Agenda Item	6.2
Report No	PLN/045/24

HIGHLAND COUNCIL

Committee: North Planning Applications Committee

Date: 4 June 2024

Report Title: 21/04984/S36: Arise AB

Land At Tormsdale 1500M South Of Bridge Of Westerdale, Halkirk

Report By: Area Planning Manager - North

Purpose/Executive Summary

Description: Tormsdale Wind Farm - Erection and operation of wind farm for period of 30 years, comprising of 10 wind turbines with maximum blade tip height of 149.9m, access tracks, substation, control building, Battery Energy Storage System, and ancillary infrastructure.

Ward: 03 - Wick And East Caithness

Development category: National Development (S36 Application)

Reason referred to Committee: Section 36 Application

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 the construction and operation of the Tormsdale Wind Farm. The application is for 10 wind turbines to be operated for a 30 year period, with all turbines having a maximum blade tip height of 149.9m. The proposal has capacity to generate more than 50MW of installed capacity, based on the power rating of the proposed turbines and Battery Energy Storage System (BESS).

1.2 Key elements of the development, as described and assessed within the proposals and the Environmental Impact Assessment Report (EIAR) include:

- 10 wind turbines of 149.9m height to blade tip (capable of generating approximately 4 MW each), with internal transformers;
- 1 substation compound measuring approximately 60 x 40m;
- 1 control and metering building approximately 10m x 25m and 4m high within the substation compound;
- A 25MW Battery Energy Storage System within the substation compound which would cover an area of approximately 25 x 35m;
- Turbine foundations (approximately 21m diameter);
- Crane hard standings (approximately 1,875m^2 at each turbine, with an area for two additional crane assist pads at 10m^2 each);
- A new bridge over the River Thurso, with an approximate span of 50m, located to the west of the existing crossing;
- Approximately 2km of upgraded access track;
- Approximately 5km of new access track with a typical running width of 5m (wider at bends and junctions) with associated drainage;
- Underground cabling along the side of the access tracks; and
- A temporary construction compound covering approximately 100 x 40m.

1.3 The proposed development will access the public road network by upgrading an existing junction with the U1823 unclassified public road to the west, connecting to the B870 and then the A9 trunk road.

1.4 A micro-siting allowance of 50m has been assumed by the applicant for the turbine locations (so long as infrastructure moves no closer to any identified watercourses), to accommodate unknown ground conditions. The micro-siting will be used to avoid various constraints including areas of deeper peat, watercourse buffers and natural and cultural heritage assets. The final design of the turbine (colour and finish), aviation infrared lighting, ancillary electrical equipment, landscaping and fencing etc. are also expected to be agreed with the Planning Authority, by condition, at the time of project procurement. Turbine manufacturers regularly update designs that are available, thereby necessitating the need for some flexibility on the approved design details.

1.5 As permission is sought to operate the windfarm for 30 years, a further application would be necessary to determine any future re-powering proposal. If the decision is made to decommission the wind turbines, all components, and above ground infrastructure would be removed. Any such track or infrastructure foundation retention would however need to be agreed via a decommissioning method statement and would require a planning application at the time of decommissioning the remainder of the site. Any application for retention of such infrastructure will be determined in line with the development plan in place at that time.

1.6 The applicant anticipates that the construction period will last approximately 18 months, guided by a Construction and Environmental Management Plan (CEMP).

1.7 Whilst public consultation for Section 36 applications is not mandatory, the applicant held two online consultation events during January 2021, with the opportunity for members of the public and other interested parties to leave feedback.

1.8 The applicant made use of the Council's Pre-Application Advice Service for Major Developments during October 2014. At the time of the advice being sought, the proposal comprised of 23 turbines. Acknowledging the differences between the current scheme and that originally submitted for pre application advice, the advice set out that the most significant effects would likely be landscape and visual impacts, especially cumulative impacts considering the degree of other wind farm development in the area. There were also concerns raised regarding the potential impacts on the interests of neighbouring designated sites, namely the River Thurso and Caithness and Sutherland Peatlands Special Areas of Conservation (SAC), Special Area of Conservation (SPA) and Ramsar site.

1.9 The application is supported by an Environmental Impact Assessment Report (EIAR), the contents of which has been informed through an EIA Scoping exercise in Summer 2019 with the Scottish Government's Energy Consents Unit in consultation with other consultees including the Council. The EIAR contains chapters on: Project Description, EIA Methodology; Energy and Planning Policy, Landscape and Visual Impacts; Cultural Heritage, Ecology, Ornithology, Hydrology and Hydrogeology, Geology, Soils and Peat, Access, Traffic and Transport, Noise, Aviation, Radar and Telecoms, Socio-economics, Climate Change and Carbon Balance, and Residential Shadow Flicker. The application is also accompanied by a Planning Statement, a Design and Access Statement, a Pre-Application Consultation (PAC) Report, and a Non-Technical Summary.

1.10 During September 2023, the applicant submitted Further Environmental Information, relating to an amendment to the proposals, removing two of the proposed turbines, primarily in response to comments received related to the original scheme from Historic Environment Scotland (HES). The applicant submitted a second FEI package in February 2024, relating mainly to natural heritage and flooding issues raised by NatureScot and SEPA. Additionally, the applicant submitted further information on Flood Risk during April 2024, in response to an objection from the Councils Flood Risk Management Team.

2. SITE DESCRIPTION

2.1 The proposal site is located just to the south east of the small settlement of Westerdale, approximately 20km to the south west of Wick and 19km south east of Thurso. Access to the site is expected to be from the B870 public road, via an upgraded existing access junction in the east of the site. The applicant has indicated that entry for the turbine components would be from Wick Harbour. They will then travel to the site via the A99, A9 and B870. A setback distance of 1.5km from the nearest turbine is proposed with respect to residential properties that are not financially involved in the proposed development.

2.2 The site predominately consists of moorland and peatland which is relatively flat. The application boundary covers an area of approximately 570ha, although the permanently developed area of the site is proposed to be significantly less than this, at 8.4ha.

2.3 The site is characterised by areas of wet modified bog, wet dwarf shrub heath and marshy grassland. The River Thurso runs through the central part of the site, between proposed turbines 5 and 6. Additionally, there are several minor watercourses within the site, including the named Alltan Ruathair. There are some areas of Ground Water Dependent Terrestrial Ecosystems (GWDTEs) within the site, but these are limited.

2.4 The majority of the northern part of the site is shown to be Class 1 Priority Peatland Habitat as defined on NatureScot's Carbon and Peatland 2016 Map, with Class 5, non-peatland habitat soils recorded predominantly in the southern part of the site. Peat probing was undertaken in 2019 which evidenced average peat depths of 1.48m. Where possible, proposed turbines and infrastructure would be located on areas with peat depths of less than 1m.

Environmental Designations and Habitats

2.5 The River Thurso which runs through part of the site, is designated as a Special Area of Conservation (SAC). The River Thurso and its adjoining Little River are both used for angling. Additionally, the site is located partly within the Caithness and Sutherland Peatlands Special Area of Conservation and Special Protection Area (SPA), which incorporates a number of Sites of Special Scientific Interest (SSSI) and Ramsar sites. Furthermore, the proposed development site also lies in proximity of the following designated sites, as listed below:

- Blar nam Faoileag SSSI, located immediately south west of the site boundary;
- Dirlot Gorge SSSI, located immediately south west of the site boundary;
- Westerdale Quarry SSSI, located 600m north west;
- Leavad SSSI, 1.2km south east;
- Achanarras Quarry SSSI, located 3km north;
- Spittal Quarry SSSI, 4.3km north east;
- Banniskirk Quarry, 6.3km north east;
- Beinn Freiceadain and Ben Dorrerey SSSI located 6.6km north west;
- Lambsdale Leans SSSI 7km north west;

- Caithness Lochs (Loch Calder) SPA, SSSI and Ramsar site, 8.1km north west;
- Loch Watten SAC, SPA (Caithness Lochs), SSSI and Ramsar site, 9.2km north east; and
- Caithness Lochs (Loch Scarmclate) SPA, SSSI and Ramsar, 9.7km north east.

2.6 A variety of habitats are present around the site. The EIAR investigated the potential impact of the proposals on otters, wildcats, pine marten, water vole, badgers, bats, and fish. The site and surrounds have been surveyed for breeding birds and transient birds.

2.7 In early 2023, a nomination for World Heritage Site (WHS) status for Scotland's Flow Country was submitted to United Nations Educational, Scientific and Cultural Organisation (UNESCO) by the Flow Country Partnership, via the UK Government. The Flow Country Partnership anticipates a decision on whether to award WHS status in Summer 2024. The Flow Country has been put forward for candidate WHS status in part for its blanket bog habitats and associated biodiversity. The western part of the application site is partly within the boundary of the cWHS.

Landscape Designations, Wild Land and Landscape Character

2.8 The site is not covered by any landscape designations. The closest such designation is the Flow Country and Berriedale Coast Special Landscape Area (SLA), which is located approximately 1.3km to the south west of the nearest turbine within the development.

2.9 The application site is located within the Sweeping Moorland and Flows – Caithness and Sutherland Landscape Character Type (LCT) 134. The applicants' assessment also considers LCT 143 Farmed Lowland Plain and LCT 144 Coastal Crofts and Small Farms, that lie within 15km of the proposed development site.

Built Heritage

2.10 There are no designated heritage assets within the site itself. There are 140 Scheduled Monuments, and 64 listed buildings within 15km of the site. Within 5km of the site there are 17 Scheduled Monuments, 4 Category B Listed Buildings and 2 Category C Listed Buildings. The nearest designate heritage assets to the applications site are Scheduled Monuments SM446 (Dirlot Stone Rows) and SM5897 (Dirlot Castle).

Recreation

2.11 The site is used for angling, however, there are no formal recreational facilities located within the site itself. Core Paths within close proximity include the Causeymire Wind Farm walking route (CA06.04) which is approximately 450 m east of the site boundary and Dirlot Gorge Ingress (CA06.13) approximately 1km south west of the site boundary.

Cumulative Development

2.12 The nearest operational wind farm is Causeymire, some 800m to the north east from the nearest of the proposed turbines.

2.13 Appendix 1 of this report provided details of operational, consented / under construction, and in planning wind farm projects that the applicant took into consideration in their cumulative assessment, dated August 2023. This has been reviewed and updated by Planning Officers and as set out within the Landscape and Visual section of this report. Scope for cumulative impacts predominantly arise from other constructed wind farms in the imeduate area, including Halsary, Bad a Cheo and Causeymire cluster directly to the west.

3. PLANNING HISTORY

3.1	9 August 2019	19/03045/SCOP - Proposed development of a 16 turbine wind farm, with a max tip height of 149.9 m and total capacity of 70 MW	Scoping Response Issued

4. PUBLIC PARTICIPATION

4.1 Advertised: Section 36 Application and EIA Development

Date EIA Advertised:

- Edinburgh Gazette and Daily Record: 22 October 2021, John O Groats Journal 22 and 29 October 2021

Date EIA FEI I Advertised:

- Edinburgh Gazette and John O Groats Journal: 8 September 2023

Date EIA FEI II Advertised:

- Edinburgh Gazette and John O Groats Journal: 1 March 2024

Representation deadline: 5 April 2024

4.2	Representations Received by the Highland Council:	70 objections, 2 neutral comments, 0 supporting comments
4.3	Representations Received by the Energy Consents Unit	45 objections, 0 neutral comments, 0 supporting comments

4.4 Material considerations raised are summarised as follows:

- Proposals do not accord with the development plan or established pattern of wind energy development;
- Adverse landscape and visual impacts of the proposals, both in solus and cumulatively;
- Adverse impacts on the capacity and condition of the local road network during construction;
- Adverse impact on habitats, terrestrial and marine ecology, ornithology and biodiversity in the area;
- Adverse impacts on fisheries within the River Thurso;

- Health and Safety concerns, particularly relating to fire risk from the proposed Battery Energy Storage System (BESS);
- Lack of clarity in EIAR documents and other supporting information;
- Noise, shadow flicker and other impacts of the proposed development on local amenity and residential amenity;
- Impact on the setting of the candidate Flow Country World Heritage Site;
- Lack of meaningful engagement with the local community; and
- Negative impact on the local economy, particularly in terms of tourism.

4.5 Non-material considerations raised are summarised as follows:

- Lack of grid capacity; and
- oversupply of renewable energy generation in the north of Scotland.

4.6 All letters of representation are available for inspection via the Council's eplanning portal which can be accessed through the internet www.wam.highland.gov.uk/wam. Those representations received by the Scottish Government's Energy Consents Unit can be accessed via www.energyconsents.scot It should be noted that some representations may have been submitted to both The Highland Council and Energy Consents Unit.

5. CONSULTATIONS

Consultations Undertaken by the Highland Council

5.1 **Halkirk and District Community Council (Host): object** to the application. Concerns raised include: the construction impacts and associated traffic on the local road network; impacts on natural heritage interests; impacts on fishing on the River Thurso; adverse landscape and visual impacts, both singularly and cumulatively; and the potential impacts on residential amenity through noise and other issues.

5.2 **Berriedale and Dunbeath Community Council:** were consulted but did not respond to the application.

5.3 **Bower Community Council:** were consulted but did not respond to the application.

5.4 **Caithness West Community Council: object** to the proposals on the basis of impact on the adjacent proposed Flow Country World Heritage Site, impacts to natural heritage interests and fishing on the River Thurso, and the landscape and visual impacts of the proposals, both singularly and cumulatively.

5.5 **Castletown Community Council:** were consulted but did not respond to the application.

5.6 **Watten Community Council:** were consulted but did not respond to the application.

5.7 **Access Officer:** does not object to the application. Comments were made regarding the status of the proposed access track as a candidate core path. A recreational Access Management Plan will be required to be approved prior to any development commencing on site.

5.8 **Contaminated Land:** do not object to the application, but drew attention to the history of use of parts of the site for quarrying. As a detailed contamination investigation report has not been submitted, it is recommended that any future deemed planning permission include a remediation scheme or management plan secured via condition.

5.9 **Development Plans Team:** do not object to the application and provided information on the planning policy context.

5.10 **Environmental Health:** do not object to the amended proposals. Conditions were recommended in respect of operational noise limits and mode management, should consent be granted.

5.11 **Flood Risk Management Team:** initially objected to the proposals based on insufficient information to determine the flood impacts of the enhanced crossing point over the River Thurso. Following the submission of a further response by the applicant, this objection was withdrawn, subject to conditions to secure a detailed drainage impact assessment (DIA) in advance of development commencing, should consent be otherwise granted.

5.12 **Forestry Officer:** does not object to the application.

5.13 **Historic Environment Team (Archaeology):** does not object to the application. The applicant's supporting information outlines significant mitigation on the impacts to cultural heritage features.

5.14 **Historic Environment Team (Conservation):** does not object to the application but raised concern over the cumulative impacts with other wind farms in the area on the wider historic landscape.

5.15 **Transport Planning Team:** does not object to the application. Further information from the applicant was requested to determine the impacts on the local road network, having identified several omissions in the applicant's initial assessment. Following the receipt of further information by the applicant, Transport Planning recommend conditions to control the impact of the proposals on the local road network, relating to the provision of a Construction Phase Traffic Management Plan (CTMP) and details of improvements to the local road network to enable the construction traffic and abnormal loads to access the site while retaining safety for all road users.

Consultations Undertake by the Scottish Government's Energy Consents Unit (ECU)

5.16 **The British Horse Society:** do not object to the application and encouraged the applicants to take into consideration the road safety and access concerns of the horse community.

5.17 **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.

5.18 **The Caithness District Salmon Fisheries Board: objects** to the application on the basis of lack of details for determining the impact on salmon interests in the River Thurso, in relation to the impacts of shadow flicker from the proposed development on fish in the river, as well as the direct impact on their habitat through construction of the new watercourse crossing proposed.

5.19 **Crown Estate Scotland:** do not object to the application and have no further comments.

5.20 **Defence Infrastructure Organisation:** does not object to the application, subject to conditions including aviation lighting and aviation charting and safety management.

5.21 **Fisheries Management Scotland (FMS):** do not specifically object to the application. They have notified the local fisheries board, noting its objection as listed above.

5.22 **Highlands and Islands Airports (HIAL):** do not object to the application which as submitted, would not infringe the safeguarding criteria of Wick Airport.

5.23 **Historic Environment Scotland:** initially objected to the application on the basis of the potential for significant and adverse effects on the setting of the Tulach Mor, broch (Scheduled Monument SM593) and the Cairn Merk, broch 800m (Scheduled Monument, SM534). Following the submission of the 2023 Further Environmental Information alongside the current 10 turbine layout, this objection was withdrawn.

5.24 **Ironside Farrar:** did not object to the application, based on the content of the applicant's Peat Landslide Risk Assessment, but noted that minor revisions were required.

5.25 **Transport Scotland:** did not object to the application and suggested conditions to address the effects of the construction phase on the Trunk Road Network, related to handling the delivery of abnormal loads to the site and provision of a Construction Phase traffic Management Plan (CTMP)

5.26 **Marine Science Scotland:** do not object to the application, but requested further supporting information be developed to assess the impacts of the proposals on the Salmon interests of the River Thurso. Further information should be provided regarding the potential impact on salmon populations associated with the construction of the new bridge over the River Thurso. Further consideration should be given to the proposed mitigation measures to avoid/minimise impacts on salmon populations associated with the construction of the new bridge, specifically during the salmonid spawning/migratory period, and should a significant effect be evident from shadow flicker.

5.27 **National Air Traffic Services Safeguarding (NATS):** do not object to the application. It notes that the proposal does not conflict with its safeguarding criteria.

5.28 **NatureScot: object** to the proposals on the basis of the impacts on designated sites and habitats in the vicinity of the application site, namely the River Thurso Special Area of Conservation (SAC), with respect to Atlantic salmon, Caithness and Sutherland Peatlands SAC with respect to blanket bog and wet heath habitats, and the Caithness and Sutherland Peatlands Special Protection Area (SPA), with respect to golden plover, greenshank, hen harrier, merlin and short-eared owl. Further information was sought to address its concerns from the applicant, which is still awaited at the time of writing of this report, as is discussed in more detail in the planning assessment that follows.

5.29 **RSPB: object** to the application. This is on the basis of the potential impacts on several protected bird species in the area, including golden plover, common scoter, hen harrier, short eared owl and curlew. Following review of the amended development represented through the FEI submission, their objection remains unresolved due to the impacts of the varied turbine array layout.

5.30 **Scottish Water:** do not object to the application. There are no Scottish Water drinking water catchments or water abstraction sources, which are designated as Drinking Water Protected Areas under the Water Framework Directive, in the area that may be affected.

5.31 **SEPA:** initially objected to the application on the basis of a lack of information related to flood risk and habitat compensation measures. SEPA's objection was later withdrawn, following the submission of further information from the applicant, subject to conditions to secure final details of the proposed crossing structures on the River Thurso and a finalised habitat management plan to secure peatland restoration and riparian planting onsite.

6. DEVELOPMENT PLAN POLICY AND OTHER MATERIAL POLICY CONSIDERATIONS

6.1 Appendix 2 of this report provides details of the documents which comprise the adopted Development Plan, including details of pertinent planning policies as well as adopted supplementary guidance, and other material policy considerations which are relevant to the assessment of the application.

7. PLANNING APPRAISAL

7.1 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). Although not a planning application, the Council processes Section 36 applications in a similar manner given that planning permission may be deemed to be granted.

7.2 Schedule 9 of The Electricity Act 1989 contains considerations in relation to the impact of proposals on amenity and fisheries. These considerations mean the developer requires 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.

7.3 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 therefore 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

7.4 The key considerations in this case are:

a) Development Plan / Other Planning Policy
b) Energy and Economic Benefit
c) Construction
d) Roads, Transport and Access
e) Water, Flood Risk, Drainage and Peat
f) Natural Heritage (including Ornithology)
g) Built and Cultural Heritage
h) Design, Landscape and Visual Impact (including Wild Land Areas)
i) Noise and Shadow Flicker
j) Telecommunications
k) Aviation
l) Other Material Considerations

Development Plan / Other Planning Policy

7.5 The Development Plan comprises National Planning Framework 4 (NPF4), the adopted Highland-wide Local Development Plan (HwLDP), the adopted Caithness and Sutherland Local Development Plan (CaSPlan) and all statutorily adopted supplementary guidance, including the Onshore Wind Energy Supplementary Guidance (OWESG).

7.6 Appendix 3 of this report provides an assessment of compliance with the Development Plan / Other Planning Policy.

7.7 In summary, the principle of wind farm development is established in national policy, with the proposed development being of national importance for the delivery of the national Spatial Strategy. 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 NPF4. At the regional level, HwLDP also offers support for renewable development proposals where they are located, sited and designed such as they will not be significantly detrimental overall, individually or cumulatively with other developments. To inform this assessment, the OWESG 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.

Energy and Economic Benefit

7.8 The Council continues to respond positively to the Government's renewable energy agenda. Installed onshore wind energy developments in Highland account for around 30% of the national installed onshore wind energy capacity, with a substantial number of onshore wind farm applications pending consideration at present. 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.

7.9 Notwithstanding any 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, with the development having the potential to generate up to 50.4MW of electricity (with a maximum output of 75MW from the combination of wind and battery).

7.10 Based upon a fossil fuel mix in the electricity grid, the applicant anticipates that 78,676 tonnes of carbon could be displaced by the development per year. There will however also be carbon losses as a result of the development, including those related to turbine manufacture and impact on peat. These losses would equate to a total of approximately 86,580 tonnes of carbon. As a result, the anticipated that the estimated carbon payback period for the development would be approximately 1.7 years, again based on a grid mix (including both renewables and fossil fuels), with the proposal reported by the applicant to have an overall beneficial effect on climate change mitigation.

7.11 The proposed development anticipates a construction period of approximately 18 months and an operational period of 30 years. Such projects can offer investment/opportunities to the local, Highland, and Scottish economy, including businesses ranging across the construction, haulage, electrical and service sectors. Overall, the applicant estimates total capital expenditure on the project (CAPEX) of approximately £90 million.

7.12 There is also likely to be some adverse effects caused by construction traffic and disruption, as well as some adverse economic impact that turbines may have on tourism. These adverse impacts are most likely to be within the service sector particularly during the construction phase when abnormal loads are being delivered to site.

