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Agenda Item	**6.1**
Report No	**PLN/011/25**

HIGHLAND COUNCIL

Committee: North Planning Applications Committee

Date: 12 March 2025

Report Title: 23/04930/S36: Offshore Wind Power Limited (OWPL)
50KM NW Of Thurso

Report By: Area Planning Manager - North

Purpose/Executive Summary

Description: West of Orkney Wind Farm - Erection and operation of an offshore wind farm for a period of 30 years, comprising of 125 fixed bottom wind turbines with a maximum blade tip height of 360m, cabling and associated ancillary offshore infrastructure.

Ward: 02 - Thurso And North West Caithness

Development category: National Development

Reason referred to Committee: Electricity Act Application

All relevant matters have been taken into account when appraising this application. It is considered that the proposal accords with the principles and policies contained within the Development Plan and is acceptable in terms of all other applicable material considerations.

Recommendation

Members are asked to agree the recommendation to **RAISE NO OBJECTION** to the application as set out in section 11 of the report.

1. PROPOSED DEVELOPMENT

1.1 The Council has been consulted by the Scottish Government's Marine Directorate on an application submitted under Section 36 of the Electricity Act 1989 and for accompanying Marine Licenses in accordance with the Marine and Coastal Access Act 2009 and the Marine (Scotland) Act 2010, to construct and operate an offshore floating wind farm off the north coast of Caithness. The applications are to be determined by Scottish Ministers.

1.2 Separate planning permission 23/05353/PIP for the onshore connecting infrastructure has been approved by the Planning Authority under the Town and Country Planning (Scotland) Act 1997 (As Amended).

1.3 The development proposed shares similar characteristics and environmental effects to applications for onshore wind development. This report therefore gives consideration to those effects, positive and negative, in so far as they relate to the interests of the Council. This primarily relates to those effects on the human environment, as opposed to the marine environment. The Marine Directorate is best placed to consider effects on the latter.

1.4 The proposed development comprises:

- Up to 125 fixed bottom offshore Wind Turbine Generators (WTGs) with a maximum blade tip height of 360m and substructures;
- Up to five Offshore Substation Platforms (OSPs);
- Up to five offshore export cables, connecting to the Caithness coast; and
- Inter array and inter connector cables.

1.5 The wind turbines shall have a maximum rotor blade tip height of 359.5m when measured from Lowest Astronomical Tide (LAT) and a maximum rotor blade diameter of 330m.

1.6 The application site comprises two elements:

- the Array Area located 23km offshore. This is where the turbines and the associated floating substructures to be located along with the associated mooring lines, anchors and inter-array cables; and
- the Offshore Export Cable Corridor. This runs from the Array Area to where two export cables are to be located to enable landfall near Greeny Geo and / or Crosskirk on the north Caithness coast.

1.7 Given many of the uncertainties around this type of development within what is a challenging marine environment, as well as the long lead time in which the project is likely to commence on site, the exact layout, design, number, height and support structure requirements for each phase of the development is yet to be determined. For each element of the project there are a range of options for deployment. The Environment Impact Assessment Report (EIAR) is therefore based on a principle known as the 'Rochdale Envelope'; a term deriving from established case law, which essentially means that consideration is given to the maximum and minimum extents of the project in order to establish a 'worst case scenario'. Work continues on refining the project concepts and the exact final design is unlikely to be known until after consent is given.

1.8 If the development is consented by Scottish Ministers, it is anticipated that construction would commence in 2028 and the site will be commissioned in 2031. Thereafter, it is anticipated it would have an operational life of up to 30 years from the date of first commissioning. At the end of the life of the development a decision will be taken as to whether re-power the site, decommission the site or extend its life. In accordance with the provisions of the Energy Act 2004, the applicant will be required to prepare a Decommissioning Programme for approval by Scottish Ministers. The applicant has outlined the decommissioning measures required in the EIAR, but a detailed programme would only be required should the development gain consent.

1.9 The applicant is considering a number of different locations for onshore servicing of the development. A final choice on which location is yet to be determined. The port of Scrabster has however been identified as candidate for use as the operational port for the project.

1.10 The applicant has been in regular contact with the Planning Authority in advance of submission of the application seeking advice on procedural matters and to advise on the details which will accompany the application. The applicant has also undertaken a series of pre-application consultation events in line with the provisions of the Marine Licensing (Pre-Application Consultation) (Scotland) Regulations 2013. This included 33 public consultation events, with the delivery of over 60,000 leaflets and almost 2,500 people attending these events.

1.11 The application is supported by an Environmental Impact Assessment Report (EIAR), with chapters on

- Policy and legislation;
- Site selection;
- Project description;
- Stakeholder engagement;
- EIA methodology;
- Marine physical and coastal processes;
- Water and sediment quality;
- Benthic, subtidal and intertidal ecology;
- Fish and shellfish ecology;
- Marine mammals and other megafauna;
- Offshore and Intertidal Ornithology;
- Commercial fisheries;
- Shipping and navigation;
- Marine archaeology and cultural heritage;
- Military and aviation and radar;
- Seascape, landscape and visual amenity;
- Socio-economics;
- Other users of marine environment.

1.12 Further Environmental Information (FEI) was submitted in response to the Marine Directorate issuing an Additional Information Request. This includes:

- Offshore EIA Report Addendum with chapters on: Benthic subtidal and Intertidal Ecology; Fish and Shellfish Ecology; Marine Mammals and

Megafauna; Commercial Fisheries; Shipping and Navigation; Marine Archaeology and Cultural Heritage; Seascape, Landscape and Visual Impact Assessment (SLVIA) Additional information; and Traffic and Transport;

- Offshore and Intertidal Ornithology EIA Addendum;
- Addendum to the Report to Inform the Appropriate Assessment (RIAA) – Offshore and Intertidal Ornithology;
- Addendum to RIAA – All Other Topics;
- Addendum to RIAA – SPA Appropriate Assessment;
- Addendums to the Derogation Case;
- Addendum to the Compensation Measures Plan; and
- Addendum to the Compensation Implementation and Monitoring Plan.

1.13 During the course of the application, the proposal has been amended to identify three restricted build areas. This mitigation has been driven by shipping and navigation and seascape, landscape and visual impact topic areas in order to reduce impacts on sensitive receptors. These areas are presented in EIAR Addendum Figure 4-2 and comprise:

- Area A – at the north-western extent of the Array Area, where a commitment is made to no wind turbines or associated infrastructure to be built; and
- Area B (1 and 2) – at the south-eastern (1) and south-western (2) extent of the Array Area, where a commitment is made that no wind turbines shall be erected, with prior approval of Scottish Ministers being required for any substation platforms or met-ocean measuring equipment.

2. SITE DESCRIPTION

2.1 The proposal is located to the northwest of the Pentland Firth and the Array Area is approximately 23km from the northern shoreline in Highland, and 28km from the western coastline of Hoy in Orkney. The offshore export cable corridor connecting to Caithness heads southeast from the array and narrows until it reaches mean high water springs at Greeny Geo and / or Crosskirk on the north Caithness coast. The nearest settlements are Tongue, Strathy and Melvich located 27 and 28km from the closest part of the Array Area.

2.2 The seabed within the application site is varied in nature, with both sedimentary and rocky habitats. In survey work undertaken to date, the applicant has identified the presence of: kelp and seaweed beds, ocean quahog, scallops, brown crab, skate, sand eel, cod, herring, mackerel, haddock and Atlantic salmon. Common dolphins, orca (killer whales), harbour porpoise, and other cetacean species have been recorded within the offshore site and surrounding waters, alongside seals and basking sharks.

2.3 In terms of Natural Heritage, there are no statutory nature conservation designations within the proposal site, although the landfall is within proximity of the following designated sites:

- Strathy Coast Site of Special Scientific Interest (SSSI)
- Ushat Head SSSI
- Sandside Bay SSSI
- Red Point Coast SSSI

2.4 The applicant has undertaken a series of ornithological surveys during the preparation of the application. It has identified and considered the effects on: kittiwake, artic tern, great black-backed gull, guillemot, razorbill, puffin, fulmar, gannet and great skua.

2.5 The applicant has reviewed the historic environment baseline in the area and identified that there are no confirmed, charted wrecks within the application site and there are no Historic Marine Protected Area, Protected Places or Controlled Sites designated under the Protection of Military Remains Act 1986. Site surveys did not indicate the presence of any wrecks, however it is acknowledged that this does not prove that none are present. There are no recorded aviation losses within the application site but there is a possibility one may be found as various aircraft have gone missing off the north coast. The applicant has not identified submerged landscapes and cultural remains through their assessment work.

2.6 Other built heritage interests terrestrial interests include the Heart of Neolithic Orkney World Heritage Site, with the being numerous listed buildings, schedule monuments and other built heritage features present within the 60km study area across Orkney and the mainland. The Flow Country World Heritage Site also falls within this extensive study area, albeit that its qualifying peatland interest would not be affected.

2.7 In terms of seascape and landscape interests, the site is located within the area of the Orkney and North Caithness Coastal Character Assessment, identified by NatureScot. The area is characterised by views north to the Atlantic and to the north east where Orkney is a distant feature. To the south east also lies Dunnet Bay and Thurso Bay. These areas generally have north west facing views but the coastlines where the sea meets the land is challenging to access. There are however more elevated locations from which views across the Pentland Firth toward the Atlantic can be appreciated

2.8 The following landscape designations are present in vicinity:

National Scenic Areas

- Hoy and West Mainland (Orkney)
- North West Sutherland
- Kyle of Tongue

Special Landscape Areas

- Oldshoremore, Cape Wrath and Druness
- Eriboll East and Whiten Head
- Farr Bay, Strathy and Portskerra
- Dunnet Head
- Duncansby Head

Gardens and Designed Landscapes

- Tongue House
- Castle of Mey (Barrogill Castle)
- Melsetter House (Orkney)

- Skaill House (Orkney)
- Balfour Castle (Orkney)

2.9 A number of Wild Land Areas (WLA) are present on land to the south. These include:

- WLA40 Hoy
- WLA35 Ben Klibreck - Armine Forest
- WLA36 Causeymore - Knockin Flows
- WLA39 East Halladale Flows
- WLA38 Ben Hope – Ben Loyal
- WLA37 Foinaven – Ben Hee
- WLA40 Cape Wrath
- WLA34 Reay – Cassley

2.10 In relation to visual receptors across the study area within Highland, these include people living and undertaking recreational activities with the aforementioned designated landscapes, as well as those residing within coastal settlements and properties, often with these being orientated to appreciate coastline and seaward views. Other key landscape and visual receptors across the north of Caithness, include people experiencing views out over the flow country, the eastern and northern coastlines. These include from principal key routes including the A9 and the promoted tourist route - North Coast 500 (NC500) on the A836. Other important key routes include the ferries between Orkney and Scrabster and Gills Bay with views being experienced across the coastline's high cliffs and sheltered bays, with other mainland attractions in the vicinity being John O'Groats, Dunnet Head, Strathy Point and Cape Wrath to name a few.

2.11 Appendix 2 of this report provides details of wind farm projects in proximity of the proposal. These must be taken into account when assessing the cumulative landscape and visual impacts (LVIA) of the proposal. Owing to the scale of the proposed turbines, the LVIA study area is set at 60km from the outermost turbines. An important part of the established cumulative baseline is the consented Pentland Offshore Wind Farm, with its most recent permission being for 6 turbines of up to 300m in height, located 8.4km from the Caithness coastline, north of the settlements of Portskerra, Melvich and Reay.

