Planning Authority must consider the following:-

- a) Development Plan
- b) Interim Supplementary Guidance.
- c) Highland Renewable Energy Strategy.
- d) National Policy.
- e) Roads / Traffic Impact and Public Access.
- f) Water / Drainage and Peat.
- g) Natural Heritage.
- h) Design, Landscape and Visual Impact.
- i) Forestry
- j) Cultural Heritage.
- k) Economic Impact and Tourism.
- l) Aviation Interests
- m) Noise and Shadow Flicker.
- n) Radio and TV.
- o) Construction Impacts.
- p) Other Material Considerations within representations.

## Development Plan

- 8.4 The Development Plan comprises the adopted Highland wide Local Development Plan (HwLDP) and those parts of the Caithness Local Plan continued in force as a consequence of the adoption of the HwLDP. There are no site specific policies affecting this application site within the Caithness Local Development Plan. The principal HwLDP policy on which the application needs to be determined is Policy 67 - Renewable Energy. The other HwLDP policies listed at 6.1 of this report are also relevant and the application must be assessed against these also for example Policy 61 - Landscape. These matters all fall within the ambit of Policy 67 and are assessed in full within a number of material considerations examined within this report.
- 8.5 Policy 67 highlights that the Council will consider the contribution of the project towards renewable energy targets, positive and negative effects on the local and national economy other material consideration including making effective use of existing and proposed infrastructure and facilities. In that context the Council will support proposals where it is satisfied they are located, sited and designed such as they will not be significantly detrimental overall individually or cumulatively with other developments having regard to 11 specified criteria (as listed in para 6.2). If the Council is satisfied that there will be no significant adverse impact then the application will accord with the Development Plan.

## Interim Supplementary Guidance: - Onshore Wind Energy

- 8.6 The Council has developed Interim Supplementary Guidance to assist with the consideration of onshore wind energy. The site at its northern end falls within features recognised within a Stage 2 “area of constraint” given its proximity to the Settlement Development Area (SDA) for Reay and Achvarasdal. It is noteworthy that emerging revised SPP may increase the buffer around communities to 2.5km given that turbine size is increasing. The turbine envelope falls within an “Area of Search” for wind energy requiring the policy to be assessed, as noted above, within Policy 67 of the HwLDP. The Supplementary Guidance also expands on the considerations / criteria set out in the Development Plan policy. Criterion 3 (Landscape and Visual Impact), 4 (Amenity at Sensitive Locations) and 5 (Safety and amenity of individuals and individual properties) will be key issues to be examined in this assessment. If the Council is satisfied on these matters then the application will accord with its Interim Supplementary Guidance.

## Highland Renewable Energy Strategy (HRES)

- 8.7 The Development Plan references HRES developed by the Council on a range of Renewable Energy technologies. In particular the additional benefits from such investment including for example ‘Education and Training,’ ‘Community Benefit’ and ‘Local Content’ which are important considerations when assessing individual project proposals – see also later section on economic impact. For the avoidance of any doubt only those parts of the Council’s HRES which are compliant with Scottish Government SPP remain in force.

## National Policy

- 8.8 The Scottish Government has a very positive approach on Renewable Energy technologies. This is set out in Scottish Planning Policy (SPP) with further advice on renewable energy targets available from its “Routemap for Renewable Energy in Scotland 2011”. There is a Scottish Government target of 100% of Scotland’s electricity demand to be generated from renewable resources by 2020. The target is not a cap. The Scottish Government has advised that operational onshore wind energy capacity at 30 June 2013 was 4,079MW with a further 4,048MW approved. As of 20 July 2013, within Highland large-scale onshore wind energy projects in operation or approved had a capacity to generate 2,394.5MW, which equates to 29.5% of the national figure. The draft SPP documents currently out for consultation do not substantially change the emphasis of the Scottish Government’s stance on wind energy, relative to the key elements of this application, other than the protection of communities as noted above. No great weight can be given to this draft position at the current time.
- 8.9 SPP advises that planning authorities should support the development of wind farms in locations where technology can operate efficiently and environmental and cumulative impacts can be satisfactorily addressed. Criteria for the assessment of applications are listed including landscape and visual impact; effects on heritage and historic environment; contribution to renewable energy targets; effect on the local and national economy and tourism and recreation interests; benefits and dis-benefits to communities; aviation and telecommunications; noise and shadow flicker; and cumulative impact. These elements, as relevant to this application, are examined within this assessment.
- 8.10 SPP advises that when considering cumulative impact the factors for planning authorities to consider should be set out in the development plan or supplementary guidance. Development Plans are expected to have a spatial framework for onshore wind farms over 20MW drawn from the identification of areas requiring significant protection, areas with potential constraints against identified criteria and areas of search where appropriate proposals are likely to be supported, again subject to identified criteria. The spatial approach advanced by Highland Council is as set out in its Interim Supplementary Guidance, noted above.

## Roads, Traffic Impact and Access

- 8.11 The development would result in increased traffic on the local road network principally during construction. Construction traffic for the most part would utilise the A836 road which is of a good standard and has already been used to assist with earlier wind farm developments in the north of Caithness. Without too much concern the additional traffic can be absorbed within current traffic flows. It is the impact of the abnormal loads delivering turbine parts which does require particular consideration to protect the network and general road safety interests. The A9 trunk road from Scrabster Harbour will also be used, potentially to a greater extent if the proposed turbine delivery route 2 is used.

- 8.12 The Trunk and Local Road Authority's have requested planning conditions to ensure the submission for approval of a final traffic impact assessment, safeguards and minor improvements to the networks and a Wear and Tear Agreement covering the use of the local road network through the construction phase.
- 8.13 The ES highlights the Borlum Rock core path (CA11.03) provides a recreational trail through around the site and that the turbine locations were altered through the various design iterations to take this resource into account. Any diversion or stopping up of the core path will require an order under 208 of the Town and Country (Scotland) Planning Act 1997.
- 8.14 The turbines and more specifically the rotor blades will spin close to users of the above core path. It is recommended that if the application is approved any further micro-siting of the turbines does not further encroach upon the path. Furthermore the applicant should deliver an access management plan specifically in relation to the construction phase of the road access upgrade, component movement / erection and borrow pit(s). This Plan, set as a condition, must enhance the access resource of this area during the operation of the wind farm proposal.

#### Water / Drainage and Peat

- 8.15 The development will have impact on peat lands and local watercourses. The project has from the outset recognised these interests and offered a number of safeguards including development avoidance of water bodies and areas of deep peat; a 50m construction buffer zone from watercourses, the protection of natural peatland drainage channels; and the discharging surface water run off in a manner to minimise risk of pollution / silting to watercourses and thereby Ground Water Dependant Terrestrial Ecosystems (GWDTE). These measures are welcomed and need to be secured through planning conditions attached to any consent through a requirement of a site specific CEMD in line with Council standards.
- 8.16 The applicant has set out in its ES that all new watercourse crossings are to be designed to convey a 1 in 200 year return period flood event. SEPA has requested that this provision is set as a condition of consent. The Council's own Flood Team requires that such design provision also includes an allowance for climate change on top of the 1 in 200 year flood predictions.
- 8.17 SEPA has noted the degree of peat probing that has been undertaken by the applicant and is content to recognise that deep peat is not a significant issue at the site. The applicant has offered a Peat Management Plan which is to be agreed as part of the CEMD with the planning authority in association with SEPA and SNH. An early commentary on the draft plan has already been made by SEPA for the applicant to include in any final submission.
- 8.18 It will be for Scottish Ministers, with advice from SEPA, to determine if the carbon balance calculations associated with this project are acceptable. Given the nature of this project, the expected impact on peat lands and deployment of good construction practices associated with the disturbance and handling of peat this is not anticipated to be a key concern in the final determination of this application.