7.13 The assessment of socio-economic impact offered by the applicant suggests a minor beneficial economic impact resulting from the development. It has identified that of the capital expenditure related to the development, £10.8m would be spent within Highland. The applicant considers that the construction and operation phases of the project would lead to increased employment opportunities. It is anticipated in their assessment that a temporary workforce of a maximum of 60 persons would be employed during the construction phase. Thereafter, it is estimated that in operation, the development will create employment opportunities equivalent to 2-3 Full Time Equivalent (FTE) posts. The total Capital Expenditure (CAPEX) spend on the development will be approximately £90 million.

7.14 The effect of introducing NPF4 Policy 11 c) relating to the need for energy development to maximise socio-economic benefits of which community benefit forms a part, means that this is now material to the determination of an application. Additionally, NPF4 Policy 25 provides support for development that is consistent with local economic priorities and where they contribute to local and/or regional community wealth building strategies. The Council is currently in the process of developing its priorities, along with partners, through the Highland Outcome Improvement Plan and the work on production of a community wealth building strategy that is under way. This work will set a strategic framework along with identifying many of the local priorities and projects to promote and encourage economic activity and retain wealth within the Highland area. The ongoing Local Place Plans initiative will likely identify other opportunities. While many opportunities are likely to be identified locally, there will be a need to consider the opportunities available from a strategic perspective to ensure that communities across all of Highland benefit.

7.15 The applicant has proposed a Community Benefit Fund, committed to meeting the Scottish Government best practice of £5,000 per installed megawatt per annum. While the applicant has indicated they are willing to support domestic energy efficiency measures and broadband improvements through this fund, as identified as desirable outcomes during the community consultation process, no further details are provided. The applicant has also not detailed the intention to offer or support any community ownership of the proposed development. On this basis no additional support for the proposed development can be given under NPF4 Policy 25,

Design, Landscape and Visual Impacts

7.16 A total of 15 viewpoints (VP) across a 40km study area have been assessed with regard to landscape and visual impact. These viewpoints are representative of a range of receptors including recreational users of the outdoors and road users. The expected bare earth visibility of the development can be appreciated from the figures with photomontages and wirelines. The photomontages are considered to have been produced to an acceptable standard.

7.17 The methodology for the Landscape and Visual Impact Assessment (LVIA) is sufficiently clear, being generally in accordance with the Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3), with the assessment's methodology being provided within EIAR. This methodology has been used to appraise the assessment provided and to come to a view on what combination of effects on the sensitivity of receptor and magnitude of change are leading to a significant effect.

7.18 In the assessment of each viewpoint, the applicant has come to a judgement as to whether the effect is significant or not. In assessing visual impacts in particular, it is important to consider that the viewpoint is representative of particular receptors i.e. people who would be at that point and experiencing that view of the landscape not just in that single view but in taking in their entire surroundings. A key consideration in the effects on receptors of wind energy development is the sequential effect when travelling through and area on the local road network both by individuals who live and work in the area and tourists. Those travelling scenic routes, whether designated as such or not, have a higher sensitivity to views. While a driver of a vehicle is likely to be concentrated on the view immediately in front, passengers have a greater scope for looking at their surroundings. As such it is considered that road users are usually high sensitivity receptors, particularly through a landscape such as that where the proposed development is located.

Siting, Design and Layout Evolution

7.19 The site does not fall directly within any area designated for landscape quality or cultural heritage. The proposed turbine locations maintain a setback distance of at least 1.5km from nearby residential properties, with the exception of one, Dirlot Cottage some 800m to the closest turbine, to the west of the site, that is financially involved.

7.20 The applicant considers that the site is suitable for development due to having a strong wind resource. The applicant's stated design principles focus on maximising energy generation while respecting technical and environmental constraints, minimising impacts on the amenity of residential properties around the site, and avoiding deep peat, watercourses, and ecologically sensitive areas.

7.21 Wider views of the wind farm will be mainly encountered by road users and recreational users of the outdoors. The design of the development and its relationship with the surrounding landscape and features is best demonstrated by the visuals from:

- North - VP 11 (B874 North of Halkirk, 10.11km to the nearest proposed turbine). Representative of views from residential receptors and road users southbound. The proposals will increase the spread of windfarm development westward from the existing Causeymire wind farm array, with a noticeable difference in apparent size of the proposed turbines. The new turbines will be located within a working agricultural landscape and will be partially screened by buildings within Halkirk. Key views toward the distant hills will not be affected. Nevertheless, the turbines will appear larger than those existing, and will be noticeably stacked at the western edge of the proposals.

- South - VP6 (A9 Loch Rangag, 5.6km to the nearest proposed turbine). This mainly represents views from users of the A9 trunk road northbound. Turbines of the Causeymire Wind Farm are visible beyond the sloping hillside in the middle distance to the north. Further distant to the north west are the turbines of Baillie Wind Farm. The proposed turbines would extend the horizontal spread of the current wind farm cluster further west across the open moorland, thereby extending the overall cluster's visibility and influence, with the additional turbines appearing larger than the existing turbines with these being situated closer to this viewpoint. This difference in scale would be most apparent for the turbines proposed in the southern area of the application site. The blades of the proposed turbines would be notably longer than those of existing turbines, and as the bases of the turbines would be slightly hidden by intervening landform, they may appear to be closer than they are.

- East - VP8 (Minor Road, Grey Cairns of Camster, 8.4km to the nearest proposed turbine). Representative of views for road users in addition to visitors to the historic site. The proposals will be seen to the west, as additional turbines behind Causeymire and Bad a'Cheò. The proposed turbines will not horizontally extend the established wind farm cluster but would slightly increase the number of turbines visible within the cluster, although generally without additional stacking. There may be slight differences in size apparent due to perspective, although it is debatable to what extent this would be perceptible to most receptors.

- West - VP3 (Loch More Parking, 4.5km to the nearest proposed turbine). This represents views from road users and visitors to Loch More and Achnabreck, an access point for local cycle trails. The effect of the proposals would be to introduce additional turbines closer to the viewpoint. The effect would be the proposal turbines being perceptibly larger and of a contrasting scale than those currently present, although there are a number of existing turbines already featuring at a greater distance in the wider westward view.

7.22 The current design represents a series of iterations. The applicant originally presented a scheme for 23 turbines of up to 135m height to blade tip, when utilising the Council's Pre-Application Advice Service for Major Developments during October 2014. As originally submitted under the current application, the scheme was for 12 turbines up to 149.9m to blade tip height, with the current scheme removing 2 turbines, numbers 1 and 2 from the original scheme, with 10 to blade tip height 149.9m now being proposed. These changes were made due to consultee feedback during the assessment of the application, namely concerns raised by Historic Environment Scotland regarding the impacts of the scheme on the setting of two nearby scheduled brochs, Tulach Mor (SM593) and Cairn Merk (SM 534).

Ancillary Infrastructure

7.23 The proposal also incorporates a substation building and switchgear compound alongside a battery storage compound, of approximately 25MW capacity. While the detailed design of these elements is indicative at this stage, the compound will measure approximately 40 x 60m, with buildings a maximum of 4.1m in height.

7.24 The applicant has identified that a grid connection will be required to the Mybster substation, some 3km to the northeast, however, the likely form, direction or length of connection remains uncertain with this being subject to a separate application.

Landscape Impact

7.25 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.

7.26 The development lies within the Sweeping Moorland and Flows Landscape Character Type (LCT) 134. This is an extensive type covering much of the land to the south of the proposed development site and consisting of gently sloping or undulating landforms that generally lie below 350 metres with occasional isolated hills of limited height forming landmark features. The LCT is punctuated by lochs and mature, meandering rivers and is noted for its distinct flora, dominated by sphagnum mosses. The applicant's assessment considers that the development will be seen as an extension to the existing Halsary, Bad a Cheo and Causeymire cluster. While the development will introduce additional, larger turbines that extend the existing cluster westwards, given the existing context, it is considered that the proposed turbines would not represent an additional significant influence in landscape character terms. The applicant has also assessed the impacts upon the adjoining LCT 143 (Farmed Lowland Plain) where due to the more limited visibility of the proposals as a result of intervening topography, the effects on the landscape character of the LCT are predicted to be negligible.

7.27 NatureScot, while recognising that the proposals encroach into areas to the west of the adjacent Halsary, Bad a Cheo and Causeymire cluster that currently do not have wind energy development, do not object to the proposals on landscape grounds and are generally in agreement with the applicant's assessment of the landscape impacts, as are the Council Officers.

7.28 The proposed development is not situated within any formal landscape designation, with the closest being Special Landscape Area (SLA) 6, the Flow Country and Berriedale Coast. The applicant's assessment considers that, although the development will be visible from higher, northeasterly facing ground within the northeastern part of the SLA, that it will be seen in association with the existing Halsary, Bad a Cheo and Causeymire cluster and as such, will not later the perception of the special qualities of the SLA that can be perceived already with the presence of this group considered. As such, significant landscape impacts would not be incurred on the integrity and character of the SLA. This is agreed by the Council Officers.

Wild Land

7.29 No element of the proposed development is within a wild land area; however, it is in relative proximity to Wild Land Areas (WLA) 36 – Causeymire and Knockfin Flows and WLA 39 - East Halladale Flows. The applicant's assessment notes that the proposals would introduce limited areas of new visibility of turbines from within both WLA's, the qualities for neither would be impacted significantly. Nature Scot consider that the introduction of the proposal just outside the WLA 36 may reduce the sense of remoteness and solitude in some parts of the north east of the area. However, given the presence of other wind farm developments in the area, they do not consider that the effects on the qualities of either WLA 36 or WLA 39 will be significant. NatureScot thus do not consider the impacts to raise issues of national interest and this assessment is also accepted by the Council Officers.

7.30 It is important to note that with the introduction of NPF4 in February 2023 there has been a significant policy change brought about by NPF4 Policy 4, 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.

Visual Impact

7.31 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 6 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.

7.32 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 10km. Beyond this distance there will be more intermittent visibility, however, owing to the relatively open moorland character of the area, theoretical visibility in mid to longer distance views is more widespread, particularly in areas to the east north and west of the site, where at these greater distances the turbines would be seen as forming part of an enlarged wind farm cluster.

7.33 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.

7.34 A summary of the applicant's assessment and officer appraisal of this assessment, which highlights the differences and any concerns with regard to visual impact, can be found in Appendix 5. The EIAR includes a visual impact assessment from each of the 15 representative viewpoints.

7.35 Most viewpoints are 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 receptors.

Impact on Road and Rail Users

7.36 The primary impact on road users on through routes would be incurred on the A9 trunk road, which runs from south to north to the west of the site, between Latheron and Thurso. The applicant considers that significant, albeit moderate visual impacts would be incurred on this route. The applicant had not provided a suite of dedicated sequential wireframe visualisations during the assessment of the proposals. This is an important omission, although these visualisations were shared with the Council Officers just before the finalisation of this report. A summation of the visual impacts on north bound road users can be gained from comparing Viewpoints 12 (A9 Smerral Junction), 6 (Loch Rangag) and 2 (A9 War Memorial), the latter of which is defined as a key view within the Onshore Wind Energy Supplementary Guidance, for the vast panorama it offers. The applicant's ZTV indicates that all 10 of the proposed turbines will be visible to blade tip along this section of the route, representing a distance of approximately 12km and driving time of approximately 10 minutes. The route is relatively straight at this point, with meandering gentle bends. From all 3 viewpoints, the proposals extend the influence of wind energy development westward, with noticeably taller turbines than those existing to the east, especially those of Causeymire.

7.37 The group would also appear somewhat unbalanced, with the appearance of an isolated group, with noticeable stacking, due to Turbines 11 and 12, located away from the main array at Viewpoints 6 (Loch Rangag) and 12 (A9 Smerral Junction). In this respect the applicant underplays the visual impacts on road users, with the application noticeably extending the influence of wind farm development for northbound road users. Council Officers are in agreement with the applicant's LVIA reported significant visual impacts predicted at Viewpoint 6, however the applicant's assessment of non significant impacts at Viewpoints 12 and 2 is contested, with significant visual effects being likely for a much longer northbound stretch of the A9 as represented by these additional viewpoints. Furthermore, the Council Officers consider the sensitivity at each northbound viewpoint to be high, given the importance of the A9 for both tourism and local access.

7.38 The Far North Railway line runs between Forsinard and Georgemass Stations, to the northwest of the application site, with all 10 of the proposed turbines theoretically visible for a portion of some 25km along this route, as best exemplified by Viewpoint 10 (Loch Meadhoin). However, due to the distance to the development from the rail line, as well as the position adjacent the established Halsary, Bad a Cheo and Causeymire cluster, the visual impacts of the proposals on rail travellers, are not considered significant, as agreed by the applicant and Council Officers.

Residential Receptors

7.39 Westerdale is the nearest settlement to the proposed development. The applicant has prepared a dedicated Residential Visual Amenity Assessment featuring a 2km study area around the development site within which, 10 residential properties are located. The greatest impacts will be incurred by properties at Westerdale,

approximately 1.5km distant to the northwest of the development and at Tacher, 1.8km east of the development, that are closest to the proposed turbines. In both cases however, the presence of existing large scale turbines part of the Halsary, Bad a Cheo and Causeymire cluster existing within views from properties is considered to lessen the magnitude of change in views such as that the assessment concludes that the visual impacts on the outlook of these properties would not be of a high magnitude, with the effects being so severe as to affect living conditions at any one property to the point where it becomes an unattractive place to live. More widely however, both the applicant and the council consider that significant adverse visual impacts will be incurred from within the settlement of Westerdale as a whole, as discussed in more detail below, in relation to Viewpoint 1.

7.40 Viewpoint 1 (Westerdale) is located within the settlement, close to the junction of the B780 and the U1823 public roads. The proposals will extend the presence of wind turbines noticeably further to the west and into the middle distance as compared to the visual baseline, at a distance of 1.6km from the nearest turbine to the viewpoint. The proposed turbines will be noticeably larger than those existing, associated with the Bad a Cheo, Causyemire and Tacher wind farms more distantly. The development would appear as two distinct groups of 8 and 2 turbines, with considerable stacking apparent. The Council Officers are broadly in agreement with the applicant's assessment of significant visual impacts from this location.

7.41 More distantly, the wind farm's theoretical visibility also extends across the settlement of Halkirk, situated approximately 8km north. Halkirk is a low lying settlement with visibility of existing wind farms and overhead line infrastructure to the south being most noticeable when travelling southbound on the B874, in the vicinity of Viewpoint 11 (B874 North of Halkirk) and from the nearby football ground. Visibility south is also obtained by nearby two storey residential properties in this broad location and from properties along the southern edge of the settlement, with this generally being broken up by intervening outbuildings and scattered vegetation. While properties located centrally within the settlement will not be impacted to an appreciable degree, moderate impacts will likely be incurred for those located on higher ground to the north and south of the settlement, although the magnitude of these impacts are not likely to be significant in EIA terms.

Impact on Recreational Users of the Outdoors

7.42 The applicant's assessment of visual impacts has not identified significant impacts on recreational users of the outdoors, apart from in relation to The Achavanich to Munsary Core Path (CA10.11), to the east of the application site.

7.43 Significant visual impacts will occur however, for walkers and cyclists, from the summits of Coire na Beinne (Viewpoint 7) and Benn Dorrery (Viewpoint 9), the latter summit is well visited by walkers, offering 360° panoramic views from the hilltop, with the coast and Orkney to the north, Caithness farmlands to the east and open moorland to the west. The proposals would extend the influence of wind energy development further westward towards receptors at this viewpoint, with larger turbines than those incorporated in the existing Halsry, Bad a Cheo and Causeymire cluster against which the proposals would be backdropped.

Cumulative Visual Impacts

7.44 When considering visual impact, it is important to consider the cumulative impact with other consented and proposed (application stage) developments. The key cumulative visual impacts will be realised in conjunction with the established Halsary, Bad a Cheo and Causeymire cluster, to the east of the proposed development, viewed by receptors on the A9 trunk road, travelling north. Cumulatively, therefore, the current proposals would extend the influence of wind energy development westward, with noticeably taller turbines than those existing to the east, especially those of Causeymire. This would have the effect of unbalancing the existing cluster. As discussed above, the applicant's assertion of non-significant visual impacts on 2 of the 3 viewpoints on this route is contested, Viewpoints 2 (A9 War Memorial) and 12 (A9 Smerral Junction). The proposals in both cases resulting in the extension of turbines of a noticeably larger scale into areas of the view that currently do not have these features present. Whilst not presented by a representative viewpoint, it is considered that when travelling northbound on the A9, the proposed development would fail to read as a coherent part of the existing wind farm cluster when being viewed from the A9, when looking north west in broad alignment with the River Thurso, with the lack of visual integration being apparent by the differing scale of proposed turbines, but also, due to the underlying ground conditions with the river creating physical separation which splits the proposed wind farm from the established cluster and forces the proposed turbines further west following an irregular, incoherent layout.

Construction

7.45 It is anticipated that the construction period for the development would take approximately 18 months. Construction will be scheduled from Monday to Friday 07:00 to 19:00 and Saturday 07:00 to 16:00. Sunday working is not generally expected however, it should be noted that out of necessity some activities, for example abnormal load deliveries, concrete deliveries during foundation pours and also the lifting of the turbine components, may occur outside the specified hours. These activities would not be undertaken without prior approval from The Highland Council. Environment Health is content with these hours but has suggested that measures will be implemented to reduce the impact of construction noise at noise sensitive locations, through conditions. Developers must also 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 and not Planning.

7.46 The nature of the project anticipates the need for a Construction Environmental Management Document (CEMD), in association with the successful contractor engaged. This may be secured via condition and should include site-specific environmental management procedures which can be finalised and agreed through appropriate planning conditions. 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.

7.47 In addition to the requirement for submission and agreement on a CEMD, the Council will require the applicant to provide a financial bond regarding final site restoration (restoration bond) in the event of non-wind turbine operation and to provide a Construction Traffic Management Plan (CEMP) for the use of the local road network.

7.48 The applicant has anticipated a micro-siting allowance of 50m. Micro-siting is acceptable, within reason, to address unforeseen onsite constraints. Anything in excess of 50m may have a significant effect on the composition of a development. Further if matters are identified during the application stage which require movement of infrastructure, it is considered that this is best addressed during the application stage rather than relying on micro-siting. A micro-siting limit of no more than 50m can be conditioned, with micro-siting to avoiding any areas of deeper peat, any higher elevations of ground, watercourse buffers, Ground Water Dependent Terrestrial Ecosystems and cultural heritage assets.

7.49 Should the development be granted consent, a Community Liaison Group should be set up to ensure that the community council and other stakeholders are kept up to date and consulted before and during the construction period.

Contaminated Land

7.50 Part of the site has an historic use as a gravel pit and quarry, as indicated by the records held by the Council's Contaminated Land Unit. This may have resulted in the presence of contaminated ground onsite, if it was infilled or works included processes such as fuel storage. As a detailed contamination investigation has not been submitted with the applicant's EIAR or FEI, the Council's Contaminated Land Service recommends that any future deemed planning permission, should consent otherwise be granted, include a condition to secure a detailed scheme or management plan to address this issue.

Roads, Transport and Access

7.51 The applicant has highlighted the expected impact of this development, particularly through the construction phase, with Wick Harbour being the starting point of on land turbine blade deliveries, the route then following the A99 and A9 before accessing the application site off the local road network, near Westerdale, from the B870 and U1823 unclassified road. The EIAR reports that the proposed development would lead to a temporary increase in traffic volumes on the road network during the construction phase, peaking in month 7 of the construction programme, During this period the proposals will result in approximately 4000 additional monthly vehicle movements, approximately half of which will be HGV's.

7.52 While not specifically objecting to the proposals, the Transport Planning Team has raised concerns regarding the information provided in the EIAR with respect to access and transportation issues. Both the U1823 and B870 are narrow, single track routes with passing places and are showing signs of deterioration, which was apparent during officers site visit. While the applicant's assessment makes reference to temporary improvement works for outsize loads to access the site during the construction phase, no further information is given related to the measures required to accommodate other construction traffic. While these details could be secured via condition should the proposals otherwise gain consent, these omissions are

disappointing in this respect. The proposed access strategy is also a standalone solution, and does not utilise any of the nearby existing wind farm track access, albeit that this may well be for other environmental reasons, such as to limit the impact on the water environment and not introduce more watercourse crossings.

7.53 While no core paths are present directly through the application site or along the public road, the area is well used for recreational access to the outdoors. The site, like most land in Scotland, is subject to the provisions of the Land Reform (Scotland) Act 2003. The existing access track to the River Thurso is used for recreation with limited use of the river itself for paddle sports, in particular the Dirlot Gorge section. The access track is a candidate core path, CA06.12(C) which is awaiting to be adopted by The Highland Council. Should consent be granted, the core path, if formally adopted, should remain open for public access at all times of the construction period as well as operation. 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 could be secured by planning condition. 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 permission ultimately be forthcoming, the scope of the plan should consider what measures could be introduced to mitigate impacts for anglers, with measures to utilise stone on site from derelict buildings for use in site landscaping, with scope for potential shelter provision.

Water, Flood Risk, Drainage and Peat

7.54 The EIAR is clear that a Construction Environmental Management Document / Plan (CEMD) 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. The CEMD needs to be secured by planning condition. This would ensure the agreement of construction methodologies with statutory agencies following appointment of the wind farm balance of plant contractor and prior to the start of development or works.

7.55 In order to protect the water environment a number of measures have been highlighted by the applicant for inclusion in the CEMD including the adoption of sustainable drainage principles, and measures to mitigate against effects of potential chemical contamination, sediment release and changes in supplies to Ground Water Dependent Terrestrial Ecosystems. A Water Quality Monitoring Plan (WQMP) would be developed to form part of the Construction Method Statement (CMS), which would be submitted to the appropriate planning authorities and bodies such as SEPA prior to construction and development. The WQMP will be implemented to monitor surface water quality, fish populations and macroinvertebrate communities prior to, during and post-construction.