3. PLANNING HISTORY

3.1	9 May 2022	22/00972/SCOP - West of Orkney Wind Farm - EIA Scoping Request for Onshore infrastructure associated with the Onshore Wind Farm, including cable landfall, substation, cable route, tracks and associated infrastructure.	EIA Scoping Consultation Response Issued
3.2	9 June 2022	22/01589/SCOP - West of Orkney Wind Farm - Erection and Operation of an Offshore Wind Farm comprising up to 125 wind turbines with a maximum blade tip height of 370m, up to 5 offshore substation platforms, up to 750km of of inter -array cables, up to 10 export cables including up to 5 cables making landfall in	EIA Scoping Consultation Response Issued

		Caithness and ancillary infrastructure	
3.3	14 June 2023	23/02399/SCRE - Onshore HRA Screening report for the onshore transmission infrastructure associated with the West of Orkney Windfarm	EIA Scoping Consultation Response Issued
3.4	18 June 2024	23/05353/PIP, West of Orkney Wind Farm - construction of onshore transmission infrastructure comprising up to two cable landfalls, an onshore substation and up to five associated export circuits	Planning Permission Granted

4. PUBLIC PARTICIPATION

4.1 The application was advertised by the applicant under the provisions of the Electricity Act, Electricity Works EIA Regulations and the Marine Works EIA Regulations in the following publications:

- The Orcadian 12 October 2023
- John O'Groat Journal 13 October 2023
- The Caithness Courier 11 October 2023
- Edinburgh Gazette 10 October 2023
- The Press and Journal 09 October 2023
- Fishing News Bulletin 12 October 2023
- Lloyds List 09 October 2023
- The Herald 09 October 2023

4.2 The EIA Further Environmental Information (FEI) was also advertised in:

- The Orcadian 24 October 2024, 31 October 2024
- John O'Groat Journal 25 October 2024, 01 November 2024
- Caithness Courier 23 October 2024, 30 October 2024
- Edinburgh Gazette 25 October 2024
- The Press and Journal 22 October 2024
- Fishing News 24 October 2024
- Lloyd's List 22 October 2024
- The Herald 22 October 2024

Representation deadline: 01 December 2024

4.3	Timeous representations received by THC:	5 objections, 1 late objection
4.4	Timeous representations made to Marine Directorate:	20 support comments, 1 general comment, 2 objections

4.5 Material considerations raised in objections are summarised as follows:

- Incompliance with the development plan and energy policy and strategy;
- Seascape, Landscape and Visual Impacts;
- Cumulative environmental impacts with other large developments in the area;
- Impacts on marine ecology, protected species and ornithology;
- Potential inability to deliver mitigation over third party land;
- Potential impacts on the Flow Country World Heritage Site;
- Questions over the scope of the EIA design envelope, and assessment detail in the EIA chapters;
- Impact on tourism;
- Visual impact associated with required grid connections;
- Potential lack of housing for contractors; and
- Procedural matters regarding any Council objection triggering a Public Local Inquiry.

4.6 Non-material considerations raised in objection are summarised as follows:

- Question of need for further wind energy development in the North of Scotland;
- Electricity grid constraints; and
- Lack of community benefit.

4.7 Material considerations raised in support are summarised as follows:

- Socio-economic benefits of the proposals.

4.8 All letters of representation received by the Council are available for inspection via the eplanning portal which can be accessed through the internet www.wam.highland.gov.uk/wam. Those representations received by Marine Directorate can be accessed via https://marine.gov.scot/marine-licence-applications. It should be noted that some representations may have been submitted to both The Highland Council and Marine Directorate.

5. CONSULTATIONS

Consultations Undertaken by the Planning Authority

5.1 **Community Councils** no responses were received. Every community council along the northern mainland coastline were consulted, including:

- Dunnet and Canisbay;
- Castletown;
- Thurso;
- Caithness West;
- Melvich;
- Strathy and Armadale;
- Bettyhill, Strathnaver and Altnaharra;
- Tongue; and
- Durness.

5.2 **Environmental Health** do not object to the application and have no further

comment.

5.3 **Flood Risk Management Team** do not object to the application and provided standing advice for any onshore infrastructure, (none is however proposed as part of this application).

5.4 **Forestry Officer** does not object to the application. Conditions are advised relating to the onshore associated cable connection as consented under Planning Permission in Principle 23/05353/PIP.

5.5 **Historic Environment Team (Conservation)** do not object to the application given the apparent lack of direct impacts on built heritage and relatively minimal impact upon the setting of coastal listed buildings, due to the separation distance.

5.6 **Landscape Officer** does not object to the application. Support is given to the amendments made to the layout through the EIA FEI, with this resulting in some contraction of the horizontal extent, and an increase in the cohesion of the array with the more remote outliers having been relocated or removed. The development has also been pushed further from the coast, leading to some perception of reduced turbine height. The development would remain a significant intervention in the seaward views from much of the coast of North Sutherland and from elevated locations further inland. No significant effects on any Special Landscape Area or landscape character area or type are identified. Aviation lighting effects described within the applicant's assessment are not disputed. Concerns are however expressed with the cumulative effect the proposal with receptors along the north coast potentially perceiving or experiencing a diminution or degradation to the character of the north coast as a whole and to the regional sense of place.

5.7 **Transport Planning Team** do not object to the application. The applicant has assessed the likely worst case impacts at the potential ports and airports to serve the development. Although these are yet to be finalised, for Highland, these include ports at Scrabster, Nigg, Invergordon and Ardersier, plus Inverness Airport. This suggests that it should be possible to manage the predicted levels of impact on the public road network through effective traffic management measures. Given this, support is given for the Construction Traffic Management Plan (CTMP) condition being sought by Transport Scotland. The scope of which is to cover likely impacts of traffic from this development on the local and trunk roads serving the ports and airports that will be serving this offshore development.

Consultations Undertaken by the Marine Directorate

5.8 **Graemsay Hoy and Walls Community Council (Orkney)** do not object to the application. Wishes to ensure further consultation in future regarding cabling.

5.9 **Fisheries Management Scotland** do not object to the application. They however raised concerns regarding the potential impact on diadromous fish, in particular wild Atlantic salmon populations.

5.10 **Historic Environment Scotland** do not object to the application. Initially requested further information relating to the potential impacts of the development on the Category A Listed Sule Skerry Lighthouse, part of the Orkney islands Council area.

HES are now content with the information provided in the EIA addendum and its conclusions, with their initial objection having been withdrawn.

5.11 **Joint Radio Company** do not object to the application. Due to the large number of adjacent radio links in this vicinity, which have been taken into account, clearance is given specifically for the locations specified, with any future change to the location or scale of any turbine requiring re-assessment.

5.12 **Marine Directorate – Science, Evidence, Data and Digital (Commercial Fisheries)** do not object to the application. Advise monitoring of the creel fishery to determine any impact to the fishery, as well as validating the assumptions of the return of fishing to the Array Area. Further pre and post construction monitoring is advised in addition to further mitigation in relation to movement of boulders, cable protection, and other related measures to help address the proposal's effects on commercial fishing.

5.13 **Marine Directorate – Science, Evidence, Data and Digital (Physical Environmental / Coastal Processes)** do not object to the application. It provided comments on physical environment/coastal processes and confirms its general satisfaction with modelling work undertake and the findings set out within the EIA.

5.14 **Marine Directorate – Science, Evidence, Data and Digital (Renewables and Ecology Team)** do not object to the application. There is uncertainty around the potential for impacts of offshore wind farms on Atlantic salmon, with limited evidence to support impacts or the lack thereof. The EIA identifies Crosskirk and Greeny Geo as the landfall location for the export cable. The Forss Water which drains into Crosskirk Bay supports salmon and trout populations. Salmon populations in the Forss Water have been assessed as a category 3 (less than 60% probability of salmon stocks meeting the conservation limit) for 2023 and 2024. The cable piling strategy will detail underwater noise mitigation measures specific for salmon and trout populations. It is advised that this mitigation also considers the emigration times of salmon smolts for Scotland and salmonid diurnal patterns in relation to all potential sources of underwater noise. A strategic approach to addressing key questions around diadromous fish distribution and migration through the marine environment, and potential impact mechanisms, is required to increase the evidence base available for planning and consenting decisions.

5.15 **Marine Directorate – Science, Evidence, Data and Digital (Socioeconomics)** do not object to the application. Comments were provided on the applicant's assessment of the potential impacts of the proposal on fishing activities in the area and on their modelling of physical, environmental and coastal processes. The Marine Analytical Unit is not only confident that the applicant's assessment of socio-economic impacts results is relatively robust, but that the embedded mitigation has been designed in collaboration with representatives of those affected, and therefore this mitigation should be as effective as is possible

5.16 **Ministry of Defence** do not object to the application. The development falls within an offshore area designated for low flying aircraft and a suitable aviation lighting scheme is required to be secured via condition. A condition is also sought for the routing, locations and installation methodology for the offshore export cables.

5.17 **Maritime and Coastguard Agency (MCA)** do not object to the application. Comments are provided non matters within their remit, including vessel navigation, layout, marking and lighting, search and rescue, construction scenarios, cable routes, safety zones, and hydrographic surveys. They are content that no surface infrastructure would be installed in the restricted areas which would include wind turbines, platforms and scientific equipment. They are also content with the calculations on the widths of the additional sea space and confirm they are acceptable. It confirms that the MCA require to agree to lighting and marking proposals.

5.18 **National Air Traffic Service (NATS)** do not object to the application. The proposed development does not conflict with their relevant safeguarding criteria.

5.19 **Natural England** do not object to the application. Confirmed that the project is unlikely to significantly impact any species from English designated sites or waters. It advised to seek advice from NatureScot.

5.20 **NatureScot** do not object to the application. An initial objection was raised on the basis of the applicant's assessment of Seascape, Landscape and Visual (SLVIA) and ornithological impacts. Further to submission of additional information, NatureScot still have significant concerns but no longer object to the proposal. They will continue to work with applicant regarding further mitigation required as the project progresses. SLVIA findings are outlined in Section 7 of this report, and in summary, significant adverse impact on the Kyle of Tongue NSA and the North Coast are identified, however, further reductions in adverse impacts could be achieved through condition requiring a final Design Statement and Layout Plan. In relation to seabirds, adverse effect on site integrity for several Special Protection Areas are identified, thereby necessitating Appropriate Assessment. In relation to the compensatory measures which is required for Guillemot, Kittiwake, Puffin, Gannet, Razorbill and great black-backed gull, there remains a lack of confidence that the measures proposed on the short-listed islands of Orkney (Rousay, Hoy, Flotta, Stronsay and Gairsay) are likely to compensate for the impacts predicted to seabirds and further detailed advice on this is given. NatureScot do however conclude that based on current information, and subject to mitigation, there would be no adverse effect on site integrity for any marine based SPA; there would be no significant impact on any fish or shellfish interests, including diadromous fish, with further recommendations given for post-consent monitoring.

5.21 **Northern District Salmon Fishery Board object** to the proposal. Its concerns relate to the fish returning to the northern rivers, with the construction and operational phase of the development potentially having an adverse effect on migratory salmon. It advised that MD-LOT should approach NatureScot to extend their review of the EIA Report to cover the sections on diadromous fishes.

5.22 **Northern Lighthouse Board** do not object to the application. Welcomes the applicant's commitment to engage with the Board on matters of navigational safety. It notes the EIA FEI amendments made to address shipping safety concerns with the gap between the Sule Skerry and Sule Stack to the north west having been increased, with further amendments for seascape, landscape and visual interests elsewhere.

5.23 **Orbex** do not object to the application. Expect to cooperate with the project to determine the required operating procedures during, and after, construction, and ask the Council to take note of this in setting any planning permission mandatory conditions for operation.

5.24 **Orkney Islands Council** do not object to the application. The policy framework which establishes in principle support for the proposal is outlined. The proposal would result in significant positive socio economic effects for Orkney and advises that a socio economic working group be established to uplift the employment and GVA benefits in Orkney. The applicant's strategy for temporary construction workers in Orkney is advised to be developed further to minimise effects on the current already pressured housing system, and this strategy also includes provisions for a long term housing legacy for Orkney's communities. The proposal's effect on commercial fishing are raised, emphasising the income this generates and the need for further liaison to protect processing businesses in Orkney. Similarly, further ongoing assessment work is advised in relation to fish and shellfish ecology interests. The importance of establishing a community benefit fund is outlined.

The development would have a significant effect on the Hoy and West Mainland NSA. Notably, Special Landscape Quality "land and water in constantly changing combinations under the open sky". It however agrees that the objectives of the designation and the overall integrity of the NSA would not be compromised.

It also raises concerns about the appropriateness of proposed seabird mitigation measures and if these will be effective for the targeted SPA species, as well as the potential effects on non-target biodiversity, landscape, archaeology, access and recreation. Further marine based biodiversity enhancement measures are also suggested, such as artificial reef creation through reef friendly rock placement/scour protection and cable materials, attachment of reef cages to foundations, marine litter removal projects, and the delivery of off-site restoration projects (e.g. native oyster bed restoration).

In relation to cultural heritage, the potential for further finds within the site are identified, and it is agreed that the proposal would not have a significant effect on the integrity and setting of the Skara Brae World Heritage Site. Whilst some omissions are identified in the applicant's assessment, it is concluded that there will be a clearly visible change in the seascape and the setting of sites and monuments on the west coast of Orkney. Whilst this change will be distant, it is counterbalanced by the scale and geographical spread of the proposed development.

5.25 **Orkney Islands Council (Archaeology)** do not object to the application. The applicant's setting assessments are judged to underestimate the contribution of the open seascape to the setting of coastal historic assets and of the relationships of assets to the sea.

5.26 **Orkney Islands Council (Marine Services and Transportation)** do not object to the application. It expressed support for the proposal citing economic benefits for Orkney and helping to meet net zero targets. The proposal has informed development of their Scapa Deep Water Quay project to support deployment to Scotwind sites. The evidence presented to accompany the application confirms the compelling case for the siting of the wind farm to the west of Orkney, with a combination of high, consistent wind speeds and water depths that can

accommodate the proposed fixed foundations. It also references the benefits of the projects supporting STEM activities creating opportunities for local young people to get involved with the project and the wider energy transition in Scotland.