## Natural Heritage

- 8.19 As noted in paragraph 2.4 above the development, whilst not within a designated site, may impact on a number of nearby sites, protected species, valued habitats and other ecological interests. The ES has been assessed by SNH. The Scottish Government, if minded to support the application, will carry out an “Appropriate Assessment” on the qualifying interests of the conservation objectives of these nearby internationally designated sites. SNH do not anticipate any particular issues that suggest this cannot be undertaken successfully.
- 8.20 The moorland to the south and west of the site forms part of the Caithness & Sutherland Peatlands SAC and SPA, designated for internationally important peatland habitats, rare plant species, otter and a range of birds including hen harrier and merlin. The applicant, within its ES, has set out intentions to undertake significant mitigation to protect and enhance the environmental resources of the proposed wind site and its surrounding area. In paragraph 3.8 and table 3.8 of the ES a summary of the mitigation proposed is set down highlighting for example a peatland management strategy; a habitat management plan; a species protection plan; and the engagement of an Environmental Clerk of Works (ECoW) to assist with the implementation of the CEMD. Such measures are welcome and entirely consistent with the Council’s adopted guidance on construction and environmental management for largescale proposals. Planning conditions must be applied to ensure that the final CEMD details require approval by the planning authority following the engagement of the successful contractor and prior to commencement of construction.
- 8.21 SNH has advised that with the exception of potential impacts on blanket bog through changes in deer movement it does not consider there will be significant effects on the SAC. Provided the deer fence surrounding the estate and development site is sufficiently robust and well maintained to prevent an influx of deer, SNH has advised it would be possible to conclude that there would not be a significant effect. It recommends a condition be applied to any consent to require on-going monitoring and maintenance of deer fence. With regard to hen harrier and merlin its advice is that the predicted collision mortality figures are very low and will not affect the viability of the populations. The deer fencing noted above should also ensure that bird habitats are safeguarded.
- 8.22 With regard to the Caithness Lochs SPA there is a likely significant effect on greylag geese, caused by predicted collision mortality. SNH has advised however that the predicted mortality is at a level that can be accommodated by the population without affecting its viability and therefore any adverse effect on the integrity of the SPA.
- 8.23 With regard to other protected areas the East Halladale and Loch Caluim Flows SSSIs are both components of the Caithness & Sutherland Peatlands SAC, SPA and Ramsar site. The Broubster Leans, Loch Calder and Loch Scarmclate SSSIs are components of the Caithness Lochs SPA and Ramsar site. SNH has advised, that provided its concerns for the internationally designated sites are addressed,

this should ensure there are no adverse impacts on the notified features of the designated SSSIs and interests of the Ramsar sites surrounding the development area.

### Design, Landscape and Visual Impact

- 8.24 The applicant has presented a number of features that have influenced the project's design and layout. It is focused within existing woodland, which is to continue in forestry management. The photomontage presented for Viewpoint 17 highlights the key-holing effect within the existing woodland. Its location, in a bowl feature in the landscape, seeks to screen the development to the open moorland to the south and west. At its northern end it has been set back from the forest edge to reduce its impact to the north and east where the landscape is flatter and more settled. The applicant has requested the potential to use a turbine potentially with an external transformer. The Council is not supportive of external transformers which add visual clutter to the area around each turbine base. A condition can be proposed to exclude these.
- 8.25 The turbines present the largest turbines to blade tip in the local landscape set generally above 100m AOD, with Baillie wind farm being 110m sited around or above 100m AOD and Forss 78mm and sited around 50m AOD. Beinn Ratha, the hill top to the west of the development extends to 242m AOD. The nine turbines which have been reduced in height seek to firstly lessen the impact of the nearest turbines upon the residents of Reay. This is in addition to the above noted setback. Secondly the smaller turbines, set on the ridgeline within the site are advanced to reduce the impact on the wider landscape to make their appearance more consistent with the other turbines within the scheme. Viewpoints 1, 4, and 5 set out in the ES demonstrate these elements.
- 8.26 SNH has advised that the most significant adverse effects of the development (see also further comments below) could be mitigated by changes to the size, scale and design of the wind farm. It had advised at the pre application stage that a simple layout of limited scale and extent (both turbine number and height) was more likely to be appropriate in this location. It has highlighted that excluding development in areas where 12 turbines (Nos19, 20, 21, 22, 25, 26, 31, 42, 43, 54, 55 and 60) are located would: -
- increase the separation of the development from Ben Ratha, the ridgeline and the A836.
  - achieve a more visually balanced design.
  - be more consistent with other commercial wind farms in the same view.
  - mitigate the extent to which Limekiln would diminish the apparent scale of Ben Ratha, supporting its continuation as a focus in views.
- 8.27 The applicant has responded against the design suggestions of SNH which particularly seeks to reduce the development from 24 turbines to 12 which it considers would underplay the capacity of the landscape for renewable energy development. It advises that the application is for a significantly reduced number of turbines including several at a reduced height. It considers that Beinn Ratha has

some local significance, which has been considered and respected in the project, and that there are differences between the Baillie Wind farm site and Limekilns that allows for a project as presented to be considered.

- 8.28 A total of 20 viewpoints have been assessed with regard to landscape and visual impact, together with other key receptors including settlements, route-ways etc. The expected impact of the development can be seen within the ES from the Zone of Visual Influence (ZTV) Fig 9.7a and in combination with other wind farms including Forss and Baillie Hill. There is considerable overlap between the theoretical visibility of this project with Baillie Hill given the turbines size and location of each project. As would be expected Limekiln has more impact to the west, with Baillie Wind farm having greater impact to the east.
- 8.29 The applicant has highlighted that the landscape character of the site comprises low and sweeping hills with a blanket covering of coniferous woodland. The ES submits that this landscape has a scale and depth which makes it potentially suitable for wind farm development and the woodland cover makes the proposed development appear contained in the wider landscape. The landscape to the south and west of the site comprises Sweeping Moorland characterised by open and gently undulating landform and distinct absence of development. The north of the site comprises agricultural land and small settlements, which accommodates some largescale developments including the Dounreay Nuclear Establishment and wind farms at Baillie Hill and Forss.
- 8.30 The applicant identifies that significant effects arise principally as a result of the close proximity of the immediate Landscape Character Area (LCA) and closely surrounding LCAs to the turbines, whose influence will alter the character of these LCAs despite there already being an influence from other baseline wind farm developments in the locality. These effects it believes extend out to a maximum range of 6km.
- 8.31 With regard to the area impacted by the development surrounding the site the applicant has highlighted that it is not covered by any landscape designation such as a National Scenic Area (NSA) or Special Landscape Area (SLA). These designations do occur in the 35km radius study area around the development but owing to limited extents of visibility and distance from the proposed turbines such designated landscapes will not be significantly affected.
- 8.32 In cumulative terms the applicant has acknowledged that Baillie Wind Farm and Forss Wind Farm have established a baseline in the landscape. The addition of the Limekiln turbines will add to this experience but there is separation between the developments which limits a combining effect. From further afield the addition of Limekiln would add to the collective experience of turbines that currently impact on the wider area. It does not assess these to be significantly detrimental to an adverse degree on the wider landscape.
- 8.33 SNH has advised that this general area presently contributes to a sense of respite between the established pattern of wind farms to the east (Forss and Baillie), and the consented and proposed developments in the Strathy area to the west. Its view is that the addition of a sizable commercial wind farm at Limekiln affects the

sense of transition, which in combination with these other wind farms, adversely affects the sequential experience of the north coast tourist route. Its advice is that the most significant adverse effects could be partly mitigated by changes to the size, scale and design of the wind farm. The response from SNH does not advise against a potential renewable project in this location, the focus of its concerns relates to its size / scale. Its comment on respite therefore seems incongruous.