7.56 SEPA and the Council's Flood Risk Management Team (FRMT) had issued holding objections initially, related to the impacts of the proposed upgraded crossing of the River Thurso on flood risk grounds, with scope for the development in increase flood risk within Halkirk which is downstream from the site. The applicant's Further Environmental Information includes additional background flood risk information and design changes to the crossing in relation to height, with the addition of relief culverts.

As such, the design will result in only very limited localised changes in flood risk and SEPA's objection has been withdrawn, subject to a condition to secure a finalised design of the proposed river crossing. FRMT's objection was also withdrawn, subject to conditions to secure a detailed drainage impact assessment and design details of water crossing structures and their approach routes, should consent otherwise be granted.

7.57 One area of Ground Water Dependent Terrestrial Ecosystems (GWDTEs) habitat is present on site. This area is located over 100 m north of, and down gradient of turbine 8 and its associated access tracks and due to this positioning, the development is considered to only have potential indirect effects on the GWDTE that may be adequately mitigated as noted within the EIAR schedule. The applicant thus considers that no significant effect will be incurred on this by the proposed development. Should consent otherwise be granted, the implementation of good construction practices will require to be implemented on site and a plan brought forward in the CEMD to ensure existing groundwater and surface water flow paths are maintained.

7.58 Turbines 3, 4, 5, 11 and 12 will be located in Class 1 Peatland, as designated in SEPA's Carbon and Peatland Maps (2016). Deep peat is present in pockets across the site. Where possible however, the development infrastructure is located outwith these areas. A Peat Slide Risk Assessment has been submitted and has helped to inform the proposals. The applicant's risk assessment identifies that the site is of low risk to peat instability. Should consent be granted, the production of a detailed Peat Management Plan and finalised Peat Slide Risk Assessment could be secured via condition. SEPA also requires that a finalised Habitat Management Plan is submitted is secured via condition, to deliver no less than 35.26ha of peatland restoration. This represents a total restoration of more than 10% of the 2.32ha of modified bog habitat impacted directly by the development and at least 10% of the existing priority peatland habitat on site, as advised by the relevant Nature Scot guidance. The applicant has provided an outline Habitat Management Plan that indicates that this degree of restoration may be accomplished within the site boundaries.

7.59 The application site overlaps the candidate Flow Country World Heritage Site (cWHS) in part of its western extent. The applicant has submitted a UNESCO Heritage Site Impact Assessment Toolkit in this respect. The cWHS designation is based on 2 Outstanding Universal Values (OUV's): peatlands, in that the outstanding importance of the Flow Country lies in its extent and continuity, the diversity of mire and vegetation types, and the on-going processes of bog formation which it exhibits and ornithology interests, in terms of the size and range of the bird populations supported, as well as concentrations of other rare species. None of the proposed turbines are located within the cWHS designation. Approximately 0.0846 Ha of bare ground and grassland will be lost for ancillary infrastructure, mainly hardstandings and access tracks. The applicant's assessment concludes however, that no blanket bog, which is the habitat type that represents one of the Outstanding Universal Values (OUV) of the cWHS. will be lost as a result of the proposed development. The effects on ornithology are considered in more detail below. The Council's Ecologist and WHS Project Officer have however, confirmed informally that they do not foresee major issues specifically affecting the designation and do not wish to issue further comments.

7.60 The River Thurso, designated as a Special Area of Conservation (SAC) bisects the site. Additionally, the site is located partly within the Caithness and Sutherland Peatlands Special Area of Conservation and Special Protection Area (SPA), which incorporates a number of Sites of Special Scientific Interest (SSSI) and Ramsar sites. Furthermore, the Dirlot Gorge SSSI, is located immediately south-west of the site boundary. The applicant has submitted an Outline Habitat Management Plan (HMP) in relation to these designations and any significant effects. The applicant has proposed mitigation for these impacts, including restoration of peatland habitats in the area and longer-term monitoring and management of habitats across the site with respect to environmental conditions and encouraging protected bird populations.

7.61 The proposed site has been subject of an ecological survey, including a protected species survey for badger, otter, pine marten, water vole and wildcat. The site was also subject to bat surveys. These surveys took place during the period June 2019 to January 2021. Evidence was found of otter and badger within the site, as well as evidence of the presence of both foraging and commuting bats, dominated by the common species, Pipistrellus Pipistrellus.

7.62 In relation to ornithology, the applicant's assessment focussed on the potential impacts of the development on hen harrier, short eared owl, golden plover and curlew. Potential construction effects were assessed as not significant in terms of the EIA Regulations for golden plover and curlew, however, potential significant effects remain for hen harrier and short-eared owl, with the applicant suggesting outline mitigation measures with respect to these species. RSPB has maintained its objection to the proposals primarily on the basis of the possible impacts on golden plover, hen harrier, short eared owl, common scoter, curlew and wood sandpiper. It is considered that the impacts generally cannot be mitigated without the removal of turbines or further research work, although in the specific case of hen harrier and short eared owl, RSPB contend that no acceptable mitigation is possible in relation to the proposed development.

7.63 NatureScot maintains their previous objections to the proposals, based on the impacts on the River Thurso SAC, in terms of the qualifying interest of Atlantic salmon. NatureScot have also raised concerns with respect to the potential impact of the proposals on the Caithness and Sutherland Peatlands SAC, with particular regards to impact on the peatland habitats. Additionally, Nature Scot have further concerns regarding the impacts on the Caithness and Sutherland Peatlands SPA, with respect to short eared owl and hen harrier, that were not addressed as of the time of writing of this report. In all three cases, the Scottish Government, as the competent authority, will be required to undertake an appropriate assessment of the proposals in advance of issuing a decision on any consent. However, in the case of both the River Thurso SAC and Caithness and Sutherland Peatlands SAC, Nature Scot consider that it is unlikely that the Scottish Government will be able to conclude that there will be no adverse effect on the integrity of the site.

7.64 NatureScot also noted potential impacts of the proposals on the East Caithness Cliffs SPA and Caithness Lochs SPA, however, these are not considered to undermine the conservation management objectives for the sites. The Scottish Government will

also be required to undertake an appropriate assessment of the proposals on these sites, in advance of issuing a decision on any consent.

7.65 Given the unique nature of the application site, bisected by the River Thurso, the Caithness and District Salmon Fisheries Board have raised concerns regarding the impact of the proposed new river crossing on Atlantic Salmon as well as the impacts of external visual cues from blade movement and shadow flicker. Nature Scot share these concerns. Additionally, the applicant is not considered to have specified a robust fish monitoring programme and realistic mitigation measures for the species.

7.66 A finalised Habitat Management Plan is proposed to be developed, based upon the applicant's outline Habitat Management Plan submitted along with the Further Environmental Information, as could be secured via condition should consent otherwise be granted. This would include areas of habitat restoration across the site, focused on restoration of at least 35.26 ha of peatland habitat, riparian planting along the River Thurso and the Little River to provide shading for Atlantic salmon, measures to reduce bird collision risk with the turbines and to improve habitats in the area for breeding and nesting birds and deer management.

Built and Cultural Heritage

7.67 There are no designated built or other cultural heritage features directly within the site. Within a 5km buffer of the site, there are 17 Scheduled Monuments (SM) and 6 Listed Buildings. The EIAR identifies potentially significant impacts on the Cairn Merk Broch (SM534), Tulach Mor Broch SM593 and Dirlot Castle SM5897.

7.68 Historic Environment Scotland (HES) initially objected to the proposals given the potential for significant and adverse effects on these scheduled monuments. The key impacts resulting from the proposals was the filling of the remaining unobstructed outward views from the scheduled monuments, adversely affecting the intervisibility between each that is characteristic of their setting in the landscape. Following the response from HES, the applicant has amended the proposals to address these impacts. The removal of the previously northeastern most turbines, numbers 1 and 2, now results in sufficient separation within views from the scheduled monuments that HES have now withdrawn their objection. Although significant impacts would remain on the setting of the scheduled monuments, HES is now content that these do not raise issues of national importance to the extent that they would object.

7.69 Given the site is rich in cultural heritage, it is possible that there will be unknown archaeology across the site. As this is the case a condition will be applied to ensure a scheme for the investigation, recording and evaluation of any buried archaeology on the stie should be secured by conditions should deemed planning permission be granted.

Noise and Shadow Flicker

7.70 The Planning Authority would expect that a condition restricting operational noise levels to no more than 2dB above the predicted levels in the EIAR. Environmental Health had initially objected to the proposals on the basis of limited information to determine the operational noise impacts. Following the submission of further information from the applicant, this objection was withdrawn, subject to a condition

restricting the use of mode management on turbines to that noted in the applicant's scheme.

7.71 The applicant has conducted an assessment that has shown that the modelled occurrence of shadow flicker. The EIAR concludes that during the operational phase of the proposals, only one assessed receptor would have the potential to experience shadow flicker effects, likely not exceeding the threshold of 30 minutes per day. Therefore, the effects are considered not significant in EIA terms.

7.72 NatureScot have however, raised an objection and requested further information in terms of the potential shadow flicker impacts on Atlantic Salmon within the River Thurso SAC which bisects the site. The Caithness and District Salmon Fisheries Board also raised concerns regarding the impact of shadow flicker and the quality of the applicant's supporting information in this respect, and this objection is maintained.

Telecommunications

7.73 No concerns have been raised in relation to potential interference with radio / television networks in the locality. A condition should nonetheless be sought to secure a scheme of mitigation should consent otherwise be granted.

Aviation

7.74 There are no objections with regard to aviation interests, with no outstanding concerns being raised. Should the proposal be granted permission, a condition can be applied to secure suitable mitigation in terms of infrared (not visible to the naked eye) aviation lighting only and notification to the appropriate bodies of the final turbine positions.

Other Material Considerations

7.75 The applicant has sought permission to operate the wind farm for 30 years. As with any wind farm, the Planning Authority would request that any forthcoming permission includes a clear description of development which specifies the precise number of turbines to be developed, the maximum blade tip height, the rotor diameter and includes details of all associated ancillary infrastructure with such matters not be left to planning conditions, which could lead to scope for further redesign or re-powering without requiring a full fresh consent.

8. CONCLUSION

8.1 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 50 MW of renewable energy alongside up to 25 MW of battery storage capacity towards Scottish Government targets and play a role in the route to a net zero Scotland.

8.2 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, and all other material considerations.

8.3 In this respect, the proposal will result in considerable visual impacts along the A9 north for a section of the route, representing a distance of approximately 12km and driving time of approximately 10 minutes. Significant visual impacts will also be incurred by recreational users of the outdoors, particularly anglers on the River Thurso.

8.4 NatureScot objects to the proposals based on the impacts on the River Thurso SAC, in terms of the qualifying interest of Atlantic salmon and with respect to the potential impact of the proposals on the Caithness and Sutherland Peatlands SAC, with particular regards to impact on the peatland habitats. Additionally, Nature Scot have further concerns regarding the impacts on the Caithness and Sutherland Peatlands SPA, with respect to short eared owl and hen harrier.

8.5 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 west of the River Thurso, the extent of resultant landscape and visual effects, as well as the natural habitat impacts, which are deemed unacceptable.

8.6 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 and has not done what is reasonable to mitigate 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. Officers are also not satisfied that environmental effects of this development can be addressed by way of mitigation.

8.7 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.

9. IMPLICATIONS

9.1 Resource: Not applicable

9.2 Legal: Not applicable

9.3 Community (Equality, Poverty and Rural): Not applicable

9.4 Climate Change/Carbon Clever: The proposal has the ability to make a meaningful contribution toward the production of renewable energy.

9.5 Risk: Not applicable

9.6 Gaelic: Not applicable

10. 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 incur significant visual impacts, beyond a local scale, on users of the A9 roads, as particularly evident through Viewpoints 2, 6 and 12, by virtue of the scale and location of the development.

2. The application is contrary to NPF4 Policy 3 parts (a and b), NPF4 Policy 4, NPF 4 Policy 11 part (d) and Highland-wide Local Development Plan Policies 67 (Renewable Energy) and 57 (Natural Built and Cultural Heritage) in that the proposals cannot be taken forward without detriment to the qualifying interests and integrity of the River Thurso Special Area of Conservation and the Caithness and Sutherland Peatlands Special Area of Conservation.

3. The application is contrary to NPF4 Policy 3 parts (a and b), NPF4 Policy 4, NPF 4 Policy 11 part (d) and Highland-wide Local Development Plan Policies 67 (Renewable Energy) and 57 (Natural Built and Cultural Heritage) in that insufficient information has been submitted to determine if the proposals can be taken forward without detriment to the qualifying interests and integrity of the Caithness and Sutherland Peatlands Special Protection Area.

Signature:	Dafydd Jones
Designation:	Area Planning Manager – North
Author:	Michael Kordas
Background Papers:	Documents referred to in report and in case file.

Document Type	Document No.	Version No.	Date Received
Site Location Plan	Figure 1.1		7 September 2023
Site Layout Plan	Figure 3.1		7 September 2023
Typical Turbine Elevation	Figure 3.2		21 October 2021

Appendix 1 – Cumulative Windfarm Development

A1.1 This list has been updated by Planning Officers to reflect the most recent position. The assessment looked at all wind farms within 40km of the site but excluded those at scoping stage.

Site Name	No. of Turbines	Blade-Tip Height	Distance from Proposal (approx.) (km)
Operational / Under Construction			
Causeymire	21	100	0.8
Bad a'Cheò	13	111	0.9
Achlachan	5	115	1.8
Halsary	15	120	2.9
Camster	25	120	11.3
Buolfruich	15	75	11.4
Bilbster	3	93	12.0
Wathegar	5	101	12.2
Wathegar 2	9	110	13.2
Burn of Whilk	9	113.8	14.0
Achairn Farm	3	100	14.1
Weydale	1	66	15.0
Baillie	21	110	17.7
Forss Phase 1	2	76	22.2
Forss Phase 2	4	78	22.2
Lochend	4	99.5	23.1
Stroupster	13	113	24.8
Taigh Na Muir	1	48	25.4
Strathy North	33	109	32.0

Beatrice	84	288	33.5
Moray West	85	285	32.4
Bettyhill Phase 2	10	150	36
Application / Appeal Sites			
Golticlay Variation	13	200	8.7
Watten	8	220	5.4
Kirkton	11	149.5	26
Melvich	12	149.5	26
Pentland Offshore	6	300	32.5

Appendix 2 – Development Plan and Other Material Policy Considerations

DEVELOPMENT PLAN

A2.1 **National Planning Framework (NPF) 4 (2023)**

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

A2.2 **Highland Wide Local Development Plan (HwLDP) (2012)**

28 - Sustainable Design
29 - Design Quality and Place-making
30 - Physical Constraints
31 - Developer Contributions
53 - Minerals
55 - Peat and Soils
56 - Travel
57 - Natural, Built and Cultural Heritage
58 - Protected Species
59 - Other important Species
60 - Other Importance Habitats
61 - Landscape
62 - Geodiversity
63 - Water Environment
64 - Flood Risk
66 - Surface Water Drainage
67 - Renewable Energy Developments
68 - Community Renewable Energy Developments
69 - Electricity Transmission Infrastructure
72 - Pollution
73 - Air Quality
74 - Green Networks
77 - Public Access
78 - Long Distance Routes

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

A2.3 Confirms the boundaries of Special Landscape Areas within the plan's boundary.

Onshore Wind Energy Supplementary Guidance (OWESG) (2016)

A2.4 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.

A2.5 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

A2.6 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

Emerging Highland Council Development Plan Documents and Planning Guidance

A2.7 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 post National Planning Framework 4.

A2.8 The Highland Council also 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.

Other National Guidance

A2.9 Onshore Wind Energy Policy Statement (2022)
Onshore Wind Sector Deal for Scotland (2023)
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)

Appendix 3 - Compliance with the Development Plan / Other Planning Policy

Development Plan / Other Planning Policy

A3.1 The Development Plan comprises National Planning Framework 4 (NPF4), the adopted Highland-wide Local Development Plan (HwLDP), the adopted Caithness and Sutherland Local Development Plan (CaSPlan) and all statutorily adopted supplementary guidance.

National Policy

A3.2 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.

A3.3 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 out 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.

A3.4 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 generating over 50 MW, it is of a type and scale that constitutes NPF4 National Development 3 - Strategic Renewable Electricity Generation and Transmission Infrastructure.

A3.5 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.

A3.6 NPF4 Policies 1, 2, and 3 now 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.

A3.7 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

A3.8 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.

A3.9 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.

A3.10 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 and post the adoption of NPF4.

A3.11 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 turbines at up to 150m in height remains challenging to be entirely contained, as reflected in the significant adverse impacts identified within the EIAR and through the consultation process. 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.

A3.12 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, CaSPlan, 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 tested through the planning system.

Highland-wide Local Development Plan

A3.13 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 the concept of supporting the right development in the right place at the right time.

A3.14 Although HwLDP Policy 67, the OWESG and NPG4 Policy 11 are compatible, NPF4 expresses greater support for renewable energy projects outwith National Parks and NSAs, and requires greater weight to be attributed to the twin climate and biodiversity crises in the decision making process, whilst still recognising that a balancing exercise must still be carried out.

Area Local Development Plans

A3.15 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 (OWESG)

A3.16 The Council's OWESG forms part of the Development Plan and remains a critical document in the determination of 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

A3.17 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 6 of this report.

A3.18 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

A3.19 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, being 20 GW. This is set against a currently installed capacity of 9.4 GW (June 2023). Therefore, a further 10.6 GW 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 25-30 GW of installed capacity across the UK identified by the Climate Change Committee.

A3.20 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.

A3.21 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.

A3.22 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.

A3.23 Additionally, the document acknowledges that in order for Scotland to achieve its climate targets and the ambition for the minimum installed capacity of 20 GW by 2030, the landscape will change. 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.

A3.24 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.

A3.25 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.

A3.26 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.

A3.27 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 built out

Appendix 5 – Visual Assessment Appraisal

			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
VP1.Westerdale (1.5 km to nearest turbine)	App	Medium	Medium	**Moderate**	**Significant**	Medium	**Moderate**	**Significant**
	THC	High	High	**Major**	**Significant**	High	**Major**	**Significant**
	THC are in broad agreement with the App's LVIA. This viewpoint is located close to the junction of the B780 and the U1823 public roads at Westerdale, west of Spittal. The viewpoint is located to the south of the junction as buildings screen views from the junction itself. All 10 of the proposed turbines will be visible to tower height from the location. The location offers panoramic views out across moorland to the south of the road. The Causeymire group turbines are seen to the south east, as a large group of turbines with the five turbines of Achlachan slightly separated to the north. The proposals will extend the presence of wind turbines noticeably further to the west and into the middle distance as compared to the visual baseline. The proposed turbines will be noticeably larger than those existing, associated with the Bad a Cheo, Causyemire and Tacher wind farms more distantly. The development will appear as two distinct groups of 8 and 2 turbines, with considerable stacking apparent.						
VP2.A9 War Memorial (1.8 km to nearest turbine)	App	Medium	Low	Minor	Not significant	Low	Minor	Not significant
	THC	High	Medium	**Major**	**Significant**	Medium	**Major**	**Significant**
	This viewpoint is located at a layby off the A9 Trunk Road, adjacent to a local war memorial and close to Bad a'Cheò Wind Farm. All 10 of the proposed turbines will be visible to tower height from the location. The view point provides a panorama across open moorland with turbines and tracks associated with Bad a'Cheò windfarm located in proximity, with the nearest of these turbines approximately 190 m away. Views are through the wind farms to moorland and forests beyond, and the distant mountains including Scaraben, Maiden Pap, Morven and the Bens Griam. The proposals will be directly visibly associated with the existing Bad a'Cheò windfarm from this location. Turbines from this development will be directly in the foreground of the view and the proposal turbines will appear of a similar scale to the more distant Bad a'Cheò turbines. Nevertheless, the proposed						

			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
	development will infill areas of the view that are currently free of turbines up to around 65 degrees of the view from this location, resulting in a significant visual impact for road users on the A9.							
VP3.Loch More Car Park (4.5km to nearest turbine)	App	Medium	Medium	**Moderate**	**Significant**	Medium	**Moderate**	**Significant**
	THC	Medium	Medium	**Moderate**	**Significant**	Medium	**Moderate**	**Significant**
	THC are in broad agreement with the App's LVIA. This viewpoint is located at a parking area approximately 1km from Loch More, at the end of the U1823 public road. Tracks and cycle trails leading west and south from this location can be used by recreational users, although it is not actively promoted as recreational or tourist destination. All 10 of the proposed turbines will be visible to tower height from the location. The view is a panorama across flat open moorland, with an array of numerous turbines in the middle distance, with those of the Causeymire Wind Farm the most prominent. Strathmore Lodge is a stone building set in a clump of trees in the middle distance along the road. The effect of the proposals will be to introduce additional turbines closer to the viewpoint than currently. The effect will be the proposal turbines will be perceptibly higher than those currently present, although there are a large number of existing turbines across the view overall.							
VP4.Harpsdale (4.4km to nearest turbine)	App	Low	Medium	**Moderate**	**Significant**	Medium	**Moderate**	**Significant**
	THC	Medium	Medium	**Moderate**	**Significant**	Medium	**Moderate**	**Significant**
	THC are in broad agreement with the App's LVIA. This viewpoint is located just east of the crossing of two minor roads in the Harpsdale area, on a slight rise between the A9 and the River Thurso. All 10 of the proposed turbines will be visible to tower height. Views from the location are panoramic across gently sloping crofting land, contained to the north and east by rising land. The middle distance is moorland and forest, with the tops of Scaraben and Morven visible on the horizon to the south, and the Bens Griam visible to the south-west. To the west is Ben Dorrery with forest on its lower slopes and a mast at the summit. To the north, Baillie Wind Farm is visible on the horizon. Causeymire Wind Farm is visible in the middle distance to the south.							