5.27 **Royal Society for the Protection of Birds (RSPB) object** to the application. Concerns expressed in response to the EIA include a lack of confidence in the applicant's ornithological assessment, particularly relating to the modelling work undertaken and predictions drawn. It however welcomed the EIA FEI which has improved immeasurably on the original application. Nevertheless, they object as they do not believe this is the right location for a wind farm. This is principally due to predicted adverse effects on seabirds which are in decline, with the integrity of a number of Special Protection Areas being affected, and there being a lack of information provided in the application to ascertain effects on several others. It however welcomes the compensatory measures proposed but considers these not to be sufficiently developed or detailed.

5.28 **Royal Yachting Association** do not object to the application and has no further comment.

5.29 **Scottish Canoe Association** do not object to the application. This is on the basis that access is maintained for paddlesport around the shore of the proposed landfall.

5.30 **Scottish Environmental Protection Agency (SEPA)** did not comment on the application.

5.31 **Scottish Fishermen's Federation object** to the application. Concerns include the potential impacts on fishing in the area and suggests a range of mitigation measures in this regard, which is also reflected in the Marine Directorate commercial fisheries response above. Further detailed advice is given in relation to: the siting of turbines and platforms to avoid prime fishing ground; design of cabling; measures to secure full decommissioning; preparation of a Vessel Management Plan; construction to be undertaken out with fishing seasons and out with fish spawning and nursery periods; and in relation to the proposed draft Fisheries Management and Mitigation Strategy.

5.32 **Scottish and Southern Electricity Networks (Transmission)** do not object to the application. This is on the premiss that 'freedom of the seas' is maintained for cables relating to other projects, to cross the array and export corridor.

5.33 **Sports Scotland** do not object to the application and have no further comment.

5.34 **Transport Scotland** do not object to the application, subject to a condition to submit a Construction Traffic Management Plan (CTMP) prior to the commencement of the project. Should there be any road traffic and transport impacts associated with the construction, operation and maintenance and decommissioning of the offshore elements of the proposed development, these should be appropriately considered. Any assessment of the onshore effects of the offshore works should be scoped with the relevant road authorities.

5.35 **United Kingdom Chamber of Shipping** do not object to the application. Initially raised navigational concerns regarding the potential impact on shipping routes in

the area and asks for further information and mitigation details from the applicant. Further to submission of additional information, they confirm they are content with the actions undertaken and committed to by the applicant.

6. DEVELOPMENT PLAN POLICY

6.1 Appendix 3 of this report provides details of the documents that 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 The application has been submitted to the Scottish Government for approval under Section 36 of the Electricity Act 1989 (as amended) and for a Marine Licence under the Marine (Scotland) Act 2010. Although not a planning application, the Council processes Section 36 applications in a similar manner.

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

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

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 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.

7.4 Section 27 of the Marine (Scotland) Act 2010 requires that 'in determining an application for a marine licence (including the terms on which it is to be granted and what conditions, if any, are to be attached to it), the Scottish Ministers must have regard' to:

- The need to protect the environment;
- The need to protect human health;
- The need to prevent interference with legitimate users of the sea;
- Any representations received from any person having an interest in the outcome of the application;
- Such other matters as the Scottish Ministers consider relevant;
- The practical availability of alternative methods;
- The effects of any use intended to be made of the works; and

- Giving the applicant the opportunity to make representations to them about observations made by consultees.

Planning Considerations

7.5 The key considerations in this case are:

a) Development Plan / Other Government Policy
b) Energy and Economic Benefits
c) Layout, Design, Landscape and Visual Impacts
d) Natural Heritage (including Ornithology)
e) Built and Cultural Heritage
f) Other Material Considerations

Development Plan / Other Government Policy

7.6 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 2018 (CaSPlan), and statutorily adopted supplementary guidance.

National Policy

7.7 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 sets out how the Scottish Government will implement the strategies and policies contained in the document.

7.8 The Spatial Strategy sets out that we are facing unprecedented challenges and that we need to reduce greenhouse gas emissions and adapt to future impacts of climate change. It sets out that that Scotland's environment is a national asset which supports our economy, identity, health and wellbeing. It sets out that choices need to be made about how we can make sustainable use of our natural assets in a way which benefits communities. The spatial strategy reflects legislation in setting out that decisions require to reflect the long term public interest. However, in doing

so it is clear that we will need to make the right choices about where development should be located ensuring clarity is provided over the types of infrastructure that needs to be provided and the assets that should be protected to ensure they continue to benefit future generations. The Spatial Priorities support the planning and delivery of sustainable places, where we reduce emissions, restore and better connect biodiversity; liveable places, where we can all live better, healthier lives; and productive places, where we have a greener, fairer and more inclusive wellbeing economy.

7.9 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 consists of renewable energy generation well in excess of 50MW, as well as new high voltage electricity transmission lines, cables and interconnectors of 132kV or more, it is of a type and scale that constitutes NPF4 National Development 3 - Strategic Renewable Electricity Generation and Transmission Infrastructure.

7.10 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.

7.11 NPF4 Policies 1, 2, and 3 apply to all development proposals Scotland-wide, which means that significant weight must be given to the global climate and nature crises when considering all development proposals, as required by NPF4 Policy 1. To that end, development proposals must be sited and designed to minimise lifecycle greenhouse gas emissions as far as is practicably possible in accordance with NPF4 Policy 2, while contributing to the enhancement of biodiversity, as required by NPF4 Policy 3.

7.12 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 and their supporting infrastructure. 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.

7.13 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.

7.14 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.

7.15 Specific for energy developments, NPF4 Policy 11 states that the principle of all forms of renewable, low-carbon, and zero emission technologies is supported with the exception of wind farm proposals located in National Parks or NSAs. The policy goes on to state that while significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on reduction of greenhouse gas emissions targets, the development's impacts, including cumulative impacts, must be suitably addressed and mitigated against. In this regard, the Highland Council has consistently given significant weight to a development's contribution to environmental targets prior to the adoption of NPF4.

7.16 NPF4 Policy 11 Part e) sets out the additional project design and mitigation requirements for energy proposals. This includes a broad range of matters akin to those to be assessed under HwLDP Policy 67. This includes consideration of the landscape and visual impacts and advises that where impacts are localised and / or appropriate design mitigation has been applied such effects will generally be considered acceptable. Whilst this development proposal is offshore it will result in a number of onshore environmental effects, such as landscape and visual, meaning that the policy tests established in NPF4 remain applicable.

7.17 The other policies relevant to this proposal are set out in the previous section of this report, the provisions of which are considered throughout the report where notable conflict or compliance has been highlighted.

Highland wide Local Development Plan

7.18 At the Highland region level, the principal policies against which the applications requires to be determined are Policy 67 Renewable Energy Developments and Policy 69 Electricity Transmission Infrastructure of the Highland-wide Local Development Plan (HwLDP). These policies offer support for renewable electricity generation and transmission infrastructure, having regard to its level of strategic significance in transmitting electricity from areas of generation to areas of consumption.

7.19 HwLDP Policy 67 sets out that renewable energy development should be well related to the source of the primary renewable resource needed for its operation. Proposals are required to be judged according to their contribution in meeting renewable energy targets and positive/negative effects on the local and national economy, as well as against all other relevant policies of the Development Plan and other relevant guidance. In this regard the proposed development would make a significant contribution to meeting renewable energy targets. 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, either individually

or cumulatively with other developments, having regard to the policy's 11 specified criteria (as set out in Appendix 3 of this report). Such an approach is consistent with the concept of HwLDP Policy 28 Sustainable Design and NPF4 Policy 11 Energy, to achieve the right development in the right place, and to promote appropriate management of development and land uses in the long-term public interest; it is not to allow development at any cost.

7.20 As the development would also allow for renewable energy to be exported from an offshore wind farm to the transmission network, the principle of the development receives support under HwLDP Policy 69, subject to site selection, design and overcoming any unacceptable significant environmental effects.

Area Local Development Plan

7.21 The Caithness and Sutherland Local Development Plan does not contain any specific land allocations related to the proposed development. Paragraph 74 of the CaSPlan sets out that the Special Landscape Area (SLA) boundaries have been revised for the CaSPlan to ensure 'key designated landscape features are not severed and that distinct landscapes are preserved.' The boundaries set out in the CaSPlan are supported by a background paper that includes citations for each of the SLAs. Policies 28, 57, 61 and 67 of the HwLDP seek to safeguard these regionally important landscapes.

7.22 The CaSPlan recognises the potential for marine renewable energy generation, particularly in the north-east of the Plan area which is identified in the Spatial Strategy for energy business expansion. The CaSPlan aims to maximise the benefits to the local economy by adopting a more targeted, but still flexible, approach to identifying business and industrial land. It builds on the work carried out as part of the North Highland Onshore Vision (NHOV) which identified land use planning actions to support the growth of marine renewables. The Caithness and Sutherland Vision and Spatial Strategy 2030 states that the area will become an international centre of excellence for marine renewables.

Onshore Wind Energy Supplementary Guidance (OWESG)

7.23 The Council's Supplementary Guidance for Onshore Wind Energy is a material consideration in the determination of planning applications. It should be noted that the guidance does not provide additional tests to assess development proposals against over and above the Development Plan policy. Rather, the guidance compliments the policy by ensuring a consistent and robust methodology is adopted in the assessment of all applicable applications, in particular (although not exclusively) for consideration of landscape and visual impacts. In that way, the guidance provides a clear indication of the approach the Council takes towards the assessment of proposals.

7.24 The OWESG also provides strategic considerations that identify sensitivities and potential capacity for windfarm development called the Landscape Sensitivity Appraisals (LSA). The Caithness Sensitivity Appraisal were published in 2017 and forms an integral part of the statutorily adopted OWESG. The findings of this study identifies key routes and key views which need to be given consideration in bringing forward development. While directed to onshore wind energy, the findings of the

document are also applicable to offshore wind development given the similarities in development type.

7.25 Paragraphs 4.16 and 4.17 of the OWESG describe the 10 key design criterion that set the 'thresholds' developments should seek to achieve in order to ensure the development is appropriately sited and designed to avoid significant landscape and visual impacts, and in turn, comply with the applicable criteria of HwLDP Policy 67. The development's compliance or otherwise with the 10 criteria is discussed in the Design, Landscape and Visual Impact (including Wild Land) section of this report.

Other Government Policy

7.26 Scotland's National Marine Plan (NMP) was adopted in 2015, reviewed in 2018 and 2021 and an announcement was made in October 2022 on the development of the National Marine Plan 2. It outlines a national strategy for sustainable economic growth of marine industries, taking into account environmental protection. The plan covers Scottish inshore and offshore waters, setting policies with economic, social, and marine ecosystem objectives. The proposed site location was identified through the Sectoral Marine Plan (SMP) process as being in a suitable Plan Option area, and positive socio-economic benefits including significant supply chain benefits are expected.

7.27 The Sectoral Marine Plan for Offshore Wind Energy in Scotland (2020) (SMP) aims to identify sustainable options for the future development of commercial-scale offshore wind energy in Scottish waters, including deep water offshore wind technologies. The Plan established 15 Plan Option areas across four regions, capable of generating significant renewable energy. Feedback from consultation led to boundary amendments and the exclusion of certain options to mitigate negative impacts. The plan served as the basis for the ScotWind Leasing cycles and is reviewed periodically. It aligns with the strategic aims of the NMP and the development of Regional Marine Plans (RMPs). The proposed development falls within one of the established Plan Option areas (N1 PO) which has been identified as a sustainable option for future commercial-scale wind energy.

7.28 The Pilot Pentland Firth and Orkney Waters Marine Spatial Plan was adopted in 2016. It was developed by Marine Scotland, Orkney Islands Council and Highland Council. It sets out an integrated planning policy framework to guide marine development and activities and management decisions, whilst ensuring the quality of the marine environment is protected. Specifically related to this proposal is Sectoral Policy 4 (Renewable Energy Generation). This sets out that the plan will support proposals: sited in the areas identified through the Sectoral Marine Spatial Plan; where the integration of different marine uses have been considered; regard has been had to relevant factors in regional locational guidance; connections for developments have been considered against policies in the Local Development Plan; there has been early communication and consultation with affected stakeholders to avoid or minimise adverse impacts; and any adverse impacts are satisfactorily mitigated. Sustainable growth of marine renewable energy and the potential for co-existence with other marine users is a key objective of the Plan.