- 8.34 To determine the acceptability of the application in landscape terms does require a degree of judgement. The quality of the landscape in the vicinity of the development is not recognised by any formal designation and therefore need not be tested against particular qualities. The Caithness landscape has already absorbed a number of large scale projects including onshore wind farms. The landscape is experienced across a wide area, being generally open in nature. The addition of turbines at Limekiln will present a significant change to the landscape. The change represents an adverse impact, but the degree of change in terms of its acceptability is the judgement call.
- 8.35 The applicant highlights that there is a small area of “wild land” to the south west of the development. Its assessment of impact on this resource advises that there will be no significant effects or cumulative significant effects on wild land. However SNH whilst not objecting to the application considers that the proposal will significantly affect parts of an area of land with strong qualities of wildness (although not classified as a Search Area for Wild Land), located to the south-west between the A897 and Limekiln. This wild land is noted as a potential Core Area of Wild Land in the recent Scottish Government consultation on the National Planning framework and Scottish Planning Policy. As a potential designation it cannot as yet be given particular weight in any planning assessment but it cannot also be set aside lightly.
- 8.36 SNH advises that the above wild land core area is divided by a north-south ridgeline, with the western view-shed compromised by visibility of the consented Strathy North wind farm. The eastern view shed is affected by the built Baillie Hill wind farm, which has lesser influence than this proposal, due to its smaller turbines and greater distance. The individual effect of Limekiln is considered partly significant due to its increased influence on the area’s eastern view-shed. This impact arises from the larger turbine size and comparatively close proximity, as compared with other wind farms in the landscape baseline. SNH advises that the cumulative effect of the proposal in combination with other developments described above is likely to significantly reduce the qualities of wildness experienced across the area. SNH has not however objected to the proposal.
- 8.37 The viewpoints presented within the ES allow assessment of the expected visual impact of the development from key receptors particularly from local settlements, communities, infrastructure (roads, paths harbours) and surrounding hilltops / viewpoints. The applicant has highlighted that 7 of the 20 viewpoints are significantly affected as a result of the proposed development. All seven lie within approximately 5km of the proposed development and the significant effects relate principally to the close proximity of the turbines which will appear as large scale moving structures that will form a new focus in the view. The majority of the viewpoints (5) are representative of settlements and routes and lie in the settled



landscapes to the north and north-east. 2 viewpoints which have significant impact are from two local hilltops Borlum Hill and Beinn Ratha. Significant cumulative effects which arise relate principally to the effect of the proposed development with Baillie Hill Wind Farm and to a less degree Forss Wind Farm.

- 8.38 There are clear views expressed in public representations objecting to the visual impact of the development particularly on local housing and travellers passing through the area. In addition to the concerns noted earlier from SNH it also highlighted that the addition of a sizable commercial wind farm at Limekiln affects the sense of transition, which in combination with other wind farms, adversely affects the sequential experience of the north coast tourist route. The following five viewpoints resulting in significant adverse impact and are considered further given that they represent the key receptors that will experience the development from housing / settlements and or main roads.

Viewpoint 1 A836 Drum Hollistan Layby is 4.5km from the nearest turbine. Road users travelling westbound (towards Thurso) will be impacted by the development given the scale of the development on view. This is the first clear view of the development, with all 24 turbines being visible.

Viewpoint 2 Reay Footpath is 2.68km from the nearest turbine. Residents in this locality and users of the footpath will experience significant impact of the development including 2 turbines as blades and 11 turbines below the nacelle / hub.

Viewpoint 3 Reay Church is 2.9km from the nearest turbine. Representing views from the settlement of Reay the turbines will appear as largescale elements and create a new focus out from this view. Baillie Wind farm, at a distance of 5.2 km from the viewpoint, can be seen when looking more to the east, however actual visibility is limited by the topography and housing as Isauld.

Viewpoint 4 Shebster is 3.76km to the nearest turbine. Representing views from local residents, who back onto Baillie Wind Farm, the impact of Limekiln is seen as significant given the relatively undeveloped open outlook from this viewpoint.

Viewpoint 5 Sandside Bay Harbour is 4.32km from the nearest turbine. All 24 turbines are visible in the view from this location. It presents the development as a clear array set on the low hills on an open skyline. Beinn Ratha sits clear of the turbine array further to the west. The impact is seen as being significant to users of the beach and harbour.

- 8.39 It is noteworthy that these viewpoints are generally at a distance in excess of 2km from the development. They provide a view of the development set on a low lying landscape which carries no significant designation, although it carries local importance / value. Generally these viewpoints provide a wider view that contain in a separate focus / view a number other medium to largescale structures such as the Beaully to Dounreay Grid Line, the Dounreay Establishment, other wind turbine projects and open aspects to the Pentland Firth, etc. Although the impact of the development is assessed as being significantly adverse, judgement is required as to whether the impact is unacceptable upon receptors. The key receptors are

residents, travellers, community services (churches /shops/ harbour), recreational facilities including golf course, beach and local footpaths. From Viewpoint 3 – set at 2.9km distance to the nearest turbine, the impact of the development on many within Reay is not seen as being unacceptable to the continued amenity (visually) of residents who generally have a wide range of outlooks.

- 8.40 A significant number of people who live in the area, work at Dounreay. Viewpoint 6 at the site entrance on the A836 seeks to allow an assessment of the impact to the large workforce at this facility as well as road users including tourists. From this location the nearest turbines at Limekiln are 5.2km away and can be seen as a distinct cluster set apart from Baillie Wind Farm which is clearly visible to the south and closer to the viewpoint. It also shows Beinn Ratha further to the west of the turbine envelope. In this open view the impact has been assessed in the ES as being of medium significance. This assessment is not contested.
- 8.41 Travellers, including tourists, across Caithness and beyond now experience considerable wind farm development on the trunk road network and the local road network both cumulatively and sequentially – see cumulative map. Along the A836 Thurso to Tongue Road the existing developments of Forss and Baillie wind farms are obvious and the Limekiln development would add to this experience. From the A9 trunk road south of Thurso (for example by Spittal recently visited by the North PAC) these three developments around Dounreay would be seen in the same view, although all three projects would appear as distinct features, rather than an enlarged cluster.
- 8.42 Travellers through the area are picking up a sequential experience, a point touched on within the comments from SNH. In particular SNH has highlighted the approval of Strathy North wind farm and the potential of other projects in the Strathy area. It highlights the value of this north UK coastline and the benefits of retaining respite from onshore wind energy projects in the experience of travellers journeying around the north of the UK mainland. The applicant's ZTV suggests that the extent of the impact of this development along the A936 is contained to approximately 5km close by Viewpoint 1 the layby at Drum Hollistan. It is at this location that the impact of Baillie wind farm extends. The impact arising from development would therefore add to the experience, but not extend the experience, to travellers on this principal route-way.

#### Forestry

- 8.43 The current proposal seeks to integrate the windfarm into the forest structure. The larger turbines proposed at Limekiln allows for this. This approach is not inconsistent with the Council's Interim Supplementary Guidance on Trees, Woodlands and Development which supports the co-existence of the two land uses to co-exist, providing mutual benefits such as improvements to the forest road infrastructure and creation of designed open ground for landscape / biodiversity. Should there be any requirement to reduce the height of the turbines this could have implications for woodland retention and replanting.

- 8.44 The proposed Forestry Plan described within the ES highlights 272 hectares of felling in order to facilitate the initial construction of the wind farm and associated infrastructure. The scale of future felling phases is reduced accordingly. The ES acknowledges that the proposals do not comply with the criteria of the Scottish Government's Control of Woodland Removal Policy and notes off-site compensatory planting may be required. SEPA has highlighted its concerns on felling and the need to minimise the production of any waste wood. Accordingly SEPA has asked that a condition be applied that all stem-wood of greater than 7 cm diameter be conventionally harvested and removed from the site.
- 8.45 The applicant is committed to providing appropriate compensation planting, the extent, location and composition of which remains to be agreed taking into account any revision to the felling and restocking plans prior to commencement of construction. This may also take into account matters such as on-site habitat improvement. Compensatory planting associated with development is normally agreed with the planning authority, although in this case the determining authority is Scottish Ministers. Of the 1,123 hectares of woodland at Limekiln a loss of 53 hectares is directly associated with the windfarm infrastructure. The Council should set this level for Scottish Ministers to secure as the compensatory planting requirement. The Council should also request that this level of planting is secured as a commitment prior to the commencement of any felling related to the wind farm project and provided for locally or within North Highland unless otherwise agreed in writing with the local planning authority.

#### Cultural Heritage

- 8.46 Given the rich cultural heritage of Caithness the applicant's assessment of the archaeology and cultural heritage within and around the application site has identified a number of known features and the potential of further artefacts to be uncovered. Historic Scotland, following its assessment of the proposed development upon scheduled ancient monuments in the area, is content not to raise an objection to the application. The Council's Archaeology unit is also content that the proposed wind farm will not have a significantly detrimental impact on the setting or appreciation of cultural heritage assets outwith the application boundary.
- 8.47 Important archaeological features have been preserved within the current woodland at the northern section of the development site along with a number of other features along its eastern side. It is acknowledged that the development has minimised through design and layout the direct impacts to known cultural heritage assets where possible. The ES also offers mitigation to address direct impacts to known assets and to address the potential for direct impacts in areas where the cultural heritage baseline is unclear, including:
- Fencing off upstanding features associated with the farmstead (A 28), through which the access track will be constructed and monitoring works as per an archaeological watching brief.