			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
	The proposals will extend the influence of windfarm development significantly westward from the existing Causeymire Wind Farm. The proposed turbines will be noticeably larger in appearance than the Causeymire Wind Farm, but the proposals still may be read as an extension of the Causeymire array. The applicant's assessment of the impacts on receptor's visual amenity is considered accurate.							
VP5.A9 Spittal (4.7 km to nearest turbine)	App	Medium	Low	Minor	Not Significant	Low	Minor	Not Significant
	THC	High	Low	Minor	Not Significant	Low	Minor	Not Significant
	THC are in broad agreement with the App's LVIA. This viewpoint is located adjacent to the A9 within Spittal, at an area of hardstanding next to the garage, close to Core Path CA06.08 (The Old Quarry). All 10 of the proposed turbines will be visible to tower height. The viewpoint looks across disused mineral workings which have partly regenerated with vegetation and scrub woodland. Beyond is moorland that extends into the distance, with the top of Scaraben, Morven and Ben Dorrery visible. Causeymire, Achlachan and Bad a'Cheò Windfarms are prominent across the extent of the view in the middle distance. The proposal will result in some infill of turbines between those existing in the Causeymire and Achlachan Wind Farms. However, the proposals will be located behind these existing turbines and will not bring wind farm development outwith their present extent east to west. The proposed turbines will not appear to be at a significantly different scale to those existing.							
VP6.A9 Loch Rangag (5.6 km to nearest turbine)	App	Medium	Medium	**Moderate**	**Significant**	Medium	**Moderate**	**Significant**
	THC	High	High	**Major**	**Significant**	High	**Moderate**	**Significant**
	This viewpoint is located at a layby on the A9 Trunk Road, just north of Loch Rangag, near to a layby with an interpretation area relating to the Loch Rangag Broch. All 10 turbines will be visible to hub height from this location. The views from the location are panoramic across sweeping moorland with Loch Rangag in the foreground to the south and open moorland with Scaraben and the top of Morven visible over a middle-distance ridge to the south west. Turbines of the Causeymire Wind Farm are visible beyond the sloping hillside in the middle distance to the north. Further distant to the north west are the turbines of Baillie Wind Farm. The proposed turbines will look larger than the existing turbines and will be closer, particularly those at the southern end of the site. The blades of the proposed turbines will be notably longer than those of existing turbines, and as the bases of the turbines will be slightly hidden							

			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
	by intervening landform, they may appear to be closer than they are. The development will extend turbines noticeably further west across the view than at present, with turbines at a perceptibly larger scale, unbalancing the edge of the current Halsary, Bad a Cheo and Causeymire grouping. The form of the development will also appear irregular, with 3 distinct groups of turbines visible, with noticeable stacking on the 2 westernmost groups.							
VP7.Coire n Beinne (7.2km to nearest turbine)	App	Medium	Medium	**Moderate**	**Significant**	Medium	**Moderate**	**Significant**
	THC	High	Medium	**Moderate**	**Significant**	Medium	**Moderate**	**Significant**
	THC are in broad agreement with the App's LVIA. This viewpoint is located on the 226m summit of Coire na Beinne. It is a remote location, with some identifiable tracks, but is not considered to be a key focus for hill walkers or other recreation activities. All 10 turbines will be visible to tower height from this location. As a result of the hilltop location, views from this location are panoramic. Camster and Bilbster Wind Farms are seen to the north east, beyond Loch Rangag and Loch Stemster, and Stroupster Wind Farm is visible in the distance beyond farmland. To the north, Causeymire and the Halsary Wind Farm are visible. To the north west, in the further distance, Baillie and Forss Wind Farms are visible beyond Loch More and Ben Dorrery. The proposal will be visible from the viewpoint, as an array of large turbines predominantly in front of the existing Causeymire Wind Farm . The proposed turbines will extend that group to the west and will be closer to the viewpoint. They will appear larger than the existing turbines, although presenting a relatively regular array in front of those existing. Overall, the proposals will increase the number of turbines in the view and will bring turbines closer to the viewpoint.							
VP8.Minor road north of Grey Cairns of Camster (8.4km to nearest turbine)	App	Low	Low	Minor	Not Significant	Low	Minor	Not Significant
	THC	Medium	Low	Minor	Not Significant	Low	Minor	Not Significant
	THC are in broad agreement with the App's LVIA. This viewpoint is located on the C1029 public road from Lybster on the south coast of Caithness to the A882 at Watten. The route is single track, and runs through forest, and over open moorland. The viewpoint is located at the highest point on the public road with open views west. All 10 of the proposed turbines will be visible to hub height. Views are over open moorland to the west. Causeymire, Bad a'Cheò and Halsary Windfarms are prominent in the landscape. Bens Griam and Ben Dorrery can be seen beyond these developments.							

			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
	The proposals will be seen to the west, as additional turbines behind Causeymire and Bad a'Cheò. The proposed turbines will not extend these developments but will slightly increase the number of turbines visible within them, although generally without additional stacking. There may be slight differences in size apparent due to perspective although it is debatable the extent to which this will be perceptible to most receptors given the distance to the receptor.							
VP9.Ben Dorrery (8.5km to nearest turbine)	App	High	Medium	**Moderate**	**Significant**	Medium	**Medium**	**Significant**
	THC	High	Medium	**Moderate**	**Significant**	Medium	**Medium**	**Significant**
	THC are in broad agreement with the App's LVIA. This viewpoint is located at the 244m summit of Ben Dorrery. Similar views are seen from the top of Beinn Freiceadain immediately to the north of Beinn Dorrery. The viewpoint is accessed from the east, via a track from Dorrery Lodge, used as access for a telecoms mast also on the summit. All 10 of the proposed turbines will be visible to tower height from this location. By nature, views form this location are panoramic, looking out across farmland and blocks of forestry toward the proposed development, which will be seen in front of the Causeymire and Bad a'Cheò wind farms, among others. The proposals will be visible as a group of turbines adjacent to and in front of the Causeymire Wind Farm, to the south east of the viewpoint. The turbines, being closer to the viewpoint will be seen beyond the forest plantations that extend from below the hill. An obvious spacing is evident between the proposed turbines and the existing Halsary, Bad a Cheo and Causeymire cluster which will be seen on the left of the view, to the southeast The scale of the proposed turbines are also obviously larger, with the largest cluster further west being of a different character, with their lack of spacing and scale having a poor relationship with the wider clusters, and these being far more prominent in the landscape.							
VP10. Loch Meadhoin	App	Medium	Low	Minor	Not significant	Low	Minor	Not significant
	THC	Medium	Low	Minor	Not significant	Low	Minor	Not significant

			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
(8.6km to nearest turbine)	THC are in broad agreement with the App's LVIA. This viewpoint is located on the broad low ridge to the west of Loch Meadhoin, south of the Cnocglas Water. It is accessed from Dorrery via a track and a footbridge. The location is intended to represent views from the Far North Railway Line as it crosses the open moor south of the viewpoint. All 10 of the proposed turbines will be visible to hub height. Views are panoramic in nature, out over rolling moorland. Causeymire, Camster and Bad a'Cheò wind farms are visible in the distance, between two areas of slightly higher land. The proposals will be closer to the viewpoint than the existing wind farms and the proposed turbines may appear slightly larger than those existing. There will be no stacking or overlapping of turbines within the proposals, but they will overlap with existing turbines behind. Due to the large number of turbines already in the baseline view however, these effects would be unlikely to be significant for receptors.							
VP11. B874 North of Halkirk (10.1km to nearest turbine)	App	Medium	Low	Negligible	Not Significant	Low	Negligible	Not Significant
	THC	Medium	Medium	Moderate	Not Significant	Medium	Moderate	Not Significant
	THC are in broad agreement with the App's LVIA. This viewpoint is located on the B874 to the north of Halkirk. The B874 is on slightly higher ground at this point, and road users approaching Halkirk can see over the settlement to the landscape beyond. All 10 of the proposed turbines will be visible to at least blade tip height. The view looks south across gently sloping fields toward the development, with rugby grounds to the east of the road. To the south, the settlement of Halkirk can be seen as buildings and trees set in a shallow valley, beyond which the land rises towards a horizon of coniferous plantations on Achlachan Moss, electricity pylons feeding into the new substation west of Spittal. Turbines of Achlachan and Causeymire Windfarms and the distant hills of Scaraben, Maiden Pap and Morven are visible in the distance to the south-west. The proposals will increase the spread of windfarm development westward from the existing Causeymire array, with a noticeable difference in apparent size. The new turbines will be located within a working agricultural landscape and will be partially screened by buildings within Halkirk. Key views toward the distant hills will not be affected. Nevertheless, the turbines will appear larger than those existing and will be noticeably stacked at the western edge of the proposals.							

			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
VP12.A9 Smerral Junction (10.8km to nearest turbine)	App	Medium	Low	Minor	Not Significant	Low	Minor	Not Significant
	THC	High	Moderate	**Moderate**	**Significant**	Low	**Moderate**	**Significant**
	This viewpoint is located at the junction of the A9 Trunk Road with the C1065 local road, approximately 4 km north of Latheron. All 10 of the proposed turbines will be visible to hub height. This viewpoint represents one of the first views that northbound A9 users will have of the proposals. It is located on the slope of a low hill with views to the northwest across moorland and rough grazing. The Causeymire and Halsary existing turbines can be seen in the centre of the view. The proposals will extend views of windfarm development noticeably to the west from the Causeymire array, with the proposals representing noticeably taller turbines. Notable stacking of the westernmost turbines of the proposed Tormsdale array will also be apparent. At this distance the additional larger turbine s will be more noticeable, increasing the horizontal spread and drawing the eye in forward views toward the presence of the larger cluster ahead.							
VP13.Ben Alisky (13.8km to nearest turbine)	App	High	Low	Minor	Not Significant	Low	Minor	Not Significant
	THC	High	Low	Minor	Not Significant	Low	Minor	Not Significant
	THC are in broad agreement with the App's LVIA. This viewpoint is situated on the 348m summit of Ben Alisky. The viewpoint is considered representative of walkers accessing the hill, or the nearby core paths from Dalnawillan – Braemore. All 10 of the proposed turbines would be visible to tower height. By nature, views are panoramic from this location. Looking to the northeast across open moor, the farmed lands of Caithness are visible in the distance, with occasional forest areas. The Causeymire and Bad a'Cheò Windfarms are visible in the middle distance and further, the turbines of Camster, Lochend and Stroupster wind farms. The proposals will be seen in front of the existing Causeymire, Bad a'Cheò and Achlachan Windfarms, but will not extend windfarm development outwith this group and will appear of a similar apparent size.							
VP14.B870, Catchory	App	Medium	Negligible	Negligible	Not Significant	Negligible	Negligible	Not Significant
	THC	Medium	Low	Negligible	Not Significant	Low	Negligible	Not Significant

			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
(13.6km to nearest turbine)	THC are in broad agreement with the App's LVIA This viewpoint is located on the U1300 local road that runs along the North Watten ridge north of Loch Watten, approximately 500 m west of the junction with the B870. 2 of the proposed turbines will be visible to hub height, with the rest visible to blade height only. The view is over farmland with moorland and forest plantations, and with Scaraben, Maiden Pap and Morven in the far distance. The turbines of Causeymire, Bad a'Cheò and Achlachan wind farms are visible, with some partly screened by woodland plantations on the intervening Backlass to Spittal ridge. The proposals will be seen mainly as additional turbine blades behind the Bad a'Cheò and Causeymire Windfarms and at this distance, will not likely be distinguishable from these existing developments.							
VP15. Loch of Yarrows Trail (15.4km to nearest turbine)	App	Medium	Negligible	Negligible	Not Significant	Negligible	Negligible	Not Significant
	THC	High	Low	Negligible	Not Significant	Low	Negligible	Not Significant
	THC are in broad agreement with the App's LVIA This viewpoint is located on the Loch of Yarrows Archaeology Trail, close to the car park. All 10 of the proposed turbines would be visible to at least hub height. The existing view is open to the northeast and west, and enclosed by higher ground to the south and includes extensive views across the Flow Country to the west, and the coast to the east. Archaeological remains are visible above ground as rocky outcrops. Several operational wind farms can be observed, including Bad a'Cheò and Causeymire. The proposed turbines would be viewed within a dense cluster of existing development, with no significant perception of differences in scale. The applicant's assessment of the impacts on receptor's visual amenity is generally considered accurate in this respect, although the Council Officers consider that sensitivity of receptors would be high at this recognised historic location of the A97 / North Coast 500 tourist route.							

Appendix 6 - Assessment against Landscape and Visual Assessment Criteria contained within Section 4 of the Onshore Wind Energy Supplementary Guidance

1	Relationship between Settlements/Key locations and wider landscape respected	Turbines are not visually prominent in the majority of views within or from settlements/Key Locations or from the majority of its access routes. --- The settlement of Westerdale is the nearest to the proposed development. The proposals will extend the presence of wind turbines noticeably further to the west and into the middle distance as compared to the visual baseline. As discussed in the main body of the committee report, these impacts are not well mitigated. The proposed turbines will be noticeably larger than those existing, associated with the Bad a Cheo, Causyemire and Tacher wind farms more distantly. The development will appear as two distinct groups of 8 and 2 turbines, with considerable stacking apparent from within the settlement. Visual impacts will also be incurred on the more distant settlement of Halkirk, to the north, although these are not considered significant. It is therefore considered that the threshold for this criterion is not met.
2	Key Gateway locations and routes are respected	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. --- The primary impact on road users on through routes would be incurred on the A9 trunk road, which runs from south to north to the west of the site, between Latheron and Thurso. As noted above, between Smerral and South of Mybster, the proposals will extend the influence of wind energy development westward, with noticeably taller turbines than those existing to the east, especially those of Causeymire. The impact is somewhat mitigated by the presence of other wind energy development, however, there remains an adverse effect on significant stretches of the route, with the addition of the proposed turbines failing to integrate with the existing cluster, and extending the impact of wind farm development northbound, with the development causing in combination and sequential adverse visual effects for this key route. Therefore the threshold for this criterion is not met.
3	Valued natural and cultural landmarks are respected	The development does not, by its presence, diminish the prominence of the landmark or disrupt its relationship to its setting. --- The lone mountains of Morven and Scaraben are the key natural landmarks. When looking toward these hills, from places where receptors are likely to see them, the development would sit in front of the hills, but would be seen in the context of other wind energy development. It is considered that the threshold is met.

4	The amenity of key recreational routes and ways is respected	Wind Turbines or other infrastructure do not overwhelm or otherwise significantly detract from the visual appeal of key routes and ways. ---- Significant visual effects will be incurred on the Achavanich to Munsary Core Path (CA10.11) to the east of the application site, but is otherwise considered that this criteria is broadly met.
5	The amenity of transport routes is respected	Wind Turbines or other infrastructure do not overwhelm or otherwise significantly detract from the visual appeal of transport routes. --------. As considered in more detail above with respect to the impact on the A9, this criterion is not achieved.
6	The existing pattern of Wind Energy Development is respected	The degree to which the proposal fits with the existing pattern of nearby wind energy development, considerations include: • Turbine height and proportions, • density and spacing of turbines within developments, • density and spacing of developments, • typical relationship of development to the landscape, • previously instituted mitigation measures • Planning Authority stated aims for development of area ---------- The existing pattern of development is of wind farms set within the Sweeping Moorland and Flows Landscape Character Type. The scheme will not have separate visibility from others adjacent, from most viewpoint locations excepting those closest where significant visual impacts will be occurred. That said, the height and proportions of the proposed turbines clearly differ from those in the existing cluster, the density and spacing is irregular following no clear design or pattern, as is most evident from VP 9 (Ben Dorrery) . The threshold for this creation is therefore not entirely met.
7	The proposal contributes positively to existing pattern or objectives for development in the area	The proposal maintains appropriate and effective separation between developments and/ or clusters ---------- Whilst appearing as a natural extension in 2D form, it cannot be said that the proposal contributes 'positively' to the pattern or objectives for the area, with the proposal expanding the existing cluster westwards in longer distance views, and failing to integrate in closer in views, such as from the A9 northbound. This isn't however the case for all views with the proposal integrating better in east to west views where the proposal would be viewed behind the existing cluster. Overall. it is considered that the threshold is not met, taking into account the location of the proposed development relative to other existing and proposed wind farms in the area.
8	The perception of landscape scale and distance is respected	The perception of landscape scale and distance is respected --- For the most part, the proposed turbines do not create a focal point in the view and do not diminish the scale of the landforms situated behind. It is therefore considered that this threshold is met.
9	Landscape setting of nearby wind energy	Proposal relates well to the existing landscape setting and does not increase the perceived visual prominence of surrounding wind turbines.

	developments is respected	--- It is considered that the threshold is broadly met, considering the assessment of the cumulative landscape impacts of the development.
10	Distinctiveness of Landscape character is respected	Integrity and variety of Landscape Character Areas are maintained. ---------- For the avoidance of doubt this does not relate to landscape designations. Consideration should be given to the variety of landscape character as one travels through the area and how that changes and transitions as one moves through the area. It is not considered that this is adversely affected by the proposals to an unacceptable degree and therefore it is considered that the threshold is met.

P:\Projects\Environment\2366 Tormsdale\2366 Tormsdale.aprx\2366-REP-060 Fig 01.1 Site Location

arise

ARCUS

Site Boundary

1:300,000 Scale @ A3

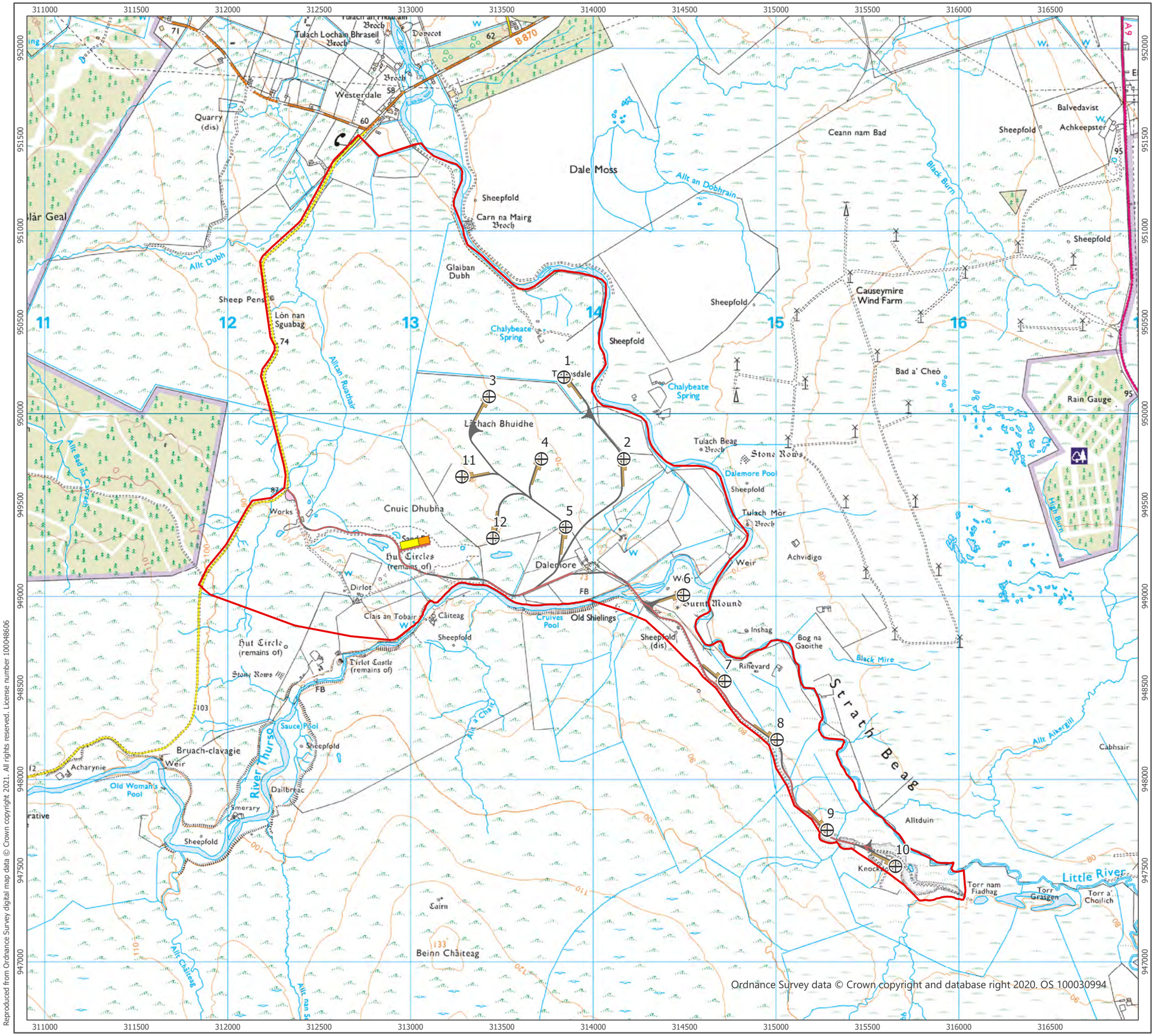
0 5 10 km

NORTH

Produced By: CM	Ref: 2366-REP-060
Checked By: SC	Date: 28/01/2021

Site Location
Planning Figure 1

Tormsdale Wind Farm
Planning Application



P:\Projects\Environment\2366 Tormsdale\2366 Tormsdale.aprx\2366-REP-061 Fig1.2 Site Layout Plan

arise

ARCUS

- Site Boundary
- Proposed Turbine Location

Site Infrastructure

- Construction Compound
- Crane Hardstanding
- Existing Access Tracks
- New Access Tracks
- Substation and BESS Compound
- Temporary Overrun Area