7.29 In summary, to aid Scottish Ministers determination of the proposed development, this report focuses on the terrestrial impacts of the proposed development, with the

Marine Directorate to consider these effects alongside other marine related interests established in this policy framework. The principle of developing an offshore wind farm in the proposed broad location is however well established, and receives strong policy support at both the regional, Scotland and UK level, subject to detailed matters such as siting and design, and consideration of all other environmental effects, as well as other material considerations raised, which are all critical to undertaking the planning balancing exercise and an informed decision making process.

Energy and Economic Benefits

7.30 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. A fundamental part of the Strategy is expanding the energy generation sector. Unsurprisingly, the material on onshore wind in the document reflects in large part the content contained in NPF4 and the Onshore Wind Energy Policy Statement (OWESP) 2022. 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.

7.31 In terms of offshore wind, the draft Scottish Energy Strategy and Just Transition Plan and the Offshore Wind Policy Statement has identified a target of 8-11GW of installed offshore wind energy capacity in Scottish waters by 2030. As one of the cheapest forms of electricity, offshore wind is described as having a vital role to play in decarbonising our energy demand and securing a just transition to net zero. Subject to planning and consenting decisions and finding a route to market, there is 38 GW of offshore wind projects in the pipeline. When projects which are awaiting construction, under construction or already operational are added to this, the total potential capacity reaches over 40 GW – the equivalent to producing enough electricity to power every home in the UK for over a year and a half. The Draft Energy Strategy and Just Transition Plan's theoretical pipeline, if all delivered, would be well in excess of the 8-11GW target.

7.32 Further, the UK Government Clean Power Action Plan has also recently set a more ambitious target of 43-50 GW of offshore wind by 2030, to significantly reduce our fossil fuel dependency, with offshore wind being described as having a particularly important role as the backbone of the clean power system. The reported current offshore installed capacity stands at 14.8 GW (Q2 2024).

7.33 The proposed West of Orkney Offshore Wind Farm would have an indicative maximum electricity generating capacity of 2,000MW, or 2GW. This would make a significant contribution to Scottish and UK Government policy targets, British energy security, and the international commitments for renewable energy and electricity generation to facilitate net zero by 2045. The application estimates that the project will produce enough electricity each year to meet the needs of the equivalent of 2,008,134 households (which increases to 2,746,081 households when a project specific capacity factor is used).

7.34 The electricity generated would be exported to the grid. The project's onshore connection and substation at Spittal has received Planning Permission In Principle. A planning application is also pending consideration for the development of Banniskirk substation and High Voltage Direct Current (HVDC) converter station. This is one of many planned grid reinforcement upgrades in Highland and elsewhere across Britain, which collectively are necessary to deliver the UK's energy strategy.

7.35 Wind turbines provide an important mechanism for the reduction of carbon dioxide (CO2), and other greenhouse gas (GHG) emissions into the atmosphere by reducing the consumption of fossil fuel generated mains electricity. However, during their manufacture, construction and decommissioning, wind farms can result in the emissions of GHGs, particularly where natural carbon stores, such as peat, are present and potentially impacted by the development, often termed "carbon balance".

7.36 The applicant has submitted a Climate and Carbon Assessment which considers the combined impacts associated with the proposed offshore wind farm, as well as the associated consented project's specific grid connection and substation. This assesses the GHG emissions and uses carbon dioxide equivalent (tCO2e) where equivalence means having the same warming effect as CO2 over 100 years. The majority of CO2e emissions are associated with the offshore construction stage (97.8%) with embodied carbon and construction vessel activity accounting for most of these emissions. Emissions during the operation and maintenance, as well as decommissioning stages of the project are limited in comparison. The total emissions for the project are reported to be 5,006,902 tCO2e. The payback period for the project, the period of time before the project has avoided more carbon dioxide equivalent emissions than has been produced by its construction and operation, is estimated to be 8 years, meaning that the project would make a positive contribution to achieving the UK Government's carbon budget.

7.37 In terms of economic benefits, the proposed development anticipates a construction period of approximately 4 years with the project being operational for 30 years prior to decommissioning or repowering. Such a project can offer significant investment/opportunities to the local, Highland, and Scottish economy including for businesses ranging across construction, haulage, electrical and service sectors through the supply chain, with opportunities in research and development, design, project management, civil engineering, component fabrication / manufacture, installation, and maintenance. The application is accompanied by a socio-economic assessment which looks at both the construction and operational phases for the development.

7.38 Localised disruption is also predicted during construction on tourism and recreation receptors. For the consented onshore elements, A Design and Access Statement was submitted with that application which set out how access would be managed, with this being conditioned through the Construction Traffic Management Plan (CTMP), recreational Access Management Plan and through a Construction Environmental Management Plan (CEMP). For the offshore elements, the long-term post construction operational impacts would likely result in significant adverse effects on the visitor experience in small parts of a number of affected settlements,

small parts of landscape or seascape character areas, or short sections of transport routes (such as the A838/A836, affected Core Paths, and the Scrabster-Stromness ferry route). However, the EIAR did not conclude that these effects would dominate the visitor experience in these areas, places, or routes. This is especially the case in Caithness and Orkney, but also is the case in Sutherland where the majority of the affected areas, places, or routes are located.

7.39 During construction, it is anticipated that up to 200 direct/indirect jobs will be created within Caithness and up to 453 in Highland. Beyond our region, direct/indirect construction job numbers are also reported to be up to 1,562 for Scotland as a whole, and 3,059 for the UK. The magnitude of impact for the construction stage would be high at the Caithness and Highland level, resulting in major to moderate significant socio-economic benefits. These figures are inclusive of the associated consented onshore cable connection and substation. During the operational phase, within Caithness the project is predicted to require an average permanent workforce of up to 115 personnel. In addition, there would be supply chain opportunities.

7.40 The applicant estimates that the operation of the project as a whole (the onshore development and the offshore wind farm) would generate additional economic output, measured in Gross Value Added (GVA)) both directly and indirectly. The assessment concludes that up to £36.4 million annual GVA could be generated in Caithness and Sutherland and £39.7 million at the Highland level during operation of the whole project (2018 prices). Mirroring the predicted employment impacts, the change in GVA levels are reported to result in a major to moderate positive significant effect.

7.41 The applicant submitted a Supply Chain Development Statement as part of the ScotWind leasing process, which sets out a commitment to investment in developing supply chain capacity within the UK. This includes over £9 million expected to be invested in upgrading ports and harbours in Caithness and Orkney. The applicant has set a target of 40% project content sourced from Scotland, with a further 20% elsewhere in the UK.

7.42 The applicant has also committed £33.5m to fund co-investment with the supply chain to help deliver a step change in Scottish and UK supply chain preparedness. This fund will be allocated across key areas working closely with individual suppliers and available across all tiers of suppliers. It will also be used by the partners to leverage match funding from third parties into the supply chain.

7.43 Other commitments set out include the establishment of a North of Scotland Workforce Strategy, diverse workforce programme, and student sponsorship programme with the applicant also having entered into agreements with the University of Highlands and Islands and the Energy Skills Partnership to deliver a local multi-level programme focussed on Science, Technology, Engineering and Mathematics (STEM) development.

7.44 Housing demand during the project's construction is anticipated to be high, particularly within Caithness and Sutherland. This can give rise to both positive and potentially negative effects and a Local Accommodation Strategy is therefore proposed. The applicant would work with local accommodation providers and agencies to promote the use of local accommodation during the winter months

when demand may be typically lower. Exploration of sites for temporary accommodation to relieve pressure on availability during the peak season is envisaged. Where possible, the project will seek accommodation close to the onshore work sites and local ports and harbours to reduce traffic. The next step is to establish partnerships with local accommodation providers to enter into long-term contracts or through the establishment of preferred supplier agreements.

7.45 The creation of visitor information stops are also proposed In Highland these would be along the North Coast 500 where there would be visibility of the proposal. The intention of these is to enhance the visitor experience by providing infrastructure, including a car park, project information boards, public toilets, bins, and electric vehicle charging points. The proposed location, layout and features of each visitor information stop is likely to require further separate planning approval.

7.46 Following consultation, the Highland Council's Community Wealth Building Strategy 2024-2027 was agreed by the Council on 19 September 2024. The strategy provides a framework that sets out how the Council will utilise different activities to maximise the impact of investment in local areas and support more local ownership of assets and wealth. Since the application has been submitted, the Council has also published the Social Value Charter for Renewables Investment in June 2024. This has been brought to the applicant's attention.

7.47 Officers understand that the applicant has been liaising with the Council's Economy and Regeneration Team in relation to the reported range of socio-economic benefits outlined above, and community benefit. The applicant has stated their intention to establish a community benefit fund to be shared across communities in Caithness, Sutherland and Orkney. Short and long-term priorities have been identified, that will continue to evolve as the project progresses. Following successful consent award, the Socio-Economic Working Group (or equivalent) is expected to continue. As community benefit is however voluntary in nature, this is not documented further within this Report of Handing with this not deemed a material planning consideration.

7.48 Although no community ownership has been proposed to date, the commitments set out in applicant's EIAR Chapter 19 Socio-Economics indicate that the proposal is potentially capable of contributing towards the Highland Council's Community Wealth Building Strategy, particularly in terms of ensuring the use of local supply chains and service, and local job creation. As such, additional support for the project can be given under NPF4 Policy 25 Community Wealth Building.

7.49 Similarly, NPF4 Policy 11 Energy states that development proposals 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 Council has commissioned a study on what maximising benefits from development might look like with the intention of providing further guidance. Whether what is on offer, while not without merit, can be said to be considered as maximising socio-economic benefit, particularly for the wider Highland area will need to be an area for further discussion with the applicant. The socio-economic commitments reported in the EIAR can however be secured by condition, with these being integral to the project and accordance with the

provisions of the Council's Development Plan.

Layout, Design, Landscape and Visual Impact

7.50 The applicant has undertaken a Seascape, Landscape and Visual Impact Assessment (SLVIA) to determine the likely significant effects of the wind farm and offshore transmission infrastructure. This assessment is based on a 'worst case' which is considered in the EIAR at 360m height to tip.

7.51 The methodology for the SLVIA follows that set out in Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3). The methodology for the LVIA as described is sufficiently clear to follow the applicant's logic, whereby any discrepancies of the applicant's final assessment of significance of effect between viewpoints where the sensitivity of the receptor and magnitude of change are otherwise the same is explained within the text of the SLVIA.

7.52 The applicants cumulative assessment for the purposes of the SLVIA includes two scenarios:

- Scenario 1 – impacts of the proposed development in combination with the consented and operational wind energy developments.
- Scenario 2 – impacts of the proposed development in combination with the consented and operational wind energy developments and developments at the application stage.

Site Selection and Design

7.53 Development in this area has some significant history, dating to 2017 and the first ScotWind leasing round. While the layout set out in the applicant's assessment is indicative and will be refined based on a range of technical criteria, the visual impact of the proposal has clearly been part of the applicant's considerations to date. The site selection process involved consideration of environmental and technical matters such as wind resource, water depths, ground and wind, wave and tidal conditions considerations, as well as consideration being given to other sea users including yachting route and key sightlines between Orkney and mainland Scotland to the south east, the helicopter main route in the east and commercial fisheries activities, as presented in Plan 2 (EIAR Figure 7) appended to this report.

7.54 Through the EIA process, the extent of the proposed Array Area, which reflects the demarked Options Agreement Area (OAA) represents a 44% reduction from the Sectoral Marine Plan for Offshore Wind Energy in Scotland's identified N1 Plan Option area.

7. During the assessment of the application, owing in part to the landscape and visual concerns expressed by both NatureScot and Council officers, the applicant has further reduced the maximum extend of the Array Area as illustrated in Plan 3 (EIAR Addendum Figure 4-2). The introduction of restricted Areas A and B represent a reduction in the Array Area by 13%. The introduction of restricted Area B retracts the turbine envelop by 3km in the south west corner, and by 1.1km along

the south eastern edge. Area B is within the zone identified by NatureScot as being a constraint area which relates to sensitivities from Cape Wrath and the Kyle of Tongue, the North Coast, and Hoy and the West Mainland of Orkney. The introduction of this restricted area therefore reduces the horizontal field of view when viewed from the coast of Caithness and Orkney, and represents an improved relationship and overall setback from both coastlines, particularly in comparison to the extend to the N1 Plan Option area. The northern extent of the Array Area has also been retracted to address navigational shipping concerns raised since the application was made.

7.55 The precise configuration of each turbine and associated infrastructure within the Array Area is yet to be finalised. This is expected to be subject to further project design refinement, based on the results of ongoing site investigations and turbine procurement. Whilst the overall Array Area has been reduced through the EIA Addendum, the maximum number of proposed turbines has not changed. The extent of this retraction is not however anticipated by officers to result in any significant changes to the findings set out within the EIAR for the chapters which have not been the subject of any EIA Addendum. This is however also a matter for the Marine Directorate to consider.

