

Agenda Item	6.1
Report No	PLN/023/24

## HIGHLAND COUNCIL

**Committee:** North Planning Applications Committee  
**Date:** 05 March 2024  
**Report Title:** 22/01972/S36 : Armadale Wind Farm Ltd  
Land 800M South Of Armadale Farm, Armadale  
**Report By:** Area Planning Manager - North

### Purpose/Executive Summary

**Description:** Armadale Wind Farm - Erection and Operation of Wind Farm for a period of 30 years, comprising of 9 Wind Turbines with maximum blade tip height of 149.9m, access tracks, borrow pits, substation, control building, met mast, battery energy storage system and ancillary infrastructure  
**Ward:** 01 - North, West And Central Sutherland

**Development category:** National Development (S36 Application)

**Reason referred to Committee:** Section 36 Application under Electricity Act

All relevant matters have been taken into account when appraising this application. It is considered that the proposal does not accord with the principles and policies contained within the Development Plan and is unacceptable in terms of applicable material considerations.

### Recommendation

Members are asked to agree the recommendation to **RAISE OBJECTION** to the application as set out in section 11 of the report.

## 1. PROPOSED DEVELOPMENT

1.1 The Highland Council has been consulted by the Scottish Government's Energy Consents Unit (ECU) on an application made under Section 36 of the Electricity Act 1989 (as amended) for construction of the Armadale Windfarm and associated infrastructure. The application is for 9 wind turbines to be operated for 30 years, with all turbines having a maximum blade tip height of 149.9m. The proposals have the capacity to generate up to 43.2MW based on the power rating of the proposed turbines, alongside up to 42 MW of battery storage capacity.

The proposed development comprises:

- 9 wind turbines with a tip height of up to 149.9m with an operational life of 30 years.
- Associated foundations, component laydown areas and crane hardstanding (approximately 45m x 35m plus laydown areas) at each wind turbine location;
- A new site access junction off the A836;
- The construction of approximately, 6.49km of onsite access tracks, consisting of 0.47km of improved existing tracks and 6.02km of new tracks;
- Network of underground cabling; where required and possible, this will run adjacent the access tracks;
- Five new watercourse crossings;
- An on-site borrow pit;
- Substation compound incorporating electrical equipment and the control building. The compound will comprise a fenced hardstanding with maximum dimensions of approximately 135 m x 45 m, which would contain electrical equipment and a single storey control building measuring approximately 18 m x 6 m. The proposed location of the compound is within the area identified for use as an onsite borrow pit;
- A temporary construction compound of approximately 100 m x 50m;
- A containerised battery energy storage system (BESS) located to the southwest of the borrow pit and substation compound, measuring approximately 112 m x 53 m. The total capacity of the batteries would be up to approximately 42 MW;
- An anemometry mast with a maximum height of 83m.

1.2 The grid connection from the on-site substation to the National Grid would be subject to a separate consent application by the Network Operator. The precise grid route has not yet been confirmed, but it is anticipated that the Development will connect into the grid at Connagill Substation, located approximately 15 km to the southeast of the site.

- 1.3 To access the site, a new access junction off the A836 is proposed. A finalised Construction Traffic Management Plan (CTMP) will be prepared and agreed with the Council and Transport Scotland prior to works commencing. The preferred access strategy proposes that all turbine abnormal loads will originate from Scrabster Harbour, then proceed southbound on A9 towards Burnside, then turn right onto the A836. This will then proceed westward on the A836 for approximately 22 miles and finally leave the A836 and turning left into Site access junction
- 1.4 The applicant has requested a micro-siting allowance of 50m for site infrastructure (tracks, turbine locations, underground cables and crane hard standing areas) this is to avoid or minimise environmental or engineering constraints identified during pre-construction ground investigation or construction phase excavation works. The final design of the turbines (colours and finish), aviation lighting, substation, welfare and store buildings/compounds/ancillary electrical equipment, landscaping and fencing etc. are expected to be agreed with the Planning Authority and the Energy Consents Unit, by condition, at the time of project procurement. Whilst indicative drawings for these elements are set out in the application, turbine manufacturers regularly update the designs that are available, thereby necessitating the need for some flexibility in the approved design details.
- 1.5 The applicant anticipates that the wind farm construction period will last 18 months. A Construction Environment Management Plan (CEMP) will be in place during the construction phase. This would also include a programme of site reinstatement which would allow for the rehabilitation of disturbed areas as early as possible in order to minimise storage of excavated material on vegetation.
- 1.6 The wind farm has an expected operational life of 30 years. Following this a further planning application would be required to determine any future re-powering proposal the site, which may include retention of the development. If the decision is made to decommission the wind farm, the detailed method and extent of the decommissioning activities would need to be agreed via a decommissioning method statement. The EIAR does include an Outline Decommissioning and Restoration Plan and states that decommissioning would involve the dismantling and removal of the wind turbines and electrical equipment; the reinstatement of the turbine areas and associated hardstanding; and the demolition and removal of the BESS and substation compound. Underground cables and access tracks will be left in situ. It is estimated that the decommissioning period for the Development would be approximately six months.
- 1.7 The applicant utilised the Council's Pre-Application Advice Service for major developments in 2016 (ref. 16/04520/PREAPP) and 2019 (19/04958/PREMAJ). Most recently, 19/04958/PREMAJ presented a scheme of up to 23 turbines with a tip height of 180m, the applicants were advised that based on the submitted information and the information presented at the meeting it is unlikely that the Council would be in a position to support the proposed wind farm should it be brought forward as an application. The main areas of concern related to the potential landscape impacts The applicant was informed that the proposed wind turbines would dominate the views, particularly from Armadale Broch and the seascape/coast. The number and size of the turbines raise significant concerns. A turbine height of up to 180m to blade tip, is significantly taller than those in nearby constructed Strathy North windfarm (110m to blade tip) and approved Strathy South (135m to blade tip).

- 1.8 The applicant has undertaken public exhibition events in the local area; Bettyhill Village Hall – 10<sup>th</sup> March 2020: 2pm-6pm and Strathy Village Hall – 11<sup>th</sup> March 2020: 4pm – 8pm. Due to the Covid-19 pandemic, virtual online exhibition was available from the week commencing 7th February 2022 and a virtual Q&A session held on Tuesday 8th February. Further meetings were completed with the local Community Councils and crofting stakeholders. Feedback on the consultation events is contained within the submitted Pre-Application Consultation Report.
- 1.9 The application is supported by an Environmental Impact Assessment Report (EIAR) which includes chapters on Planning Policy; Seascape, Landscape and Visual Impacts; Ecology; Ornithology; Hydrology and Hydrogeology; Geology, Soils and Peat, Noise, Access, Transport and Traffic, Land-use, Socio-Economics and Tourism, Archaeology and Cultural Heritage, Climate Change and Carbon Balance, other issues including Aviation and Shadow Flicker and finally a summary of the mitigation proposed. The application is also accompanied by Technical Appendices, a Pre-Application Consultation Report, an EIA Non-Technical Summary (NTS), a Design and Access Statement and a Planning Statement.
- 1.10 Since the application was first submitted to the Scottish Government's Energy Consents Unit, it has been varied in the following ways:
- Turbines 4, 9 and 10 and associated infrastructure were removed from the scheme following discussions between the applicant, Council Officers and consultees. These changes are summarised in a Further Environmental Information (FEI) Report, dated May 2023.

## **2. SITE DESCRIPTION**

- 2.1 The application site is located to the south of the village of Armadale and approx. 40km to the west of Thurso. As detailed in the EIAR the site is largely open moorland used for rough grazing, there is a small area of woodland in the northwest. The elevation of the site itself ranges from approximately 160m Above Ordnance Datum (AOD) in the south of the site, at Beinn Chuldail to 30m in the north near Allt Beag watercourse and Armadale Burn. The site covers an area of 395.53 hectares, however, the estimated permanent footprint of the development following completion of construction will be approximately 25.95 ha which equates to approximately 6.5% of the total site area.
- 2.2 As detailed in the EIAR, the development lies within the main river catchments of the Armadale Burn and Allt Beag and is situated within the smaller catchments and associated tributaries of Allt Claise Deirge, an upstream tributary of the Allt Beag; and Allt nan Gleannan, an upstream tributary of the Allt Beag. The main watercourse catchment within the Site is the Armadale Burn. It rises from smaller unnamed tributaries and lochs approximately 2 km to the south of the site. It flows south to north into Armadale Bay, approximately 400 m north of the Site.
- 2.3 The site is not located within any statutory international, national, regional or local landscape-related designations. However, the following designations lie within 10km of the site boundary:
- Farr Bay, Strathy and Portskerra Special Landscape Area (SLA) is located approximately 160 m north of the site boundary and approximately 1.1 km north of the nearest proposed turbine.
  - The Kyles of Tongue National Scenic Area (NSA) is located approximately

8 km west of the site boundary and approximately 6.8 km to the west of the nearest proposed turbine.

- East Halladale Flows Wild Land Area (WLA) is located approximately 10 km to the southeast of the site and approximately 10.1 km east/ southeast of the nearest proposed turbine.

2.4 There are no cultural heritage designations within the site boundary. There are several Scheduled Monuments within 10km of the site:

- Armadale Burn Broch (SM13678), located adjacent to the eastern Site boundary.
- Fiscary, cairns and chambered cairn (SM1790), approx. 4.5 km west.
- Borge Castle (SM2112), located approx. 5.4 km northwest.
- Baligill Mill (SM4265), located approx. 6.2km northeast.
- Achoillenaborgie Broch (SM1824), located approx. 6.3 km southwest.
- Achoillenaborgie Cairns (SM1781), located approx. 6.4 km southwest.
- Allt a'Chaisteil Broch (SM1828), located approx. 6.4 km southwest.
- Farr Churchyard (SM1889), located approx. 6.4 km.
- Baligill Burn (SM4290), located approx. 6.5 northeast.
- Skelpick Long Cairn (SM1815), located approx. 7.1 km southwest.
- Invernaver Cairns, Cists, Hut Circles and Field System (SM2842), located approx. 7.1 km southwest.
- Skelpick Lodge (SM1816), located approx. 7.4 km southwest.
- Dalmoor Homestead (SM10500), located approx. 7.5 km southwest.
- Lochan Drium an Drium Broch (SM1879), located approx. 7.5 km southwest.
- Achargary Chambered Cairn (SM1760), located approx. 8.6 km southwest.
- Halladale Bridge (SM3304), located approx. 10 km east.

In addition, there are 28 Listed Buildings within 10 km of the site boundary, the closest is the Grade C listed Armadale House located 60 m north of the Site boundary on the opposite side of the A836.

2.5 There are no ecological designations within the site; however, Armadale Gorge Site of Special Scientific Interest (SSSI) is located immediately to the east of the site, the Lochan Buidhe Mires SSSI, and the Caithness and Sutherland Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar Site are located immediately to the south of the site. These designations are recognised for a variety of habitat features, including blanket bog and Scrub and subalpine dry heath. In addition, the following ecological designations are located within 10km of the site:

- Strathy Coast SSSI, located approx. 0.6 km north of the site
- Strathy Point SAC, located approx. 0.65 km northeast.
- West Halldale SSSI, located approx. 3.3 km southeast.
- Strathy Bogs SSSI, located approx. 4.5 km south.
- River Naver SAC, located approx. 6.5 km southwest.

- Invernaver SSSI, located approx. 6.8 m west.
- River Borgie SSSI and SAC, located approx. 8.8 km west.

2.6 When considering wind farm projects consideration is also given to the issue of cumulative impact of any project with other operational or consented schemes within the surrounding landscape. The following table outlines the schemes within 25km of the site.

Site Name	No. of Turbines	Tip Height (m)	Location and Distance from the Proposed Development
<b>Operational Sites</b>			
Bettyhill Wind Farm	2	120	5.2 km SW
Strathy North	33	111	4.04km SE
Baillie Wind Farm	21	115	23.42 km NE
Forss Wind Farm 1	2	76	24.35 km NE
Forss Wind Farm 2	4	78	24.17 km NE
<b>Consented / Sites Under Construction</b>			
Strathy Wood Wind Farm	13	180	6.61 km SE
Strathy South Wind Farm /	35	200	8.73 km S
Pentland Offshore	7	300	18.92 km NE
Limekiln Wind Farm (Resubmission)	21	126 - 139	18.26 km E
Bettyhill Extension	10	149.9	4.0km SW
<b>Application / Appeal Sites</b>			
Forss Wind Farm 3	2	100	24.67km NE
Limekiln Wind Farm Extension	5	149.9	20.66km E
Kirkton Energy Park	12	149.9	7.8km E
Melvich Windfarm	9	149.9	5.58km E
West of Orkney Offshore	125	360	28.04km NE

### 3. PLANNING HISTORY

- |     |             |   |                        |
|-----|-------------|---|------------------------|
| 3.1 | 7 Jan 2020  | 19/05231/SCOP - Armadale Wind Farm - Erection of up to 23 turbines with a maximum height to blade tip of 180 m and a total generating capacity of over 50 megawatts (MW)  | Scoping opinion issued |
| 3.2 | 19 Dec 2019 | 19/04958/PREMAJ - Development will consist of up to 23 turbines with a maximum height to blade tip of 180 m and a total generating capacity of over 50 megawatts (MW)   | Advice issued          |
| 3.3 | 16 Feb 2017 | 16/05807/SCOP – Wind farm on land by Cromsac Hill   | Scoping opinion issued |
| 3.4 | 16 Nov 2016 | 16/04520/PREAPP Wind turbines and associated infrastructure (new site tracks, meteorological mast, substation and control building), Up to 16 turbines with a maximum generating capacity of greater than 48MW. | Advice issued          |

### 4. PUBLIC PARTICIPATION

#### 4.1 Advertised: Section 36 Application and EIA Development

Date Advertised:

- John O’Groats Journal – 25 April 2022
- Daily Record – 25 April 2022
- Edinburgh Gazette – 6 May 2022.

Date Further Environmental Information Advertised:

- Edinburgh Gazette - 6 June 2023
- Northern Times – 6 June 2023

Representations Deadline: 10 July 2023

4.2 Representations received (30 objections, 1 neutral comment, 0 support by the Highland Council: comments)

4.3 Representations received (99 objections, 0 neutral comments, 2 support by Energy Consents Unit: comments)

4.4 Material considerations raised are summarised as follows:

- Development does not accord with the relevant Development Plan Policies or Supplementary Guidance
- Visual impact of the development, including cumulative impact along with other windfarms.
- Impact on nearby Special Landscape Areas (SLA’s) and more general landscape character impacts.
- Loss of visual amenity and character of the Armadale village and the wider surroundings.
- Impact on wild land.

- Impact on local on and offshore water quality and fisheries
- Impact on the Flow Country proposed World Heritage Site.
- Impact on local plant, animal, mammal and bird species, especially White-Tailed Sea Eagle.
- Impact on peatland.
- Impact on local cultural heritage, particularly local listed buildings, scheduled monuments and the wider historic landscape associated with the Highland. Clearances.
- Potential for Amplitude Modulated noise emissions.
- Health and safety implication including potential for turbine structural failure, failure of the proposed battery storage equipment, fires, ice and blade throw.
- Loss of amenity for residential properties in terms of shadow flicker, operational noise and night lighting.
- Health and safety implications, particularly those related to fire and pollution risks from the incorporated Battery Energy Storage System (BESS)
- Road safety implications of the visual impact of turbines and shadow flicker.
- Construction noise and disruption.
- Increase in traffic on the road network during construction and operation and potential for physical damage and alterations to the road network
- Impacts on flood risk arising from the proposals
- Impact on tourism and recreation and local business in these sectors.
- Impact on local data bandwidth and telecoms reception.
- Impact on operation of the local common grazings.
- Lack of meaningful public consultation.
- Cumulative impacts of other wind farm development in the area are too great.
- EIAR material is misleading or reliant on outdated information, especially in regard to LVIA and residential amenity matters, ornithology, socio economic assessment, decommissioning and the carbon calculator information.
- Issues with site addressing and registration of consultations as well as making representations to the Energy Consents Unit (ECU)

4.5 The following matters raised in representations are not material planning considerations:

- Lack of strategic focus in renewables development and oversupply of renewable energy in the North of Scotland.
- Need to investigate other renewables options.
- Impact on private views.
- Alleged coercive payments to residents and landowners.
- Impact on mental health.
- Level of proposed community gain and benefits payments is inappropriate.
- Possible impact of grid connection works where these would be covered by a separate application.
- Distance of proposal from sources of peak electricity demand.