1:20,000 Scale @ A3

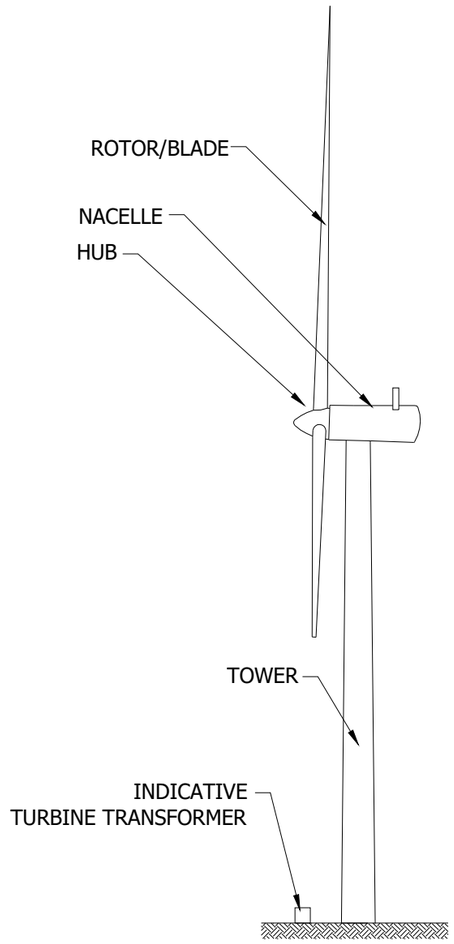
0 0.5 1 km

NORTH

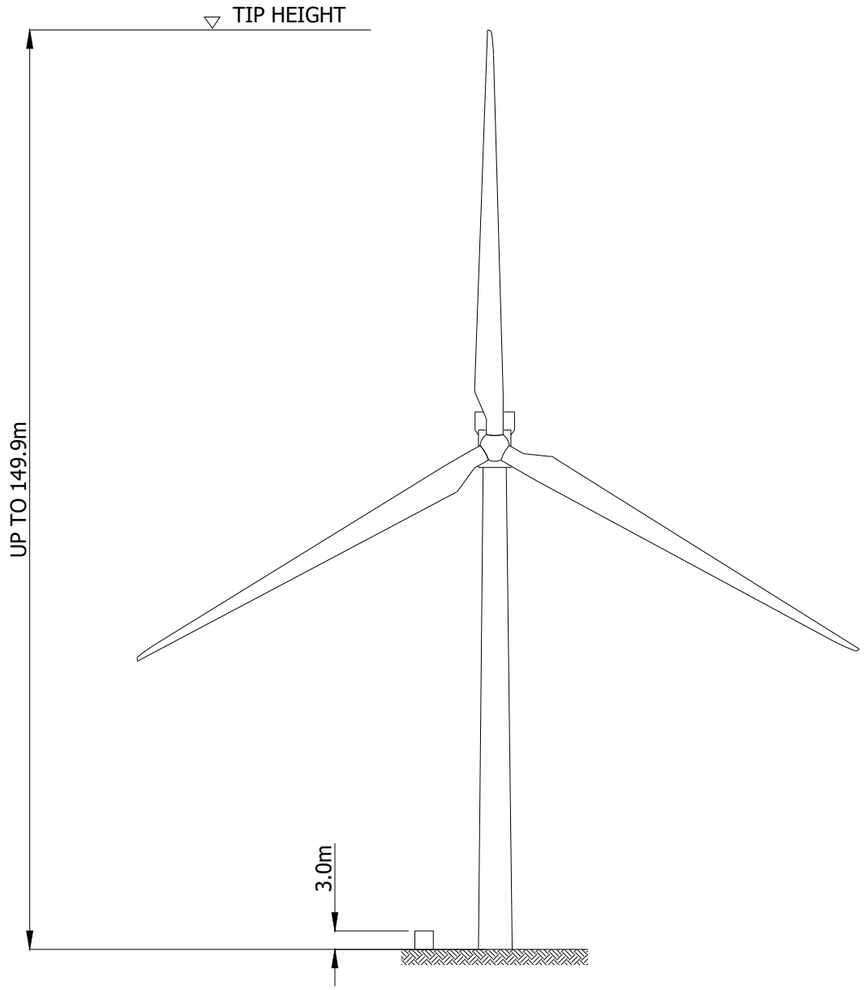
Produced By: LS	Ref: 2366-REP-061
Checked By: SC	Date: 22/04/2021

Site Layout Plan
Planning Figure 2

Tormsdale Wind Farm
Planning Application



END-ELEVATION



ELEVATION

0 10 20 30 40 50 60 70 80 90 100m

SCALE 1:1000

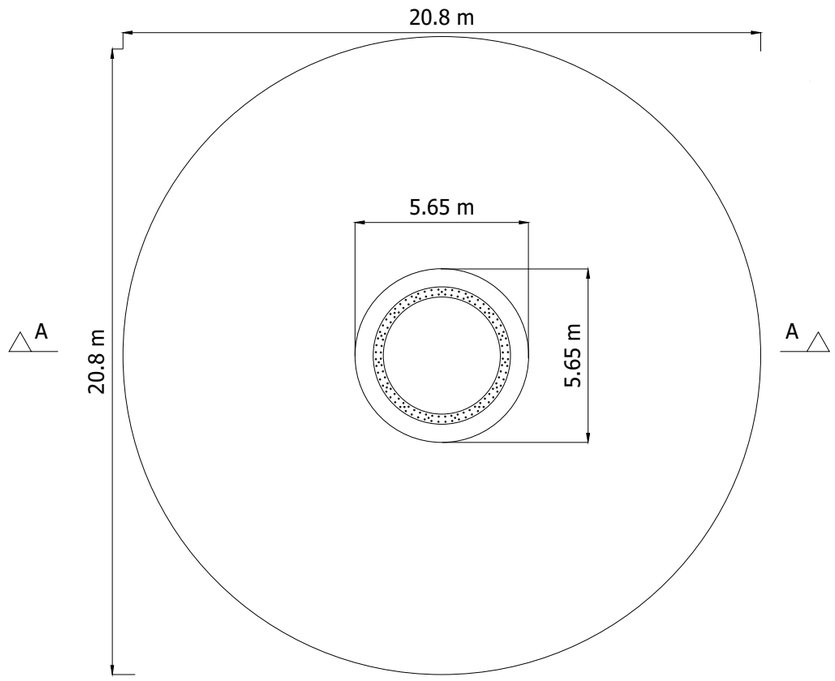
1:1000 Scale @ A3

Produced: KB Reviewed: - Approved: MG	Ref: 2366-DR-P-0020 Date: 04/05/21

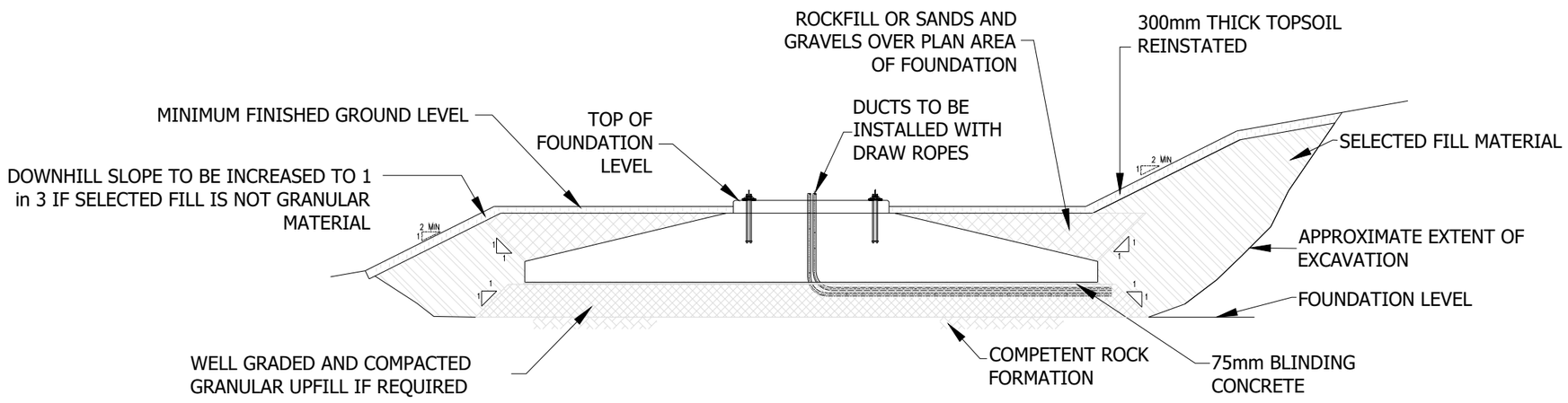
Indicative Wind Turbine
Planning Figure 3

Tormsdale Wind Farm
Planning Application

P:\PROJECTS\2366 TORMSDALE WF EIA\CAD\01-WORKING\01_01-DRAWINGS\PLANNING FIGS\2366-DR-P-0020 4.2 INDICATIVE TURBINE



PLAN ON TYPICAL TURBINE FOUNDATION



SECTION THROUGH TYPICAL TURBINE BASE

0 2 4 6 8 10 12 14 16 18 20m

SCALE 1:200

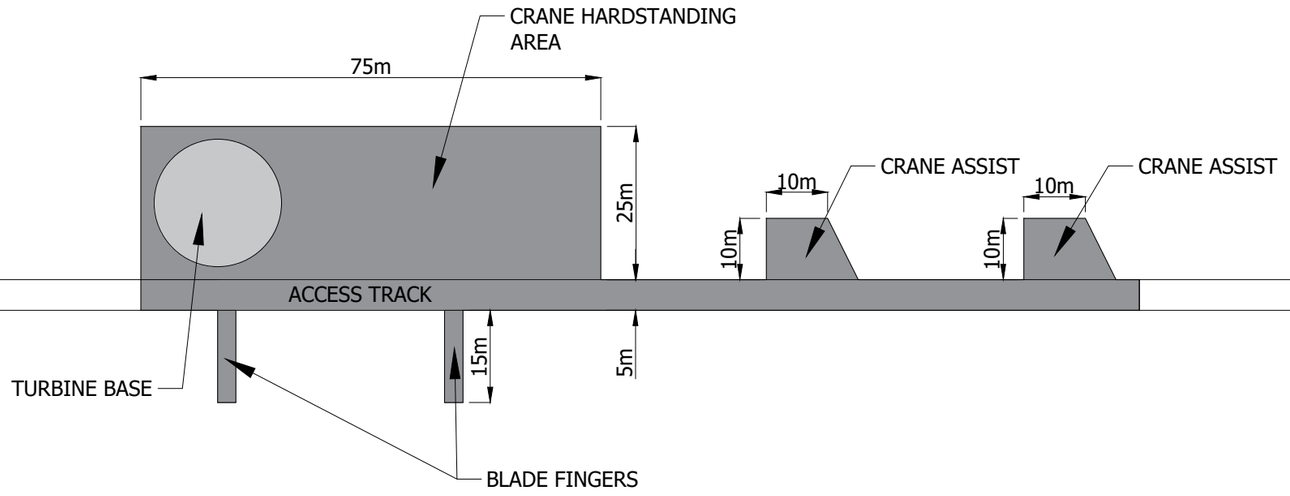
1:200 Scale @ A3

Produced: KB Reviewed: - Approved: MG	Ref: 2366-DR-P-0021 Date: 04/05/21

Typical Foundation
Planning Figure 4

Tormsdale Wind Farm
Planning Application

P:\PROJECTS\2366 TORMSDALE WF EIA\CAD\01-WORKING\01_01-DRAWINGS\PLANNING FIGS\2366-DR-P-0021 4.3 INDICATIVE FOUNDATION



0 10 20 30 40 50 60 70 80 90 100m

SCALE 1:1000

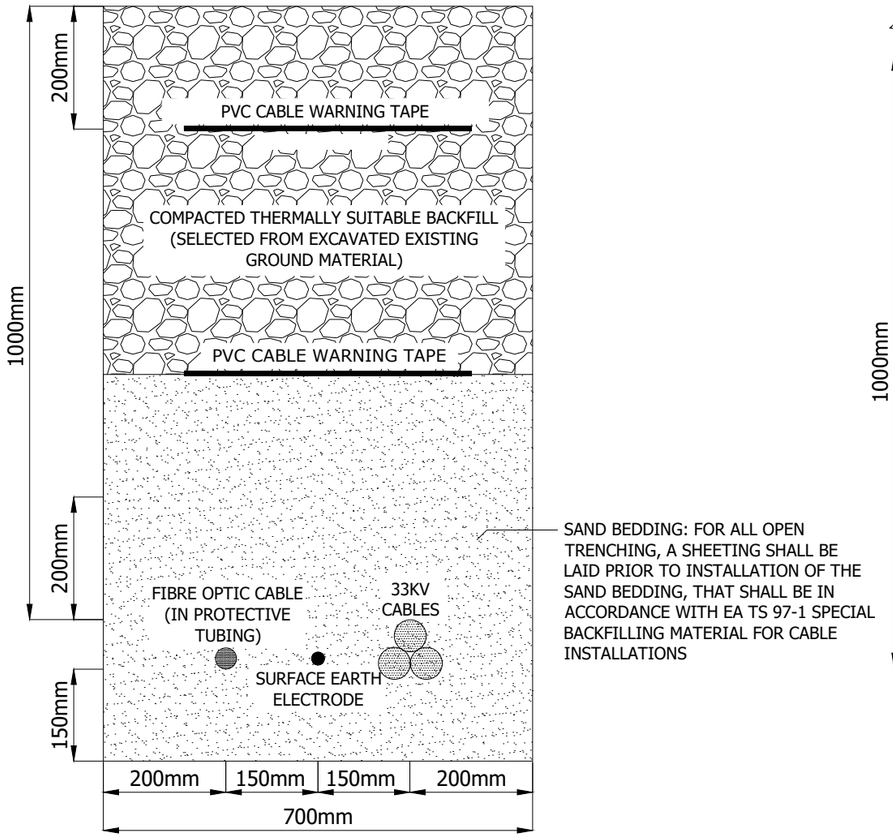
P:\PROJECTS\2366 TORMSDALE WF EIA\CAD\01-WORKING\01_01-DRAWINGS\PLANNING FIGS\2366-DR-P-0022 4.4 INDICATIVE HARDSTANDING

1:1000 Scale @ A3

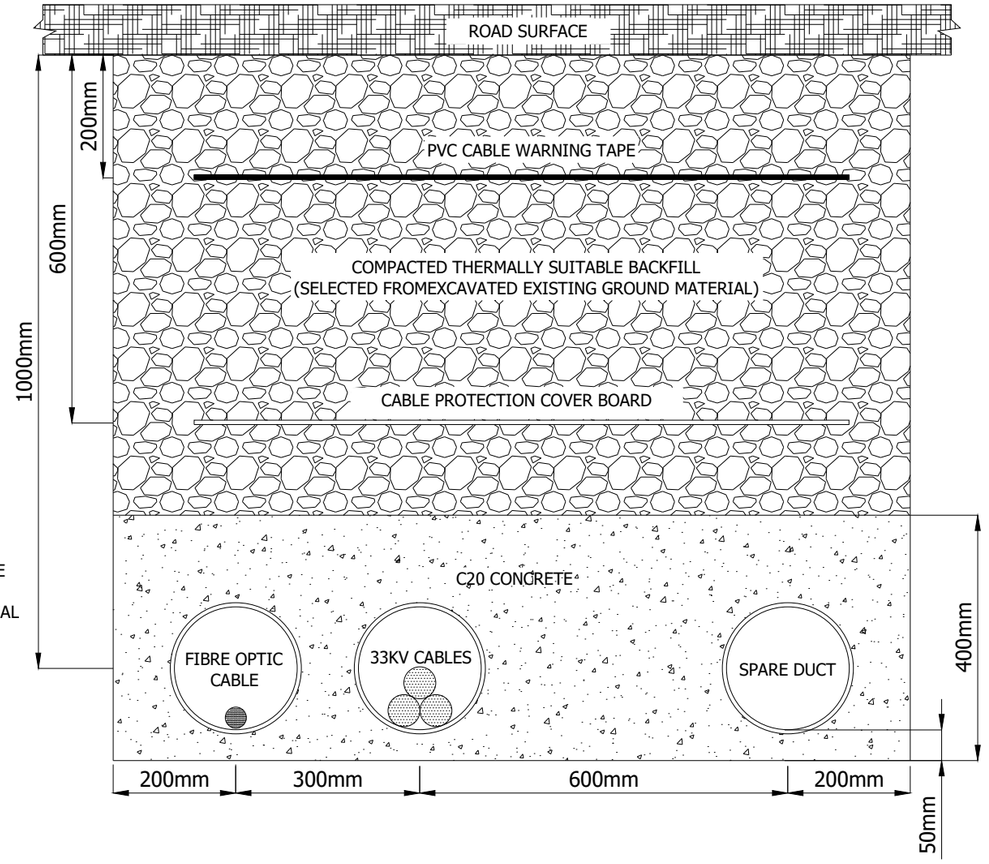
Produced: KB Reviewed: - Approved: MG	Ref: 2366-DR-P-0022 Date: 04/05/21

Typical Hardstanding
Planning Figure 5

Tormsdale Wind Farm
Planning Application



TYPICAL CABLE TRENCH DETAIL
(1:10)



TYPICAL CABLE TRENCH DETAIL AT TRACK/ROAD CROSSING
(1:10)

0 200 400 600 800 1000mm

SCALE 1:10

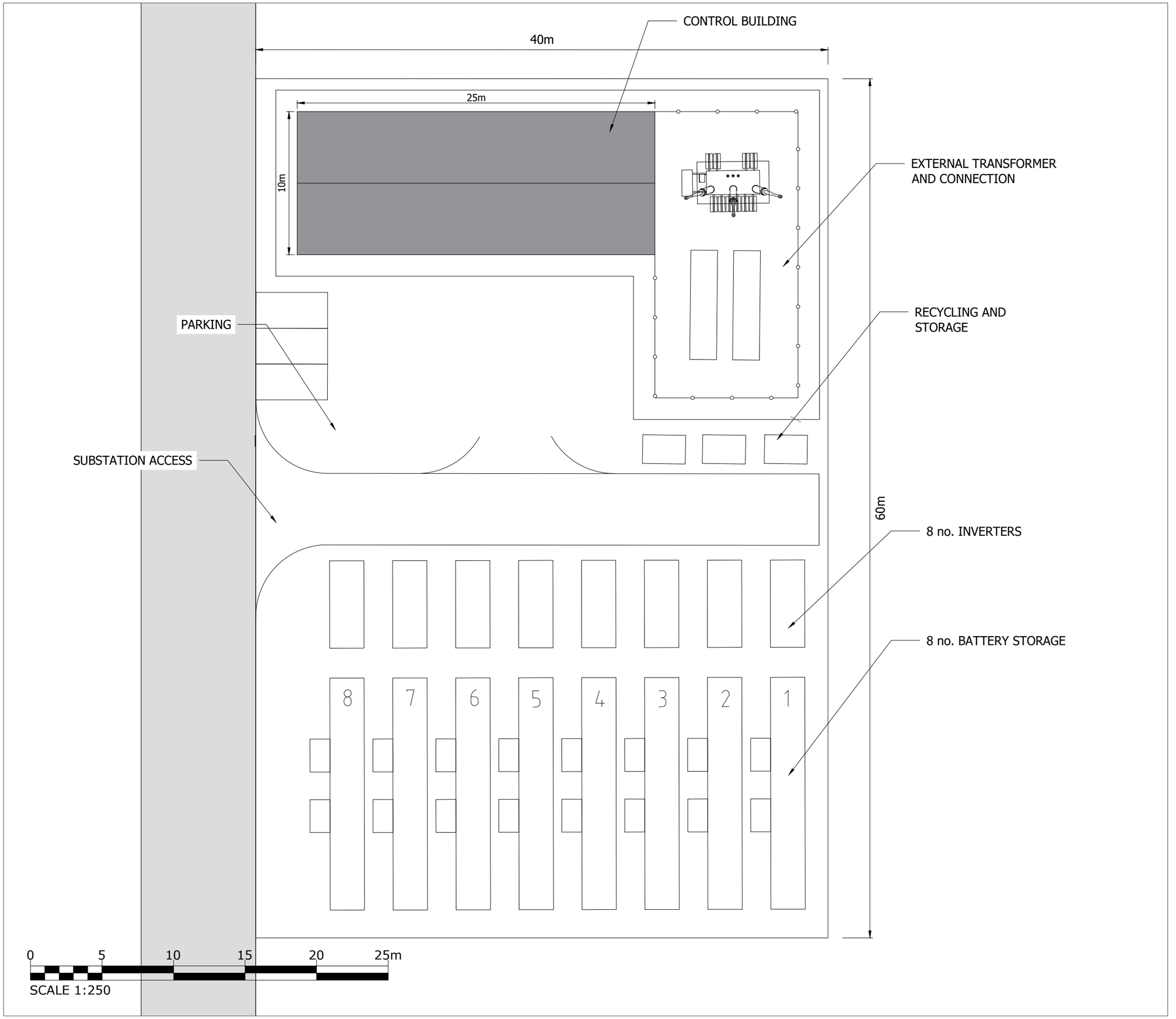
1:10 Scale @ A3

Produced: KB Reviewed: - Approved: MG	Ref: 2366-DR-P-0005
	Date: 04/05/21

Indicative Cable Trench
Planning Figure 6

Tormsdale Wind Farm
Planning Application

P:\PROJECTS\2366 TORMSDALE WF EIA\CAD\01-WORKING\01_01-DRAWINGS\PLANNING FIGS\2366-DR-P-0023 4.5 INDICATIVE CABLE TRENCH



1:250 Scale @ A3

Produced: KB Reviewed: - Approved: MG	Ref: 2366-DR-P-0014
	Date: 04/05/21

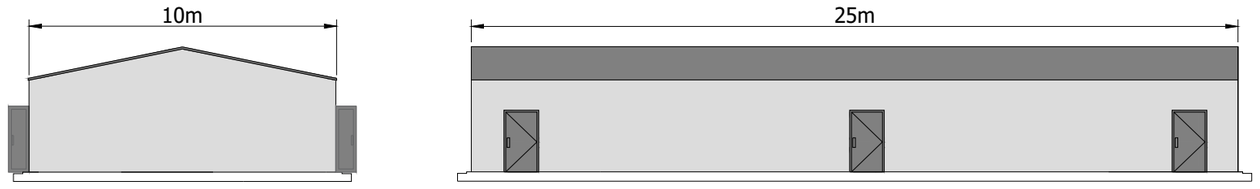
Substation and BESS Compound
Planning Figure 7