7.56 The proposed individual turbines (refer to Plan 4, EIA Figure 5-3, appended to this report) are proposed to be up to 360m in height when measured from Lowest Astronomical Tide (mLAT) sea level. Water depths within the Array Area generally range between approximately 41 mLAT and 90 mLAT, with the applicant confirming that owing to the separation distance from shore and curvature of the earth, that the limited extent of the yellow painted turbine fixed base would not be visible from land. Whilst it is officers expectation that the maximum turbine tip height is specified within the description of development of any forthcoming consent, failing that, this can be conditioned. The applicant is anticipating each turbine to have a generating capacity of between 15 and 25MW. This detail is yet to be finalised, this will not to be limited by the consent, rather it would be limited by the connection capacity to the grid.

7.57 The applicant has clearly set out the lighting requirements of the scheme to comply with current aviation and maritime safety standards. The lighting scheme proposed comprises the following:

- 2,000 candela medium intensity visible flashing aviation safety lighting on the hub of the turbines located around the perimeter. In clear conditions when visibility is greater than 5km, the intensity of the lighting will reduce to 200 candela; and
- Marine navigational lighting comprising of visible flashing yellow lights on each corner of the substructures at a maximum height of 30m. The nominal range for these would be 5 nautical miles (9.3km).

7.58 As part of the SLVIA, the applicant has undertaken an assessment of night time visual effects, better known as visual impacts in hours of darkness. This aviation lighting will appear somewhat of an alien feature in the views when darkness has fallen as the context of the development will not be easily read. The mitigation measure of reducing lighting intensity will however assist in reducing the impact during hours of darkness. The Significance of effects determined in the applicant's

assessment appears to be a reasonable interpretation of how the lighting would be experienced. Significant lighting effects (where lighting would provide a defining influence on a view or visual receptor) would occur for people across the north coast settlements of Durness, Midfield to Midtown, Skullomie and Coldbackie, Bettyhill, Kirtomy, Armadale, Lednagullin, Portskerra and Melvich. Such effects could also be experienced by recreational users of the outdoors, with road users less likely to be impacted owing to the intermittent presence of other light sources. In dark locations, the aviation warning lights are not expected to result in an obtrusive light that impedes the wider expanse of the night sky, which can be experienced readily above the aviation warning lights, nor result in brightening of the night sky (skyglow). The effect of visible aviation lighting is unwelcome, however, owing to the reduced lighting scheme, such effects would only be Significant during the predicted 6% of the year during poorer weather conditions when visibility is reduced and the medium intensity 2,000 candela lights are expected to be operational. It is to be hoped that as the detail design progresses, mitigation of lighting effects are increased as much as possible. A condition can be imposed to secure a reduced aviation lighting strategy, which is recommended to include provision for periodic assessment of the potential for installation of an Aircraft Detection Lighting System and the removal / switching off of installed visible aviation lighting.

7.59 In terms of the grid connection, the main driver of the selection of the offshore electricity cable corridor was the grid connection offer from the National Grid at Spittal, Caithness. Offshore cable search areas were developed as wide corridors between the Array Area and six potential cable landfall options along the north coast. The various landfall and cable route options were assessed against technical and environmental constraints. The landfalls at Greeny Geo and Crosskirk were identified as the preferred options, with these landfall locations avoiding environmental coastal designations, as well as ferry links at Scrabster to the east and operations at Dounreay to the west. It is currently anticipated that the five offshore export cables may landfall into a single location at either Crosskirk or Greeny Geo. However, if constrained, the offshore export cables will be split across these two landfall options. There will be no visibility of the export cables, with these being either buried 1.5 – 3m below the seabed or subject to rock protection.

7.60 Other proposed ancillary above sea level structures comprise five Offshore Substation Platforms (OSPs). These collect, transform and export the power generated by the turbines, They are to be sited within the Array Area, albeit their precise locations are yet to be finalised. The typical design of an OSP is shown in Plan 5, EIAR Figure 5-6, appended to this report. The OSPs will consist of a ‘topside’ single or multi-level platform fixed to the seabed. When measured with their associated crane and helipad, these facilities would measure up to 73 mLAT, with an antenna protruding marginally higher, with these being up to 66m in length and 45m in width. Whilst these are sizeable structures, owing to the separation distance from shore and predominantly static nature, these would be subservient to the turbines themselves.

7.61 In summary, the proposal’s siting has followed a plan led process and can be supported. The proposal has also been designed to yield as much renewable energy from the Plan Option area as possible, whilst also balancing this

requirement with environmental and operational constraints within and surrounding the site. In terms of layout, owing to the extensive lead in period to market, and project funding hurdles still to be overcome, a maximum worst case 'envelope design' approach has been taken at the application consenting stage. This approach however limits the degree of certainty that consultees can have in the predictions of what constitutes the worst case scenario. For example, if survey work were to limit locations where turbines can be placed within the Array Area, the cohesiveness of the array, which has improved throughout the consultation process, could be substantially undermined. In light of such possibility, continuing dialogue from the developers with the consultees is essential in continuing to shape the project towards its best outcome. While the layout and design appears acceptable at the present time, given the indicative nature of the layout, it is recommended that the finalised layout and design of the development within the extent of the Area, be secured by condition requiring the prior approval of the neighbouring Planning Authorities and the Marine Directorate, in consultation with NatureScot.

Landscape Impacts

7.62 There are several aspects to consider in determining whether this development represents an acceptable degree of impact on landscape / seascape. This includes impacts on landscape designations, including national and regional designations, as well as impacts on Distinctive Coastal Character Areas and Landscape Character Types. This report considers effects on landscape interests within Highland within a 60km study area. The requirement for undertaking a Wild Land Assessment was scoped out with the agreement of NatureScot.

National Designations

7.63 The proposed development will have visibility from the Kyle of Tongue National Scenic Area (NSA). The applicant's assessment has concluded that there would be significant adverse effects on parts of two of the Special Landscape Qualities (SLQs) – SLQ 3: Scale, from domestic to monumental; and SLQ 5: rich variety of coastal scenery (particularly in relation to Torrisdale Bay). The assessment concludes that there would be no significant effects on the remaining SLQs or the overall integrity of the NSA.

7.64 SLQ 3, relates to the contrasts between the small domestic scale of crofting and other activity around the coastal shores with the monumental outer landscape presented by the mountains to the south and the open ocean to the north. The turbine array would come into views along the shores of the Kyle of Tongue at around 25 km distance. From elevated locations the array would appear at the broad mouth of the Kyle where a scattering of islands mirror the landform of the rocky coastal promontories and mark the transition from open ocean in the north to the coastal crofting activities along the shore to the monumental scale of the mountains further to south. The open ocean to the north features as the special quality of monumental scale contrasting with the small-scale coastal shores and as such the proposals would contrast with the 'scale' of the settled coast with the open ocean and the incised interior of the Kyle.

7.65 SLQ 5 relates to the variety of coastal scenery within the area, including both soft landscapes of sand and mud and harder landscapes of rock and cliff. A key element of this variety is the long, sandy, Torrisdale Bay. The proposed turbines would appear in wide views across the open sea horizon and contrast with the visual composition of sky, sea and land to the north. In relation to the coastal scenery along the northern coastline, the proposals would appear at the broad mouth of the Kyle of Tongue, where a scattering of islands mirror the landform of the rocky coastal promontories and mark the transition from open sea to sheltered Kyle in the south. Up to 60 degrees of the horizon at some points would be filled by the proposed array, in between small islands.

7.66 Following the amendments made to retract the envelope of the scheme, NatureScot confirm that this has increased the separation distance from the most sensitive areas of the coastline, including from is NSA. Whilst they acknowledge that this increased distance reduces the apparent height of the turbines, NatureScot however state that in their view, the design process undertaken does not go far enough to demonstrate a process which seeks to reduce effects on the nationally recognised, highly valued, sensitive coastal landscapes of the North Coast and Kyle of Tongue NSA. Whilst not objecting, NatureScot consider that the amendments made to the scheme would not result in any change in effect on the NSA and the North Coast.

7.67 NatureScot are also in agreement with the applicant's assessment of effects on SLQ3, and SLQ5. The EIAR Addendum's inclusion of the requested additional wirelines and visualisations from the bays along the coast of the Kyle of Tongue NSA has also allowed NatureScot to conclude that effects on SLQ5 would be more extensive than just Torrisdale Bay, stating that the perceptual experience of the transition from the inner sheltered Kyle to the outer exposed Kyle along the entire north and north-east facing coastline of the NSA would be affected, as demonstrated by the visualisations provided and the additional viewpoint wirelines from Talmine Bay and A836 above Coldbackie Bay. Further adverse, but not significant effects, are also advised could be avoided across more inland areas of the NSA should a reduction turbine height or increase separation distance be achieved. This would benefit where the proposal would be visible above the Rabbit Islands, which form the focal point of funnelled views northwards from the A838 over the outer Kyle.

7.68 In summary, NatureScot advise that if the scale of the scheme were to reduce further, this would lessen the extent of landscape impact effects on the NSA. Whilst the applicant has sought to do so through the EIAR Addendum, this has not overcome NatureScot's concern, nor materially altered the reported extent of significant adverse effects which would occur for two of the six special qualities of this NSA. NatureScot's findings are agreed by officers, with renewable energy schemes of this scale expected to result in some significant adverse effects, with the integrity of the NSA being maintained, hence why NatureScot do not object.

7.69 The potential for significant effects on the North West Sutherland NSA have also been considered, however, as agreed by NatureScot have been scoped out of further assessment. There would be visibility from this NSA, however, this designation is located 40km from the proposal and its special qualities do not

having a strong relationship with the north coast.

Distinctive Coastal Character Areas

7.70 NatureScot define landscapes of regional distinctiveness as recognisable geographical areas with a consistent overall character at a strategic level. Their Landscapes of Scotland map identifies an extensive 20 km deep band of coastline area from Melvich Bay in the north, 70 km westwards as far as Loch Inchard on the west coast. This area is described as Area 4 North Coast. The mapping provides a useful strategic context for the relationship of one landscape to another.

7.71 The North Coast landscape has a clear strong sense of place, stemming from its regional context as a destination to experience the rich scenic diversity of sea, coast and mountains which contributes to the wider national landscape resource. Scotland's North Coast is distinctive at the regional scale and is described as:

> "At the northern edge of the UK mainland, this coastline is characterised by the striking views across both land and open sea. A number of distinctive mountains form the backcloth to this area, which is characterised by a rhythmic pattern of low-lying straths, glens lochs and bays that penetrate the more elevated, wide open expanses of peatland".

This distinctiveness is well experienced from the Kyle of Tongue, cliffs and bays, and along the A836 / A838 which forms part of the popular NC500, to include the scattered settlements that lie along it.

7.72 The proposed development, given its location, has the potential to affect the landscape character at the local and regional scale. The applicant's EIAR Addendum finds that the proposal would give rise to a Moderate and not significant effect on the North Coast. When seen from elevated locations the proposal is described as a vast seascape, with focus remaining on the coastal cliffs, offshore islands and lighthouses. It is however conceded that there would be greater effects upon framed views from indented bays.

7.73 NatureScot consider this area of distinctive character to be highly sensitive to development of this scale, as it would provide a new setting to the coastal area which would affect perceptual qualities experienced from the lower lying coastal crofts, bays and high cliffs. NatureScot consider that the scale and siting of the proposal could result in significant effects on the distinctive character of Scotland's North Coast. Effects of the proposal on experiential and perceptual qualities would be most profoundly experienced from the low-lying intricate settled bays and north-south orientated Kyles and sea lochs where the proposal is experienced in framed views out over the 'simple horizon' of the North Atlantic. The proposal would affect the more enclosed, intimate visual character of the small scale seascape afforded by the indented bays along the North Coast. In addition, the perceptual responses of tranquillity and seclusion from these bays would also be affected.

7.74 NatureScot consider effects would be further compounded by cumulative effects resulting from the application stage Melvich Wind Farm. That proposal will be subject to Public Local Inquiry following Highland Council raising an objection. The extent of cumulative effects with onshore wind energy proposals has however also reduced in extent, due to Armadale Wind Farm proposal having been withdrawn.

7.75 NatureScot conclude again that whilst there has been a demonstration of further design development, the revised layout would result in a no change in effects on highly valued and sensitive coastal landscapes of National Interest. Again, despite these findings, NatureScot do not state that they object, rather concluding that further design iterations could be achieved by working with the applicant prior to the submission of a final Design Statement and Layout Plan which can be conditioned.

Regional Designations

7.76 The applicant has undertaken an assessment of the impacts of the proposed development on the Special Landscape Areas (SLA) along the north coast. Four SLA's are scoped in for assessment:

- Oldshoremore, Cape Wrath and Durness;
- Eriboll East and Whitten Head;
- Farr Bay, Strathy and Portskerra; and
- Dunnet Head.