- 4.6 All letters of representation received by the Council 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) .Those representations received by the Scottish Government's Energy Consents Unit can be accessed via [www.energyconsents.scot](http://www.energyconsents.scot) It should be noted that some representations have been submitted to both The Highland Council and Energy Consents Unit.

## 5. CONSULTATIONS

### Consultation Undertaken by The Highland Council:

- 5.1 **Bettyhill, Stathnavar and Altnaharra Community Council:** object to the proposals, responding to ECU as detailed below.
- 5.2 **Caithness West Community Council:** object to the application on the basis of the visual impacts of the proposals, the proximity to Armadale Village and the A836, the increase in road traffic generated by the proposals, various residential amenity impacts and on the basis of the content of the EIAR and consultation process
- 5.3 **Melvich Community Council:** object to the application on the basis of the visual impacts of the proposals, the proximity to Armadale Village and the A836 and the residential amenity impacts of proposals.
- 5.4 **Strathy and Armadale Community Council:** object to the application on the basis of the visual impacts of the proposals, the proximity to Armadale Village and the A836, various residential amenity impacts and on the basis of the content of the EIAR and consultation process. A response was also submitted to ECU.
- 5.5 **Development Plans Team** do not object to the application. Its response considers the applicable policies relevant for the application's assessment
- 5.6 **Environmental Health** do not object to the application, but state that the noise assessment will exceed the levels at some locations and wind speeds. Use of noise management modes is proposed which will be automatically active during the relevant wind conditions.
- 5.7 **Ecology Officer:** objects to the application on the basis that the applicant's suggested habitat compensation measures are not sufficient to ensure that significant harm to the ecological function and integrity of Annex 1, UKBAP, LBAP and Scottish biodiversity list habitats has been avoided.
- 5.8 **Flood Risk Management Team** do not object and has no specific comments to make regarding the proposal.
- 5.9 **Forestry Team** do not object to the application and confirms that the application will have no significant impact upon woodland.
- 5.10 **Historic Environment Team (Archaeology)** do not object to the application, subject to a condition being attached to nay forthcoming deemed planning permission to ensure no development or work commences until a programme fo work for the survey, preservation and recording of affected heritage features has been agreed with the planning authority.

- 5.11 **Historic Environment Team (Conservation):** object to the application on the basis of the significant adverse impact upon the setting of C-listed Armadale House, particularly when viewed from the A836 on the approach from Thurso direction, but also the wider landscape setting when viewed from the western approach.
- 5.12 **Landscape Officer** objects to the application on landscape impact and visual impact grounds. The Landscape Officer's comments are considered in further detail in the Planning Appraisal section of this report.
- 5.13 **Transport Planning:** objected to the application on the basis that further information is required to fully comment on the proposals, related to traffic counts, trip generation, impact on local roads and road structures and access junction detailed design.

#### **Consultations undertaken by the Scottish Government's Energy Consents Unit (ECU)**

- 5.14 **Bettyhill, Stathnavar and Altnaharra Community Council:** object to the application on the basis of the visual impacts of the proposals, their proximity to Armadale Village and the A836 and the residential amenity impacts of proposals.
- 5.15 **British Horse Society** do not object to the application and consider the proposal an opportunity to improve connections within the community and access to the countryside. It provides advice on the importance of off-road riding in relation to road safety, the Land Reform (Scotland) Act 2003, active travel, and the suitability of infrastructure to not impede equestrian access to the countryside.
- 5.16 **British Telecom** do not object to the application. It considers the proposal should not cause interference to BT's current and presently planned radio network.
- 5.17 **Crown Estate Scotland** do not object to the application. It confirms that the assets of Crown Estate Scotland are not affected by the proposal.
- 5.18 **Fisheries Management Scotland (FMS)** do not object to the application. They have notified the local fisheries boards and organisations and note the relevant guidance in the sector for windfarm developments.
- 5.19 **Highlands and Islands Airport Ltd (HIAL)** do not object to the application and consider that this development would not infringe the safeguarding criteria for Wick Airport.
- 5.20 **Historic Environment Scotland (HES)** do not object to the application. It was initially considered that the proposals would have a significant adverse effect on the integrity of the setting of Armadale Burn broch which is a scheduled monument (SM13678). However, following the submission of the revised 9 turbine scheme, HES's initial objection was withdrawn. It was considered that the level of effect on the setting of the Armadale Burn broch was reduced to a level at which the integrity is no longer significantly adversely impacted.
- 5.21 **Ironside Farrar** do not object to the application and consider that the submitted Peat Landslide and Hazard Risk Assessment to be acceptable.
- 5.22 **Joint Radio Company** do not object to the application and does not foresee any potential problems based on known interference scenarios.

- 5.23 **Ministry of Defence, Defence Infrastructure Organisation** do not object to the application, but request a condition requiring the submission of an aviation lighting scheme and that notification is sent to it at least 14 days prior to the commencement of the development.
- 5.24 **National Air Traffic Services Safeguarding (NATS)** do not object to the application. It notes that the proposal does not conflict with its safeguarding criteria.
- 5.25 **NatureScot**: object to the application on the basis that there would be significant effects on Scotland's North Coast which is a regionally distinctive landscape that makes a contribution to the identity of Scotland's landscapes. Nature Scot's comments are considered in further detail in the Planning Appraisal section of this report.
- 5.26 **The Northern District Salmon Fishery Board** do not object to the application. It considers that there is very little risk to the freshwater fish and fisheries from this proposal. Subject to adherence to measures preventing the ingress of peat, mineral sediment and chemicals to the stream then it considers that no detriment is likely to result from the construction or operation of the windfarm.
- 5.27 **The Office of Nuclear Regulation**: made no comment on the proposed development.
- 5.28 **Royal Society for the Protection of Birds Scotland (RSPB)** do not object to the application but made comments on the assumptions and information contained within the EIA, should the development proceed RSPB provided a list of comments to inform the ECU in undertaking its Habitats Regulation Appraisal, before issuing a decision on the case.
- 5.29 **Scottish Environment Protection Agency (SEPA)**: do not object to the application subject to conditions, primarily to manage any impacts on peatland and the water environment.
- 5.30 **Scottish Forestry**: do not object to the application. The development is unlikely to impact on nearby forest resources.
- 5.31 **Scottish Water** do not object to the application. It notes the proposal would not affect any Scottish Water drinking water catchment areas. It provides advice that it would not support surface water drainage connections to the public sewer network.
- 5.32 **Strathy and Armadale Community Council**: object to the application on the basis of the visual impacts of the proposals, their proximity to Armadale Village and the A836, various residential amenity impacts and on the basis of the content of the EIAR and consultation process.
- 5.33 **Transport Scotland**: raised no objections to the proposals and recommended conditions to be attached to any further deemed planning permission.

## **6. DEVELOPMENT PLAN POLICY**

The following documents comprise the adopted Development Plan are relevant to the assessment of the application.

### **6.1 National Planning Framework 4 (2022)**

The NPF4 policies of most relevance to this proposal include:

National Development 3 (NAD3) - Strategic Renewable Electricity Generation and Transmission Infrastructure

- 1 – Tackling the climate and nature crisis
- 2 – Climate mitigation and adaptation
- 3 – Biodiversity
- 4 – Natural places
- 5 – Soils
- 7 – Historic assets and places
- 11 – Energy
- 13 – Sustainable transport
- 22 – Flood risk and water management
- 23 – Health and safety
- 25 – Community wealth benefits
- 33 – Minerals

### **6.2 Highland Wide Local Development Plan 2012**

- 28 - Sustainable Design
- 29 - Design Quality and Place-making
- 30 - Physical Constraints
- 31 - Developer Contributions
- 53 - Minerals
- 54 - Mineral Wastes
- 55 - Peat and Soils
- 56 - Travel
- 57 - Natural, Built and Cultural Heritage
- 58 - Protected Species
- 59 - Other important Species
- 60 - Other Important Habitats
- 61 - Landscape
- 63 - Water Environment
- 64 - Flood Risk
- 65 - Waste Water Treatment
- 66 - Surface Water Drainage
- 67 - Renewable Energy Developments:
- 72 - Pollution
- 73 - Air Quality
- 77 - Public Access

### **Caithness and Sutherland Local Development Plan 2018 (CaSPlan)**

- 6.3 There are no site-specific policies covering the application site therefore the application requires to be assessed against the general policies of the Highland-wide Local Development Plan referred to above. However, the CaSPlan does confirm the boundaries for the Special Landscape Areas (SLA) within the plan area, in particular revisions to the SLAs location on the north coast including the nearby Farr Bay, Strathy and Portskerra SLA.

## **Onshore Wind Energy Supplementary Guidance (OWESG) (2016)**

- 6.4 The Onshore Wind Energy Supplementary Guidance (OWESG) provides additional guidance on the principles set out in HwLDP Policy 67 for renewable energy developments. The guidance sets out the Council's agreed position on onshore wind energy matters, and, although reflective of Scottish Planning Policy at the time of its adoption prior to the adoption of NPF4, the document remains an extant part of the Development Plan and is therefore a material consideration in the determination of onshore wind energy planning applications. Nevertheless, the Spatial Framework included in the document is no longer relevant to the assessment of applications as in effect, the policies of NPF4 (specifically Policy 11 - Energy) removes Group 2 Areas of significant protection from consideration by effectively making all land in Scotland either Group 1 Areas where wind farms will not be acceptable, or Group 3, Areas with potential for wind farm development.
- 6.5 The OWESG also contains the Loch Ness Landscape Sensitivity Study, the Black Isle, Surrounding Hills and Moray Firth Coast Sensitivity Study, and the Caithness Sensitivity Study. The site falls within the Caithness Sensitivity Study area.

### **Other Highland Council Supplementary Guidance**

- 6.6 Developer Contributions (Mar 2018)  
Flood Risk and Drainage Impact Assessment (Jan 2013)  
Green Networks (Jan 2013)  
Highland Historic Environment Strategy (Jan 2013)  
Highland's Statutorily Protected Species (Mar 2013)  
Highland Renewable Energy Strategy and Planning Guidelines (May 2006)  
Physical Constraints (Mar 2013)  
Roads and Transport Guidelines for New Developments (May 2013)  
Special Landscape Area Citations (Jun 2011)  
Sustainable Design Guide (Jan 2013)

### **OTHER MATERIAL CONSIDERATIONS**

## **7. OTHER MATERIAL CONSIDERATIONS**

### **Emerging Highland Council Development Plan Documents and Planning Guidance**

- 7.1 The Highland-wide Local Development Plan is currently under review and is at Main Issues Report Stage. It is anticipated the Proposed Plan will be published following publication of secondary legislation and National Planning Framework 4.
- 7.2 In addition to the above, The Highland Council has further advice on the delivery of major developments in a number of documents, which include the Construction Environmental Management Process for Large Scale Projects; and The Highland Council Visualisation Standards for Wind Energy Developments.
- 7.3 **Other National Guidance**  
Nature Scot Advising on Peatland, Carbon Rich Soils and Priority Peatland Habitats in Development Management (2023)  
Onshore Wind Energy Policy Statement (2022)  
Draft Energy Strategy and Just Transition Plan (2023)

Scottish Energy Strategy (2017)

2020 Routemap for Renewable Energy (2011)

Energy Efficient Scotland Route Map, Scottish Government (2018)

Siting and Designing Wind Farms in the Landscape, SNH (2017)

Assessing Impacts on Wild Land Areas, Technical Guidance, NatureScot (2020)

Wind Farm Developments on Peat Lands, Scottish Government (2011)

Historic Environment Policy for Scotland, HES (2019)

PAN 1/2011 - Planning and Noise (2011)

PAN 60 – Planning for Natural Heritage (2008)

Circular 1/2017: Environmental Impact Assessment Regulations (2017)

## **8. PLANNING APPRAISAL**

8.1 The application has been submitted to the Scottish Government for approval under Section 36 of the Electricity Act 1989 (as amended). Should Ministers approve the development, it will receive deemed planning permission under Section 57(2) of the Town and Country Planning (Scotland) Act 1997 (as amended). While not a planning application, the Council processes S36 applications in the same way as planning applications, because a consent under the Electricity Act will carry with it deemed planning permission.

8.2 Schedule 9 of The Electricity Act 1989 contains tests in relation to the impact of proposals on amenity, heritage, and fisheries, requiring proposals to:

- have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and,
- reasonably mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.

8.3 It should be noted that for applications under the Electricity Act 1989 that the Development Plan is just one of a number of considerations and Section 25 of the Town and Country Planning (Scotland) Act 1997 which requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise, is not engaged. That said, the application still requires to be assessed against all policies of the Development Plan relevant to the application, all national and local policy guidance and all other material considerations relevant to the application.

### **Planning Considerations**

8.4 The key considerations in this case are:

- a) compliance with the development plan and other planning policy;
- b) energy and economic benefits;
- c) construction impacts;
- d) design, landscape and visual impact (including wild land areas)
- e) natural heritage (including ornithology);

- f) impact on forestry
- g) hydrology, hydrogeology and peat;
- h) noise and shadow flicker;
- i) transport, roads and wider access;
- j) built and cultural heritage;
- k) telecommunications;
- l) aviation;
- m) decommissioning, and,
- n) other material considerations

### **Development plan/other planning policy**

8.5 The Development Plan comprises the adopted Highland-wide Local Development Plan (HwLDP), Caithness and Sutherland Local Development Plan and all statutorily adopted supplementary guidance.

### **National Policy**

8.6 National Planning Framework 4 (NPF4) forms part of the Development Plan and was adopted in February 2023. It comprises three parts:

- Part 1 – sets out an overarching spatial strategy for Scotland in the future and includes six spatial principles (just transition / conserving and recycling assets / local living / compact urban growth / rebalanced development / rural revitalisation. Part 1 sets out that there are eighteen national developments to support the spatial strategy and regional spatial priorities, which includes single large-scale projects and networks of smaller proposals that are collectively nationally significant.
- Part 2 – sets out policies for the development and use of land that are to be applied in the preparation of local development plans; local place plans; masterplans and briefs; and for determining the range of planning consents. This part of the document should be taken as a whole in that all relevant policies should be applied to each application.
- Part 3 – provides a series of annexes that provide the rationale for the strategies and policies of NPF4. The annexes outline how the document should be used and set out how the Scottish Government will implement the strategies and policies contained in the document.

8.7 The Spatial Strategy sets out that we are facing unprecedented challenges and that we need to reduce greenhouse gas emissions and adapt to future impacts of climate change. It sets out that that Scotland's environment is a national asset which supports our economy, identity, health and wellbeing. It sets out that choices need to be made about how we can make sustainable use of our natural assets in a way which benefits communities. The spatial strategy reflects legislation in setting out that decisions require to reflect the long term public interest. However, in doing so it is clear that we will need to make the right choices about where development should be located ensuring clarity is provided over the types of infrastructure that needs to be provided and the assets that should be protected to ensure they continue to benefit future generations. The Spatial Priorities support the planning and delivery of sustainable places, where we reduce emissions, restore and better connect biodiversity; liveable places, where we can all live better, healthier lives; and productive places, where we have

a greener, fairer and more inclusive wellbeing economy.