- Post-felling walkover survey to test for the presence or absence of unrecorded upstanding archaeological features - (The Council's archaeologist concurs with this proposal but would add that brash will also need to be cleared prior to attempting the survey).
- Watching brief on ground breaking works - (The Council's archaeologist concur with this proposal in part but considers the probability of buried remains to survive over much of the site to be relatively low, largely due to the damage resulting from the dense commercial plantation).

8.48 The Council's archaeologist has highlighted that there may be benefit to a more targeted approach to archaeological monitoring in the most sensitive areas, i.e. the access track to the west of sites A12-17, and the access track to the south of A1-10. It also recommends additional mitigation is put in place founded upon the fact that the development will inevitably impact on the setting of the cultural heritage assets present within the development area and three specific areas in particular; the multi period landscape preserved within two forestry clearings in the north of the development area (A1-21), and the lime kiln and associated remains located further to the south (A22-23). This should include a programme to advance understanding of these features and professionally record, survey and plan them in their present condition. This information will be used to enhance the Historic Environment Record, stimulate research and aid decision making when considering similar sites in the future. It is noted that no invasive archaeological investigation is considered necessary in order to record these assets. A standard ARC1 condition would be sufficient to secure the above mitigation.

#### Economic Impact and Tourism

- 8.49 The proposal with a development and construction expenditure of £92.9 million is expected to generate a slight beneficial effect on the economy in the local area, Highland and in the wider Scottish economy during the construction phase lasting approximately 17 months and the operational phase extending over 25 years. This is due to the contracts that could be secured in these areas by businesses; the jobs supported by these contracts and spend from wages. There is expected to be a moderate beneficial effect on tourism businesses during the construction phase and a slight beneficial effect in the Highlands from tourism during the construction phase. This is due to construction workers, engineers and management staying in local tourism businesses.
- 8.50 Visit Scotland has advised of the importance of scenery to tourism when assessing this application. Scenery and the natural environment have become the two most important factors for visitors in recent years when choosing a holiday location. The importance of this element to tourism in Scotland cannot be underestimated. The character and visual amenity value of Scotland's landscapes is a key driver of our tourism product. A large majority of visitors to Scotland come because of the landscape, scenery and the wider environment, which supports important visitor activities such as walking, cycling, wildlife watching and visiting historic sites.
- 8.51 The applicant has identified many of the areas key tourist related attractions and activities including Caithness Horizons with 76,931 visitors; Castle of Mey 28,598 visitors and Forsinard Reserve 3,970 visits in 2009. The A836 is an important

Tourist Route connecting Ullapool to John O'Groats via Durness as well as being part of the National Cycle Route. Other key interests in the area including fishing, walking, horse riding and golfing. Subject to the adoption of good working practices during construction it is not anticipated that the development will impact adversely on these activities during construction or at the operational phase, recognising the micro siting limitations close by footpaths noted earlier in paragraph 8.13.

#### Aviation Interests

- 8.52 This development is approximately 35km West of Wick Airport and is therefore outside the safeguarded area around the airport. HIAL has advised that it is possible that the development may have potential impact on local aviation activity.
- 8.53 Following consultation with the Defence Infrastructure Organisation (MOD) National Air Traffic Services Limited – En-Route (NERL) and the Civil Aviation Authority (CAA) no objections have been raised with regard to aviation interests. Requests have been made for aviation lighting (either 25 candela Omni-directional red lighting or infrared aviation lighting with an optimised flash pattern of 60 flashes per minute of 200m/s to 500m/s duration at the highest practicable point). The Council's preference is for infra red lighting to reduce impact on the local amenity / landscape. The matter can be addressed through the use of planning conditions. Standard conditions will also require notification of development start dates and confirmation of final build details for plotting on aviation maps.

#### Noise and Shadow Flicker

- 8.54 The applicant's assessment has been based upon a candidate wind turbine model (Enercon E-82 E3 3MW), with 4 noise monitoring points helping to assess likely impact upon nine properties all of which lie north of the development. The design of the scheme is such that prediction of operational noise levels lie within appropriate ETSU-R-97 limits derived from measurements taken at locations surrounding the proposed Limekiln Wind Farm. The nearest properties are in excess of 2km from the nearest turbine as highlighted in paragraph 2.3 above. Given this distance shadow flicker is not predicted to occur at any nearby residential properties.
- 8.55 The Council's Environmental Health Officer is content with the findings of the ES assessment. Given that the ES has indicated that noise levels will meet the ETSU simplified level of 35dB LA90 it is suggested that the Council's simplified condition is applied to any consent.

#### Radio and TV

- 8.56 There is the potential for wind turbines to affect telecommunications and other services. Initial concerns raised by the Joint Radio Company based on the proximity of a nearby SSE Microwave link has following further analysis on turbine location have been resolved.

- 8.57 With the switch to digital TV from analogue the impact on TV reception has been significantly reduced. No representations have been received on this matter. Notwithstanding this, the Council has a standard practice of requiring developers to address adverse impacts that may emerge during construction and over the initial year of operation when problems may be detected. This should be sufficient to address any future concerns should they emerge with the project construction and over the initial year of operation when problems might be experienced.

#### Construction Impacts

- 8.58 As noted earlier the construction phase of the development is anticipated to last 17 months. Further works may be required for any interim site restoration in addition to decommissioning and site restoration at the end of the operation period of the wind farm. The key impacts for local residents through construction will be the additional traffic movements of the work force and material deliveries including abnormal loads associated with turbine deliveries. The excavation of new access tracks and turbine pads as well as the operation of local borrow pits can give rise to noise nuisance as will any associated forestry operations which can involve 24hour working practices. The ES highlights that using best practice construction management, the anticipated impacts can be managed to minimise the effect on local communities and residential properties in the proximity of the development / road access routes.
- 8.59 As highlighted earlier it will be important to require a CEMD as a condition attached to any approval. This will ensure that all the proposed construction works are assessed prior to commencement of construction with the preferred contractor on board to ensure best practices are adopted to minimise harm to the environment, hydrology, ecology and local communities / properties. In addition to such a condition the Council will require the applicant to enter into a legal agreement and provide financial bonds with regard to its use of the local road network (wear and tear agreement) and site restoration (Restoration Bond). In this manner the site can be best protected from the impacts of construction and for disturbed ground to be effectively restored post construction and operational phases.
- 8.60 SEPA's response on the application is caveated by a request for particular matters to be secured by condition including the development and approval of a decommissioning and site restoration plan. Furthermore SEPA requires that separate conditions be applied to the restoration of borrow pits, which it presumes will occur co-currently with, or directly following, construction. Information should specifically be provided on depth of excavated materials to be used for restoration. These are approaches which the Council also requires and would expect to be secured within the terms of any consent.

#### Other Material Considerations within representations

- 8.61 Representations have highlighted a number of other issues such as potential effect of property values, necessity and need for renewable energy projects, potential impact on utility bills and fuel poverty. These are not material planning matters that can be taken into account in the determination of this application.

8.62 There are no other material considerations that have been raised for consideration within the assessment of this application.

## **9. CONCLUSION**

9.1 The Scottish Government gives considerable commitment to renewable energy. This position is sustained within the emerging draft Scottish Planning Policy. Planning authorities are encouraged to support the development of wind farms where they can operate successfully and where concerns can be satisfactorily addressed. The Council has adopted a supportive position towards renewable energy developments within its Development Plan and associated policy guidance.

9.2 As with all applications, including this Section 36 project, the benefits of the proposal must be weighed against potential drawbacks and then considered in the round. The project has the potential to provide a further 75MW generation of renewable energy towards Scottish government targets, albeit there is no cap on such targets. A small level of support has been advanced within public representations, with no objections being raised by many principal statutory consultees.

9.3 The development has attracted an objection from Caithness West Community Council and over 500 individuals, many of whom reside in Caithness. Many of the issues highlighted, for example in relation to construction noise, impact on peat and local watercourses, ecology and traffic impact, can be adequately controlled through planning conditions, the adoption of good construction practices and /or through appropriate mitigation.

9.4 The final balance of decision making on this application would seem to relate to matters of design / scale, landscape and visual impact including cumulative / sequential impact on communities and tourists / travellers. Such matters are not always easily measured or assessed and often require subjective judgement. In this regard the views of SNH are helpful but its response has not triggered an objection to the application. Its view is that the size and scale of the turbines should be reduced.