Due to the intermittent visibility and distance of the development from within each of the SLA's, the applicant has assessed the landscape effects as not significant. This is not disputed by Council officers:

- **Oldshoremore, Cape Wrath and Durness SLA** - The applicant's assessment of the effect on the designation is Moderate and Not Significant. The Council's landscape officer has considered the extent and nature of the visibility from the SLA, and the nature of the Special Qualities, which generally focus on the more western parts of the SLA. As such the applicant's assessment is accepted.

- **Eriboll East and Whitten Head SLA** - The applicant's assessment of the effect on the designation is Moderate and Not Significant. The Council's landscape officer has explained that the Special Qualities for the SLA which would be most susceptible to offshore wind development is 'Striking Views', highlighting 'a series of framed views, both inland to the dramatic mountains of north Sutherland, and northwards towards the open sea'. The applicant's assessment acknowledges visibility of the development from the Loch Eriboll area, but it is apparent that the described frames views to the sea are not obtained from the majority of the A838 and may be limited to views from Ard Neackie and from the viewpoint/pull-off at An t'Sron, which lies south of Ard Neackie and east of Eilean Choraidh. Neither location appears to be within the predicted visibility splay. This being the case, the Special Quality is not likely to be significantly affected, and the current assessment is accepted.

- **Farr Bay, Strathy and Post Skerra SLA** - The applicant's assessment of the effect on the designation is Moderate and Not Significant. The Council's landscape officer considers that the effects on the experience of the enclosed and sheltered bays would be altered with Armadale and Swordly Bays being the most affected. The SLA citation does not particularly address the nature of the sea view from enclosed bays. The Special Quality 'Dramatically Intricate Coastline and Forceful Sea' draws attention to their

sheltered nature and ‘tranquil setting’, which would not be significantly changed by the presence of the development. The ’Big Skies and Extensive Views’ Special Quality is also relevant, particularly to the higher ground above cliffs and on headlands, and is strongly expressed at Strathy Point. The proposed development would form a significant new visual element within views, but would not in itself reduce the impression of big skies or limit the extent of the view and experience of coastal light and weather changes. Taking these factors into account, the current assessment is accepted.

- **Dunnet Head SLA** - The applicant’s assessment of the effect on the designation is Moderate / Minor and Not Significant. In relation to the Special Quality of “panoramic views from prominent headlands and striking cliffs”, due to the intervening distance, the proposal would not impinge on views towards the headland from the east and west or the expansive panorama seen from Dunnet Head itself. It would not disrupt the gentle curve of Dunnet Bay and its qualities of seclusion neither would it compromise the perceived large scale of the headland and the distinctive landmark qualities, leading to a low magnitude of change. This is not disputed with the proposal being 38km from this SLA.

Landscape Character

7.77 Numerous regional landscape character types contribute to the repeated pattern of the distinctive North Coast. The Sandy Beaches and Dunes, High Cliffs and Sheltered Bays and Coastal Croft and Small Farms Landscape Character Types (LCT) are interwoven with each other along this stretch of northern coastline. The Coastal Croft and Small Farms LCT description makes reference to the relationship of these LCTs in creating the highly scenic character of this coast which is highly distinctive. ‘On the northwest Sutherland coast, this farmed and settled landscape is often seen in conjunction with intricate coastal features including sandy beaches, dunes, rocky headlands and islands, contributing to the richly scenic character of these coastal areas. The proposal would affect the strong sense of seclusion and interrupt the experience of the framed views of the simple horizon afforded by the sea from these small-scale intimate bays. The Council’s Landscape Officer agrees with the applicant’s LVIA findings in terms of impact on Landscape Character. This is with the exception of cumulative effects as explained below.

Cumulative Landscape Effects - Onshore Grid Infrastructure

7.78 Cumulative effects with the project’s consented onshore substation are likely to be minimal. The study area for impacts of the substation was limited to a 5km area, as significant visibility beyond this limit was agreed to be scoped out. There is some visibility showing overlap with the offshore wind element, but this is limited in extent and not likely to give rise to significant cumulative effects on any SLAs.

7.79 Similarly, cumulative effects with the proposed Banniskirk Substation are likely to be minimal. The study area for that proposal’s impacts was limited to a 4km area with significant visual effects beyond this limit agreed to be scoped out. While there is some overlapping visibility with the offshore development, the greatest visibility of the offshore turbines is within the Banniskirk substation site itself. As such, in-combination cumulative visibility of the two projects is unlikely to be experienced by

many receptors.

7.80 The Banniskirk EIA cites the West of Orkney Wind Farm grid connection as being the cumulative project most likely to contribute towards operational cumulative effects. Such effects are considered collectively to change the character of the local landscape, with Banniskirk being the more significant contributor to the effect. However, the EIA concludes that the magnitude of change would remain low in respect of the scale of the host Farmed Lowland Plain Landscape Character Type (LCT) and the additional cumulative effect would be minor.

7.81 The Council's Landscape Officer explains that this affected LCT is under increasing pressure for substation and other energy related developments. The LCT is a single area, occurring only in Caithness. That singularity should be considered to raise the value of the landscape due to its uniqueness and contrast with surrounding landscape character types. That said, it remains unlikely that this would be sufficient to elevate the cumulative effects with West of Orkney Wind Farm to a level of significance. Therefore, the non-significant effect of West of Orkney Wind Farm on the LCT is accepted.

Cumulative Landscape Effects - Offshore Projects

7.82 The offshore project which is likely to give rise to significant cumulative effects is the consented Pentland Floating Off-Shore Wind Farm (PFOSWF). The SLVIA concludes that existing development associated with the coastline means that 'the added cumulative magnitude of change attributed to the offshore Project would be reduced and seen as a subsidiary distant element behind the PFOSWF', and that this combined with the two developments' contrasting distances from the shore lead to a magnitude of change varying from low-negligible to medium.

7.83 The magnitude of change assessment informs a conclusion of Not Significant cumulative effects with PFOSWF effects on the Dunnet Head SLA and the closest Coastal Character Areas.

7.84 While the Council's Landscape Officer confirms that it is not disputed that the cumulative effects on the Dunnet Head SLA do not directly affect the Special Qualities set out for the designation, there would be undoubted effects on the perception of views of open sea from Dunnet Bay. The West of Orkney development would be seen as visually related to Dunnet Head, with PFOSWF similarly visually anchored to Holborn Head. In combination, the two developments would represent a significant change to the relationship of the bay to the open sea in views framed by the headlands. It is also worth considering the degree to which the nature of potential developments has changed since the citations for THC's SLAs were first drafted and how qualities which may have been thought unchangeable may be under-represented in the citations.

Cumulative Landscape Effects – Onshore Wind

7.85 It is noted that Bettyhill Phase II is now approved. This wind farm does not appear in either the consented or application wind farms list for consideration of cumulative effects, which may be a quirk of timing. Due to the relative excessiveness of Bettyhill II from the coast it is unlikely that there would significant cumulative effects arising.

7.86 The SLVIA addresses cumulative impacts with on-shore developments primarily with respect to the presence and absence of Simultaneous, Sequential and Successive visibility and concludes that effects are generally limited. The Council's Landscape Officer advises that this approach does not capture the regional scale of the effects of the proposed development and the degree to which it represents a potential change to the overall perception of the North Coast in Caithness and into Sutherland. The SLVIA states that 'The off-shore Project would not increase the magnitude of change [of Scenario 1 on-shore developments] to the extent that the landscape would become a windfarm landscape'. The consideration for a development of this scale, particularly one located beyond the edge of the land itself, should extend beyond the concept of a wind farm 'landscape' and consider whether a 'wind farm place' or 'windfarm zone' is created.

7.87 The GLVIA3 cautions against the risk of missing significant effects through the complexity of the assessment, which can speak to how applicants and officers put together the understanding of effects identified under different headings such as Designated Landscapes, Coastal Character Types, Landscape Character Types and Route Assessment. For a development whose effects are regional in scale, it is particularly important that the collective outcome of both significant and below significant effects spread across the study area should be understood. There may not be significant effects on SLA's, or landscape character areas, but that does not necessarily mean that receptors living and working in, or visiting, the north coast would not perceive or experience a diminution or degradation to the character of the north coast as a whole and to the regional sense of place.

Visual Impacts

7.88 The Zone of Theoretical Visibility indicates that the development would be visible beyond the 60km study area however visibility will predominantly be concentrated within 10 to 20km of the northern coastline which is set back form the Array Area by at least 23km, with this closest mainland area being Strathy Point. Elsewhere, the coastline separation distance is greater. Further to the east towards Dunner Head this is over 40km and to the west this separation distanced reduces to being more consistently at around 25km out to around Durness, before increasing to around 35km at Cape Wrath. Beyond the coast, visibility inland more extensive across the northern slopes of more elevated ground. Visibility of the turbines is more consistent along the coastline's main settlements and transport route, the A836 that broadly runs perpendicular to the south of the development, albeit with many stretches of this route are winding in nature around more challenging terrain and sea lochs, particularly further to the west.

7.89 The EIAR and its Addendum includes a visual impact assessment from 28 viewpoints (VPs), 19 of which fall within Caithness and Sutherland. Any large-scale wind energy scheme would be expected to result in significant visual effects. This is acknowledged through the OWESG, which explains that significant effects do not automatically translate to unacceptable effects. Following a review of the applicant's LVIA, there are however several differences in finding between the applicant and Council officers.

7.90 Appendix 5 of this report provides a summary of the applicant's visual assessment

and the officer's appraisal of the assessment, which highlights any differences and any concerns with regard to visual impact. Pertinent findings are outlined below

7.91 Based on the EIA Layout - The applicant identified the proposed development would give rise to significant adverse visual effects for people at ten representative locations within a separation distance of 34.3 km from the Array Area. These are:

Caithness and Sutherland:

- VP1 Fariad Head
- VP4 Achininiver Beach
- VP5 Torrisdale Bay
- VP6 Strathy Point
- VP7 Melvich Beach
- VP10 Crosskirk, St Mary's Chapel (Original EIAR Layout Only)
- VP19 A836 Dounreay (Original EIAR Layout Only)

Orkney:

- VP20 Scrabster – Stromness Ferry
- VP21 Rackwick Bay
- VP22 Path to Old Man of Hoy

7.92 Based on the EIAR Addendum layout – As a result of the amendments made, significant adverse visual impacts identified in the EIAR are reported to have been overcome / removed at: VP10 Crosskirk, St Mary's Chapel and VP19 A836 Dounreay. Council officers dispute that the EIA Addendum would overcome / remove significant effects at VP10 and VP19, however, still welcome the amendments made to the scheme. Some of the predicted visual effects elsewhere have also been reportedly reduced, albeit that this has not materially altered the reported extent of significant effects.

7.93 In addition, Officers have identified that significant adverse visual effects would also occur at two further viewpoint locations:

- VP2 Ben Hope
- VP9 A836, Reay Kirk, Sandside Bay

7.94 When taking into account the cumulative effects of the proposal (in combination with other operational / under construction / consented projects, as well as with schemes at application stage), Council officers have identified nine significant adverse cumulative visual effects extending to a separation distance of up to 48.9km. Locations in addition to the solus assessment's identified significant effects are: VP8 Beinn Ratha and VP16 Beinn Freiceadain Hillfort. Those in bold below have only been identified by officers and are not reported within the applicant's assessment:

- VP1 Faraid Head
- **VP2 Ben Hope**
- VP6 Strathy Point
- **VP7 Melvich Beach**
- **VP8 Beinn Ratha**
- **VP9 A836, Reay Kirk, Sandside Bay**

- **VP10 Crosskirk, St Mary's Chapel**
- **VP16 Beinn Freiceadain Hillfort**
- **VP19 A836 Dounreay**

7.95 This brings the combined total number of significant adverse visual effects to fourteen viewpoints.

7.96 The severity of these significant effects is variable across the study area, with officers having found the most acute impacts to be across the northern coastline with a singular Major adverse significant visual effect occurring at Strathy Point which is the closest onshore location to the proposed Array Area. The development will be predominantly viewed by three different types of receptors: residents and those in and around settlements; users of the road network; and recreational users of the outdoors.

Impacts on Settlements

7.97 Settlements located along the northern narrow coastal strip of Caithness and Sutherland would sustain significant adverse visual effects. The largest settlements of Thurso, Dunnet and Castletown are however located out with the ZTV. In Sutherland, significant effects are reported to occur within: Durness; Midfield to Midtown; Skullomie and Coldbackie; Bettyhill; Kirtomy; Armadale; Lednagullin; and Portskerra. In Caithness this is reported to be confined to Crosskirk, however Officers consider the settlement of Reay to potentially also be significantly affected due to cumulative effects. The EIA Addendum has sought to mitigate this by marginally increase the coastal setback, however, owing the extent of the Array Area, such effects cannot be effectively designed out. The prevailing setback proposed justifies the scale of turbines proposed, and further layout refinement is necessary to smooth out the balance of the array which can be conditioned. For the people within these communities, the project represents a step change in visual effects, however the turbines are mostly experienced in seaward views where they appear distant and on the horizon.