- 8.8 The proposed development is of national importance for the delivery of the national Spatial Strategy, whereby in principle support for the development is established. As the proposed development would be capable of providing over 50 MW of power output, including that from the battery storage, it is of a type and scale that constitutes NPF4 National Development 3 - Strategic Renewable Electricity Generation and Transmission Infrastructure.
- 8.9 At the high level, NPF4 considers that Strategic Renewable Electricity Generation and Transmission Infrastructure will assist in the delivery of the Spatial Strategy and Spatial Priorities for the north of Scotland, and that Highland can continue to make a strong contribution toward meeting Scotland's ambition for net zero. Alongside these ambitions, the strategy for Highland aims to protect environmental assets as well as to stimulate investment in natural and engineered solutions to address climate change. This aim is not new and will clearly require a balancing exercise to be undertaken, which is reflected throughout the document.
- 8.10 NPF4 Policies 1, 2, and 3 apply to all development proposals Scotland-wide, which means that significant weight must be given to the global climate and nature crises when considering all development proposals, as required by NPF4 Policy 1. To that end, development proposals must be sited and designed to minimise lifecycle greenhouse gas emissions as far as is practicably possible in accordance with NPF4 Policy 2, while contributing to the enhancement of biodiversity, as required by NPF4 Policy 3.
- 8.11 Specific to this proposal, as well as the support in Policy 1 (significant weight will be given to the global climate and nature crisis when considering development), Policy 11 of NPF4 supports all forms of proposals for renewable, low-carbon and zero emission technologies including wind farms. However, any project identified as a national development requires to be considered at a project level to ensure all statutory tests are met, as set out in Annex 1 of the NPF4. This includes consideration against the provisions of the Development Plan, of which NPF4 is a part.
- 8.12 Complementing those policies is NPF4 Policy 4 Natural Places, which sets out that development proposals by virtue of type, location, or scale that have an unacceptable impact on the natural environment will not be supported. The policy goes on to clarify what that means for different designations. It sets out that proposals with likely significant effects on European sites (SACs or SPAs) require appropriate assessment, and that development proposals that will affect a National Park, NSA or SSSI will only be supported where: i) the objectives of designation and the overall integrity of the areas will not be compromised; or ii) any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance. This is an important consideration given the proximity of the development in relation to the Strathy Point, River Naver and River Borgie SAC's, the Kyles of Tongue NSA and the several SSSI's in the wider area of the site.
- 8.13 Similarly, sites designated in Development Plans for local nature conservation or Special Landscape Areas (SLAs) are protected in NPF4 Policy 4 unless the development will not result in significantly adverse effects on its qualities or its integrity, or these effects are clearly outweighed by social, environmental, or economic benefits of at least local importance. The presence of the Farr Bay, Strathy and Portskerra Special Landscape Area (SLA) in relatively close proximity



to the site boundary, is an important consideration in this regard.

- 8.14 The most significant policy change for Natural Places brought about by NPF Policy 4 is with regard Wild Land Areas, which states that renewable energy developments that support national targets will be supported in Wild Land Areas (WLA) and that buffer zones around WLAs will not be applied, so that effects of development outwith WLAs will not be a significant consideration. The site itself is not with Wild Land, however the development will be seen from the nearby East Halladale Flows Wild Land Area (WLA).
- 8.15 Specific for energy developments, NPF4 Policy 11 states that the principle of all forms of renewable, low-carbon, and zero emission technologies is supported with the exception of wind farm proposals located in National Parks or National Scenic Areas. Policy 11 Part c) qualifies this position by stating that wind farms should only be supported where they maximise net economic impact, including local and community socio-economic benefits such as employment, associated business, and supply chain opportunities. The policy goes on to state that while significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on reduction of greenhouse gas emissions targets, the development's impacts, including cumulative impacts, must be suitably addressed and mitigated against. In this regard, the Highland Council has consistently given significant weight to a development's contribution to environmental targets prior to the adoption of NPF4.
- 8.16 NPF4 Policy 11 Part e) sets out the additional project design and mitigation requirements for energy proposals. This includes a broad range of matters akin to those to be assessed under HwLDP Policy 67. This includes consideration of the landscape and visual impacts and advises that where impacts are localised and / or appropriate design mitigation has been applied such effects will generally be considered acceptable. Members will be aware that the concept of wind energy developments that have only localised impacts as being more likely to be acceptable is not new and is also reflected in previous Highland Council planning decisions. However, the landscape and visual impacts of a proposal of 9 turbines at 149.9m in height remains challenging to be entirely contained, as reflected in the significant adverse impacts identified within the landscape and visual section of this report. While the adopted NPF4 reflects a stronger presumption in favour of all national scale energy developments, judgment still requires to be applied at the project level to ensure proposals do not have unacceptable landscape and visual impacts even if the contribution to national renewable energy targets is considerable.
- 8.17 On that point it is noted that both legislation and planning law indicate that where there may be incompatibility between NPF4 and the Local Development Plan (LDP) (HwLDP, IMFLDP, WHILDP and Highland Council Supplementary Guidance) published prior to NPF4, then the more recent document shall prevail. Notwithstanding however, in instances of incompatibility, this requirement may not eliminate the provisions of the LDP in their entirety whilst these documents remain an extant part of the adopted Development Plan. That means that the Council may wish to give more weight to the provisions of its LDP over national policies where there is strong justification for doing so, such as where it feels that LDP policy is better equipped to respond to local conditions for example. However, this matter is yet to be fully tested through the planning system.

## **Highland-wide Local Development Plan (HwLDP)**

- 8.18 The principal HwLDP policy on which the application needs to be determined is Policy 67 - Renewable Energy. HwLDP Policy 67 sets out that renewable energy development should be well related to the source of the primary renewable resource needed for operation, the contribution of the proposed development in meeting renewable energy targets and positive/negative effects on the local and national economy as well as all other relevant policies of the Development Plan and other relevant guidance. 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 HwLDP Policy 67. Such an approach is consistent with the concept of Sustainable Design (HwLDP Policy 28) and aim of SPP to achieve the right development in the right place; it is not to allow development at any cost.
- 8.19 It is here where the policy conflict between HwLDP 67 and NPF4 Policy 11 would appear most pronounced; whereby support for wind farm development has until now been more qualified in the LDP, which gives greater weight to protecting landscape and natural resources, NPF4 on the other hand appears to give tacit support for renewable energy projects even at the expense of certain landscape and natural resources, with the exception of National Parks and NSAs, particularly where energy contributions are at a national development scale, by treating the twin climate and biodiversity crises, and security of energy supply, with greater urgency.

## **Caithness and Sutherland Local Development Plan**

- 8.20 The Caithness and Sutherland Local Development Plan (CaSPlan) does not contain land allocations related to the proposed development. It confirms the boundaries of Special Landscape Areas within these plan areas. NPF4 Policy 4 and HwLDP Policies 28, 57, 61 and 67 seek to safeguard these regionally important landscapes. The impact of this development on landscape is primarily assessed in the Design, Landscape and Visual Impact section of this report

## **Onshore Wind Energy Supplementary Guidance (OSWESG)**

- 8.21 The Council's OWESG is a material consideration in the determination of planning applications. The supplementary guidance does not provide additional tests in respect of the consideration of development proposals against Development Plan policy. However, it provides a clear indication of the approach the Council towards the assessment of proposals, and thereby aid consideration of applications for onshore wind energy proposals.
- 8.22 The OWESG approach and methodology to the assessment of proposals is applicable and is set out in the OWESG Para 4.16 - 4.17. It provides a methodology for a judgement to be made on the likely impact of a development on assessed "thresholds" in order to assist the application of HwLDP Policy 67. The 10 criteria are particularly useful in considering visual impacts, including cumulative impacts. An appraisal of how the proposal relates to the thresholds set out in the criteria, is included in Appendix 3 of this report.

- 8.23 The Landscape Sensitivity Appraisal for Caithness was published in 2017 and forms part of the statutorily adopted OWESG. The turbine envelope for this application falls within area CT4 Central Caithness, a landscape area described as flat to gently undulating where the guidance advises “there is some limited potential for further commercial scale development in this LCT, to concentrate and consolidate with existing development”.

**Onshore Wind Energy Policy Statement (2022), Draft Energy Strategy and Just Transition Plan (2023) and Onshore Wind Sector Deal for Scotland (2023)**

- 8.24 The Onshore Wind Energy Policy Statement supersedes the previously adopted Onshore Wind Energy Policy Statement which was published in 2017. The document sets out a clear ambition for onshore wind in Scotland and for the first time sets a national target for a minimum level of installed capacity for onshore wind energy, 20GW. This is set against a currently installed capacity of 8.7GW. Therefore, a further 11.3GW of onshore wind requires to be installed to meet the target. It is however acknowledged that targets are not caps. In delivering such a target Scotland would play a significant role in meeting the requirement of 25-30GW of installed capacity across the UK identified by the Climate Change Committee.
- 8.25 Like the previous iteration of the Onshore Wind Energy Policy Statement, the document recognises that balance is required and that no one technology can allow Scotland to reach its net zero targets. The document is clear that in achieving a balance, environmental and economic benefits to Scotland must be maximised. In taking this approach, this echoes Scotland’s Third Land Use Strategy.
- 8.26 The document recognises that there may be a need to develop onshore wind energy development on peat. While peatland is present on the site, it is considered that appropriate mitigation has been applied by design and peat management plan can be secured by condition.
- 8.27 Benefits to rural areas, such as provision of jobs and opportunities to restore and protect natural habitats, are also highlighted in the document. The proposed development does lead to such benefits being delivered; however, the scale of the benefits are not demonstrably greater than those one would expect on any such wind farm development of commensurate size prior to the adoption of NPF4.
- 8.28 Additionally, the document acknowledges that in order for Scotland to achieve its climate targets and the ambition for the minimum installed capacity of 20GW by 2030, the landscape will change, which relates the document to landscape and visual impacts. However, the OWEPS also sets out that the right development should happen in the right place. Echoing NPF4, the document sets out that significant landscape and visual impacts are to be expected and that where the impacts are localised and / or appropriate mitigation has been applied the effects will be considered acceptable.
- 8.29 The role of Landscape Sensitivity Appraisals in considering wind energy proposals is promoted through the document. This highlights the importance of applying those contained within the Council’s OWESG when assessing applications.

- 8.30 Finally, the document considers some of the wider benefits and challenges faced by in delivery of ambition and vision for onshore wind energy in Scotland. These include shared ownership, community benefit, supply chain benefits, skills development and financial mechanisms for delivery. Technical considerations are also highlighted, those relevant to this application have been considered and mitigation, where required has been secured by condition.
- 8.31 The Draft Energy Strategy and Just Transition Plan has been published for consultation. Ministers will likely give consideration to this document in their decision on the application, however, limited weight can be applied to the document given its draft status. Unsurprisingly, the material on onshore wind in the document reflects in large part that contained in NPF4 and the Onshore Wind Energy Policy Statement 2022. A fundamental part of the Strategy is expanding the energy generation sector. Overall, the draft Energy Strategy forms part of the new policy approach alongside the OWEPS and NPF4 and confirms the Scottish Government's policy objectives and related targets reaffirming the crucial role that onshore wind and enabling transmission infrastructure will play in response to the climate crisis which is at the heart of all these policies.
- 8.32 To deliver the ambition for onshore wind, the Onshore Wind Sector Deal for Scotland was introduced in September 2023. The document focuses on necessary high level actions by Government and the Sector to support onshore wind delivery. Jointly, Government and the Sector are committed to working together to ensure a balance is struck between onshore wind and the impacts on land use and the environment. The document looks to expediate decision making and consent implementation to achieve 20 GW of installation by 2030, meaning we should be seeing faster decisions on applications that are already in the system, with more consents being build out.

### **Energy, Carbon Saving, and Socio-Economic Benefits**

- 8.33 The Council continues to respond positively to the Government's renewable energy agenda. There is currently 8.4GW of installed onshore wind capacity in Scotland, with a further 4.69GW in the planning/consenting process, 4.64 GW are awaiting construction and 0.43GW under construction. Highland wind energy projects currently have an installed capacity of 2.53GW, there is a further 1.42GW of generation permitted but not yet built and 1.3GW currently under construction. Installed onshore wind energy developments in Highland therefore accounts for around 30.12% of the national installed onshore wind energy capacity. There is also a further 2.1GW of onshore wind farm proposals currently in planning pending consideration in Highland.
- 8.34 While the Highland Council has effectively met its own target, as previously set out in the Highland Renewable Energy Strategy, it remains the case that there are areas of Highland capable of absorbing renewable developments without significant effects. However, equally the Council could take a more selective approach to determining which wind farm developments should be supported, consistent with national and local policy. This is not treating targets as a cap or suggesting that targets cannot be exceeded, it is simply a recognition of the balance that is called for in both national and local policy.

- 8.35 This scheme, including the battery storage element, has the potential to provide up to 85.4 MW. Therefore, notwithstanding any significant impacts that this proposal may have upon the landscape resource, amenity and heritage of the area, the development could be seen to be compatible with Scottish Government policy and guidance and increase its overall contribution to the Government, UK and European energy targets.
- 8.36 The proposed development anticipates a construction period of 18 months followed by 30 years of operation prior to decommissioning or repowering. Such a project can offer significant investment/opportunities to the local, Highland, and Scottish economy including businesses ranging across construction, haulage, electrical and service sectors. The EIAR, as amended through the Further Environmental Information (FEI) Report, for the 9-turbine scheme, estimates that during the construction phase the proposed development could generate approximately £27 million to the UK economy. Of that some £21.2 million is expected to be spent within Scotland (national) and approximately £7 million is expected to be spent within Caithness and Sutherland. It is anticipated that a temporary workforce peaking at 60 people will be employed during the construction period. The EIAR concludes that the effect on the Highland economy of the spending associated with the construction and development of the proposed development was assessed as minor (beneficial).
- 8.37 The applicant foresees additional wider benefits associated with a proposed Community Fund, providing funding to local communities and community projects. The EIAR states that the contribution will be £5,000 per megawatt installed capacity. With a 30-year consent, the applicant anticipates this will provide approximately £8.6 million in community benefit. In addition, the applicant states they will explore supporting opportunities for shared ownership of the deployment development, where possible. The applicant is willing to put in place a funding arrangement for energy provision to the local medical practice.
- 8.38 However, there is also likely to be some adverse effects caused by construction traffic and disruption, these will be temporary in nature and managed through the mitigation identified in the EIAR.
- 8.39 In terms of impacts upon tourism, this sector is an important component in the economy of the Highlands, with the scenery and the natural environment within being important factors for many visitors when choosing the area as a holiday destination. Any detrimental impact of the proposed development on tourism, whether visually, environmentally, or economically should be identified and considered.
- 8.40 The applicant's socio-economic assessment identified the following formal tourist attractions/activities within 5km of the site.
- North Coast 500 (NC500), located adjacent to the northern boundary of the Site.
  - National Cycle Route 1), located adjacent to the northern boundary of the Site.
  - Armadale Bay, located approximately 610 m north of the Site.
  - Bettyhill Viewpoint, located approximately 2.3 km west of the Site.
  - Strathy Beach, located approximately 4.5 km northeast of the Site.

- 8.41 The EIAR concludes that the development is unlikely to have a significant adverse impact on tourism both in isolation or cumulatively with other schemes. The applicant cites a number of studies which conclude that there is no empirical evidence identifying a negative relationship between the development of onshore wind and the tourism sector in Scotland in the decade of 2009 to 2019. While the Council's own experience has not shown significantly adverse effects from windfarm development on tourism so far, there is little in the literature regarding the potential for a critical mass of development and to conclude whether there is indeed a tipping point where windfarm development will ultimately discourage tourism in Highland. It is however recognised that there are an increasing number of wind farm submissions with significantly larger turbines reflecting the advent of technological advances than was the case previously.
- 8.42 The EIAR states that over its 30-year lifetime the project is expected to generate 3,635, 218 MWh of electricity. This equates to displacing approximately 1,570,410 tonnes of fossil fuel mix generation CO2 emissions. The EIAR states that the project has a payback time of 2.4 years compared to grid-mix electricity generation and 1.1 years in comparison to a fossil fuel-mix of electricity generation. Further elements of the carbon offsetting may come in the form of peatland restoration which could be secured as part of the habitat management plan, should the development gain consent.

### **Construction Impacts**

- 8.43 It is anticipated that construction would take place over an 18-month period. The EIAR states that the project would deploy a Construction Environmental Management Plan (CEMP), an outline version has been included in the EIAR. In addition, a Construction Traffic Management Plan (CTMP) will also be utilised, it is proposed that this will be advanced in consultation with the Council and Transport Scotland. SEPA have also requested adherence to the measures outlined in the Schedule of Mitigation, the Outline Borrow Pit Management Plan and the Outline Construction Environmental Management Plan.
- 8.44 If consent is granted, then the final versions of these documents should be secured via planning conditions. SEPA highlight that the borrow pit restoration should be in line with the relevant Technical Appendix. Final versions of the documents should be "plan based" highlighting the measures being deployed to safeguard specific local environmental resources and not simply re-state best practice manuals. Due to the scale of the development SEPA will control pollution prevention measures relating to surface water run-off via a Controlled Activities Regulations Construction Site Licence.
- 8.45 Developers have to comply with reasonable operational practices with regard to construction noise so as not to cause nuisance. Section 60 of the Control of Pollution Act 1974 sets restrictions in terms of hours of operation, plant and equipment used and noise levels etc. and is enforceable via Environmental Health. The applicant is committed to ensuring that best practice mitigation measures are adopted to manage noise emissions during construction, including restrictions on construction working hours. These will form part of the Construction Environmental Management Plan (CEMP).
- 8.46 The applicant has sought a micrositing allowance of 50m. Turbines and associated infrastructure would not be micro-sited into deeper peat or closer to watercourses without prior agreement from the Scottish Environment Protection Agency (SEPA). This is considered to be a reasonable allowance to address unforeseen onsite constraints, anything in excess of 50m may have a significant

effect on the composition of a development.