Tormsdale Wind Farm
Planning Application

P:\PROJECTS\2366 TORMSDALE WF EIA\CAD\01-WORKING\01_01-DRAWINGS\PLANNING FIGS\2366-DR-P-0014-P1 3.6 SUBSTATION COMPOUND

END- ELEVATION

FRONT ELEVATION



END ELEVATION

REAR ELEVATION

0 2 4 6 8 10 12 14 16 18 20m

SCALE 1:200

G:\TECHNICAL INFORMATION\ENGINEERING\STANDARDS\BORDERS\ARCUS A3 2015 FIGURE

arise

ARCUS

1:200 Scale @ A3

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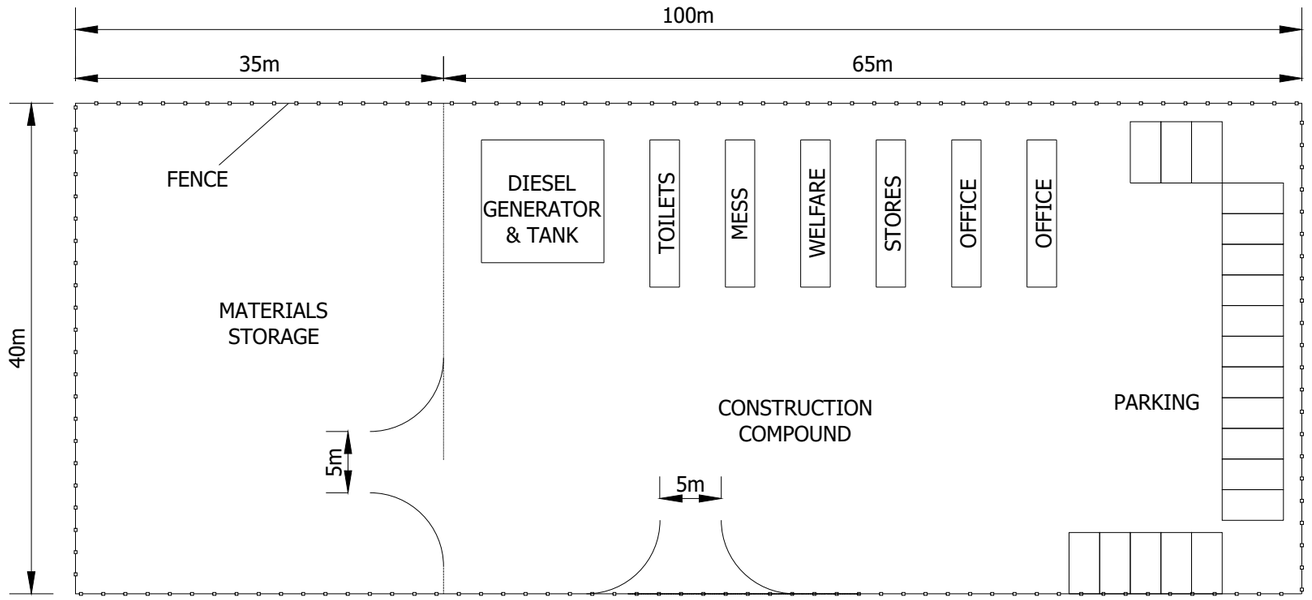
Produced: KB Reviewed: - Approved: MG	Ref: 2366-DR-P-0015 Date: 04/05/21

Control Building Elevations
Planning Figure 8

Tormsdale Wind Farm
Planning Application



PLAN VIEW OF INDICATIVE
CONSTRUCTION COMPOUND ARRANGEMENT

0 10 20 30 40 50 60 70 80 90 100m

SCALE 1:1000

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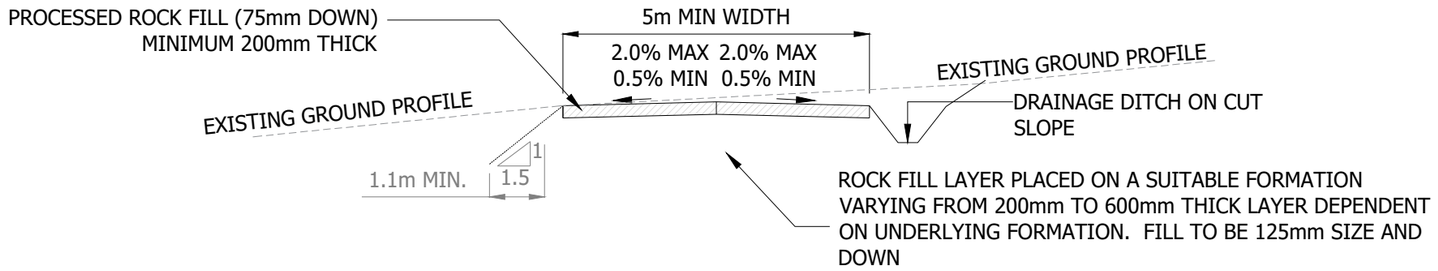
1:1000 Scale @ A3

Produced: KB Reviewed: - Approved: MG	Ref: 2366-DR-P-0024 Date: 04/05/21

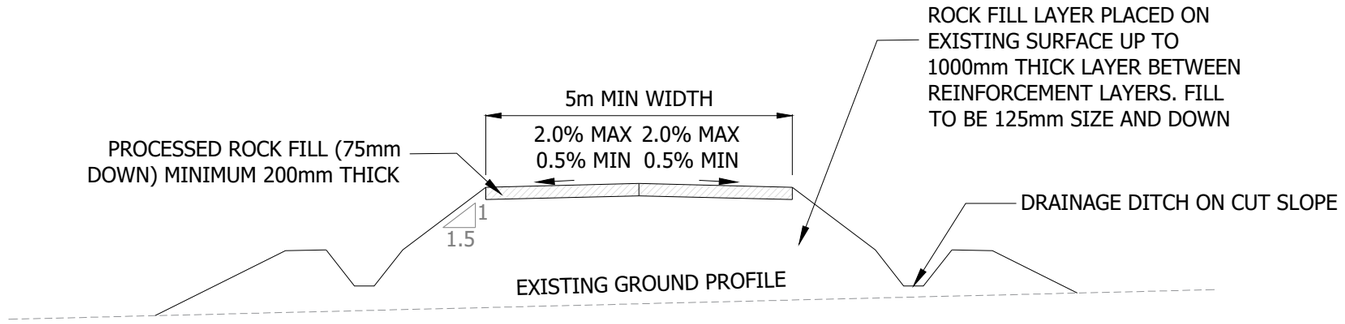
Indicative Construction Compound

Planning Figure 9

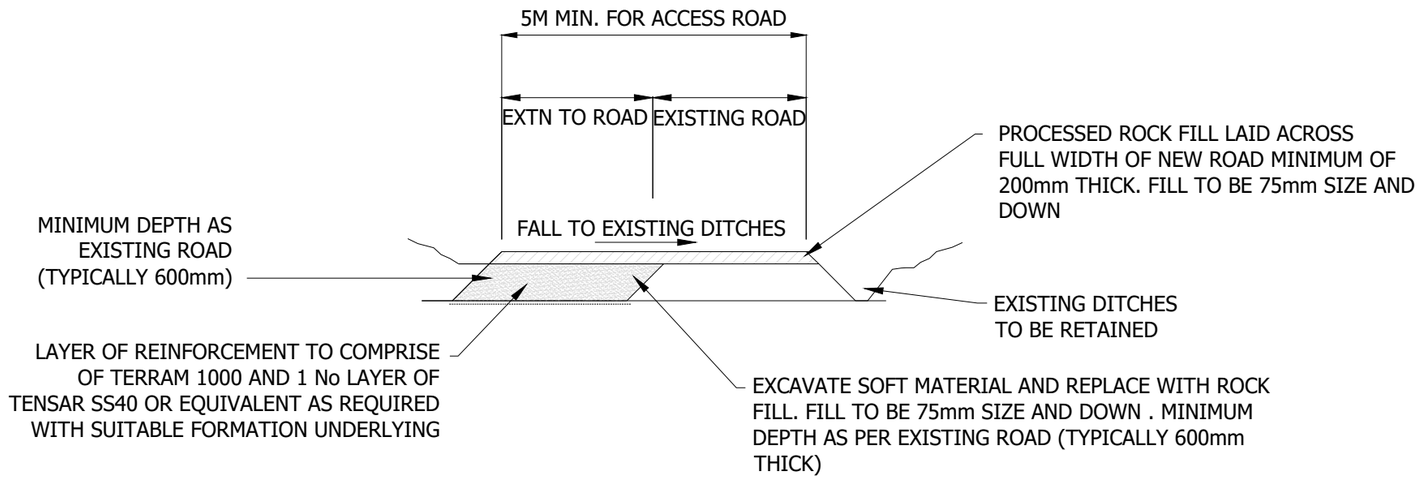
Tormsdale Wind Farm
Planning Application



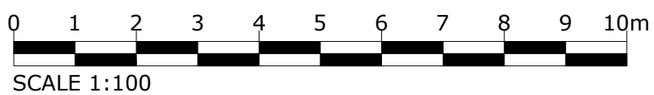
TYPICAL SECTION THROUGH EXCAVATED TRACK (1:100)



TYPICAL SECTION THROUGH ROCK-FILL TRACK (1:100)



TYPICAL SECTION WIDENING OF EXISTING TRACK (1:100)



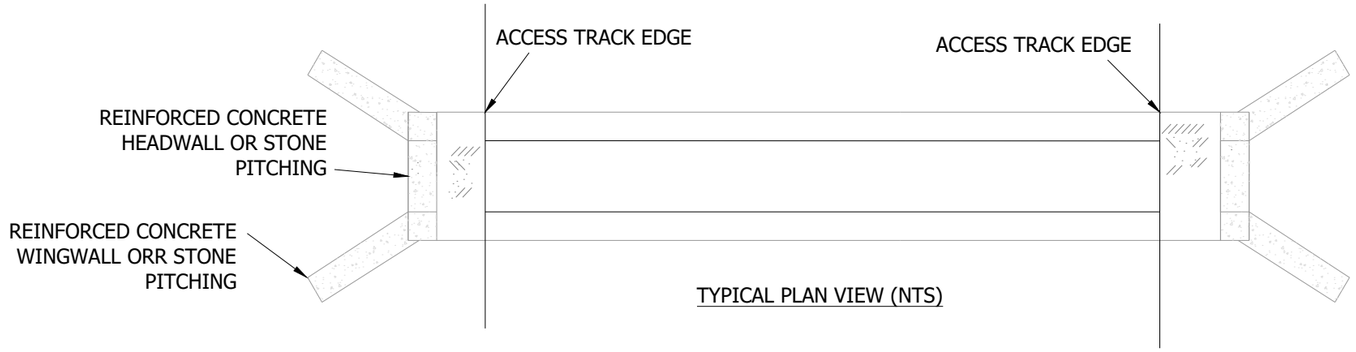
1:100 Scale @ A3

Produced: KB Reviewed: - Approved: MG	Ref: 2366-DR-P-0016 Date: 04/05/21

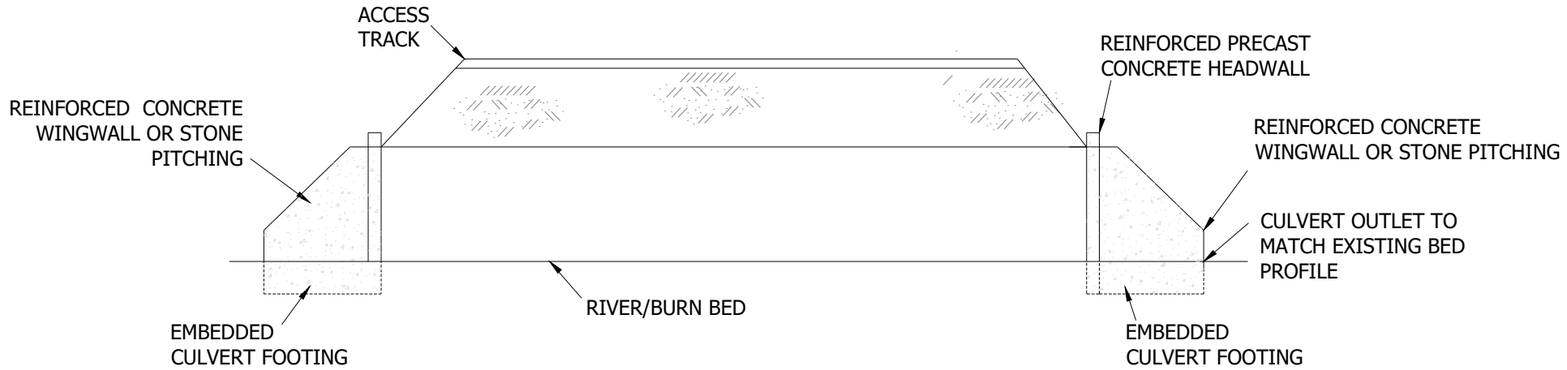
Indicative Access Track
Planning Figure 10

Tormsdale Wind Farm
Planning Application

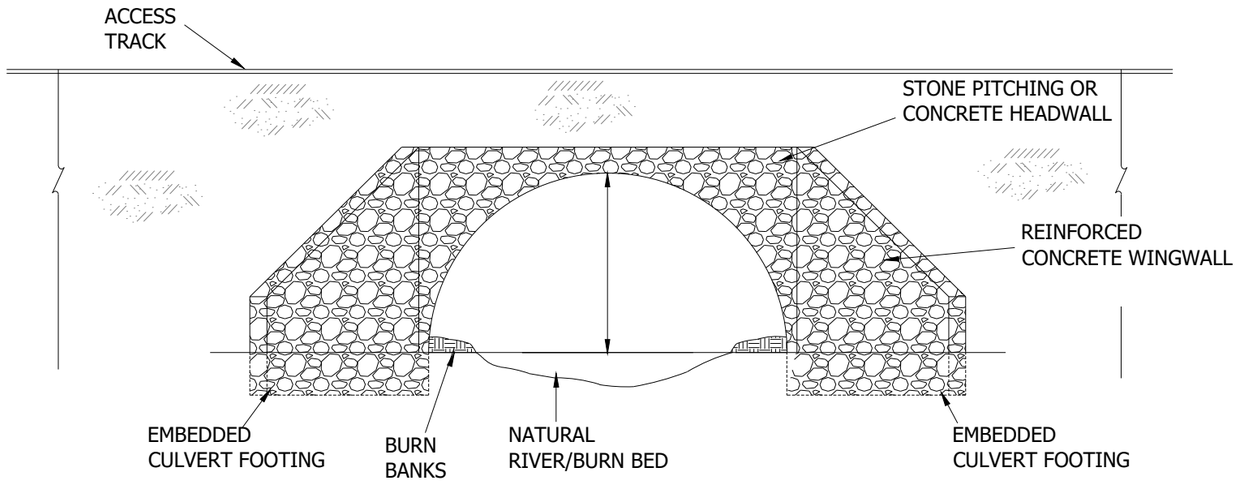
G:\TECHNICAL INFORMATION\ENGINEERING\STANDARDS\BORDERS\ARCUS A3 2015 FIGURE



TYPICAL PLAN VIEW (NTS)



TYPICAL CROSS SECTION THROUGH CULVERT (NTS)



TYPICAL BOTTOMLESS ARCHED CULVERT ELEVATION (NTS)

NTS Scale @ A3

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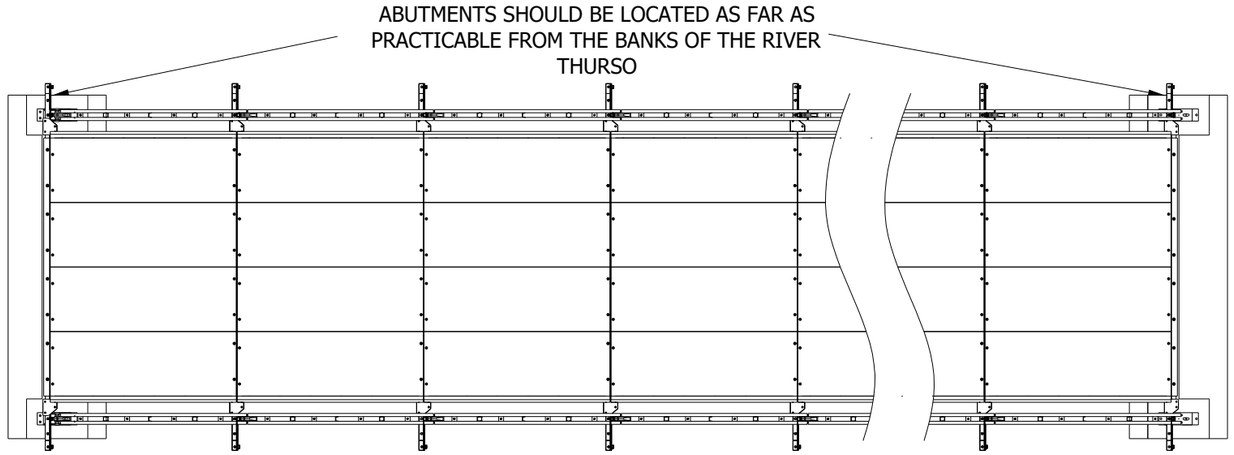
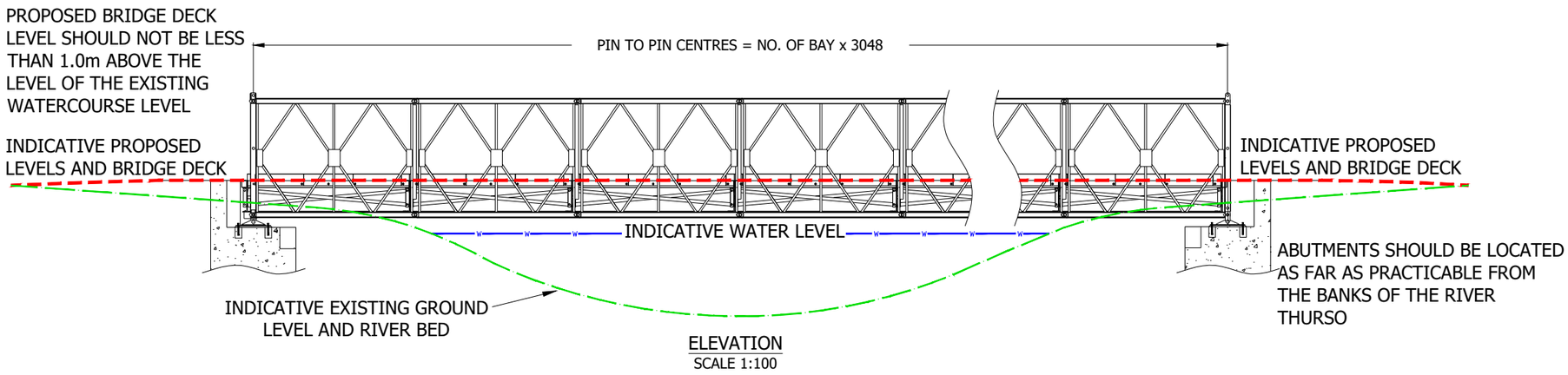
Indicative Culvert Details
Planning Figure 11

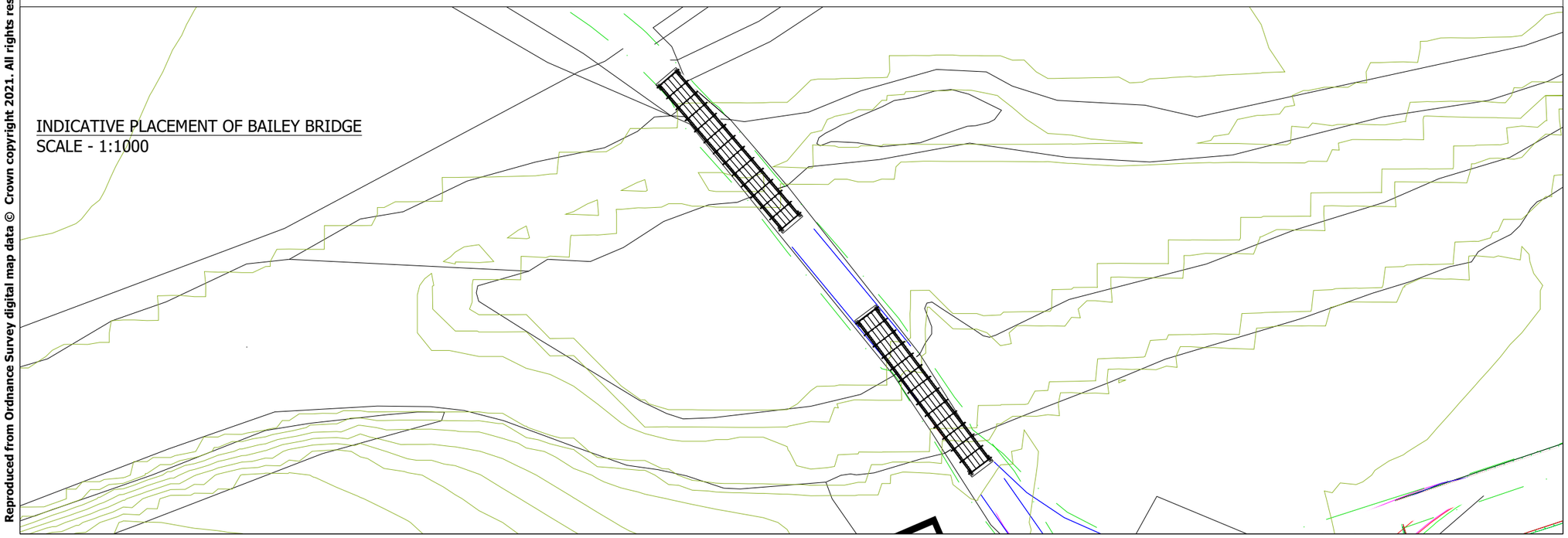
Tormsdale Wind Farm Planning Application



PLAN
SCALE 1:100



ELEVATION
SCALE 1:100



AS SHOWN Scale @ A3

Produced: KB Reviewed: - Approved: MG	Ref: 2366-DR-P-0018 Date: 04/05/21

Indicative Temporary Bridge Detail

Planning Figure 12

Tormsdale Wind Farm Planning Application

N

215m VISIBILITY SPLAY

25m OF PERMANENT SURFACING FROM EDGE OF EXISTING CARRIAGEWAY. (CONSTRUCTION DETAILS WILL BE SUPPLIED BY THE CONTRACTOR AND AGREED WITH THE ROADS AUTHORITY WHEN APPLYING FOR ROAD OPENING PERMIT)