Impacts on Users of the Road Network

7.98 In relation to road users, the primary concern is the impact on users of the A836, which also forms part of the North Coast 500 tourist route. This route has been subject to sequential route analysis which has identified that around 55 km of the route would have theoretical visibility of the proposed turbines. This is however more intermittent, particularly further to the west. The applicant concludes that significant effects would be limited to a 7.7km stretch of this route. These effects would occur:

- eastbound for approximately 1.7 km between Tongue (sequential VP1) and Coldbackie around the lower slopes of Ben Tongue and Cnoc an Fhreiceadain, and approximately 6 km intermittently between west of Armadale Bay and Melvich (sequential VPs 6 though to 11); and
- westbound for approximately 5 km intermittently between Melvich and west of Armadale Bay, and for approximately 0.5 km between Coldbackie to Tongue along the lower slopes of Cnoc an Fhreiceadain.

7.99 This equates to significant visual effects occuring intermittently over a period of approximately 5-10 minutes, whilst travelling at 40-50 mph, in any one direction.

7.100 Whilst a number of other more localised routes and sections of road may be affected, it is agreed that significant effects would be confirmed to users on the A836. This is generally because the routes heading north follow the lower lying areas and along the straths where there is limited visibility of the proposal. The applicant's stated duration and extent of significant effects is also considered to be fair for the significantly affected areas reported. There are however longer stretches of visibility between west of Scrabster through to Reay (VP9 and inclusive of VP19 Dounreay) for 10km where officers consider significant effects would also arise, particularly westbound. It is however accepted that the consented Pentland Floating Wind Farm would likely be the principal focus owing to its closer proximity and prominence in these views.

Recreational Users of the Outdoors

7.101 Beyond the NC500 route, which also forms part of the Sustrans National Cycle Route 1: Inverness to John O' Groats, the applicant's assessment has identified significant visual impacts for a range of settlements located along the north coastline, as previously reported, with there being a number of core paths around these settlement where these face directly out to sea. Such recreational routes at these lower elevations would be significantly affected on days with clear visibility, when users of the coastal headlands, bays and beaches would also experience the proposal, with the locations significantly affected set out in the viewpoint assessment. Users of the Ferry route between Scrabster and Stromness would also experience significant visual effects, with this route generally being set back by around 26 km.

7.102 Officers have also identified that such significant effects would not be confined to the lower lying coastal margins and that more extensive visibility of the proposal would occur across more elevated ground, albeit at a greater distance, as shown by the ZTV.

7.103 Hillwalkers at VP2 on the munro summit of Ben Hope within the Kyle of Tongue NSA would experience significant visual effects on days of optimum hill walking visibility to take in panoramic views across Caithness and Sutherland. Although the array is low down in the seascape, and would not intervene in the view towards Hoy, the elevated view over the sea is a key attraction of this summit, with the vast uninterrupted seascape being diminished by the scale of this proposal, with this northern view capturing the full horizontal extend and depth of the wind farm, with its compositing potential being less coherent as a result of outlier turbines located at the western edge of the array. The lack of integration of these limited number of turbines is to the detriment of the scheme, albeit that this is an indicative layout with scope remaining for further refinement.

7.104 Hillwalkers at VP8 on Beinn Ratha would also experience in-combination cumulative effects. Whilst the project would clearly read in a separate space, it would fill the backdrop off Pentland Wind Farm resulting in contrastingly designed layered windfarms in seaward views. Similarly, although at a considerable distance

of 48.9km visitors at the Beinn Freiceadain Hillfort VP16 would experience the array partially behind the intervening onshore wind farms and across the sea horizon. The wireframe provided indicates a continuous band of wind farm development across the northern horizon covering land to the west at Limekiln and across the sea with the array engulfing Pentland and adding additional weight to the cluster of turbines at Baillie. The addition of Cairnmore Hill if consented would extend this effect further to the east. The totality of these projects if all developed have not been presented as a photomontage and therefore officers have identified this significant as a worst case scenario.

7.105 Such more elevated significant effects are however extensive, with the project's visibility being generally more contained to the coastal areas owing to the relatively low lying inland nature of Caithness and Sutherland. That said, the related connecting grid infrastructure requirements to serve this proposal would also cause in-combination effects, however, the decision to underground this project's connection well inland away from coastal areas helps to avoid in combination visual effects for the coastal areas which would be most affected by this proposal.

Natural Heritage

7.106 The applicant has undertaken a number of surveys and related assessments in relation to benthic ecology, fish and shellfish ecology, marine mammal and other megafauna. While a number of species have been identified within the area, subject to the implementation of mitigation through design or via condition, it is not anticipated that there would be any significant effects. NatureScot and Marine Directorate Science are the government's technical advisors on such matters and have no objections, subject to conditions to cover such matters.

7.107 In relation to ornithology, the methodology for the assessment has been questioned by the RSPB and NatureScot. However, it should be noted that the study of collision risk for marine ornithology is an evolving subject. The applicant had however reached an agreement with Marine Directorate on the methodology to be employed. The applicant is in dialogue with Marine Directorate, NatureScot and RSPB to resolve the concerns with the modelling. It is anticipated that an agreement will be reached, and that Scottish Ministers will have sufficient information to allow them to reach a view on the impacts on marine ornithology.

Built and Cultural Heritage

7.108 The applicant's EIA incorporates a marine archaeology and cultural heritage study area, encompassing the offshore project area and a 60km buffer area to determine indirect setting impacts on onshore historic environment assets.

7.109 The potential impacts of the offshore project construction and operation include loss of or damage to known and unknown marine and intertidal historic environment assets, loss of or damage to submerged prehistoric landscapes and long term changes to the setting of onshore historic environment assets that reduces their value. There are no known wrecks within the application site. While a number of surveys have been undertaken to establish seabed conditions there remains scope for unknown marine and intertidal archaeology within the area as a result of the use of the area for military operations, fishing and aviation.

7.110 No significant impacts to any marine archaeology and cultural heritage receptors within the Highland Council Area are predicted by the applicant's assessment. The applicant proposes a suite of embedded mitigation measures in the event of any accidental discoveries of archaeological interest. This includes the production of a marine heritage Written Scheme of Investigation (WSI) and Protocol for Archaeological Discoveries (PAD). As the offshore site is beyond high mean water springs, then the archaeological matters fall primarily into the remit of Historic Environment Scotland. However, the Council's Historic Environment Team will also have an interest given the way in which it will assist in our understanding of the area. If there are finds it is expected that the applicant will make the information available to the Council for inclusion within the Historic Environment Record.

7.111 An assessment has also been undertaken of the setting of onshore historic environment assets. This has considered a range of listed buildings and Scheduled Monuments. The applicant has provided visual material to assist in the consideration of the impact on the setting of those features. Particular consideration has been given to the way in which these historic assets would be appreciated and the impact on people understanding of the assets if the development is constructed. The applicant has not identified any significant adverse effects on the setting of any of the cultural heritage features within the study area. Historic Environment Scotland broadly agree with the findings of the assessment undertaken by the applicant. An exception is the impacts on the setting of the Category A listed Sule Skerry Lighthouse, in the Orkney Islands Council area, where further information was required, including wireline visualisations. Overall, the project has no apparent direct impacts upon built heritage and a relatively minimal impact upon the setting of coastal listed buildings due to separation distances. The Council's Historic Environment Team (Conservation) has no objections to the proposal and agree these findings.

Other Material Considerations

7.112 **Transport and Access** - This is an application for the offshore elements of the development only. It is anticipated that all major components of the offshore infrastructure will be taken to the site by marine transportation vessels, therefore an Abnormal Loads Assessment is not required. There will be onshore vehicular movements associated with works taking place at the construction, assembly and maintenance ports, however, the impact on the local or trunk road network is not considered significant. There is likely to be movement of staff between the servicing bases and their place of residence. As the service bases are yet to be confirmed it is not possible to reach a significance of assessment on such matters. It is anticipated that the road network will be affected by the onshore elements of the works. A separate planning application under the Town and Country Planning (Scotland) Act 1997 (As Amended) has been approved by the Planning Authority for the onshore infrastructure, under reference 23/05353/PIP.

7.113 **Noise -** The applicant has not assessed onshore noise directly. However, Environmental Health have raised no concerns due to the offshore positioning of the turbine array

7.114 **Telecommunications, Aviation and Maritime Safety -** Based on the submissions

made by the relevant interests for these matters, subject to technical matters being addressed and guidance followed in the final designed layout of the scheme, it is not anticipated that there will be any effects on telecommunications, aviation or maritime safety. As the proposal will require visible aviation safety lighting, a condition can be imposed to secure a reduced aviation lighting strategy, which is recommended to include provision for periodic assessment of the potential for installation of an Aircraft Detection Lighting System and the removal / switching off of installed visible aviation lighting. A condition can also be applied to secure a radio and television reception mitigation plan should any further mitigation be necessary.

7.115 **Decommissioning -** There is a legal requirement under the Energy Act 2004 for the site to be decommissioned at the end of its working life. The applicant's EIAR includes an outline decommissioning programme, that will be subject to review every five years while the project is operational, if consent is granted. A decision may also be taken at some point within the period of operation on whether the development should be re-powered.

7.116 **Determination Procedure** - Representations raised queried how any forthcoming objection from the Council would be treated by Scottish Ministers and if this would automatically trigger a Public Local Inquiry (PLI) to be held. It is officers understanding that no such automatic PLI trigger would apply for offshore Section 36 application where there is no direct terrestrial interest. Following a Council objection, the need for any further procedure would therefore be at Scottish Minister's discretion. Further guidance on this is set out within Section 4.11 of the Offshore wind, wave and tidal energy applications: consenting and licensing manual, Scottish Government, published 15 October 2018:

https://www.gov.scot/publications/marine-scotland-consenting-licensing-manual-offshore-wind-wave-tidal-energy-applications/pages/5/

Non-Material Considerations

7.117 The issue of need for further wind energy development in the North of Scotland is not a material consideration, given that this need is clearly established within several government policies and associated publications. Similarly grid capacity constraints are also not a material consideration, as explained in NPF4 Policy 11. Community benefit is also a voluntary nature and remains a non-material consideration.

8. Matters to be Secured by Section 75 Agreement

8.1 A decommissioning and restoration financial guarantee can be secured by condition. No legal agreement is required should consent be granted.

9. CONCLUSION

9.1 The Development Plan and national planning policy expressly support the deployment of renewable energy development, particularly offshore wind. The intention to develop an offshore wind farm in the proposed location is also well established. The Sectoral Marine Plan for Offshore Wind Energy in Scotland aims to identify sustainable options for the future development of commercial-scale offshore wind energy in Scottish waters. The Plan established 15 Plan

Option areas capable of generating significant renewable energy. Feedback from consultation led to boundary amendments and the exclusion of certain options to mitigate negative impacts. The plan served as the basis for the ScotWind Leasing cycles and is reviewed periodically. The proposed development falls within one of the established Plan Option areas (N1 PO) which has been identified as a sustainable option for future commercial-scale wind energy. The principle of developing an offshore wind farm in the proposed locations is therefore well established and receives strong government support.

9.2 When considering such proposals, NPF4's 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 choices need to be made about how we can make sustainable use of our natural assets in a way which benefits communities. In assessing such nationally important development proposals, NPF4 Policy 1 demands decision makers to place significant weight to be given to the global climate and nature crisis.

9.3 Any project identified as a national development, however, requires to be considered at a project level to ensure all statutory tests are met. This includes consideration against the provisions of the Development Plan, of which NPF4 is a part and all other material considerations. The majority of the technical matters raised with the application are out with the remit of the Council. The applicant has proposed a significant package of mitigation, both by design of the development and through commitments to preparation and implementation of protection plans and monitoring of effects to address matters which may be of concern.

9.4 The key issue for the Council is the seascape, landscape and visual impact of the development. These turbines would, at this time, be some of the largest deployed in offshore, albeit at a minimum distance of some 23km from shore. Unsurprisingly, despite this substantial setback from the coast, Significant adverse seascape / landscape and visual effects will arise. Such impacts are to be expected for a proposal of this scale and would be most acute for communities along the north coast of Caithness and Sutherland, with inland effects being more isolated to areas of higher ground where more cumulative effects would arise in combination with onshore wind schemes.