9.5 The size, scale and layout as promoted within this application has particularly drawn objection from local residents within the community of Reay. With some turbines offering a maximum tip height at 139m, which would be the largest turbine to be used in Caithness and indeed Highland to-date. It is fully recognised that the development will introduce change with significant visual impact. However given the distance (>2km) between existing houses in the locality and the turbines, the impact from turbines, their visual movement, overshadowing or noise is not considered to be at a level, sufficiently adverse, which would suggest that the application be refused.

9.6 Houses and the community generally have some protection from the local topography which helps to screen the development at least in part. Housing in Reay is orientated upon a range of outlooks such as the northern coastline, farmland and moorland. The proposed wind farm will be a new dominant feature but is not seen as being sufficiently overbearing to residents to the extent that the

application be refused. Assessment of the viewpoints within the local communities suggest that concerns raised in respect of the development's impact on views towards Beinn Ratha, a valued local hill top, are overstated. It is generally accepted that the eastward view from Beinn Ratha hill top will be significantly impacted but that is a different issue, not seen as significant, relating more to users of this hill-top for recreation.

- 9.7 The project's association with Baillie and Forss wind farms is also a consideration when assessing turbine size compatibility. There is separation at a local level between the three onshore projects that would allow for turbine size differences to be accommodated. The set back from the road and slightly differing terrain upon which the projects are located also suggests there can be some flexibility to the issue of turbine size. Indeed there is already a difference in turbine size between the Forss (78m) and Baillie (100m) wind farms in this locality.
- 9.8 Whilst the impact of the development could be reduced with a smaller turbine, the use of larger turbines within this application site in design terms has a dual purpose. The deployment of a variable turbine size within the design layout for the reasons set out by the applicant's ES, particularly on-going woodland management, is a persuasive argument consistent with the Council's Interim Supplementary Guidance : Trees, Woodland and Development. The acceptance of the larger turbine allows for continued forestry management of this hill-side together with a renewable energy project. It also allows for a quicker change to the existing forestry scheme and habitat management.
- 9.9 The scale of the development presenting 24 turbines generally close to Baillie Wind farm (21 turbines) and Forss Wind Farm (6 turbines) is considered to be acceptable. Given that there is a precedent in the landscape for such development, the accumulation of development seems to offer an element of complementary development where the impact of on shore turbines is increased but not significantly extended as demonstrated within the ZTV maps and also in the assessment of sequential impact along the A836. The large scale project will of course have greater impact on land with wild land characteristics to the south west. The latter two points were highlighted within SNH's response as material matters but they both lack a fully considered policy foundation which would add weight to these concerns when seeking to reach the final planning balance. They also lack a formal objection from SNH.
- 9.10 The main consideration of this application by the Council principally lies within the provisions of Policy 67 of the Highland Wide Local Development Plan. The requirement is to consider the likely impacts of the development on a number criteria and then consider if the development as presented is significantly detrimental overall individually or cumulatively with other developments. In respect of the eleven criteria set out in the policy the impact is deemed to be: -

No	Policy 67 Criteria	Significance
1	Natural, Built and Cultural Heritage	Acceptable
2	Other Species and Habitat Interests	Acceptable
3	Landscape and Visual Impact	Adverse impact



4	Amenity at Sensitive Locations	Acceptable
5	Safety and Amenity of Individuals / Properties	Acceptable
6	Airport, Defence and Emergency Services	Acceptable
7	The Water Environment	Acceptable
8	Operational / Efficiency of Communications	Acceptable
9	The Quantity and Quality of Public Access	Acceptable
10	Tourism and Recreation Interests	Acceptable
11	Traffic and Transport Interests	Acceptable

9.11 There are adverse impacts to taken into account with the application, but the development is also considered to be acceptable on many of the specific criteria set out in the Development Plan. The impact of the project is also reversible in that permission is being sought for a period of 25 years after which time the infrastructure can be removed and the site largely restored to woodland. The application is one that can be seen as being located and sited such that it will not be significantly detrimental overall, either individually or cumulatively with other operational onshore wind farms. The application is therefore one which is seen to accord with the policies of the Council's Development Plan. The application is therefore one which on balance should be supported.

## 10 RECOMMENDATION

10.1 It is recommended that the Council **raise no objection** to the application but any approval by Scottish Ministers should be subject to a number of planning conditions as presented below: -

### CONDITIONS

1 This planning permission shall expire and cease to have effect after a period of 30 years from the date when electricity is first exported from any of the approved wind turbines to the electricity grid network (the "First Export Date"). Upon the expiration of a period of 25 years from the First Export Date, the wind turbines shall be decommissioned and removed from the site, with decommissioning and restoration works undertaken in accordance with the terms of condition 2 of this permission. Written confirmation of the First Export Date shall be submitted in writing to the Planning Authority within one month of the First Export Date.

**Reason:** - Wind turbines have a projected lifespan of 25 years, after which their condition is likely to be such that they require to be replaced, both in terms of technical and environmental considerations. This limited consent period also enables a review and, if required, reassessment to be made of the environmental impacts of the development and the success, or otherwise, of noise impact, species protection, habitat management and mitigation measures. The 30 year cessation date allows for a 5 year period to complete commissioning and site restoration work.

2. No development shall commence until a draft Decommissioning and Restoration Plan (DRP) for the site has been submitted to, and approved in writing by, the Planning Authority in consultation with SNH and SEPA. Thereafter:

- i. No later than 3 years prior to the decommissioning of the development, the draft DRP shall be reviewed by the Wind Farm Operator and a copy submitted to the Planning Authority for their written approval, in consultation with SNH and SEPA; and
- ii. No later than 12 months prior to the decommissioning of the development, a detailed DRP, based upon the principles of the approved draft plan, shall be submitted to, and approved in writing by, the Planning Authority, in consultation with SNH and SEPA.

For the avoidance of doubt, the DRP shall include the removal of all aboveground elements of the development, all access tracks, the treatment of disturbed ground surfaces, management and timing of the works, environmental management provisions and a traffic management plan to address any traffic impact issues during the decommissioning period. The detailed Decommissioning and Restoration Plan shall be implemented as approved.

**Reason:** To ensure that all wind turbines and associated development is removed from site should the wind farm become largely redundant; in the interests of safety, amenity and environmental protection.

3 No development shall commence until:

- a. Full details of a bond or other financial provision to be put in place to cover all of the decommissioning and site restoration measures outlined in the Decommissioning and Restoration Plan approved under condition 2 of this permission have been submitted to, and approved in writing by, the Planning Authority; and
- b. Confirmation in writing by a suitably qualified independent professional that the amount of financial provision proposed under part (i) above is sufficient to meet the full estimated costs of all decommissioning, dismantling, removal, disposal, site restoration, remediation and incidental work, as well as associated professional costs, has been submitted to, and approved in writing by, the Planning Authority; and
- c. Documentary evidence that the bond or other financial provision approved under parts (i) and (ii) above is in place has been submitted to, and confirmation in writing that the bond or other financial provision is satisfactory has been issued by, the Planning Authority.

Thereafter, the Wind Farm Operator shall:

- d. Ensure that the bond or other financial provision is maintained throughout the duration of this permission; and
- e. Pay for the bond or other financial provision to be subject to a review five years after the commencement of development and every five years thereafter until such time as the wind farm is decommissioned and the site restored.

Each review shall be:

- f. conducted by a suitably qualified independent professional; and
- g. published within three months of each five year period ending, with a copy submitted upon its publication to both the landowner(s) and the Planning Authority; and
- h. approved in writing by the Planning Authority without amendment or, as the case may be, approved in writing by the Planning Authority following amendment to their reasonable satisfaction.

Where a review recommends that the amount of the bond or other financial provision should be altered (be that an increase or decrease) or the framework governing the bond or other financial provision requires to be amended, the Wind Farm Operator shall do so within one month of receiving that written approval, or another timescale as may be agreed in writing by the Planning Authority, and in accordance with the recommendations contained therein.

**Reason:** To ensure financial security for the cost of the restoration of the site to the satisfaction of the Planning Authority.