- 8.47 Additionally, if consent is granted then the Council would require the applicant to enter into legal agreements and provide financial bonds with regard to the developer's use of the local road network (Wear and Tear Agreement) and final 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. Whether restoration would include the full restoration of new access tracks would be considered when the development is due to be decommissioned however all other associated infrastructure is expected to be restored.
- 8.48 Finally, should the development be granted consent, a Community Liaison Group should be set up to ensure that Community Councils and other stakeholders are kept up to date and consulted before and during the construction period.

### **Transport, Roads and Wider Access**

- 8.49 The applicant has highlighted the expected impact of this development, particularly through the construction phase, with the Port of Entry likely to be Scrabster Harbour for the turbine components. The EIAR reports that the proposed development would lead to a temporary increase in traffic volumes on the study road network during the construction phase. Traffic volumes would decrease considerably outside the peak period of construction. The greatest impacts would be felt at the site access, where a monthly maximum of 1076 additional HGV and abnormal load movements and 2,164 car and van movements would be anticipated.
- 8.50 As a result of increased vehicle movements, given the capacity of the existing road network, the applicant's Transport Assessment found that there would be no significant effects on users of the local road network. The Council's Transport Planning Team has however, objected to the proposals on the basis of insufficient information. The applicant provided further information during October 2023 to address Transport Planning's concerns, nevertheless, should the proposals otherwise be consented, it may be possible to address the Team's objection on the basis of the applicant's supporting information, via a condition requiring more detailed analysis.
- 8.51 No core paths are located directly within the application site boundary. The nearest Core Path is Armadale – A836 (SU04.08), approximately 30 m north of the site boundary.
- 8.52 The site, like most land in Scotland, is subject to the provisions of the Land Reform (Scotland) Act 2003. There are paths running around the site and the wider area is rich in opportunities to access the outdoors. There will be a need to restrict access to the site during construction works at key times. Where and when feasible however existing tracks should be made available for public use during the construction phase. Access tracks to the proposed development should be accessible to a wide variety of users. Large pedestrian gates and by-pass gates adjacent to cattle grids should all be "easy open" accesses. All other gates within the application boundary should similarly be unlocked to responsible access takers.

- 8.53 To ensure access is provided throughout the construction period and that enhanced recreational access opportunities are provided during the operational phase, a Recreational Access Management Plan will be required by planning condition, should consent otherwise be granted. This will also be required to include details of signage to be included on the site to warn users of the paths within the wind farm of any hazards such as maintenance or potential ice throw during winter, should consent be granted.

### **Natural Heritage (including Ornithology and Peat)**

- 8.54 The EIAR has identified and assessed impacts on protected species, ornithology, ecology and designated sites. The application is also supported by an extended Phase 1 Habitat Survey, National Vegetation Classification Survey, protected species surveys (badger, otter, pine marten, red squirrel, water vole and wildcat), bat survey and a fisheries habitat survey. The EIAR states that the development has adopted mitigation by design practices but is also committed to continued mitigation throughout the construction process. This will be in the form of pre-construction surveys for protected species and breeding bird species and ongoing ornithological monitoring. A Habitat Management Plan (HMP) will be used to inform and guide the commencement of practical habitat creation and restoration techniques during construction, with the aim of effective management of construction activities and commencement of restoration works within the Bog Restoration Area. The EIAR states that all works will be overseen by an Ecological Clerk of Works (ECoW), if consent is granted this should be secured by a planning condition.
- 8.55 The site is located directly adjacent to the proposed Flow Country World Heritage site. The Council's Ecology Officer has noted from the applicant's supporting information that no significant adverse impacts are predicted in terms of the Outstanding Universal Values (OUV) of the World Heritage Site, although a breeding bird protection plan would be required to be secured via condition, should the proposals receive consent.
- 8.56 No statutory designated nature conservation sites for ecological or ornithological interests/features occur within the site boundary of the site. However, designated sites are located immediately adjacent to the sites boundary and within 10km of the site.
- 8.57 The Caithness and Sutherland Peatlands Special Area of Conservation (SAC) and Special Protection Area (SPA) lies immediately to the south of the site and the following qualifying features were scoped into the assessment; blanket bog, otter and wet heathland with cross-leaved heath. The SAC is also included in the Caithness and Sutherland Peatlands Ramsar. The site's status means that the Scottish Government as competent authority is required to consider the effect of the proposal on the designation before it approves any application (commonly known as Habitats Regulations Appraisal).
- 8.58 The development will result in the permanent loss of 4.09 ha of bog habitats. The EIAR contends that the loss is limited to areas of poor quality modified or drained blanket bog and excludes areas of near natural blanket bog and that overall, the magnitude of effects on this qualifying aspect of the SAC is negligible and not significant.



- 8.59 Following the applicant's submission of Further Environmental Information, NatureScot consider that it is unlikely that the proposal will have a significant effect on any qualifying interests of the SAC, either directly or indirectly.
- 8.60 The applicant's updated EIAR includes an outline Habitat Management Plan (HMP) which aims to restore and enhance peatland habitats. The EIAR states that there will be a minimum of twice the bog restoration to that which will be lost. However, the current Nature Scot guidance, states that the restoration levels should be a ratio of 1:10, therefore there is insufficient habitat bog restoration. While the outline Habitat Management Plan focuses mainly on peatland in terms of direct habitat restoration, as noted by the Council's Ecology Officer, there are significant areas of other habitat, such as acid grassland and heathland that will be lost through the development, that also require compensation and enhancement measures. This brings the application into conflict with NPF4 Policy 3 (b) in that suitable habitat enhancement measures have not been put forward.
- 8.61 The majority of the site comprises heathland and blanket bog habitat and, as such; the EIAR contends that the site is unsuitable for species which predominantly favour woodland habitats, such as badger, pine marten and red squirrel. However, further work was undertaken in relation to bats in the form of bat surveys. The EIAR reports that the site has low value for foraging, commuting and roosting bats, and was therefore considered to be of low value to bats. This was reflected in the very low level of activity and species diversity recorded during bat surveys. NatureScot agree with the conclusions and support the embedded mitigation, in the form of a 50 m separation distance between blade tips and high-value bat habitats implemented during construction (mitigation by design) (such as woodland). Following this, the 50 m buffer will be maintained throughout the operational life of the development by ensuring that tree regeneration does not encroach on the buffer.
- 8.62 A Fisheries Habitat Survey was carried out to determine the potential of three main watercourses: Armadale Burn, Allt Beag and Allt nan Gleannan, to support Atlantic salmon, brown trout, eel and freshwater pearl mussel. In addition, a fish population assessment was undertaken. The Northern District Salmon Fishery Board consider that there is very little risk to the freshwater fish and fisheries, subject to measures to prevent ingress of peat, mineral sediment and chemicals to the streams.
- 8.63 Evidence for otters in the form numerous spraints and two potential resting places was identified along tributaries of the Armadale Burn which was located along the eastern boundary of the site. The EIAR concludes that there would be no significant effect on this protected species. NatureScot are content with the assessment presented.
- 8.64 The Caithness and Sutherland Peatlands Special Protection Area (SPA) and Ramsar are situated adjacent to the site, designated for the protection of peatland breeding birds. Due to the potential for connectivity between the Caithness and Sutherland Peatlands SPA/Ramsar sites and the application site, it is considered possible that the proposal could have a likely significant effect on the site's qualifying interests. The qualifying ornithological interests for the SPA are wigeon, common scoter, red-throated diver, black-throated diver, golden eagle, hen harrier, golden plover, dunlin, wood sandpiper, greenshank, short-eared owl and merlin. The qualifying interests for the Ramsar are the greylag goose, dunlin,

curlew and Arctic skua.

- 8.65 NatureScot considers that the proposal is likely to have a significant effect on merlin, greenshank, golden plover, golden eagle and hen harrier of the SPA through collision risk or displacement. NatureScot have examined further data provided by the applicant and conclude that the risk of collision for four of the five SPA species will be reduced, considering the reduction from a 12 to a 9-turbine layout, as represented by the current proposals. However, RSPB raised concerns in relation to the following qualifying interests, including curlew, golden and white-tailed eagle, black and red throated diver and common scoter. Further information / clarification was received from the applicant in November 2022 to address RSPB's concerns. RSPB responded during July 2023 and, while not objecting directly to the proposals, retained concerns regarding the cumulative collision risk for some species and the details of the amount of habitat restoration proposed. If consented, the RSPB request that a Bird Protection Plan should be secured by condition. The SPA status means that the Scottish Government, as competent authority, are required to carry out an appropriate assessment in view of the site's conservation objectives for its qualifying interests under the Habitat Regulations before it approves any application.

### **Impact on Forestry**

- 8.66 In order to provide the required visibility splay for the new proposed access junction from the A836, an area of trees is proposed to be removed. It is proposed that the tree removal will be compensated through onsite planting. As detailed on the site layout plan, there is an existing coniferous plantation block to the north-east of proposed turbine 5, the applicants intend to site the substation compound and battery storage system to the west of the existing trees and the additional compensatory tree planting will be used to augment and overtime help to mitigate views of this element of the development. If consent is granted, this may be secured via a planning condition.

### **Hydrology, Hydrogeology and Peat**

- 8.67 Three statutory designations within 10km are hydrologically connected to the site. The closest, Armadale Gorge Site of Special Scientific Interest (SSSI), is located immediately downslope of the Development along the Armadale Burn. The Strathy Coast SSSI and Strathy Point SAC are hydrologically connected by the Armadale Burn and Allt Beag. To mitigate any potential downstream effects on these designations the applicant is committed to providing a final Construction Environmental Management Plan (CEMP) which will be in place to ensure that potential sources of pollution on site can be effectively managed throughout construction and in turn during operation; albeit there will be fewer sources of pollution during operation. In addition, an Environmental Clerk of Works (ECoW) will also monitor and advise on the implementation of pollution prevention and good working practices throughout construction.
- 8.68 18 communities of Groundwater Dependant Terrestrial Ecosystems (GWDTEs) were found to be present within the 100 m and 250 m buffer zones from site infrastructure. There is no direct habitat loss as the footprint of the Development is not located within GWDTE communities. However, some communities are likely to be indirectly affected by disruption of flows and localised lowering of water levels. Should the proposals be otherwise consented, the final CEMP will include identifying flush areas prior to track construction and maintaining hydraulic conductivity by spanning these sections with plastic pipes or drainage matting. SEPA have no objection, but it should be stipulated that any micro-siting

allowance should not be to the detriment of other sensitive features

- 8.69 In terms of flood risk, the Indicative River and Coastal Flood Map (Scotland) indicate that potential flooding on the site is restricted to the onsite watercourses. All turbine infrastructure associated with the development is located within the Armadale Burn and Allt Beag catchments. All turbine, BESS compound and substation infrastructure is located outwith areas identified as medium to high risk of flooding from all sources.
- 8.70 The development has been designed to avoid impacts on the water environment. A 50 m buffer from watercourses has been incorporated into the design of the Development, with the exception of watercourse crossings and hardstanding north of WC05. Overall, the development proposes five new watercourse crossings. The only infrastructure overlying an area of fluvial flood risk is at one watercourse crossing location. The EIAR state that this will be designed to 1:200 year flood risk plus climate change, with culverts installed at ground level (not raised) and to ensure flood storage area is not compromised. SEPA do not object but require all crossings to be oversized bottomless arched culverts or traditional style bridges which should be secured by a planning condition. The Council's Flood Risk Management Team have no objection to the application.
- 8.71 The Development does not lie within a designated Drinking Water Protected Area (DWPA). The EIAR has identified one private water supply at Druimbasbie Farm but has concluded that it is not hydrologically connected to the development and has therefore been scoped out of further assessment. Environmental Health are content with this assessment.
- 8.72 Overall, the EIAR concludes that the development will have minor or negligible effects on hydrological and hydrogeological resources. No objections have been received from Scottish Water, SEPA, Flood Risk Management Team and Environmental Health. The Planning Authority are content with this assessment and element of the proposed scheme. However, the CEMP needs to be secured by planning condition should the proposals gain consent.
- 8.73 Turbines have been located in peat depths less than 1.0 m and while the layout design process has sought to avoid most areas where deep peat is recorded, some infrastructure and sections of access track encroaches on areas of deep peat. Outwith areas of deep peat, the remaining areas of the soils and peat disturbed are thin, in the region of 0.5 m to 1.0 m. SEPA have no objection but require that all tracks on peat greater than 1m must be floated and adherence to the mitigation proposed in the outline Peat Management Plan. A final version could be secured by a planning condition, if consent is otherwise granted.

### **Built and cultural heritage**

- 8.74 The EIAR evaluates both the direct and indirect effect of the proposed development on archaeological and cultural heritage receptors. The assessment was informed by an Archaeological Desk-Based Assessment (DBA) was undertaken reviewing available documentary, cartographic, and photographic evidence, in addition visits to sites and a walkover survey was carried out.

- 8.75 The applicant argues that direct effects are only likely to occur as a result of construction within the development footprint. These impacts would be incurred on Blar Dubh Hut Circle (Historic Environment Record number MHG10755), where the access road traverses the eastern margins of the hut circles, on Crowsac Hill Homestead; Prehistoric Field System (MHG10757). Where an access track traverses the centre and possibly on Burnt Mound, Blar Dubh Burnt Mound (MHG10727), which is located within the proposed micro-siting distance with access track 35 m to the west. In order to mitigate the impacts, the EIAR proposes a topographic survey from a drone of the site and along Armadale Burn to identify potentially unrecorded features and the use of pre-construction trenching evaluation which may inform further mitigation measures. With regards to potential unknown subsurface archaeology the EIAR proposes the use of trench evaluations at turbines and other locations with high archaeological potential. Depending upon the results of the trenching, further evaluation or a watching brief, may be required. Subject to this mitigation strategy the EIAR concludes that the direct impacts upon heritage features would not be significant in EIA terms.
- 8.76 The Council's Historic Environment Team (Archaeology) have no objection to the application; however, they consider that the archaeological potential of this area is high and that further survey work in the form of LiDAR is required in advance of finalising a mitigation strategy. This type of survey has been used recently in other areas of Sutherland and have consistently shown in similar upstanding prehistoric landscapes, there are many other features, including further roundhouses and associated structures, that have never been recorded. The lidar survey will allow a full assessment to be made so that the final mitigation strategy can be comprehensive. In addition, it is recommended that paleoenvironmental survey work is carried out to complete the baseline recording of this area. If planning permission is granted, then it is recommended that this is secured by a planning condition.
- 8.77 The EIAR identifies that there are likely to be significant indirect effects upon the setting of the Scheduled Armadale Broch (SM13678) and Category C Listed Armadale House (LB7155).
- 8.78 Historic Environment Scotland (HES) have assessed the application and are content that the EIAR provides sufficient information to come to a view on the development and that the assessment methodology broadly follows the relevant policy and current guidance.
- 8.79 HES previously objected to the scheme, considers that the original layout would have a significant adverse effect on the integrity of the setting of the scheduled monument of Armadale Burn Broch 1420m SE of Armadale House (SM13678). Armadale Burn broch is a well-preserved example, displaying identifiable architectural features.
- 8.80 Following discussions between the applicant and HES, the current, amended scheme was submitted, removing the originally proposed turbines numbers 4, 9, and 10. As a result, the objection on the impacts to the setting of the Armadale Burn Broch was withdrawn, although HES still have concerns regarding the Armadale Burn Broch, which further micro-siting of turbines might help address, should the proposals otherwise achieve consent.

8.81 Whilst the EIAR identifies that there will be a significant effect on this broch, it proposes mitigation in the form of geophysical survey, a heritage trail, interpretation signage and a scheduled monument management plan. The applicant has acknowledged that these measures would not reduce the effect of the development.

8.82 Overall, the EIAR considers that there will be significant indirect (settings) effects upon the Scheduled Armadale Broch (SM13678) and Category C Listed Armadale House (LB7155). The Historic Environment Team (Conservation) have objected to the proposals based on the significant adverse impact upon the setting of Armadale House, particularly when viewed from the A836 on the approach from the Thurso direction, but also the wider landscape setting when viewed from the western approach. It is concluded that the character of the house, sitting in some isolation within the undeveloped Sutherland landscape, will be overwhelmed by the backdrop of large-scale turbines across the horizon.