4.5m x 215m VISIBILITY SPLAY

TEMPORARY OVERRUN AREA

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ARCUS

1:1,250 Scale @ A3

Produced: DB Reviewed: - Approved: MG	Ref: 2366-DR-P-0019 Date: 04/05/21

Indicative Access Arrangement
Planning Figure 13

Tormsdale Wind Farm
Planning Application

Tormsdale Wind Farm

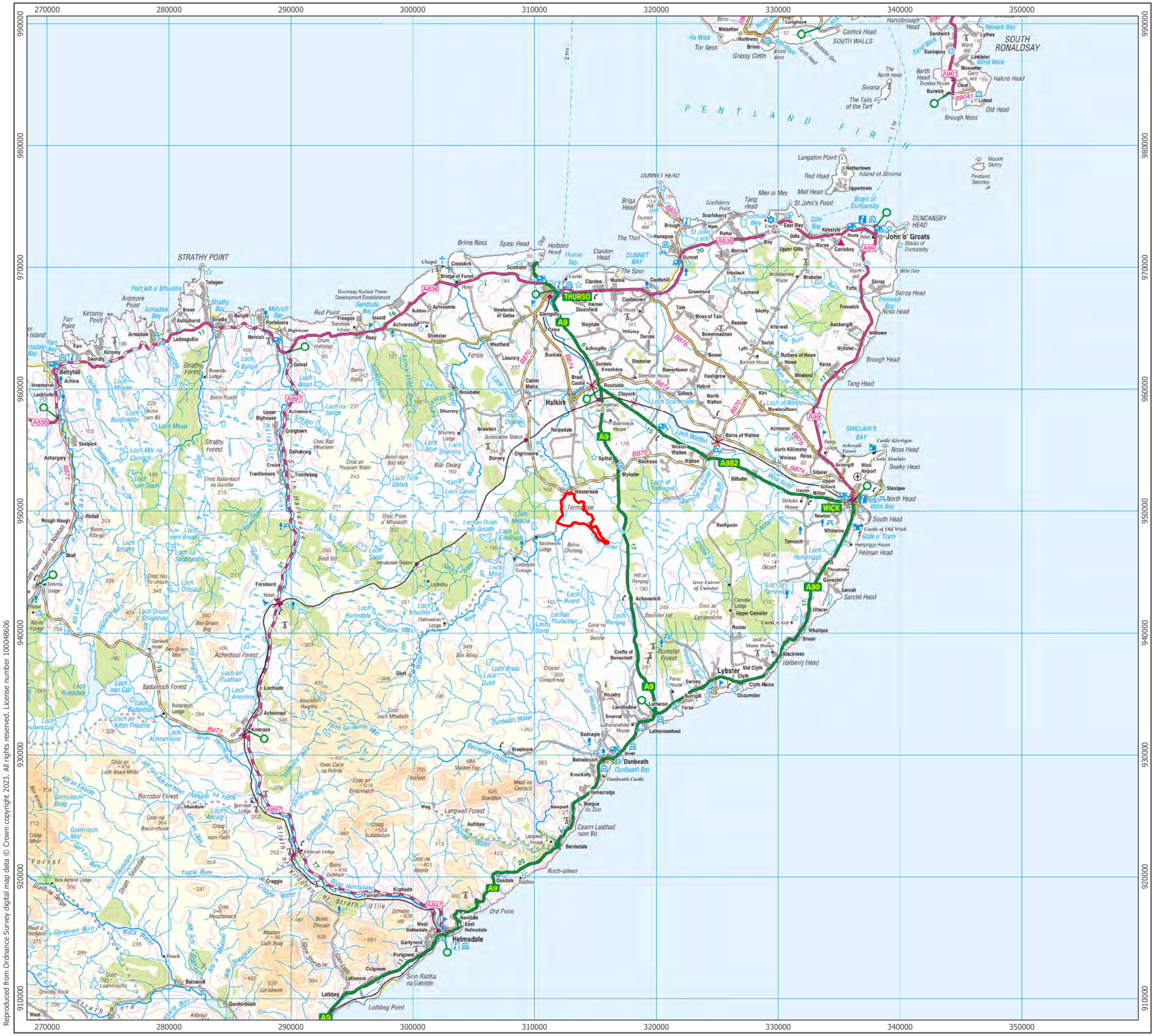
Further Environmental Information Report – Volume 2a: Report Figures excluding LVIA

August 2023

Project No.: 0669543

The business of sustainability

CONTENTS



Y:\GIS-CAD\GIS\Environment\2366 Tormsdale\2366 Tormsdale.aprx\2366-REP-060 Fig 01.1 Site Location

arise

ERM

Site Boundary

1:300,000 Scale @ A3

0 5 10 km

NORTH

Produced By: CM	Ref: 2366-REP-060
Checked By: SC	Date: 8/7/2023

Site Location Plan
Figure 1.1

Tormsdale Wind Farm
FEI Report

Site Boundary
Proposed Turbine Location
Construction Compound
Crane Hardstanding
Substation
Temporary Overrun Area
Upgraded Existing Tracks
Proposed New Tracks

0 100 200 300 400 500
Meters

N

SCALE: See Scale Bar	VERSION: A01
SIZE: A3	DRAWN: MW
PROJECT: 0669543	CHECKED: GB
DATE: 8/7/2023	APPROVED: BP

Figure 1.2
Site Layout Plan

ERM

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PROJECTION: British National Grid

Path: \\uksprdgisfs01\Data\Arcus\Projects\0669543 - Tormsdale\Maps\0669543 - PM - FIGURES.aprx/2366-REP-126 Fig 1.1 Site Location Plan

Site Boundary
Proposed Turbine Location
Construction Compound
Crane Hardstanding
Substation
Temporary Overrun Area
Upgraded Existing Tracks
Proposed New Tracks

0 100 200 300 400 500
Meters

N

SCALE: See Scale Bar	VERSION: A01
SIZE: A3	DRAWN: MW
PROJECT: 0669543	CHECKED: GB
DATE: 8/7/2023	APPROVED: BP

Figure 3.1
Site Layout Plan

ERM

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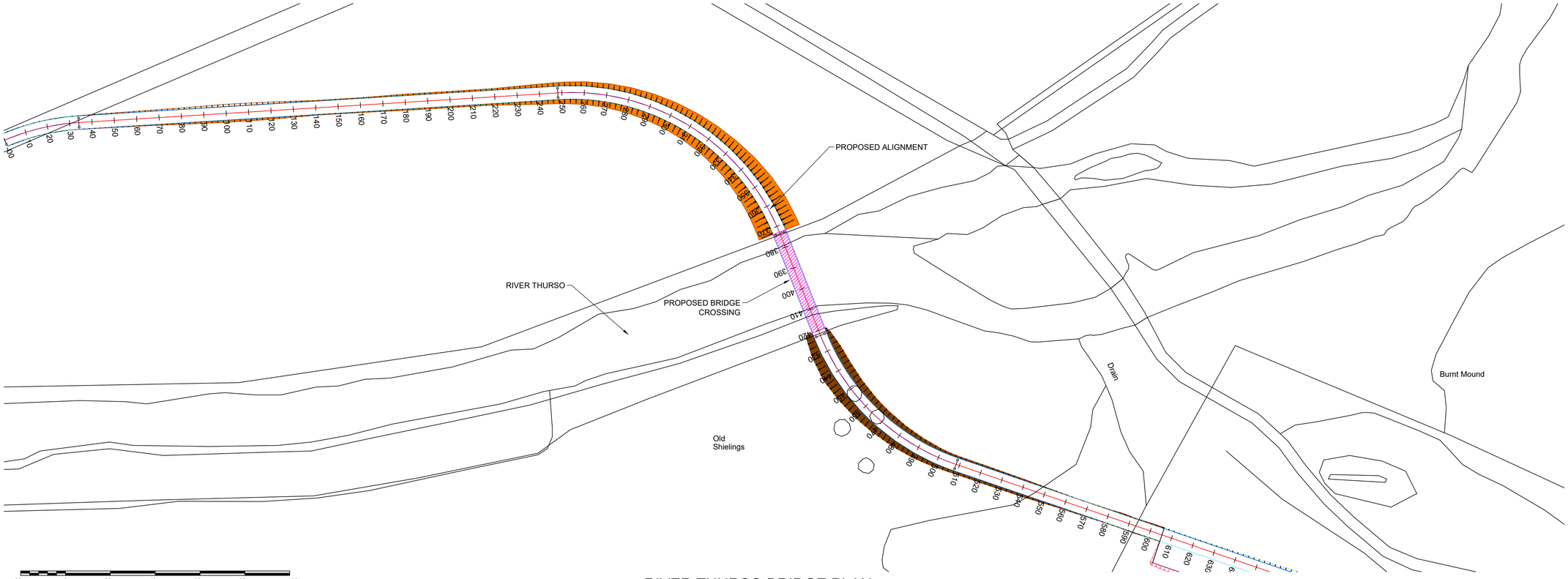
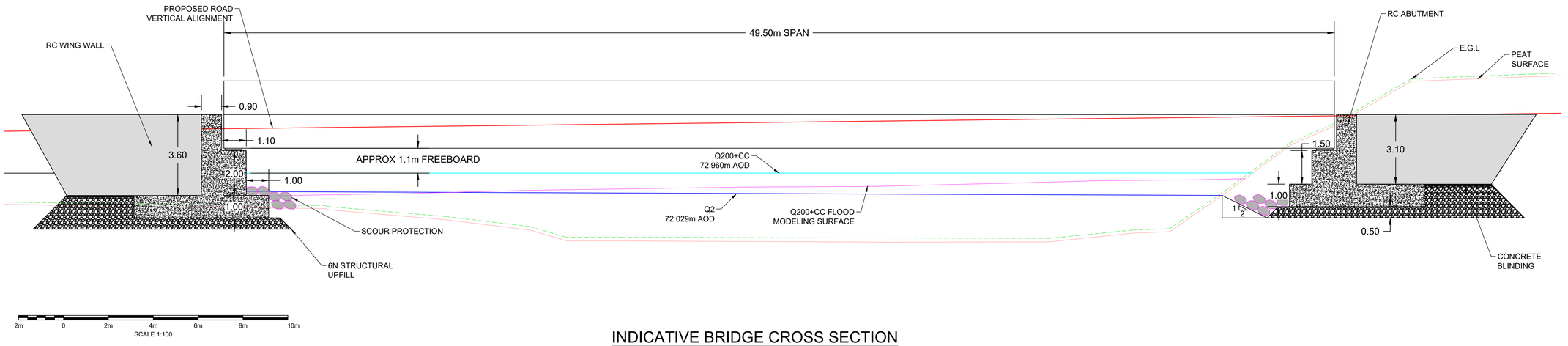
PROJECTION: British National Grid

Path: \\uksprdgisfs01\Data\Arcus\Projects\0669543 - Tormsdale\Maps\0669543 - PM - FIGURES.aprx/2366-REP-133 Fig 3.1 Site Layout Plan



RIVER THURSO BRIDGE PLAN

SCALE 1:1000



INDICATIVE BRIDGE CROSS SECTION

SCALE 1:100

KEY

- PROPOSED TRACK IN CUT
- PROPOSED TRACK IN FILL

NOTES

1. ALL DIMENSIONS ARE IN METERS UNLESS NOTED OTHERWISE.
2. BRIDGE STRUCTURE TO BE CONSTRUCTED FROM 11 X 4.5m MABEY UNIVERSAL MODULAR BAILEY BRIDGE SECTIONS OR EQUIVALENT.

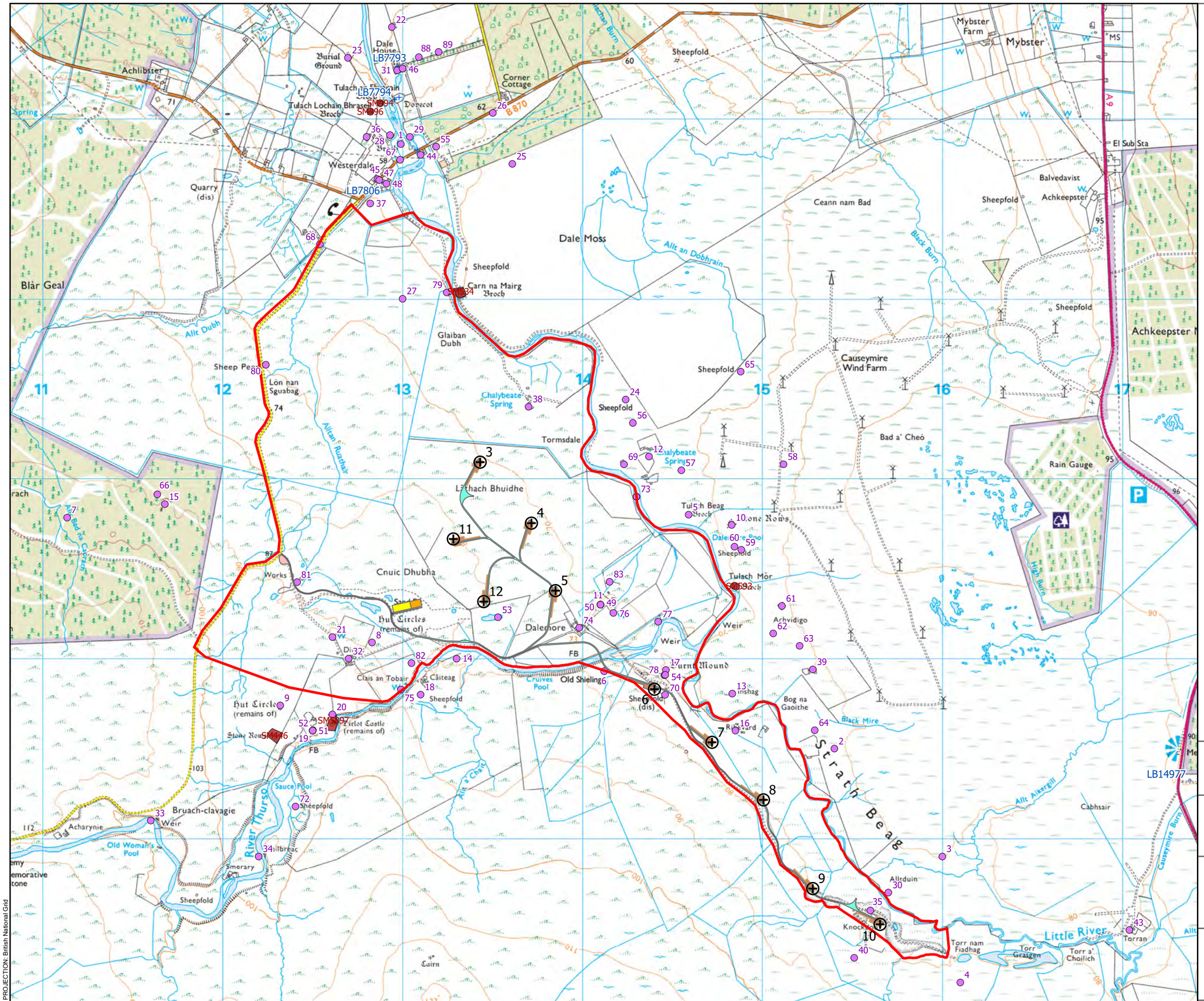
AS SHOWN Scale @ A1

N

Produced: RC Reviewed: MW Approved: BP	Ref: 2366-DR-P-0018-P1 Date: 06/07/23

Indicative Temporary Bridge Detail
Figure 3.2

Tormsdale Wind Farm Further Environmental Information



0 200 400 600 800 1,000 Meters

N

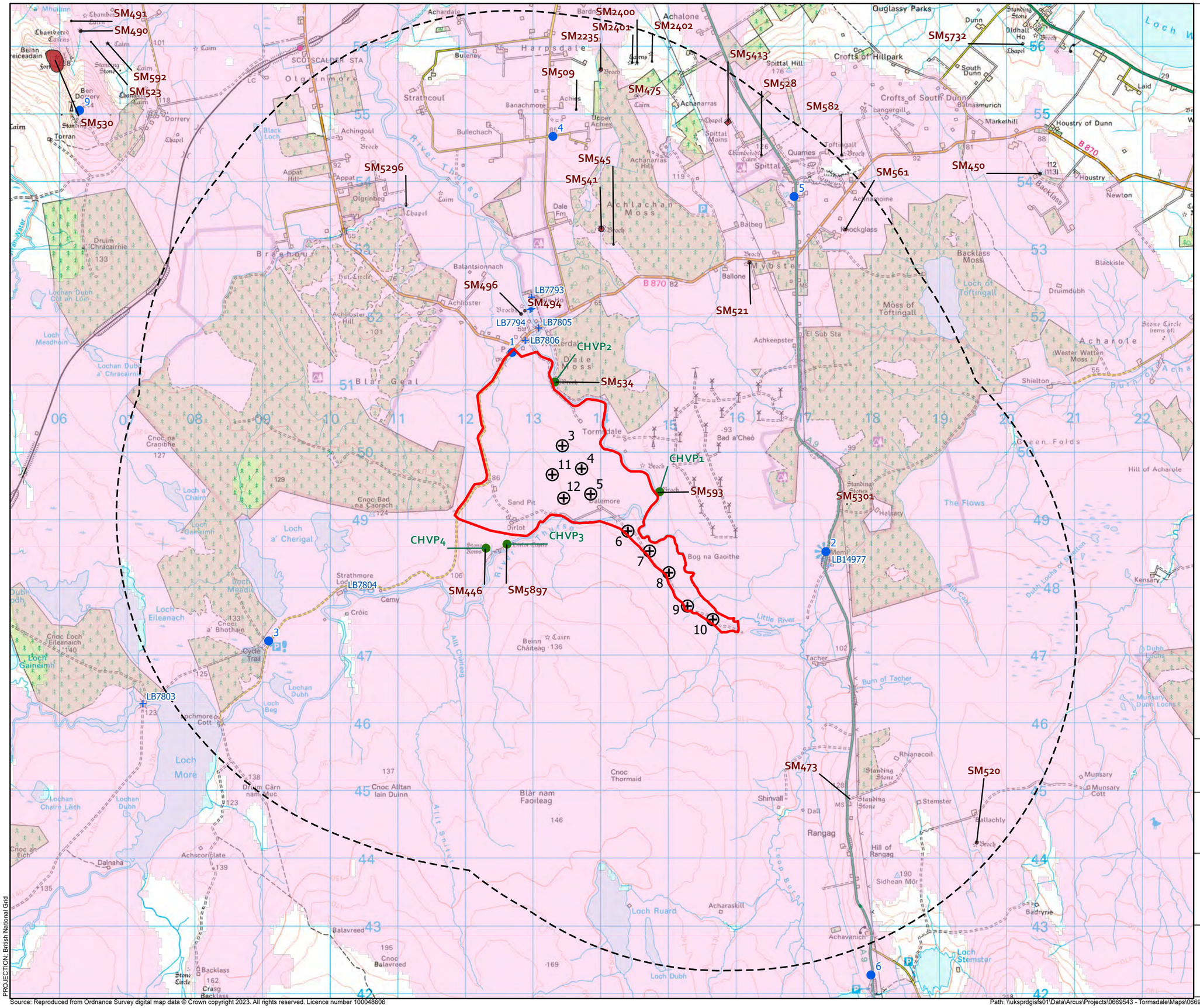
SCALE: See Scale Bar	VERSION: A01
SIZE: A3	DRAWN: MW
PROJECT: 0669543	CHECKED: GB
DATE: 8/7/2023	APPROVED: BP

Figure 7.1
Core Study Area with Infrastructure

ERM arise

PROJECTION: British National Grid

Path: \\uksprdgisfs01\Data\Arcus\Projects\0669543 - Tormsdale\Maps\0669543 - PM - FIGURES.aprx/2366-REP-129 Fig 7.1 Core Study Area with Infrastructure

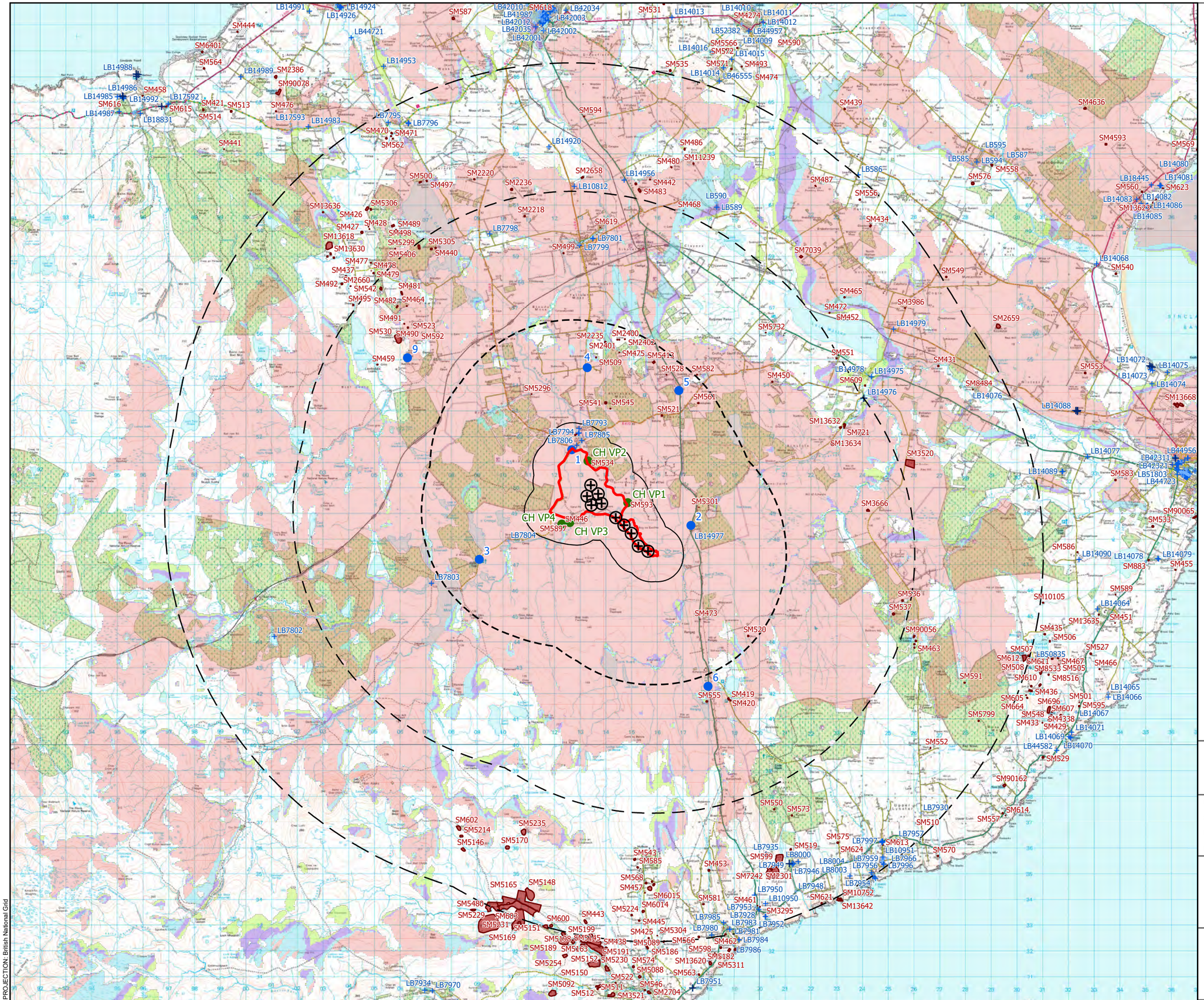


SCALE: See Scale Bar	VERSION: A01
SIZE: A3	DRAWN: MW
PROJECT: 0669543	CHECKED: GB
DATE: 8/7/2023	APPROVED: BP

Figure 7.2
Heritage Assets within 5 km and ZTV

PROJECTION: British National Grid

Path: \\uksprdgisfs01\Data\Arcus\Projects\0669543 - Tormsdale\Maps\0669543 - PM - FIGURES.aprx/2366-REP-130 Fig 7.2 Heritage Assets within 5 km and ZTV