- 4. The Wind Farm Operator shall, at all times after the First Export Date, record information regarding the monthly supply of electricity to the national grid from each turbine within the development and retain the information for a period of at least 12 months. The information shall be made available to the Planning Authority within one month of any request by them. In the event that:
  - i. any wind turbine installed and commissioned fails to supply electricity on a commercial basis to the grid for a continuous period of 6 months, then the wind turbine in question shall be deemed to have ceased to be required. Under such circumstances, the wind turbine, along with any ancillary equipment, fixtures and fittings not required in connection with retained turbines, shall, within 3 months of the end of the said continuous 6 month period, be dismantled and removed from the site and the surrounding land fully reinstated in accordance with this condition; or
  - ii. the wind farm fails to supply electricity on a commercial basis to the grid from 50% or more of the wind turbines installed and commissioned and for a continuous period of 12 months, then the Wind Farm Operator must notify the Planning Authority in writing immediately. Thereafter, the Planning Authority may direct in writing that the wind farm shall be decommissioned and the application site reinstated in accordance with this condition. For the avoidance of doubt, in making a direction under this condition, the Planning Authority shall have due regard to the circumstances surrounding the failure to generate and shall only do so following discussion with the Wind Farm Operator and such other parties as they consider appropriate.

All decommissioning and reinstatement work required by this condition shall be carried out in accordance with the approved detailed Decommissioning and Reinstatement Plan, or, should the detailed Decommissioning and Reinstatement Plan not have been approved at that stage, other decommissioning and reinstatement measures, based upon the principles of the approved draft DRP, as may be specified in writing by the Planning Authority.

**Reason:** To ensure that any redundant or non-functional wind turbines removed from site, in the interests of safety, amenity and environmental protection.

- 5 Unless otherwise agreed in writing by the Planning Authority, all of the wind turbine transformers shall be located within the tower of the wind turbine to which they relate. Agreement for external transforms will only be given if the developer can, through detailed design work and additional landscape and visual impact assessment, demonstrate, to the satisfaction of the Planning Authority, that they would not adversely affect the character, integrity or general amenity of the application site and its setting.

**Reason:** To ensure ancillary elements of the development, such as external transformers, are only permissible if, following additional design and LVIA work, are demonstrated to be acceptable in terms of visual, landscape, noise and other environmental impact considerations.

6. No development shall commence until full details of the proposed wind turbines have been submitted to, and approved in writing by, the Planning Authority. These details shall include:
- i. The make, model, design, power rating and sound power levels of the turbines to be used; and
  - ii. The external colour and/or finish of the turbines to be used (incl. towers, nacelles and blades) which should be non-reflective pale grey semi-matt.

Thereafter, development shall progress in accordance with these approved details and, with reference to part ii above, the turbines shall be maintained in the approved colour, free from external rust, staining or discolouration, until such time as the wind farm is decommissioned. For the avoidance of doubt, all wind turbine blades shall rotate in the same direction.

**Reason:** To ensure that the turbines chosen are suitable in terms of visual, landscape noise and environmental impact considerations.

7. No development shall commence until full details of the location, layout, external appearance, dimensions and surface materials of all control buildings, welfare facilities, compounds and parking areas, as well as any fencing, walls, paths and any other ancillary elements of the development, have been submitted to, and approved in writing by, the Planning Authority (in consultation with SEPA and SNH, as necessary). Thereafter, development shall progress in accordance with these approved details. For the avoidance of doubt, details relating to the control,

substation and welfare buildings shall include additional architectural design, LVIA and other relevant assessment work, carried out by suitably qualified and experienced people, to ensure that they are sensitively scaled, sited and designed.

**Reason:** To ensure that all ancillary elements of the development are acceptable in terms of visual, landscape, noise and environmental impact considerations.

8. Notwithstanding the provisions of the Town and Country Planning (Control of Advertisements) (Scotland) Regulations 1984 (as amended), and unless there is a demonstrable health and safety or operational reason, none of the wind turbines, anemometers, power performance masts, switching stations or transformer buildings/enclosures, ancillary buildings or above ground fixed plant shall display any name, logo, sign or other advertisement without express advertisement consent having been granted on application to the Planning Authority.

**Reason:** To ensure that the turbines are not used for advertising, in the interests of visual amenity.

- 9 Turbines, access tracks, crane hard-standing areas and the temporary construction compound areas may be micro sited but shall not be micro sited more than 25 metres from the positions shown in the approved plans unless otherwise agreed in writing with the Planning Authority in consultation with SNH, SEPA and the Council's Access Officer.

**Reason:** - To minimise the impact of the development in the landscape and to maintain development setback from local watercourses and existing access interests in the finished layout.

10. No development shall start on site until a Construction Environmental Management Document is submitted to and agreed in writing by the Planning Authority in consultation with SNH and SEPA. The Document shall include:

- An updated Schedule of Mitigation (SM) including all mitigation proposed in support of the application, other relevant agreed mitigation (e.g. as required by agencies) and set out in the relevant planning conditions
- Processes to control / action changes from the agreed Schedule of Mitigation.
- The following specific Construction and Environmental Management Plans (CEMP):
  - i. Peat management plan – to include details of all peat stripping, excavation, storage and reuse of material.
  - ii. Management of Geo-technical Risks.
  - iii. Pollution Prevention Plan.
  - iv. Drainage and Watercourse Management Plan including surface water management, incorporating development buffers from watercourses and appropriate bridging solutions to all watercourses using bottomless or arched culverts.
  - v. Species Protection Plan including details of pre-commencement surveys to prevent encroachment on protected species and habitat.

- vi. A Deer Fence Management Plan including inspection and repairs to ensure it is in the same or better state of repair as shown within the supporting information dated 19 July 2013 and to set out a programme for on-going annual inspections and maintenance during the operational phase.
  - vii. Site waste management plan.
  - viii. Noise and vibration mitigation plan.
- Details of the appointment of an appropriately qualified Environmental Clerk of Works with roles and responsibilities which shall include but not necessarily be limited to:
    - i. Providing training to the developer and contractors on their responsibilities to ensure that work is carried out in strict accordance with environmental protection requirements;
    - ii. Monitoring compliance with all environmental and nature conservation mitigation works and working practices approved under this consent;
    - iii. Advising the developer on adequate protection for environmental and nature conservation interests within, and adjacent to, the application site;
    - iv. Directing the placement of the development (including any micro-siting, if permitted by the terms of this consent) and the avoidance of sensitive features; and
    - v. The power to call a halt to development on site where environmental considerations warrant such action.
  - Details of any other methods of monitoring, auditing, reporting and communication of environmental management on site and with the client, Planning Authority and other relevant parties.
  - Statement of any additional persons responsible for 'stopping the job / activity' if in potential breach of a mitigation or legislation occurs.

Unless otherwise agreed in writing by the Planning Authority the development shall proceed in accordance with the agreed Document.

**Reason:** To protect the environment from the construction and operation of the development.

11 Prior to the commencement of development, a programme of work for the evaluation, preservation and recording of archaeological and historic features affected by the proposed development, including a timetable for investigation, all in accordance with the attached specification, shall be submitted to and agreed in writing by the Planning Authority. The agreed proposals shall be implemented in accordance with the agreed timetable for investigation and should as a minimum include assessment of the follow areas: -

- Period landscape preserved within two forestry clearings in the north of the development area (ES REF A1-21), and
- The lime kiln and associated remains located further to the south (ES REF A22-23).

**Reason:** In order to protect the historic interest of the site.

12. No development shall commence until an Access Management Plan to facilitate public access across the site following construction has been submitted to, and approved in writing by, the Planning Authority. The approved Access Management Plan, and any associated works, shall be implemented in full prior to the operation of the wind farm or as otherwise may be agreed within the approved plan.

**Reason:** To maximise the opportunities for public access to the countryside.

13. No development shall commence until a TV and radio reception mitigation plan has been submitted to, and approved in writing by, the Planning Authority. The plan shall provide for a baseline TV reception survey to be carried out prior to the commencement of turbine installation, the results of which shall be submitted to the Planning Authority. Within 12 months of the Final Commissioning of the development, any claim by any individual person regarding TV picture loss or interference at their house, business premises or other building, shall be investigated by a qualified engineer appointed by the developer and the results shall be submitted to the Planning Authority. Should any impairment to the TV signal be attributable to the development, the developer shall remedy such impairment so that the standard of reception at the affected property is equivalent to the baseline TV reception.

**Reason:** To ensure local TV and Radio Services are sustained during the construction and operation of this development.