### **Design, Landscape and Visual Impact (including Wild Land Areas)**

8.83 From elevated positions to the east, south and west, within the wider landscape the development would be viewed as a single distinct cluster of turbines. Wider views of the windfarm will be mainly encountered by road users and recreational users of the outdoors. There would be significant visual impacts on residents of the settlement of Armadale.

8.84 The design of the development and its relationship with the surrounding landscape and features is best demonstrated by the visuals from:

- North - VP4 (Armadale) which represents views from directly within the settlement of Armadale looking toward the proposed windfarm on higher ground to the south, with views of six of the proposed turbines to hub height and a further turbine to blade tip height and VP7 (Lednagullin) which represents views towards the development inland from the coast where all nine of the proposed turbines will be visible to at least hub height.
- East – VP2 (Strathy Village) which represents views from the A836 within the dispersed settlement of Strathy, looking toward the proposed development to the west. Blade tips of four turbines will be visible on the horizon, contained behind intervening higher ground.
- South – VP1 (Beinn Ruadh) which represents views from the summit of a 254m peak looking to the northwest towards the proposed windfarm. All 9 of the proposed turbines will be visible to hub height on lower ground.
- West – VP5 (Farr Point) represents views from the Farr Point peninsula looking southeast toward the proposed windfarm which will be located in an elevated position on the horizon. All 9 proposed turbines would be visible to hub height.

8.85 The design process has progressed through several different iterations. The preliminary design studies supporting the 2016 preap enquiry were for an initial layout of 23 turbines, with a maximum tip height of 180m. As site constraints became better understood, further layouts reduced this to 15, 14 and then 13 turbines with a tip height of 149.9m. Further modifications resulted in the 12-turbine layout that was initially submitted with the current application in December 2021, with the most recent scheme consisting of 9 turbines, with a maximum tip height of 149.9m. The proposals also includes separate substation and battery

energy storage compounds. While the design of these elements is indicative at this stage, the substation compound will measure approximately 135 x 45m and the BESS compound 112 x 53m, with buildings a maximum of 11m in height.

## **Landscape Impact**

- 8.86 There are several aspects to consider in determining whether this development represents an acceptable degree of impact on landscape character, including:
- impacts on the Landscape Character Type (LCT) as a whole and on neighbouring LCTs;
  - direct impacts on landscape designations; and
  - impacts on surrounding landscape designations
- 8.87 The development lies within the Rocky Hills and Moorland LCT. This is an extensive LCT extending to the west of the proposed development site. Windfarms are an existing feature but are at present limited to the Bettyhill Wind Farm to the west of the application site. The applicant has set out in its assessment of impact on the LCT that the relationship between the proposed development and existing development, as well as the surrounding topography, reduces the extent to which the development influences the wider LCT. Similarly, while the applicant identifies significant impacts on the surrounding LCT's 134: Sweeping Moorland and Flows; 135: Rounded Hills; 140: Sandy Beaches and Dunes and 144: Coastal Crofts and Small Farms, it is argued that these would, likewise, be contained by the surrounding topography.
- 8.88 Nature Scot object to the proposals on the basis that the applicant's LVIA has underplayed the overall significance of effect on the regionally distinctive character of Scotland's North Coast, consisting of the wider assemblage of the different LCT's within the study area. It is considered that currently, wind farms in this landscape do not intrude or dominate the smaller scale pockets of sloping pasture and the coastal crofting communities which have a strong connection with the sea.
- 8.89 NatureScot consider the North Coast landscape has a clear strong sense of place, stemming from its regional context as a destination to experience the rich scenic diversity of sea, coast and mountains, which contributes to the wider national landscape resource. The proposal would be at odds with the scale and intricate form of the settled coast. The proposal would result in significant adverse impacts on the character of the North Coast, which due to the prominent siting of the proposal, would be difficult to mitigate by any amended scheme. As such, the impacts on the character of the surrounding landscape are considered as severe as to warrant objection to the scheme.
- 8.90 The Council's Landscape Officer also objects to the proposals. The conclusions of the applicant's LVIAR are generally accepted in respect of the impacts on the surrounding Landscape Character Types and designations. However, the assessment of effects on these elements is not considered to adequately recognise the overall impact on the sense of place of the localised area, most acutely on the area between the proposed development and the coast, where the most significant impacts will be realised. This is an area characterised by views which switch between views to distant mountains across moorland and toward the coast and a settlement pattern of townships scattered along roads which run perpendicular between the coast itself and the A836. Key to the character of this area is the interaction between the coastal and inland landscape types. The association of the Coastal Crofts and Small Farms, Sweeping Moorland and

Flows and Rocky Hills and Moorland Landscape Character Types (LCT's) between Bettyhill in the west and Portskerra in the east is not repeated in this form anywhere else on the north coast and the proposed development, at such close proximity to the road and settlement, is considered to significantly weaken and detract from this sense of place.

- 8.91 Aside from these conclusions, Nature Scot and the Council Officers do not contest the LVIAR conclusions that there would be no impact on the Kyle of Tongue NSA.
- 8.92 The applicant notes that the proposals would have a significant, albeit a variable impact on the Farr Bay, Strathy and Portskerra Special Landscape Area (SLA). While the Council Officers do not consider that the overall integrity of the SLA would be impacted, there would be a more localised impacts on one of the Special Qualities of the SLA, the 'Moorland and Crofting Mosaic', with rolling landforms trending toward the coast and opening out over bays, providing a sequential experience of the landscape. It is considered that these impacts would be most evident from VP's 3 (Aultivullin) and VP7 (Lednagullin). In both cases, the proposal would introduce large turbines into areas of moorland skyline where receptor's views are focussed by the distant topography.
- 8.93 The applicant's assessment also considers the impact of the proposals on the Eriboll East and Whitten SLA, where visibility would be incurred from the eastern coastal edge. These impacts are not considered significant through the EIAR and due to the distance between the SLA and the proposals and the limited areas of visibility, this is not disputed.

### **Wild Land**

- 8.94 The applicant has conducted a dedicated assessment of potential effects on the wild land characteristics for the Ben Hope and Ben Loyal WLA 38 and East Halladale Flows WLA 39. Due to the distance at which the proposals would be seen from within these areas and the nature of the intervening topography as well as that visible aviation lighting would not be required, it is not considered that the proposals would result in a significant effect on the Wild Land resource and this is not contested by Nature Scot.

### **Visual Impact**

- 8.95 The Council considers visual impact using the criterion set out in Section 4 of the OWESG, with assessment against the criterion and view as to whether the threshold set out in the guidance is met or not, is contained in Appendix 3 to this report. Unsurprisingly, as visual impact assessment combines objective and subjective aspects through the application of professional judgement, there are differences between the applicant's assessment and the appraisal undertaken.
- 8.96 The applicant's assessment draws upon the supportive elements of how the proposal could be viewed within the landscape. The ZTV demonstrates that the scheme will be extensively visible in most directions out to a distance of around 20km. Beyond this distance there will be more intermittent visibility.
- 8.97 Whilst a large-scale wind energy scheme would be expected to result in significant visual impact effects, the Council, through the OWESG, also acknowledges that significant effects does not automatically translate to unacceptable effects. Following a review of the applicant's Landscape and Visual Impact Assessment (LVIA), there are areas of difference between officers and the

applicant.

- 8.98 The applicant's assessment of the significance of the visual impact of the proposal as a standalone development concludes that the Armadale Windfarm will result in significant visual impacts at Viewpoints 1 (Beinn Ruadh), 3 (Aultivullin), 4 (Armadale), 5 (Farr Point), 7 (Lednagullin), 8 (A836 northwest of Cnon a Chuilbh), 11 (Rubha au Fuir). These findings are generally accepted although the Council Officers contend that the effects would also be significant at Viewpoint 15 (Torrisdale)
- 8.99 Consideration of each viewpoint based on the applicant's methodology is contained within Appendix 2 of this report, as is a summary of the applicant's assessment and the officer's appraisal of the assessment, which highlights the differences and any concerns with regard to visual impact. The EIAR includes a visual impact assessment from each of the 19 viewpoints, with most viewpoints considered to be used by receptors of high sensitivity and susceptibility to wind energy development, although it is acknowledged that not all receptors experiencing the development from all viewpoints would have a high sensitivity to the development. What follows is a summation of the visual impacts grouped by key receptors.
- 8.100 Viewpoint 1 (Beinn Ruadh) is located at the summit of a 254m peak looking to the northwest towards the proposed windfarm, at a distance of 4.2km southeast of the nearest turbine. All 9 of the proposed turbines will be visible to hub height on lower ground. The proposed development would introduce a grouping of turbines prominently into an area between the extent of the upland area and the coastline. The proposals would at this location, also compete with the distant hills within the National Scenic Areas, in views to the west. Turbines 8 and 12 would also be noticeably stacked.
- 8.101 Viewpoint 3 (Aultivullin) is located along a section of a single track access road leading to three residential properties at Aultivullin, 5.85km northeast of the nearest turbine. Six of the turbines would be visible to hub height with a further two visible to blade tip height. The effect of the proposals would be to introduce large scale turbines to an area that is currently open moorland skyline and where receptors' views are focused by the adjoining topography
- 8.102 Viewpoint 4 (Armadale) represents views from directly within the settlement, adjacent to the Local Medical Practice, looking toward the proposed windfarm on higher ground to the south, with views of six of the proposed turbines to hub height and a further turbine to blade tip height. The viewpoint is located approximately 1km north of the nearest proposed turbine. The proposals would be considerably prominent from this location. The resulting visual impacts are not well mitigated in that a substantial proportion of the tower height of four of the proposed turbines will be visible from the viewpoint. The impacts on road users would also last over a driving time of approximately 3 minutes westbound, between this viewpoint and Viewpoint 8 to the west.
- 8.103 Viewpoint 5 (Farr Point) is located upon the summit of Ard Farr, at 110 m, to the northeast of the small settlement of Bettyhill, 6.14km northwest of the development. This location represents views from the Farr Point peninsula looking southeast toward the proposed windfarm, which will be located in an elevated position on the horizon. All 9 proposed turbines would be visible to hub height. As such, the proposals would introduce large scale turbines in a prominent inland



location, considerably altering the key characteristics of the view, with the development potentially becoming the key focal point. Nevertheless, the proposed turbines will be screened by the intervening ridge.

- 8.104 Viewpoint 7 (Lednagullin) is situated to the eastern edge of Armadale Bay, in close proximity to the A836, 2.22km northeast of the development. All 9 of the proposed turbines will be visible to hub height, breaking the skyline to the southwest. Views from this location are characteristics of coastal crofts connecting with the rocky hills and moorland, that forms the backdrop and consists of open moorland and a low gently undulating skyline. The development would be seen in the background of the view, due to its prominent elevated position within the landscape. Moreover, it would be skylined, forming the key element within the view, resulting in a considerable alteration to the key element, Beinn Chuldail, for receptors. Turbines 11 and 8 would also be recognisable as prominent outliers on the right-hand side of the view, detracting from any sense of cohesiveness that may be inferred from the other turbines in the scheme.
- 8.105 Viewpoint 8 (A836 northwest of Cnon a Chuilbh) is located along the A836, between Bettyhill to the west and Armadale to the east, 1.16km northwest of the nearest turbine. All 9 of the proposed turbines will be visible to hub height at this location. The development would be seen in close proximity to this viewpoint and would occupy a large proportion of the view, becoming the most prominent feature within views to the southeast from this point. These impacts would last over a driving time of approximately 3-4 minutes heading eastbound, towards Viewpoint 4 in the Armadale settlement.
- 8.106 Viewpoint 11 (Rubha au Fuir) is situated at the summit of Rubha an Tuir, at an elevation of 96 m, to the east of Melvich Bay in Portskerra, 10.22km east of the nearest turbine. 4 of the proposed turbines will be visible to hub height, with a further 5 visible to blade tip height only. The elevation and openness of this portion means that views from the viewpoint are panoramic in nature. As such, the development would result in a considerable alteration of key features of the view composition, the summits of Ben Loyal and Ben Hope would remain visible, however, their relative scale would be altered by the proposals.
- 8.107 Viewpoint 15 (Torrisdale) is located to the southwest of Torrisdale Bay, 9.67km west of the nearest turbine. 2 of the proposed turbines would be visible to hub height with a further five visible to blade tip height. No other windfarms within the study area are visible from this location, by virtue of screening by terrain. The proposals would introduce turbines onto the skyline at a point where receptor's views are focussed between higher ground in the foreground and a distant summit, albeit they would only be visible to hub and tip height and viewed at a distance.

### **Residential Receptors**

- 8.108 The settlements of Armadale, Melvich, Strathy and Portskerra are the nearest to the proposed development. The applicant has prepared a dedicated Residential Visual Amenity Assessment (RVAA) as part of the LVIAR. Residential properties are considered at the highest sensitivity to the visual impacts of the proposals. The applicant's assessment considered 7 individual residential properties as well as 4 groups of housing. High / moderate visual amenity affects would immediately impact on two individual properties within the RVAA study radius of 3km, Armadale House and Armadale Farm as well as on those properties orientated north – south within the northern group of properties that were assessed. In the former cases, 7-8 of the proposed turbines would be visible, while in the latter

case, this visibility would be reduced to 4 of the proposed turbines. In both cases, views would be a mix of full turbines, blade tops, blades and hubs

- 8.109 The applicant states that, whilst liable to significant visual effects, none of the properties assessed would be subject to effects of a scale that might be considered to render a property an unattractive place in which to live. While the visual impacts will be significant, particularly on residences in Armadale adjacent the development site, it is acknowledged that these will mainly be limited to the outlook from properties, or their access routes, inland to the south, with the outlook in other directions, including north and eastward toward the coast, unaffected.

### **Impact on Road Users and other Transport Routes**

- 8.110 The primary impact on road users on through routes would be incurred on the A836, which runs east to west along the north coast of Sutherland, forming part of the North Coast 500 tourist route, although it is accepted that views of the proposal would vary, due to the undulating and twisting setting of the road solum. Travelling eastwards from the point of the Junction on the A836 for Swordly and Kirtomy, the development would form a prominent feature in the middle ground inland, which would be at its strongest as is represented at Viewpoint 8 (A836 northwest of Cnon a Chuilbh), where the development would become a pronounced focal point. This situation would last for a distance of approximately 5km until the Armadale settlement is reached.
- 8.111 The applicant's LVIAR concludes that the majority of this route within the 40km study area would incur no significant visual effects. Between Kirtomy and Lednagullin significant effects would be incurred on eastbound road users, with westbound users incurring significant effects between Lednagullin and Cnon a Chuilbh, in both cases the development representing a prominent new feature on views inland. In respect of westbound views, it is considered that the applicant's LVIAR underplays the potential impacts of the development. Travelling westwards, the most significant impact on views would be experienced as the route passes Lednagullin where the proposals would form a prominent feature inland, to the south of the route, over a distance of approximately 3km. However, as is indicated through the applicant's route analysis of the A836, while visibility would be intermittent, there would be portions of the A836 running westward, over an additional on road distance of approximately 3.2km, from where the majority of the proposed array would be visible to hub height, enroute between Drum Hollistan and Armadale. The road alignment means that the development would present an ever-changing relationship to the landform with turbines moving in and out of view. As such, the proposals would have an overbearing impact which would tend to overwhelm the visual amenity for road users.
- 8.112 The applicant's LVIAR predicts that there will not be significant effects on any other road routes within the study area including the A9, A897 B871 and B874. These conclusions are accepted by the Council Officers, as are the applicants' conclusions that no significant visual impacts will accrue for passengers on the Far North Railway line, where some visibility of the proposals will be possible around Forsinard, approximately 21km distant.

## **Impact on Recreational Users of the Outdoors**

- 8.113 With the exception of a section of the route between Reay and Thurso National Cycle Route 1 corresponds with the alignment of the A836 and consequently, the effects on this cycle route would be consistent with those predicted on the A836. Cyclists are considered to be both high sensitivity as their focus will be on their surroundings and have heightened sense of awareness and slower speed of movement through an area, giving the receptor more time to appreciate their surroundings. It is considered that the assessment of recreational receptors undertaken gives a fair account of the likely effects of the development albeit, one that does not take into account the wider effect referenced in the previous consideration of the impact on road users.
- 8.114 Significant visual effects are also predicted upon several of the core paths in the area although these are predicted to apply only to sections of routes, with the exception of core paths SU04.06 – Armadale to Poulouriscraig, SU04.07 – Armadale Bay and SU04.08 – Armadale to the A836.