Site Boundary
Proposed Turbine Location
1 km Study Area
5 km Study Area
10 km Study Area
15 km Study Area
Zone of Theoretical Visibility
1-3 tips visible
4-6 tips visible
7-9 tips visible
10-12 tips visible
Conservation Areas
Scheduled Monuments
Category A Listed Building
Category B Listed Building
Category C Listed Building
Cultural Heritage Viewpoint
LVIA Viewpoint
Proposed Turbine Locations

0 1 2 3 4 5
Kilometers

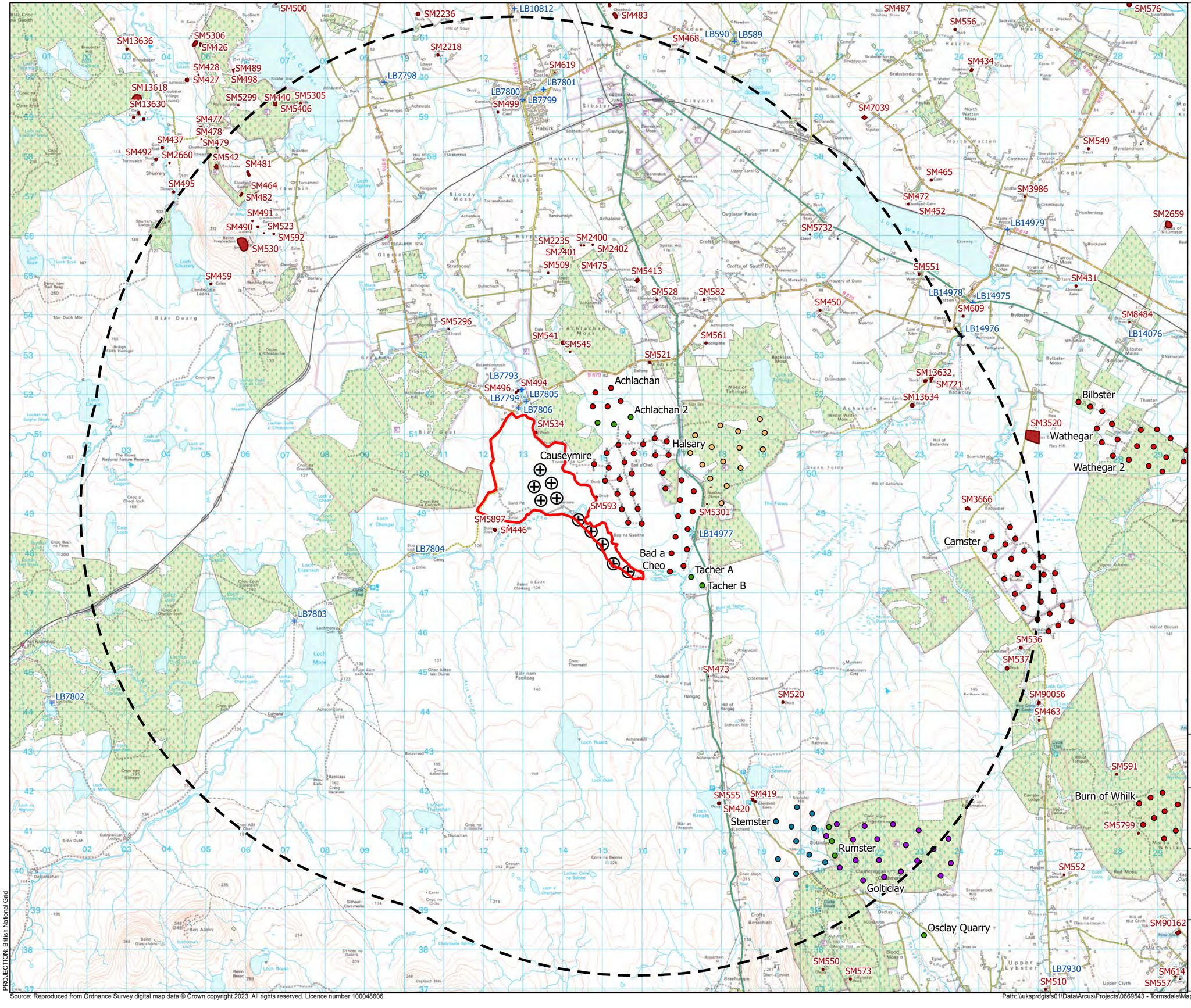
N

SCALE: See Scale Bar	VERSION: A01
SIZE: A3	DRAWN: MW
PROJECT: 0669543	CHECKED: GB
DATE: 8/7/2023	APPROVED: BP

Figure 7.3
Heritage Assets within 15 km and ZTV

PROJECTION: British National Grid

Path: \\uksprdgisfs01\Data\Arcus\Projects\0669543 - Tormsdale\Maps\0669543 - PM - FIGURES.aprx/2366-REP-131 Fig 7.3 Heritage Assets within 15 km and ZTV



Site Boundary
Proposed Turbine Location
10 km Study Area
Category A Listed Building
Category B Listed Building
Category C Listed Building

Cumulative Wind Farms
- Appealed
- Consented
- Existing
- Scoping
- Under Construction
- Tacher
- Proposed Turbine Location

Conservation Areas
Gardens and Designed Landscapes
Scheduled Monuments

0 1 2 3 4 5 Kilometers

N

SCALE: See Scale Bar	VERSION: A01
SIZE: A3	DRAWN: MW
PROJECT: 0669543	CHECKED: GB
DATE: 8/7/2023	APPROVED: BP

Figure 7.8
Cumulative Wind Farms 10 km

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PROJECTION: British National Grid

Path: \\uksprdgisfs01\Data\Arcus\Projects\0669543 - Tormsdale\Maps\0669543 - PM - FIGURES.aprx/2366-REP-132 Fig 7.8 Cumulative Wind Farms 10 km

Site Boundary
Proposed Turbine Location

Infrastructure Type
- Construction Compound
- Crane Hardstanding
- Substation
- Temporary Overrun Area
- Upgraded Existing Tracks
- Proposed New Tracks

Habitat Survey Results
- Acid grassland - semi-improved
- Acid grassland - unimproved
- Bare ground
- Blanket sphagnum bog
- Built-up area
- Dry dwarf shrub heath
- Dry heath/acid grassland
- Flush and spring - acid/neutral flush
- Marsh/marshy grassland
- SI Poor semi-improved grassland
- Running water
- Scrub - scattered
- Standing water
- Wet dwarf shrub heath
- Wet heath/acid grassland
- Wet modified bog
- Habitat Survey Area

0 100 200 300 400 500
Meters

N

SCALE: See Scale Bar	VERSION: A01
SIZE: A3	DRAWN: MW
PROJECT: 0669543	CHECKED: GB
DATE: 8/7/2023	APPROVED: BP

Figure 8.1
Habitat Survey Results

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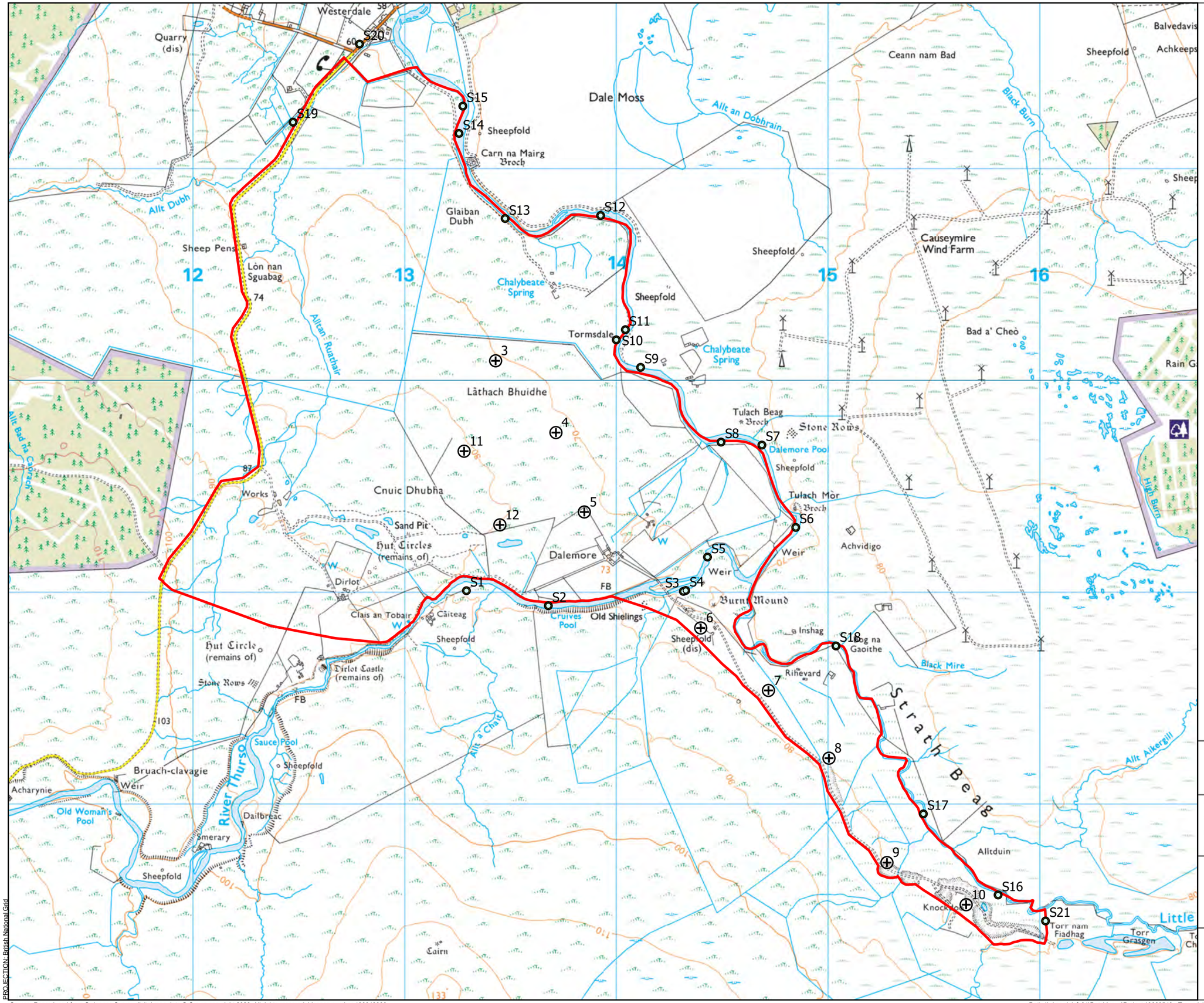
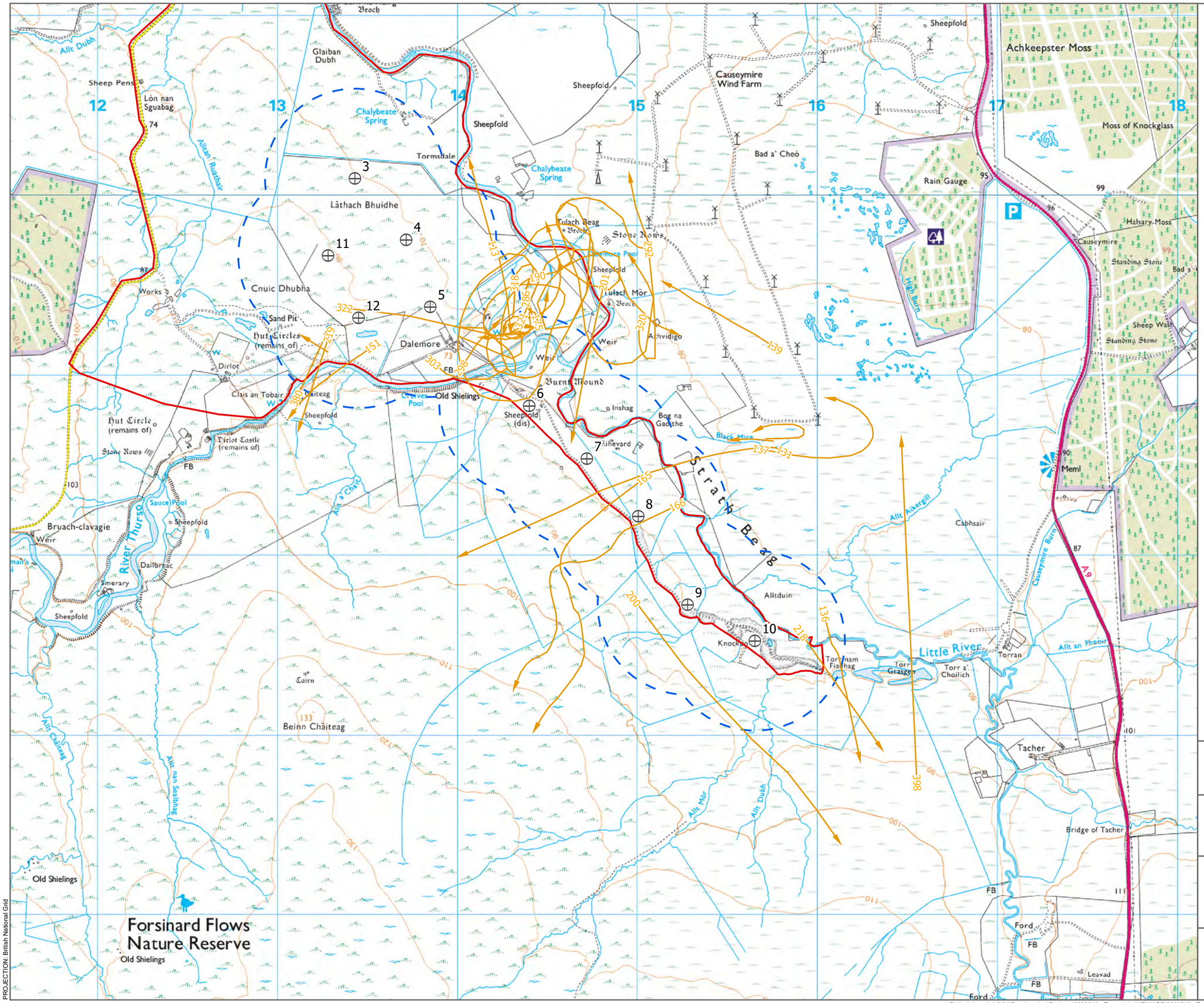
PROJECTION: British National Grid

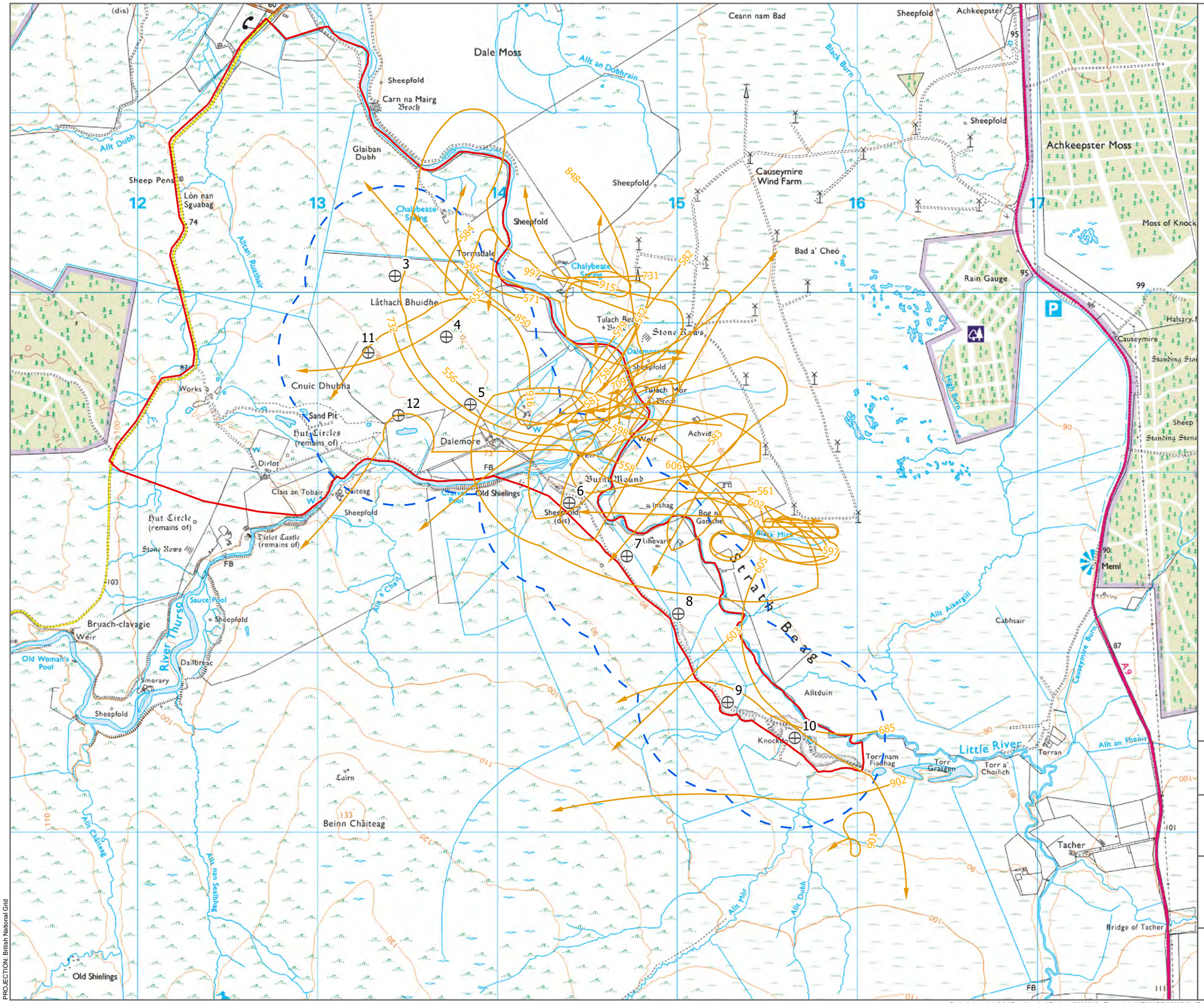
Path: \\uksprdgisfs01\Data\Arcus\Projects\0669543 - Tormsdale\Maps\0669543 - PM - FIGURES.aprx/2366-REP-136 Fig 8.1 Habitat Survey Results



PROJECTION: British National Grid

Path: \\uksprdgisfs01\Data\Arcus\Projects\0669543 - Tormsdale\Maps\0669543 - PM - FIGURES.aprx\2366-REP-128 Fig 8.2 Fauna Survey Locations


Site Boundary
Proposed Turbine Location
Collision Study Area - 500 m Buffer of Proposed Turbine Locations
Species
Golden Plover
Numbers shown on the map are unique 'key numbers' to allow identification of individual flights, and correspond with the information provided in Table A4.1, Annex 4.
0 100 200 300 400 500
Metres
N
SCALE: See Scale Bar
VERSION: A01
SIZE: A3
DRAWN: DN
PROJECT: 0669543
CHECKED: PW
DATE: 07/07/2023
APPROVED: MW
Figure 9.1.16
Year 1 Target Flights: Golden Plover
ERM
arise
PROJECTION: British National Grid
Source: Reproduced from Ordnance Survey digital map data © Crown copyright 2023. All rights reserved. License number 100048606;
Path: \\uksprdgisfs01\Data\London\Projects\0669543 - Tormsdale WF\MAPS\0669543 - Tormsdale WF.aprx / 3141-REP-049 Fig9.1.16 Year 1 Target Flights; Golden Plover - ERM


Site Boundary
Proposed Turbine Location
Collision Study Area - 500 m Buffer of Proposed Turbine Locations
Species
Golden Plover
Numbers shown on the map are unique 'key numbers' to allow identification of individual flights, and correspond with the information provided in Table A4.1, Annex 4.
0 100 200 300 400 500
Metres
N
SCALE: See Scale Bar
VERSION: A01
SIZE: A3
DRAWN: DN
PROJECT: 0669543
CHECKED: PW
DATE: 07/07/2023
APPROVED: MW
Figure 9.1.17
Year 2 Target Flights: Golden Plover
ERM
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Path: \\uksprdgisfs01\Data\London\Projects\0669543 - Tormsdale WF\MAPS\0669543 - Tormsdale WF.aprx / 3141-REP-050 Fig9.1.17 Year 2 Target Flights; Golden Plover - ERM