14. Access to the site by heavy goods vehicles and any noisy construction activity (e.g. piling) shall be restricted to 07.00 to 19.00 on Mondays to Fridays and from 07.00 to 13.00 on Saturdays with no such access on Sundays unless otherwise agreed in advance in writing by the Planning Authority.

**Reason:** In order to control noise in the interest of amenity.

15. No development shall commence until a Traffic Management Plan has been submitted and approved by the Planning Authority in consultation with Transport Scotland Network Management and TEC Services. The Plan must describe all measures to manage traffic during the construction periods. The Plan must then be implemented as approved. This plan must ensure that the local road network, including access onto the public road, is upgraded to a suitable standard to the satisfaction of the Roads Authorities. This will require as a minimum the following measures to be addressed: -

- a. A route assessment report for abnormal loads including swept path analysis and details on the movement of any street furniture and any traffic management measures.
- b. Any additional signing or temporary traffic control measures deemed necessary due to the size or length of any loads being delivered or removed must be undertaken by a recognised QA traffic management consultant, to be approved by Transport Scotland before delivery commences.

- c. An assessment of the capacity of the existing local road network to cater for predicted construction traffic volumes and measures to strengthen and improve the road to cater for this traffic. All identified road works are to be completed before any other works commence on site unless otherwise agreed with TEC Services.
- d. An assessment of the capacity of existing bridges and other structures along the construction access route(s) to cater for all construction traffic.
- e. Unless otherwise agreed in writing with the Planning Authority in consultation with the Roads Authority, a trial run to confirm the ability of the local road network to cater for turbine delivery. Three weeks notice of this trial run must be made to the Local Roads Authority who needs to be able to attend this trial run.
- f. A concluded Wear and Tear agreement in accordance with Section 96 of the Roads (Scotland) Act 1984 under which the developer is responsible for the repair of any damage to the local road network that can reasonably be attributed to construction related traffic. As part of this agreement, pre-start and post construction road condition surveys will need to be carried out by the developer to the satisfaction of TEC Services.

Reason: - To protect the integrity of the local road network during the construction and when any abnormal loads are required to deliver to this development.

16. A community liaison group shall be established by the developer prior to development commencing, in collaboration with The Highland Council and local Community Councils. The group shall act as a vehicle for the community to be kept informed of project progress and, in particular, should allow advanced dialogue on the provision of all transport-related mitigation measures and to keep under review the timing of the delivery of turbine components; this should also ensure that local events and tourist seasons are considered and appropriate measures to coordinate deliveries and work to ensure no conflict between construction traffic and the increased traffic generated by such events / seasons. The liaison group, or element of any combined liaison group relating to this development, shall be maintained until wind farm has been completed and is operational.

**Reason:** To assist with the provision of mitigation measures to minimise the potential hazard to road users, including pedestrians travelling on the road networks.

- 17 The Wind Turbine Noise Level, including the application of any tonal penalty specified in ETSU-R-97 at pages 99-109, shall not exceed 35 dB LA90,10min at any Noise-Sensitive Premises. This condition shall only apply at wind speeds up to 10m/s measured or calculated using the methods described in "Prediction and Assessment of Wind Turbine Noise" (published in IOA Bulletin March/April 2009). The Wind Farm Operator shall, beginning with the first day upon which the wind farm becomes operational, log wind speed and wind direction data continually and shall retain the data for a period of at least 12 months from the date that it was logged. The data shall include the average wind speed, measured in metres per second, over 10 minute measuring periods. These measuring periods shall be set to commence on the hour and at 10 minute consecutive increments thereafter.



Measurements shall be calculated at 10m above ground level using the methods described in "Prediction and Assessment of Wind Turbine Noise" (published in IOA Bulletin March/April 2009). All wind speed data shall be made available to the Planning Authority on request in Microsoft Excel compatible electronic spreadsheet format.

At the reasonable request of the Planning Authority, the Wind Farm Operator shall assess, at its own expense and using a suitably qualified consultant(s) not involved in the original noise assessment, the level of noise emissions from the Wind Turbines.

Assessment shall be carried out in accordance with the Noise Measurement and Mitigation Scheme approved under this planning permission and a report of assessment shall be submitted to the Planning Authority within two months of a request under this condition, unless an alternative timescale is otherwise agreed in writing by the Planning Authority.

If noise emissions are found to exceed limits prescribed under this planning permission, then the Wind Farm Operator shall implement mitigation measures in full accordance with the approved Noise Measurement and Mitigation Scheme, or alternative equal or better mitigation measures as may first be approved in writing by the Planning Authority, in order to reduce noise levels to comply with prescribed limits. The time period for implementing mitigation measures shall be as outlined in the approved Noise Measurement and Mitigation Scheme or as otherwise may be specified writing by the Planning Authority.

No development shall commence until a Noise Measurement and Mitigation Scheme has been submitted to, and approved in writing by, the Planning Authority. The scheme shall include:

- i. A framework for the measurement and calculation of noise levels to be undertaken in accordance with "The Assessment & Rating of Noise from Wind Farms", September 1996, ESTU report number ETSU-R-97 having regard to paragraphs 1-3 and 5-11 inclusive, of The Schedule, pages 95 to 97; and Supplementary Guidance Notes to the Planning Obligation, pages 99 to 109. Wind speeds shall be determined using the methods in "Prediction and Assessment of Wind Turbine Noise" (published in IOA Bulletin March/April 2009); and
- ii. Mitigation measures to be enacted, along with a timetable(s) for implementation, should noise emissions exceed the limits prescribed under this planning permission.

**Reason:** - To allow the Planning Authority effectively manage noise arising from the approved development and impacting upon existing housing / community interests.

## INFORMATIVES

1. The following are statutory requirements of the Town and Country Planning (Scotland) Act 1997 (as amended). Failure to meet their respective terms represents a breach of planning law and may result in formal enforcement action.
  - The developer must submit a Notice of Initiation of Development (NID) in accordance with Section 27A of the Town and Country Planning (Scotland) Act 1997 (as amended) to the Planning Authority prior to work commencing on site. Furthermore, work must not commence until the notice has been acknowledged in writing by the Planning Authority.
  - On completion of the development, the developer must submit a Notice of Completion in accordance with Section 27B of the Town and Country Planning (Scotland) Act 1997 (as amended) to the Planning Authority.
2. Your attention is drawn to the conditions attached to this permission. Any pre-conditions (those requiring certain works, submissions etc. prior to commencement of development) must be fulfilled prior to work starting on site. Failure to meet these conditions may invalidate your permission or result in formal enforcement action.
3. Any trunk road works will necessitate a Minute of Agreement with the Trunk Roads Authority prior to commencement of any works.
4. In line with the Council's Gaelic Language Plan and Policies, you are encouraged to consider the adoption of Gaelic or Gaelic-influenced names in this development. For further guidance, you may wish to contact the Council's Gaelic Development Manager (01463 724287) or Comunn na Gàidhlig (01463 234138).

### 5. **Definition of Terms Used**

"Wind Turbine Noise Level" means the rated noise level due to the combined effect of all the Wind Turbines, excluding existing background noise level but including any tonal penalty incurred under the methodology described in ETSU-R -97, pages 99 – 109.

"Wind Farm Operator" means the individual(s), organisation(s) or company(ies) responsible for the day-to-day operation of the windfarm, who may or may not also be the owner of the windfarm.