## **Cumulative Visual Impacts**

- 8.115 When considering visual impact, it is important to consider the cumulative impact with other consented and proposed (application stage) developments. The applicant's assessment predicts potentially significant cumulative effects between the proposed scheme and other wind energy developments in the study area. Armadale would not be subject to significant cumulative effects due to its low-lying position and the screening effect of intervening topography that obscures other wind farms from the village. Significant cumulative effects would however, accrue on sections of the A836, as well as several more distant locations. These impacts would be most strongly evident at Viewpoints 1 (Beinn Ruadh), 5 (Farr Point), 8 (A836 northwest of Cnon a Chuilbh), and 17 (Beinn Nam Bad Mor).
- 8.116 In the case of Viewpoints 1 and 17, which are located on hill summits, the main cumulative visual impacts would be in conjunction with the operational Strathy North and Bettyhill and the consented Strathy South, Strathy Wood and Bettyhill Extension windfarms, where the Armadale proposals would significantly extend wind energy development across the middle distance of views from these locations. In the case of Viewpoint 5, the proposals would extend views of wind energy projects more seaward than currently, forming a distinct focal point in the centre of the view, detached from existing operational and consented development around the Bettyhill Windfarm. From Viewpoint 8, the Armadale proposals would become a prominent new focal point in an area that currently offers some respite from wind energy development, travelling east on the A836. The proposed turbines would be notably larger in scale than those currently existing at the operational Bettyhill Windfarm and its recently consented extension.

## **Shadow Flicker**

- 8.117 Shadow flicker may occur under certain combinations of geographical position and time of day, when the sun passes behind the rotors of a wind turbine and casts a shadow over neighbouring properties. As the blades rotate, the shadow flicks on and off, an effect known as shadow flicker. The effect can only occur

inside buildings, where the flicker appears through a window opening.

- 8.118 The EIA models and assesses a worst-case scenario for shadow flicker (for example, no screening vegetation is included, and it is assumed there are windows on every side of a receptor) and assessed effects on receptors within 11 rotor diameter distance of the Development. Due to the amended design of the proposals, with three of the closest proposed turbines to Armadale now deleted, 4 of the original 15 receptors are now located within the shadow flicker study area of which, 3 are expected to experience shadow flicker and 2 expected to be subject to a theoretical maximum shadow flicker effects of over the recommended threshold 30 minutes per day or 30 hours per year, meaning these effects are significant. However, the EIA also includes mitigation measures such as a shutdown calendar to shut down the turbine at times when flicker is likely to occur. Subject to the mitigation measures outlined the EIA contends that the effects are reduced to not significant in terms of the EIA Regulations. If consent is granted, then the Planning Authority expects that this mitigation will be secured via planning condition.

### **Telecommunications**

- 8.119 No consultees have raised concerns in relation to potential interference with radio or television reception in the locality. The Council has a standard practice of recommending that developers address adverse impacts that may emerge during construction and over the initial year of operation when problems may be detected and/or experienced. If planning permission is granted, then it is recommended that a planning condition is attached to secure a scheme of mitigation should an issue arise.

### **Aviation**

- 8.120 The applicant's EIA addresses potential effects of the development on aviation infrastructure. The assessment concludes that there will be no significant effects and no objections have been raised by National Air Traffic Services, HIAL or the Ministry of Defence (MOD). However, should the proposal be granted permission, the MOD have requested that an aviation lighting scheme and notification to the appropriate bodies of the final turbine positions is secured by a planning condition. As the turbines are less than 150m to tip, the aviation lighting can be limited to infra-red.

### **Decommissioning**

- 8.121 The applicant states that at the end of their 30-year operational life, if the decision is made to decommission the wind farm, rather than apply to extend the lifetime or repower the site, then the turbines, BESS and the substation compound would be removed. The top 1m of the concrete foundations would also be broken up and removed and the ground reinstated with topsoil. The access track and underground cabling are likely to be left in situ. Should consent be granted, a condition would be attached to secure a Decommissioning, Restoration and Aftercare Strategy, the details of which to be agreed between the operator, landowner and Council.

### **Other material considerations**

- 8.122 Given the complexity of major developments, and to assist in the discharge of conditions, the Planning Authority would seek that the developer employs a Planning Monitoring Officer (PMO), should consent be granted. The role of the

PMO, will include the monitoring of, and enforcement of compliance with, all conditions, agreements and obligations related to this permission (or any superseding or related permissions) and shall include the provision of a bi-monthly compliance report to the Planning Authority.

8.123 In line with NPF4, Highland Council policy and practice, community benefit considerations are undertaken as a separate exercise and generally parallel to the planning process. There are no other relevant material factors highlighted within representations for consideration of this application.

### **Non-material considerations**

8.124 The Planning Authority may only deal with matters that are relevant to the application that is under consideration as is presented and address matters within the control of the planning system. The matters raised below are not relevant to the consideration of this application and are outwith the control of the planning system.

- Lack of strategic focus in renewables development and oversupply of renewable energy in the North of Scotland.
- Need to investigate other renewables options.
- Impact on private views.
- Alleged coercive payments to residents and landowners.
- Impact on mental health.
- Level of proposed community gain and benefits payments is inappropriate.
- Possible impact of grid connection works where these would be covered by a separate application.
- Distance of proposal from sources of peak electricity demand.

### **Matters to be secured by Section 75 Agreement**

8.125 None

## **9. CONCLUSION**

9.1 The Scottish Government gives considerable commitment to renewable energy and encourages planning authorities to support the development of wind farms where they can be situated in appropriate locations to operate successfully. The project has the potential to contribute some 85 MW of renewable energy capacity towards Scottish Government targets and play a role in the route to a net zero Scotland. In addition, the development has potential to bring economic benefits to the area and to create new jobs.

9.2 However, as with all applications, the benefits of the proposal must be weighed against potential drawbacks and then considered in the round, taking account of the relevant policies of the Development Plan.

9.3 In this respect, the proposal is considered to significantly weaken the interaction between the coastal and more inland landscape types that characterises the coast between Bettyhill and Portskerra, covering a distance of some 17km. This interaction is not repeated in this form anywhere else on the north coast. As such, the proposed development, set at close proximity to the road and the settlement of Armadale, cannot even in its modified form, be accommodated without significantly detracting from the sense of place in this wider landscape.

9.4 The proposal also raises concerns for the visual amenity of the key A836 / NC500 tourist route as the development would present an ever-changing relationship to

the landform with turbines moving in and out of view along approximately 10km straight line section of this route. As such, the proposals would have a startling impact which would tend to overwhelm the landscape for receptors at this point.

- 9.5 The applicant's updated EIAR includes an outline Habitat Management Plan (HMP) which aims to restore and enhance peatland habitats. The proposals in this regard, fail to comply with the current Nature Scot guidance, which states that the restoration levels should be a ratio of 1:10. There are also significant areas of other habitat, such as acid grassland and heathland that will be lost through the development, that also require compensation and enhancement measures. This also brings the application into conflict with NPF4 Policy 3 (b) in that suitable habitat enhancement measures have not been put forward.
- 9.6 The Council's Historic Environment Team have also objected to the proposals based on the impacts upon the setting of the nearby Category C Listed Armadale House. As the outlook and setting of the listed building would be affected, the proposals cannot be accommodated without an unacceptable adverse impact on the historic environment.
- 9.7 Officers have assessed this application principally against the policies set out in NPF4 and the Development Plan, including Policy 67 Renewable Energy of the Highland wide Local Development Plan with its eleven tests which are expanded upon within the OWESG. This policy also reflects policy tests of other policies in the HwLDP, for example Policy 28 Sustainable Design. The proposal can be considered to benefit from in principle support as a National Development prescribed by NPF4, owing to the contribution the development would make toward tackling climate change. In this case, such a contribution would however come at a considerable cost. Owing to the poor siting and design of the proposal, the extent of resultant landscape and visual effects, as well as the natural habitat and built heritage impacts, which are deemed unacceptable.
- 9.8 Schedule 9 of the Electricity Act sets out what an applicant shall do in relation of the preservation of amenity. It is considered that the proposal has had insufficient regard to the desirability of preserving natural beauty or protecting the setting of historic interests, and has not done what is reasonable to mitigated the effects on the natural beauty of the countryside or on built heritage. This is by virtue of the location, setting and design of the wind farm, resulting in landscape and visual impacts which cannot be accommodated, as well as the lack of suitable habitat enhancement measures. Officers are also not satisfied that environmental effects of this development can be addressed by way of mitigation.
- 9.9 All relevant matters have been taken into account when appraising this application. It is considered that the proposal does not accord with the principles and policies contained within the Development Plan and no other material considerations outweigh this position.

## **10. IMPLICATIONS**

- 10.1 Resource: Not applicable
- 10.2 Legal: If an objection to the application is raised, it is likely that the application will be subject to a Public Local Inquiry (PLI).
- 10.3 Community (Equality, Poverty and Rural): Not applicable
- 10.4 Climate Change/Carbon Clever: If consented then the development would

produce renewable energy.

10.5 Risk: Not applicable

10.6 Gaelic: Not applicable

## 11. RECOMMENDATION

### Action required before decision issued

Notification to Scottish Ministers - Y

Conclusion of Section 75 Obligation - N

Revocation of previous permission - N

**Subject to the above**, it is recommended that the Council **Raises an Objection** to the granting of this planning for the following reasons:

1. The application is contrary to NPF4 Policy 11 part (e) (ii) and Highland-wide Local Development Plan Policy 67 (Renewable Energy). The proposals weaken and detract from the sense of place and landscape qualities of the interaction between the Coastal Crofts and Small Farms, Sweeping Moorland and Flows and Rocky Hills and Moorland Landscape Character Types (LCT's) in the wider area, by virtue of the scale and location of the development. The proposals would also result in significant impact on the perception of one of the special qualities of the Farr Bay, Strathy and Portskerra Special Landscape Area (SLA): its moorland and crofting mosaic. Consequently, it is concluded that the type, location, and scale of the development will have an unacceptable landscape impact.
2. The application is contrary to NPF4 Policy 11 part (e) (ii) and Highland-wide Local Development Plan Policy 67 (Renewable Energy). The proposals incur significant visual impacts, beyond a local scale, on users of the A836 / North Coast 500 route, as particularly evident through VP's 4, 7 and 8, by virtue of the scale and location of the development.
3. The application is contrary to NPF4 Policy 3 part (b), NPF4 Policy 7 part (I), Highland-wide Local Development Plan Policies 67 (Renewable Energy), and 57 (Natural Built and Cultural Heritage) in that insufficient enhancement and restoration of habitat is proposed.
4. The application is contrary to NPF4 Policy 7 Part (c), Policy 11 part (e) (vii), and Highland-wide Local Development Plan Policy 57 (Natural Built and Cultural Heritage) in that it adversely effects the outlook and setting of Armadale House, a Category C-listed building.

Signature: Dafydd Jones

Designation: Area Planning Manager - North

Author: Michael Kordas

Background Papers: Documents referred to in report and in case file.

Relevant Plans:

Document Type	Document No.	Version No.	Date Received
Site Location Plan	Figure 1		27 April 2022
Site Layout Plan	Figure 4.6		6 June 2023
Typical Turbine Elevation	Figure 3.2		27 April 2022

## Appendix 2 – Visual Assessment Appraisal

Viewpoint	App / THC	Sensitivity of the Receptor (Susceptibility / value of the view)	Amended Proposed Development			Combined Development		
			Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major & Major / Moderate are Significant. Moderate may be significant)	Magnitude of Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance
1.Beinn Ruadh (4.6 km to nearest turbine)	App	High	Major / Moderate	<b>Major / Moderate</b>	<b>Significant</b>	Major – Moderate / Major	<b>Major – Moderate / Major</b>	<b>Significant</b>
	THC	High	Major / Moderate	<b>Major / Moderate</b>	<b>Significant</b>	Major – Moderate / Major	<b>Major – Moderate / Major</b>	<b>Significant</b>
<p>THC are in broad agreement with the App's LVIA. This location represents views from the summit of Beinn Ruadh, a 254m peak looking to the northwest towards the proposed windfarm. All 9 of the proposed turbines will be visible to hub height on lower ground. Views from this elevated location are of large scale and dominated by open, a gently undulating landform of sweeping moorland, with patches of coniferous forestry throughout, particularly to the northwest and southwest.</p> <p>View's northwest, towards the Development, comprise blocks of coniferous forestry in the foreground, gently undulating moorland with the distant hills of Ben Loyal, Ben Hope and Foinaven, within respectively, the Kyle of Tongue and Northwest Sutherland National Scenic Areas, forming key elements within backdrop to the view from this elevated location.</p> <p>The proposed development would have the effect of introducing large scale turbines between the extent of the upland area and the coastline, where these elements are not currently present. The proposals would at this location, also compete with the distant hills within the National Scenic Areas, in views to the west. From this location, turbines 8 and 12 would also be noticeably stacked.</p> <p>As such, the applicant's assessment of the impacts on receptor's visual amenity is considered accurate. The high sensitivity of hill walkers to onshore wind energy development is a particular consideration at this point. Nevertheless, the wider visibility of the Strathy North and Bettyhill turbines from the location, limits the overall impact experienced. Should the Bettyhill Phase 2 scheme proceed, additional turbines will be visible to the west. However, given the distance at which these will be viewed, the additional impacts are not considered significantly above those of the presently operational schemes taken together with the current Armadale Windfarm proposals.</p>								



Viewpoint	App / THC	Sensitivity of the Receptor (Susceptibility / value of the view)	Amended Proposed Development			Combined Development		
			Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major & Major / Moderate are Significant. Moderate may be significant)	Magnitude of Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance
2 Strathy Village (5.2 km to nearest turbine)	App	High	Moderate	Moderate to Moderate / Minor	Not-significant	Moderate	Moderate to Moderate / Minor	Not-significant
	THC	High	Moderate	Moderate to Moderate / Minor	Not-significant	Moderate	Moderate to Moderate / Minor	Not-significant
<p>THC are in broad agreement with the App's LVIA. This represents views from the A836 within the dispersed settlement of Strathy, looking toward the proposed development to the west. Blade tips of four of the proposed turbines will be visible on the horizon, contained behind intervening higher ground.</p> <p>Views from this viewpoint are of medium scale and are dominated by grazing fields, gently undulating open moorland and patches of coniferous forestry plantations. Scattered residential properties are evident in the landscape and are associated with small agricultural operations.</p> <p>The proposals would introduce large turbines to a part of the skyline where these are not currently present albeit, visibility would be limited to blade tips, screened by the intervening higher ground.</p> <p>The applicant's assessment of the impacts on receptor's visual amenity is generally considered accurate. Within this context, the additional landscape and visual amenity impact of the currently proposed Armadale scheme would not be significant, considering the presence of the Strathy North windfarm prominently to the southwest. Should the Bettyhill Phase 2 scheme go ahead, it would be unlikely to have visibility from this location.</p>								
3 Aultivullin (5.8 km to nearest turbine)	App	High	Major	<b>Major</b>	<b>Significant</b>	Major / Moderate	<b>Major / Moderate</b>	<b>Significant</b>
	THC	High	Major	<b>Major</b>	<b>Significant</b>	Major / Moderate	<b>Major / Moderate</b>	<b>Significant</b>
<p>THC are in broad agreement with the App's LVIA. This viewpoint is located along a section of a single-track access road leading to three residential properties at Aultivullin. Six of the turbines would be visible to hub height with a further two visible to blade tip height.</p> <p>Views from this location are large scale, with gently undulating open moorland being the predominate landcover, with the occasional patch of coniferous forestry. Views to the southwest are channelled between two topographical high points, with the summit of Ben Hope being framed within the centre point of the view.</p> <p>The proposal introduces large scale turbines to an area that is currently open moorland skyline and where receptors' views are focused by the adjoining topography. The applicant's assessment is considered accurate in that the proposals would alter the composition of the view from this location significantly, potentially detracting from the relative scale of Ben Hope. Nevertheless, considering the prominence of the Strathy North and South arrays to the southwest, the overall visual impacts are moderated somewhat. Should Bettyhill Phase 2 go ahead, it is unlikely that it will be visible from this location.</p>								

			Amended Proposed Development			Combined Development		
Viewpoint	App / THC	Sensitivity of the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major & Major / Moderate are Significant. Moderate may be significant)	Magnitude of Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance
4. Armadale (1km to nearest turbine)	App	High	Major	<b>Major (tourists, cyclists residents) - Major / Moderate (General road users)</b>	<b>Significant</b>	None	None	-
	THC	High	Major	<b>Major</b>	<b>Significant</b>	None	None	-
<p>THC are in broad agreement with the App's LVIA. This represents views from directly within the settlement of Armadale, adjacent to the local Medical Practice, looking toward the proposed windfarm on higher ground to the south, with views of six of the proposed turbines to hub height and a further turbine to blade tip height.</p> <p>While the turbine deletions put forward by the applicant have improved the composition of the scheme, the turbines would remain a very dominating feature from closer locations and would remain a significant and adverse effect. The scale of the turbines combined with their proximity to receptors both within the Armadale settlement and users of the A836, leads to a level of effect which is disproportionate to the limited number of turbines within the scheme.</p> <p>These visual impacts are not well mitigated in that a substantial proportion of the tower height of four of the proposed turbines will be visible from the viewpoint. The turbines will also be located on higher ground and will as such, represent a considerable change to inland views. In contrast to the applicant's assessment, therefore, the Council Officers consider that major and significant effects on visual amenity would be incurred by all receptors at this location, including those general road users not primarily focused on their surroundings. This is especially so with respect to users of the A836 where the closest turbine will be under 1km distant at the nearest point to the road solum.</p> <p>The visual impacts would also extend noticeably beyond the viewpoint location, enduring over a driving time of approximately 3 minutes westbound, between this viewpoint and Viewpoint 8 to the west.</p> <p>No further wind energy developments are directly visible from this viewpoint.</p>								
5 Farr Point (6.1km to nearest turbine)	App	High	Major / Moderate	<b>Major / Moderate</b>	<b>Significant</b>	Major / Moderate	Major / Moderate	<b>Significant</b>
	THC	High	Major / Moderate	<b>Major / Moderate</b>	<b>Significant</b>	Major / Moderate	Major / Moderate	<b>Significant</b>
<p>THC are in broad agreement with the App's LVIA. This viewpoint is located upon the summit of Ard Farr, at 110 m, to the northeast of the small settlement of Bettyhill.</p> <p>This represents views from the Farr Point peninsula looking southeast toward the proposed windfarm, which will be located in an elevated position on the horizon. All 9 proposed turbines would be visible to hub height.</p>								

			Amended Proposed Development			Combined Development		
Viewpoint	App / THC	Sensitivity of the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major & Major / Moderate are Significant. Moderate may be significant)	Magnitude of Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance
<p>As such, the proposals would introduce large scale turbines in a prominent inland location, considerably altering the key characteristics of the view, with the development potentially becoming the key focal point. Nevertheless, the proposed turbines will be screened by the intervening ridge and will be associated with the upland moorland landscape more strongly than the coastal landscape in the foreground. While the proposed development will extend views of wind energy projects more seaward than currently, it is acknowledged that the existing Bettyhill turbines are also prominent to almost full tower height from this location. Should Bettyhill Phase 2 proceed, there will also be visibility from the viewpoint. As such, the applicant's assessment of the visual impacts is considered accurate.</p>								
6 Minor road to Clerkhill/Farr off A836 (4.6km to nearest turbine)	App	High	Moderate	Moderate to Moderate / Minor	Not-significant	Moderate	Moderate to Moderate / Minor	Not-significant
	THC	High	Moderate	Moderate to Moderate / Minor	Not-significant	Moderate	Moderate to Moderate / Minor	Not-significant
	<p>THC are in broad agreement with the App's LVIA. This viewpoint is located the Farr Road, in close proximity to the junction with the A836 to the southeast. Six of the proposed turbines would be visible to blade tip height.</p> <p>Views from this viewpoint are large scale, extending across much of the adjoining coastal croft's landscape in the southern direction, with the moorland landscape forming the middle ground view.</p> <p>The effect of the proposals would be to introduce large scale blade tip views and movement to an inland location, breaking above the existing ridgeline. This would create a new focal point within the view, albeit only a localised one. The applicant's assessment is considered accurate in respect of the impacts, as the turbines will only be visible to tip height.</p> <p>Visibility of other wind energy developments will be restricted looking in the direction of the proposals and as such the overall cumulative impacts are limited in this respect.</p>							
7 Lednagullin (2.2km to nearest turbine)	App	High	Major	<b>Major (tourists, residents) - Major / Moderate (General road users)</b>	<b>Significant</b>	None	None	-
	THC	High	Major	<b>Major</b>	<b>Significant</b>	None	None	-
	<p>THC are in broad agreement with the App's LVIA. This viewpoint is situated to the eastern edge of Armadale Bay, in close proximity to the A836. All 9 of the proposed turbines will be visible to hub height, breaking the skyline to the southwest.</p>							

Viewpoint	App / THC	Sensitivity of the Receptor (Susceptibility / value of the view)	Amended Proposed Development			Combined Development		
			Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major & Major / Moderate are Significant. Moderate may be significant)	Magnitude of Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance
			<p>Views from this location are large scale and concentrate along the coastline in and around Armadale Bay, with Beinn Chuldail forming the main focal point in views to the south. Views inland, to the south, towards the development, are medium in scale and framed by either side of the valley topography, with the Beinn Chuldail being situated within the middle of the view. The landscape in the foreground and middleground comprises fields enclosed by post and wire fences. The views are characteristics of coastal crofts connecting with the rocky hills and moorland, that forms the backdrop and consists of open moorland and a low gently undulating skyline. The development would be seen in the background of the view, due to its prominent elevated position within the landscape. Moreover, it would be skylined, forming the key element within the view, resulting in a considerable alteration to the key element, Beinn Chuldail, for receptors. In this respect, Turbines 11 and 8 would also be recognisable as prominent outliers on the right-hand side of the view, detracting from any sense of cohesiveness that may be inferred from the other turbines in the scheme.</p> <p>As noted in the assessment of Viewpoint 4 above, in contrast to the applicant's assessment, the Council Officers consider that major and significant effects on visual amenity would be incurred by all receptors at this location, including those general road users not primarily focused on their surroundings.</p> <p>No other wind energy developments will be visible from this location.</p>					
8 A836 northwest of Cnon a Chuilbh (1.1km to nearest turbine)	App	High	Major	<b>Major (tourists, cyclists) - Major / Moderate (General road users)</b>	<b>Significant</b>	Major to Major / Moderate	<b>Major to Major / Moderate</b>	<b>Significant</b>
	THC	High	Major	<b>Major</b>	<b>Significant</b>	Major to Major / Moderate	<b>Major to Major / Moderate</b>	<b>Significant</b>
			<p>THC are in broad agreement with the App's LVIA. This viewpoint is located along the A836, between Bettyhill to the west and Armadale to the east. All 9 of the proposed turbines will be visible to hub height at this location.</p> <p>The development would be seen in close proximity to this viewpoint and would occupy a large proportion of the view, becoming the most prominent feature within views to the southeast from this point. The proposals would give the impression of an extended windfarm cluster, when seen in conjunction with the existing Strathy North turbines to the southeast, in addition to the consented Strathy South windfarm. The impact would be increased by the contrast in scale between the proposed and these existing turbines and would extend wind energy development significantly across the horizon, making it a defining characteristic of views from this location for all road users, not only tourists and cyclists as the applicant suggests, which was a similar point of the Council Officer's assessment as noted for Viewpoints 4 and 7, above. <del>As such, the Council Officers are not fully in agreement with the applicant's assessment of the visual impacts. Furthermore</del> <del>These, these</del> impacts would last over a driving time of approximately 3-4 minutes heading eastbound, towards Viewpoint 4 in the Armadale settlement.</p>					

Viewpoint	App / THC	Sensitivity of the Receptor (Susceptibility / value of the view)	Amended Proposed Development			Combined Development		
			Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major & Major / Moderate are Significant. Moderate may be significant)	Magnitude of Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance
9 Clachan (6.6km to nearest turbine)	App	High	Moderate	Moderate	Not-significant	Moderate / Minor	Moderate / Minor	Not-significant
	THC	High	Moderate	Moderate	Not-significant	Moderate / Minor	Moderate / Minor	Not-significant
	<p>THC are in broad agreement with the App's LVIA. This viewpoint is located upon the summit of Ard Beag (50 m AOD). 3 of the proposed turbines would be visible to tip height from the location. The elevation, and openness of the position means that views from this viewpoint are medium scale, due to the enclosed view provided by the adjacent hills of Creag a Bhodaich, Leathad Connaidh and Druim Mhanais.</p> <p>Cumulatively, the development would be viewed in conjunction with two of the turbines that form part of the existing Bettyhill Windfarm, visible to hub height. However, as the proposed turbines will only be visible to tip height, the additional visual impacts are not considered significant, especially if the Bettyhill Phase 2 proposals proceed.</p>							
10 B871 Carnachy	App							
	THC							
This viewpoint is located along B871, between Achargary to the north and Rhinfail to the south. The proposed development would not be visible from this location.								
11 Rubha au Fuir (10.22km to nearest turbine)	App	High	Major / Moderate	<b>Major / Moderate</b>	<b>Significant</b>	Major / Moderate	<b>Major / Moderate</b>	<b>Significant</b>
	THC	High	Major / Moderate	<b>Major / Moderate</b>	<b>Significant</b>	Major / Moderate	<b>Major / Moderate</b>	<b>Significant</b>
	<p>THC are in broad agreement with the App's LVIA. This viewpoint is situated at the summit of Rubha an Tuir, 96 m, to the east of Melvich Bay in Portskerra. 4 of the proposed turbines will be visible to hub height, with a further 5 visible to blade tip height only. The elevation and openness of this portion means that views from the viewpoint are panoramic in nature.</p> <p>View's westwards, towards the development comprise Melvich Bay and Portskerra in the foreground, with longer range views restricted by the adjacent topography, with exception to the more distant hill peaks of Ben Loyal and Ben Hope, forming main focal points in the view with their distinctive summits and form.</p> <p>The development would result in a considerable alteration of key features of the view composition, the summits of Ben Loyal and Ben Hope would remain visible, however, their relative scale would be altered by the proposals. Nevertheless, the presence of turbines from the array at Strathy North existing on the horizon to the southwest serves to lessen the magnitude of change. As such, the applicant's assessment is considered accurate.</p> <p>Cumulatively, the proposals would extend views of windfarm development from the location northward and seaward, especially should the Bettyhill Phase 2 proposals move forward.</p>							

			Amended Proposed Development			Combined Development		
Viewpoint	App / THC	Sensitivity of the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major & Major / Moderate are Significant. Moderate may be significant)	Magnitude of Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance
12 Strathy Point (7.6km to nearest turbine)	App	High	Minor	Minor	Not-significant	Minor	Minor	Not-significant
	THC	High	Minor	Minor	Not-significant	Minor	Minor	Not-significant
<p>THC are in broad agreement with the App's LVIA. This viewpoint is located at Strathy Point to the south of Strath Point Lighthouse, to the north of Totegan. Views from this location are concentrated along the coastline to the east and west, and northwards out to the sea, with views in-land being restricted by topography. As such, only 1 of the proposed turbines will be visible, to blade tip. Both the proposed and existing, consented and other planned developments would be screened by topography limiting any wider visual impact.</p>								
13 Ben Tongue (17.2km to nearest turbine)	App	High	Moderate	Moderate	Not-significant	Moderate – Major / Moderate	Moderate – Major / Moderate	Not-significant
	THC	High	Moderate	Moderate	Not-significant	Moderate – Major / Moderate	Moderate – Major / Moderate	Not-significant
<p>THC are in broad agreement with the App's LVIA. This viewpoint is situated near the summit of Ben Tongue, to the east of Kyle of Tongue. Views from this location views are large scale and panoramic. 4 of the proposed turbines will be visible to hub height, with the remainder of those in the scheme visible to blade tip height. Views in-land from this location comprise a gently undulating moorland in the foreground, with the middle ground view being dominated by the more distant hills of Ben Loyal, Ben Hope, Meallan Liath, Sail Romascaig and Beinn Stumanadh forming the key backdrop to the view across the horizon.</p> <p>The development would represent a notable increase in the influence of wind energy development from this viewpoint, however, given the distance at which it would be seen, the limited proportion of this expansive panoramic view it would occupy, and its overlapping context with existing wind farms, the magnitude of impact would be slight, as agreed by both the Council Officers and the applicant.</p>								
14 A836 Approach to Strath Naver								
<p>This viewpoint is located on the A836 as it runs northward toward Strath Naver. The proposed development would not be visible from this location.</p>								
15 Torrisdale (9.7km to nearest turbine)	App	High	Moderate	Moderate	Not-significant	None	None	-
	THC	High	Moderate	Moderate	Not-significant	None	None	-
<p>THC are in broad agreement with the App's LVIA. This viewpoint is located to the southwest of Torrisdale Bay. 2 of the proposed turbines would be visible to hub height with a further five visible to blade tip height.</p> <p>Views from this location are of medium scale, with the main panoramic view's northwards out to the sea. No other windfarms within the study area are visible from this location, by virtue of screening by terrain. The proposals would introduce turbines onto the skyline at a point where receptor's views are focussed between higher ground in the foreground and a distant summit, albeit they would only be visible to hub and tip height and viewed at a distance.</p>								

			Amended Proposed Development			Combined Development		
Viewpoint	App / THC	Sensitivity of the Receptor (Susceptibility / value of the view)	Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major & Major / Moderate are Significant. Moderate may be significant)	Magnitude of Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance
<del>Nevertheless, as the proposals would singularly introduce turbines into a landscape which currently has none, the Council Officers do not agree with the applicant's assessment of Not-significant visual impacts.</del>								
16 Ben Giam (20.7km to nearest turbine)	App	High	Moderate	Moderate	Not-significant	Moderate - Major / Moderate	Moderate - Major / Moderate	Not-significant <b>Significant (Strathy South and Strathy Wood proceed)</b>
	THC	High	Moderate	Moderate	Not-significant	Moderate - Major / Moderate	Moderate - Major / Moderate	Not-significant <b>Significant (Strathy South and Strathy Wood proceed)</b>
<p>THC are in broad agreement with the App's LVIA. This viewpoint is situated upon the summit of Ben Giam at an overall elevation of 580 m. All 9 of the proposed turbines will be visible to hub height. Views are largescale, open and panoramic, extending across the landscape to the north, south, east and west. Views comprise a relatively undulating moorland landscape, interspersed by blocks of coniferous forestry, with the more distant and distinct hills of Ben Hope and Ben Loyal forming key elements within the view westwards.</p> <p>There are a number of existing and operational windfarms within view, including Strathy North, Ballie and Gordonbush. Strathy North wind farm forms a focal point within the centre of the view. Given the distance at which it would be seen, the limited proportion of this expansive panoramic view it would occupy, and its developed context, the magnitude of impact from the proposed development would not be significant, unless the Strathy South and Strathy Wood projects are brought forward and constructed, as agreed by both the Council Officers and the applicant.</p>								
17 Beinn Nam Bad Mor (20.7km to nearest turbine)	App	High	Moderate / Minor	Moderate / Minor	Not-significant	Major / Moderate	<b>Major / Moderate</b>	<b>Significant</b>
	THC	High	Moderate / Minor	Moderate / Minor	Not-significant	Major / Moderate	<b>Major / Moderate</b>	<b>Significant</b>
<p>THC are in broad agreement with the App's LVIA. This viewpoint is located on the summit of Beinn Nam Bad Mor, to the west of Loch Scye and Beinn Nam Bad Beag. Views from this location are of large-scale, expansive and panoramic. All 9 of the proposed turbines may be visible to tip height from this location. However, given the distance at which it would be seen, the limited proportion of this expansive panoramic view it would occupy, and its developed context, the magnitude of impact from the proposed development would be slight from this viewpoint, as agreed by both the Council Officers and the applicant.</p>								