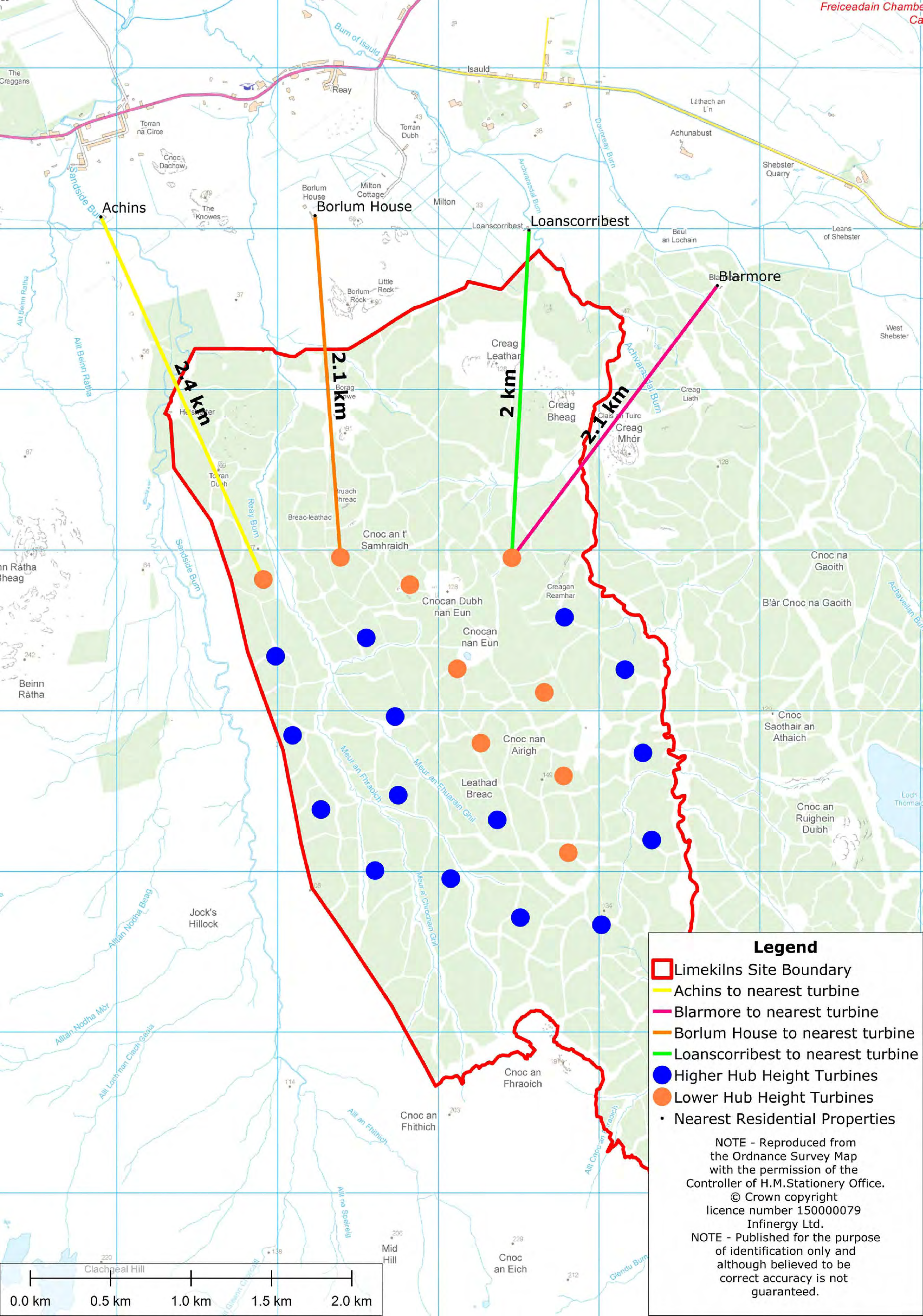
"Background Noise Level" means the ambient noise level already present within the environment (in the absence of noise generated by the development) as measured and correlated with Wind Speeds.

“Wind Speeds” means wind speeds measured or calculated at a height of 10 metres above ground level on the site at a specified Ordnance Survey grid reference agreed in writing by the Planning Authority

“Night hours” means 23:00 – 07:00 hours on all days.

“Noise-Sensitive Premises” means any building, structure or other development that, on the date of this planning permission, exists or is yet to exist but benefits from extant planning permission, the lawful use of which falls within Classes 7 (Hotels & Hostels), 8 (Residential Institutions) or 9 (Houses) of the Town and Country Planning (Use Classes) (Scotland) Order 1997 (as amended) or is as a flat or static residential caravan. Where such documents exist, this definition also includes any other premises defined as being noise-sensitive within any Environment Statement or other assessment or survey submitted in support of the planning application. For the purposes of this definition, ‘premises’ includes any relevant curtilage.

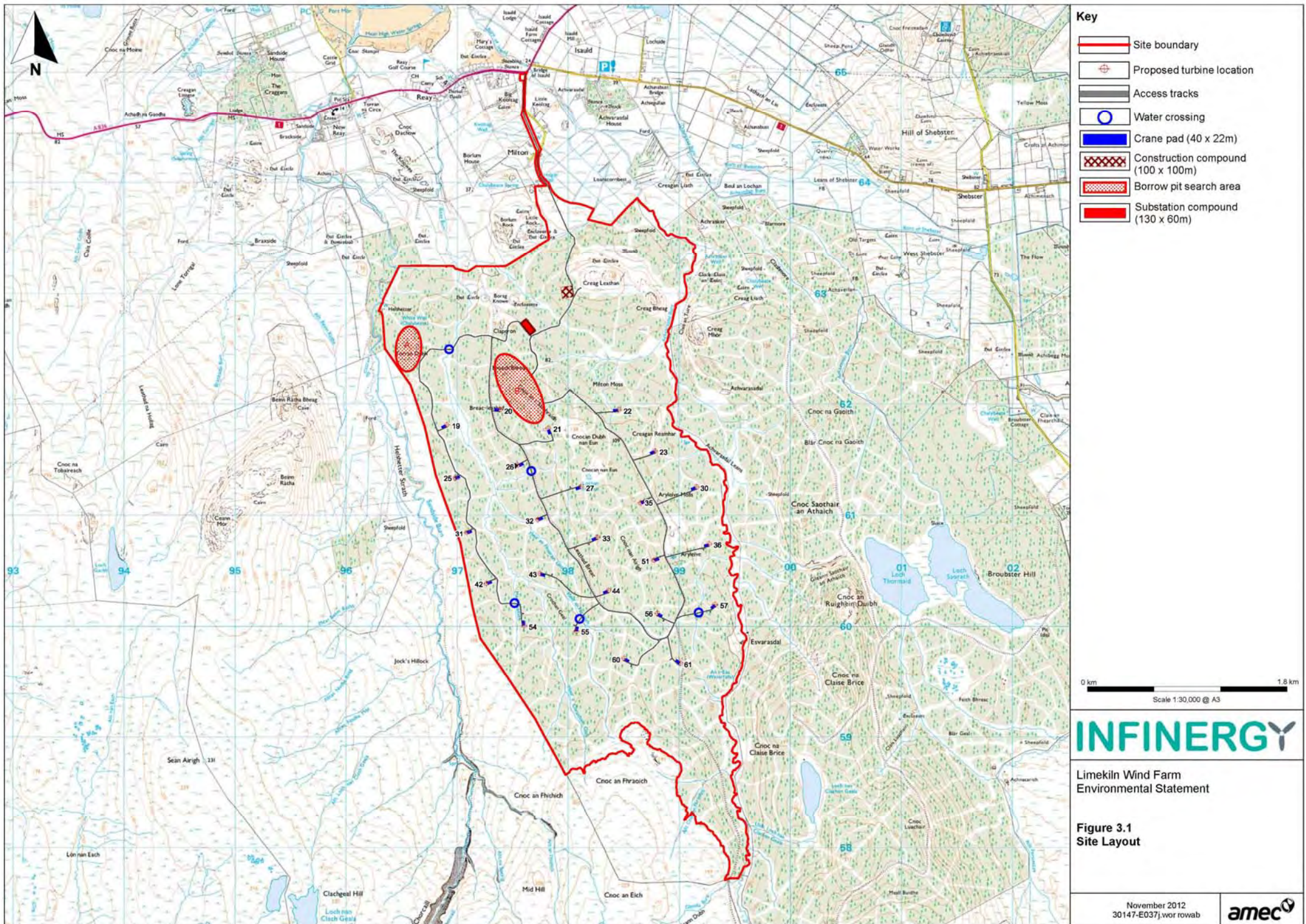
Signature: Malcolm MacLeod  
Designation: Head of Planning and Building Standards  
Author: Ken McCorquodale Principal Planning Officer  
Background Papers: Documents referred to in report and in case file 12/04781/S36.



### Legend

- Limekilns Site Boundary
- Achins to nearest turbine
- Blarmore to nearest turbine
- Borlum House to nearest turbine
- Loanscorribest to nearest turbine
- Higher Hub Height Turbines
- Lower Hub Height Turbines
- Nearest Residential Properties

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**Key**

 Site Boundary

0 km 1.8 km


Scale 1:30,000 @ A3

**INFINERGY**

Limerick Wind Farm  
Environmental Statement

Revised Site Boundary January 2013

January 2013  
30147-E081a.wor.wrab



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