Viewpoint	App / THC	Sensitivity of the Receptor (Susceptibility / value of the view)	Amended Proposed Development			Combined Development		
			Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major & Major / Moderate are Significant. Moderate may be significant)	Magnitude of Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance
	Cumulatively, the array of Strathy North, presents a focal point of wind energy development at the western side of the view. Should the Kirkton and Melvich proposals proceed, they will extend windfarm development further to the east of this view. Should the consented Strathy South and Strathy Wood proposals proceed to construction, they would form a considerable concentration of additional turbines in combination with the proposals, across the middle distance of the view.							
18. Dounreay (20.1km to nearest turbine)	App	High	Moderate / Minor	Moderate / Minor	Not-significant	Major / Moderate	<b>Major / Moderate</b>	<b>Significant</b>
	THC	High	Moderate / Minor	Moderate / Minor	Not-significant	Major / Moderate	<b>Major / Moderate</b>	<b>Significant</b>
	<p>THC are in broad agreement with the App's LVIA. This viewpoint is located along the A836, to the east of Dounreay Nuclear Facility. Views are large-scale and expansive. In the immediate vicinity of this position the Dounreay Nuclear Site and associated buildings are prominent features within an essentially flat landscape.</p> <p>All 9 of the proposed turbines may be visible to blade tip height from this location, however, given the limited extent of visibility of the development and the existing engineered features in the landscape, as well as the distance from the receptor location, the overall landscape and visual impacts would be slight, as agreed by both the Council Officers and the applicant.</p> <p>The proposed development would be seen in combination with several other proposals. Most prominently the Melvich proposed windfarm should this be consented and proceed to construction. More generally, the applicant has concluded that the combination of existing and consented windfarms and other power infrastructure, including overhead lines, creates a more discordant visual composition from this viewpoint and as such, the applicant's conclusion of significant cumulative impacts on visual amenity are accepted by the Council Officers.</p>							
19 East Halladale Flows WLA, east of Strath Halladale (20.6km to nearest turbine)	App	High	Moderate	Moderate	Not-significant	Major / Moderate	Major / Moderate	Not-significant <b>Significant (Strathy South and Strathy Wood proceed)</b>
	THC	High	Moderate	Moderate	Not-significant	Major / Moderate	Major / Moderate	Not-significant <b>Significant (Strathy South and Strathy Wood proceed)</b>



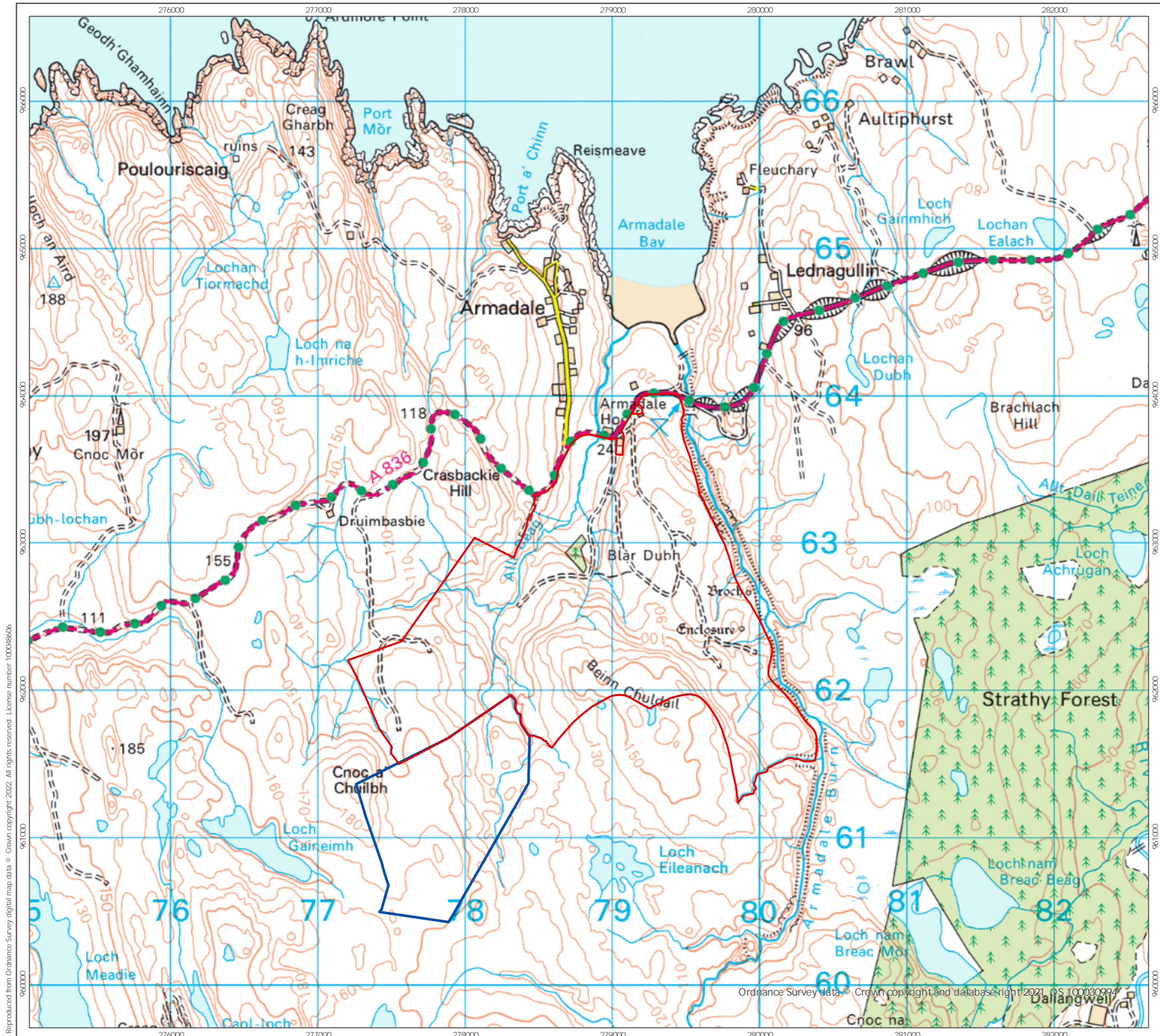
Viewpoint	App / THC	Sensitivity of the Receptor (Susceptibility / value of the view)	Amended Proposed Development			Combined Development		
			Magnitude of change (Scale of Change / Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of Receptor)	Significance (Major & Major / Moderate are Significant. Moderate may be significant)	Magnitude of Change (Scale / Extent / Duration)	Level of Effect (Magnitude of Change / Sensitivity of Receptor)	Significance
			<p>THC are in broad agreement with the App's LVIA. This viewpoint is situated with the East Halladale Flows Wild Land Area, at an elevation of 129 m AOD. The elevated and openness of this position means that views from this viewpoint are large scale, expansive and panoramic. The foreground consists of a mainly flat, gently sloping to undulating peatland with a simple extensive vegetation cover. There are a number of vertical features which interrupt largely flat landscape, these include coniferous forestry patches, transmission lines and post and wire fencing. All 9 of the proposed turbines may be visible to blade tip height from this location.</p> <p>The development would be seen distantly, would occupy a small proportion of the view and would be partially obscured by intervening topography. Consequently, the magnitude of impact experienced at this viewpoint is considered to be slight, as agreed by both the Council Officers and the applicant.</p> <p>Cumulatively, the existing Strathy North and Bettyhill Arrays are prominent in the southern part of the view. Should the Kirkton and Melvich proposals be approved, they will extend such development significantly further across the view to the north. Should the Strathy South and Strathy Wood proposal proceed to the construction stage, the influence of windfarm development would more substantially increase, incurring significant impacts on the visual amenity in combination with the current proposals.</p>					

**Appendix 3 - Assessment against Landscape and Visual Assessment Criteria contained**


Response to EIAR Review of Design against Criteria in THC Onshore Wind Energy SG 2016		
1	Relationship between Settlements/Key locations and wider landscape respected.	<p>Turbines are not visually prominent in the majority of views within or from settlements/Key Locations or from the majority of its access routes.</p> <p>-----</p> <p>The proposal will introduce large scale wind turbines directly adjacent to the Armadale settlement, four of which will be visible substantially to tower height. As discussed in the main body of the Committee Report, these impacts are not well mitigated. Furthermore, the proposals weaken and detract from the sense of place and landscape qualities of the interaction between the Coastal Crofts and Small Farms, Sweeping Moorland and Flows and Rocky Hills and Moorland Landscape Character Types (LCT's) in the wider area. It is therefore, considered that this threshold is not met.</p>
2	Key Gateway locations and routes are respected.	<p>Wind Turbines or other infrastructure do not overwhelm or otherwise detract from landscape characteristics which contribute the distinctive transitional experience found at key gateway locations and routes.</p> <p>-----</p> <p>Due to its scale and siting, the proposals would have an overbearing visual and landscape impact which would tend to overwhelm receptors along the A836 / North Coast 500 route in the vicinity of Armadale. It is therefore, considered that this threshold is not met.</p>
3	Valued natural and cultural landmarks are respected	<p>The development does not, by its presence, diminish the prominence of the landmark or disrupt its relationship to its setting.</p> <p>-----</p> <p>The Council's Historic Environment Team (Conservation) have raised an objection to the proposals on the grounds of the impact to the setting of the Category C listed Armadale House. However, apart from the impacts on this heritage asset, it is more generally considered that the threshold is met.</p>
4	The amenity of key recreational routes and ways is respected.	<p>Wind Turbines or other infrastructure do not overwhelm or otherwise significantly detract from the visual appeal of key routes and ways.</p> <p>----</p> <p>With the exception of the impact noted above on the A836 section</p>

		of the Inverness to John o Groats Cycle Route, it is considered that the threshold is met.
5	The amenity of transport routes is respected	<p>Wind Turbines or other infrastructure do not overwhelm or otherwise significantly detract from the visual appeal of transport routes</p> <p>-----.</p> <p>With the exception of the impact noted above on A836 in the vicinity of Armadale, as noted above, it is considered that the threshold is met.</p>
6	The existing pattern of Wind Energy Development is respected.	<p>The degree to which the proposal fits with the existing pattern of nearby wind energy development, considerations include:</p> <ul style="list-style-type: none"> <li>• Turbine height and proportions,</li> <li>• density and spacing of turbines within developments,</li> <li>• density and spacing of developments,</li> <li>• typical relationship of development to the landscape,</li> <li>• previously instituted mitigation measures</li> <li>• Planning Authority stated aims for development of area</li> </ul> <p>-----</p> <p>On the basis of the landscape impacts noted above, it is not considered that the threshold is met.</p>
7	The proposal contributes positively to existing pattern or objectives for development in the area.	<p>The proposal maintains appropriate and effective separation between developments and / or clusters</p> <p>-----</p> <p>It is considered that the threshold is broadly met, taking into account the degree of separation of the proposed development from other existing and proposed windfarms in the area.</p>
8	The perception of landscape scale and distance is respected	<p>The perception of landscape scale and distance is respected</p> <p>---</p> <p>On the basis of the landscape impacts noted above, it is not considered that the threshold is met.</p>
9	Landscape setting of nearby wind energy developments is respected	<p>Proposal relates well to the existing landscape setting and does not increase the perceived visual prominence of surrounding wind turbines.</p> <p>---</p> <p>It is considered that the threshold is broadly met, considering the</p>

		assessment of the cumulative landscape and visual impacts of the development undertaken by the Council Officers and other statutory consultees.
10	Distinctiveness of Landscape character is respected	<p>Integrity and variety of Landscape Character Areas are maintained.</p> <p>-----</p> <p>On the basis of the landscape impacts noted above, it is not considered that the threshold is met.</p>



- Planning Application Boundary
- Other land under Applicant's Control

1:25,000 Scale @ A3  

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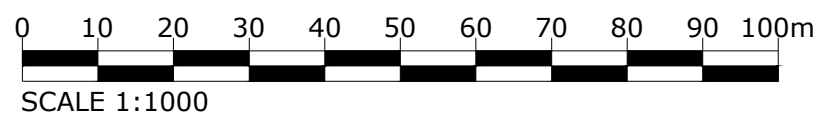
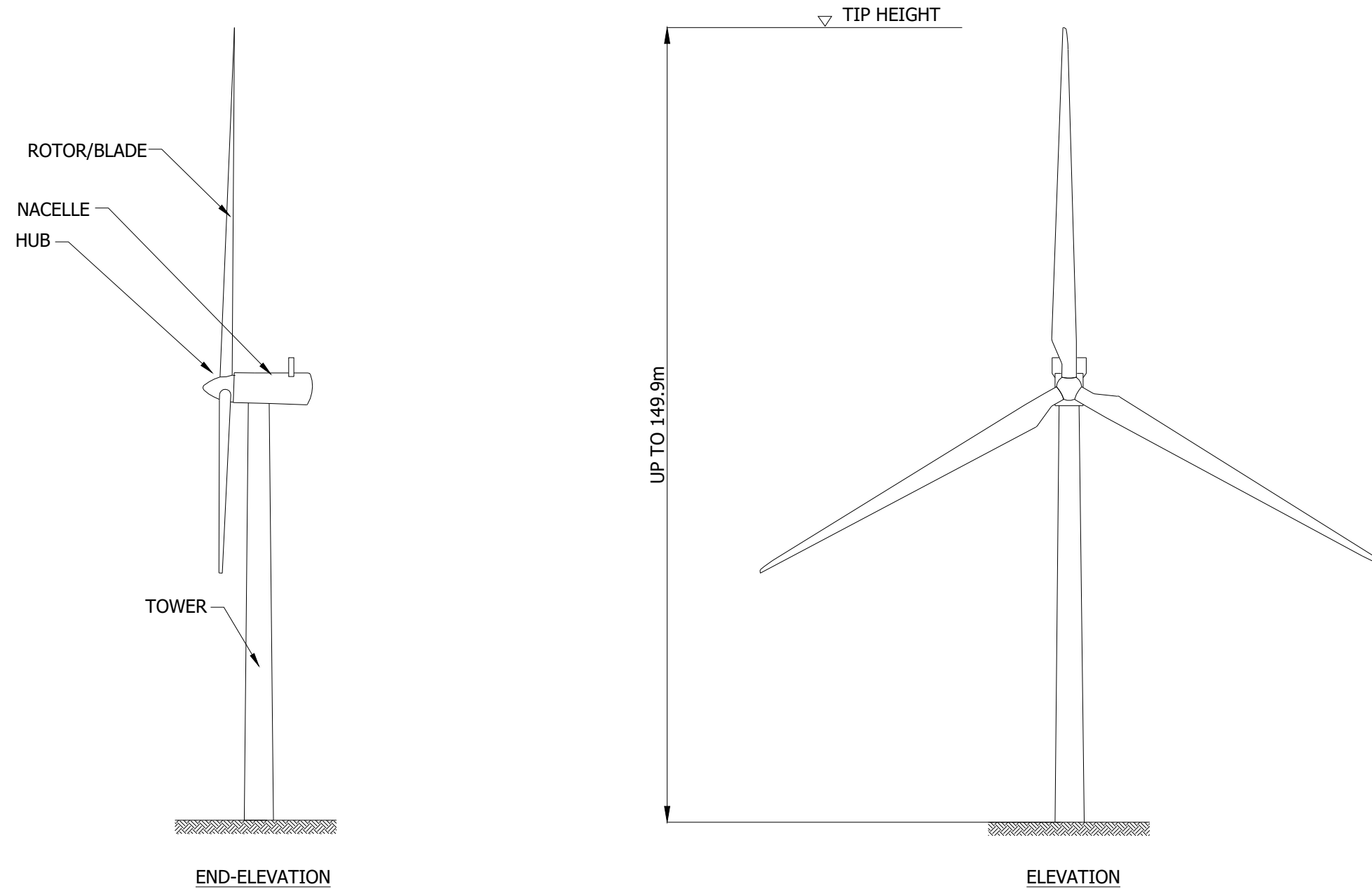
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Checked By: TW	Date: 28/03/2022

Site Location Plan  
 Figure 1

Armadale Wind Farm  
 Planning Application

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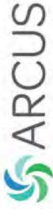
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1:1000 Scale @ A3

Produced: CR	Ref: 3262-DR-P-0002
Reviewed: DB	
Approved: DB	Date: 15/03/22

**Indicative Wind Turbine**  
Figure 3.2



- Site Boundary
- Proposed Turbine Location
- Meteorological Mast
- Access Tracks
- Battery Energy Storage System
- Borrow Pit
- Construction Compound
- Crane Hardstanding
- Earthworks Extent
- Substation Compound
- Coniferous Plantation
- Proposed Mixed Woodland

1:12,000 Scale @ A3



Produced By: DN  
 Checked By: SC  
 Ref: 3262-REP-150  
 Date: 16/05/2023

**FEI Amended Site Layout**  
 Figure 4.6

**Armadale Wind Farm**  
 FEI Report