9.5 The applicant's mitigation by design to push the turbine array further offshore and reduce the horizontal spread of the turbine Array Area has helped to reduce the effects of the development in this respect. NatureScot have expressed that a development of this scale would result in regional landscape character change. The Council's landscape officer has also cautioned that the citations written for the regionally important costal Special Landscape Areas were prepared at a time without knowledge of the emerging prospect of offshore wind of the scale now proposed. Officers have also found that in addition to the significant visual effects identified by the applicant, that such effects would be more widespread. The combination effect of this proposal with the build out of the consented Pentland Floating Offshore Wind Farm also leads to visual confusion and an apparent disjoint of a plan led approach. Such effects are however more limited in extend and are justifiable to ascertain the future for developing floating offshore wind farms further from the coastline. It is also

envisaged that through further project layout refinement, that further compositional improvements to the array could be achieved through further collaboration with Council Officer and NatureScot with this to be by an appropriately worded condition. Whilst the proposal's effects go well beyond localised, the retraction of the proposed layout and its coastal setback, with scope for further array compositional refinement, results in a scheme which can be appropriately mitigated.

9.6 The adverse effects need to be balanced against the economic and energy benefits of the scheme for the area. The development would make a substantial contribution to tackling the climate emergency through the delivery of a nominal 2GW of installed renewable energy capacity, which must be given significant weight. Should offshore proposals of this nature also not be developed, consideration needs to be given to the prospect of how this energy could be generated by other means. Whilst of a vast scale, this development proposal is mitigated by distance and the decision to underground the associated grid connection well inland away from the north coastline is commendable to limit in-combination above ground infrastructure effects for coastal communities, with the terrestrial connection and substation having planning permission in principle. It also anticipated that the development would give rise to significant employment opportunities for the Highland region, particularly during construction, with the applicant's assessment predicting up to an 8.3% increase in jobs and 5.6% increase in Gross Value Added in Caithness and Sutherland. For a project of this scale, despite extensive pre-application engagement, there has also been a low level of representation received from members of the public, with the community councils also raising limited concern. It is also notable that no statutory consultees have raised any objection.

9.7 Although offshore, significant adverse landscape / seascape and visual effect will be experienced, particularly along the north coast. These effects will be most acute on the clearest of days when people will be enjoying the coastline and appreciating seaward views. The proposal will change the northern aspect of the mainland, but this is for a clearly understood overriding cause. Given this context, on balance, the proposal can be considered acceptable. As such, the proposal accords with the provisions of the development plan, national planning and energy policy and is acceptable in terms of all other applicable material considerations. Consequently, it is recommended that the Council raises no objection to the application.

10. IMPLICATIONS

10.1 Resource: There are significant staffing and financial resource implications if the application is to be subject to a Public Local Inquiry.

10.2 Legal: Not applicable

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

10.4 Climate Change/Carbon Clever: The proposed development would generate a significant amount of renewable energy and make a meaningful contribution towards achieving net zero.

10.5 Risk: Not applicable

10.6 Gaelic: Not applicable

11. RECOMMENDATION

Action required before decision issued: N

Subject to the above actions, it is recommended to **RAISE NO OBJECTION** to the application subject to the following conditions and reasons:

It is recommended to **RAISE NO OBJECTION** to the application subject to:

A. Members grant delegated authority to the Area Planning Manager – North to respond to the Marine Directorate regarding any future Further / Supplementary Environmental Information, where that does not: i) materially increase the scale of the proposed development; and ii) result in any additional significant adverse environmental effects; and iii) does not undermine or remove mitigation which was secured within the Council previous consultation response on the application;

B. Members granting delegated authority to the Area Planning Manager- North to agree the finished condition wording, with any substantive amendments to be subject to prior consultation with the Chair of the North Planning Applications Committee; and

C. The following conditions and reasons.

Conditions and Reasons

1. The Development must be constructed and operated in accordance with the Application and the Environmental Impact Assessment (EIA) submitted by the Company on 26 September 2023 and the EIA Additional Information submitted by the Company on 18 October 2024, unless otherwise agreed in advance in writing with Scottish Ministers.

   Reason: To ensure that the Development is carried out in accordance with the approved details.

2. No development shall commence until the finalised layout and design of the development has been submitted to, and approved in writing by the Marine Directorate, the neighbouring Planning Authorities of The Highland Council and Orkney Council, and, in consultation with NatureScot. The details must include, but not be limited to the following:

   a) A plan showing the location of each individual Wind Turbine Generator (WTG) (subject to any required micro-siting), including information on WTG spacing, WTG identification/numbering, and any key constraints recorded on the site;

   b) A list of latitude and longitude co-ordinates accurate to three decimal places of minutes of arc for each WTG. This should also be provided as a Geographic Information System shape file using WGS84 format;

c) A table or diagram of each WTG dimensions including - height to blade tip (measured above Lowest Astronomical Tide ("LAT")) to the highest point, height to hub (measured above LAT to the centreline of the generator shaft), rotor diameter and maximum rotation speed;

d) The finishes for each WTG; and

e) The length and proposed arrangements on the seabed of all inter-array cables.

Thereafter the development shall be built out in accordance with the approved details.

Reason: To ensure that the Development's environmental, seascape, landscape and visual impacts are suitably mitigated.

3. No development shall commence until a Decommissioning Programme ("DP") has been submitted to and approved in writing by the Scottish Ministers. Such approval may only be granted following consultation by the Scottish Ministers with Scottish Environmental Protection Agency ("SEPA") and any such other advisors or organisations as may be required at the discretion of the Scottish Ministers. The DP must outline measures for the decommissioning of the Development, proposals for the removal of the Development, the management and timing of the works and, environmental management provisions.

The Development must be decommissioned in accordance with the approved DP, unless otherwise agreed in writing in advance with the Scottish Ministers.

Reason: To ensure the decommissioning and removal of the Development in an appropriate and environmentally acceptable manner, and in the interests of safety and environmental protection.

4. (1) No wind turbines shall be erected until a scheme for aviation lighting for the Development has been submitted to, and approved by, the Scottish Ministers in consultation with the neighbouring Planning Authorities of The Highland Council and Orkney Council and the Civil Aviation Authority. The scheme shall include details of aviation lighting which is to be applied.

(2) No later than the first, third and fifth anniversary of the date of First Commissioning and every five-year anniversary thereafter, the Company shall submit a written review of the Aviation Lighting Scheme to Scottish Ministers and the neighbouring Planning Authorities of The Highland Council and Orkney Council. Each review shall include:

a. An assessment of options available for the reduction in the number of visible lights installed on turbines and the time period when lights are visible;

b. An assessment of the potential for installation of an Aircraft Detection Lighting System ("ADLS"), including a statement setting out the current and anticipated regulatory environment in relation to ADLS; and

c. An assessment of whether, in the Company's view, it is reasonably practicable to install an ADLS at the Development.

(3) The review may propose amendment of the Aviation Lighting Scheme. If a review assesses that it is reasonably practicable to install ADLS, provided that such installation shall not require planning permission, such review shall also include the

Company's proposals for installation of ADLS together with a proposed timetable for installation. Any proposed amendment shall be compliant with the then current aviation lighting requirements of the Civil Aviation Authority and the Ministry of Defence.

(4) Any proposed amendment to the Aviation Lighting Scheme shall be subject to the written approval of the Scottish Ministers in consultation with the neighbouring Planning Authorities of The Highland Council and Orkney Council, the Civil Aviation Authority and the Ministry of Defence and shall thereafter be installed in accordance with the approved details.

(5) The Aviation Lighting Scheme, or such alternative scheme as may be approved under part (4), shall thereafter be maintained throughout the operational life of the Development.

(6) No lighting other than that described in the approved scheme for aviation lighting shall be applied within the site, other than that required for health and safety purposes, unless otherwise approved in writing by Scottish Ministers in consultation with the neighbouring Planning Authorities of The Highland Council and Orkney Council, or required by law.

(7) The Development shall be operated in accordance with the approved scheme, or any alternative scheme as may be approved under part (4), as a result of a periodic review.

Reason: In the interests of aviation safety and to minimise visual effects of the Development.

5. No development shall commence unless and until a Community Liaison Plan has been approved in writing by Scottish Ministers, after consultation with the neighbouring Planning Authorities of The Highland Council and Orkney Council, relevant local community councils and affected businesses, including representatives to consider the interests of Sutherland Space Port. This plan shall include the arrangements for establishing a Community Liaison Group to act as a vehicle for the community to be kept informed of project progress by the Company. The terms and condition of these arrangements must include that the Community Liaison Group will have timely dialogue in advance on the provision of all transport-related mitigation measures and keep under review the timing of the delivery of turbine components. The terms and conditions shall detail the continuation of the Community Liaison Group until the wind farm has been completed and is fully operational. The approved Community Liaison Plan shall be implemented in full.

Reason: To assist with the provision of mitigation measures to minimise potential hazards to surrounding sea and land users.

6. Prior to the Commencement of Development, a Local Employment Scheme for the construction of the development shall be submitted to and agreed in writing by the Scottish Ministers, after consultation with the neighbouring Planning Authorities of The Highland Council and Orkney Council. The submitted Scheme shall make reference to the Environmental Impact Assessment (EIA) submitted by the Company on 26 September 2023 and the EIA Additional Information submitted by the Company on 18 October 2024. The Scheme shall include the following:

a) details of how the staff/employment opportunities at the development will be advertised and how liaison with the Council and other local bodies will take place in relation to maximising the access of the local workforce to information about employment opportunities;

b) details of how sustainable training opportunities will be provided for those recruited to fulfil staff/employment requirements including the provision of apprenticeships or an agreed alternative;

c) a procedure setting out criteria for employment, and for matching of candidates to the vacancies;

d) measures to be taken to offer and provide college and/or work placement opportunities at the development to students within the locality;

e) details of the promotion of the Local Employment Scheme and liaison with contractors engaged in the construction of the development to ensure that they also apply the Local Employment Scheme so far as practicable having due regard to the need and availability for specialist skills and trades and the programme for constructing the development;

f) a procedure for monitoring the Local Employment Scheme and reporting the results of such monitoring to the Scottish Ministers and the neighboring Planning Authorities of The Highland Council and Orkney Council; and

g) a timetable for the implementation of the Local Employment Scheme.

Thereafter, the development shall be implemented in accordance with the approved scheme.

Reason: In order to ensure compliance with NPF4 Policy 11c) and to maximise the local socio-economic benefits of the development to the wider community. To make provision for publicity and details relating to any local employment opportunities.

Signature:	Dafydd Jones
Designation:	Area Planning Manager - North
Author:	Peter Wheelan, Strategic Projects Team Leader
Background Papers:	Documents referred to in report and in case file.
Relevant Plans:	Plan 1 – Location Plan – EIAR Addendum Figure 1-1
	Plan 2 – Key Constraints – EIAR Addendum Figure 4-1
	Plan 3 – OAA Restricted Build Areas – EIAR Addendum Figure 4-2
	Plan 4 – Wind Turbine Design Elements – EIA Figure 5-3
	Plan 5 – Typical OSP – EIA Figure 5-6

Appendix 2 – Cumulative Wind Farm Projects

Site Name	No. of Turbines	Tip Height (m)	Distance from the Proposed Development (km)
Operational / Under Construction			
Bettyhill	2	119	30
Forss I and II	6	78	33
Strathy North	33	110	33
Baillie	21	115	37
Limekiln	21	149.9	38
Limekiln Extension	5	149.9	38
Lochend	4	99.5	50
Achlachan	5	115	55
Stroupster	13	110	56
Causeymire	21	100	56
Halsary	15	120	57
Cogle Moss	12	100	57
Bad a Cheo	13	112	58
Consented			
Pentland Offshore Windfarm	6	300	23
Dounreay Trì Floating Wind Demonstration Project*	2	201	24
Bettyhill Phase 2 *	10	149.9	30
Forss III	2	100	35
Strathy South	35	200	36

Site Name	No. of Turbines	Tip Height (m)	Distance from the Proposed Development (km)
Strathy Wood	13	180	36
Hollandmey	10	149.9	50
Slickly	11	149.9	52
Application / Appeal Sites			
Melvich	12	149.9	27
Kirkton	11	149.9	34
Cairnmore Hill	5	138.5	37
Swarclett Wind Farm*	2	149.9	50
Lochend Extension*	5	149.9	51
Tormsdale	10	149.9	56
Watten	7	220	58

Note: Single wind turbine projects and those below 50m in height to blade tip are not listed. Those marked with * are not included within the applicant's EIA and have been added by Council officers.

Appendix 3 - Development Plan and Other Material Policy Considerations

DEVELOPMENT PLAN

National Planning Framework 4 (2023)

A3.1 The NPF4 policies of most relevance to this proposal include:

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

1 – Tackling the climate and nature crisis

2 – Climate mitigation and adaptation

3 – Biodiversity

4 – Natural places

5 – Soils

7 – Historic assets and places

11 – Energy

13 – Sustainable transport

22 – Flood risk and water management

23 – Health and safety

25 – Community wealth building

Highland Wide Local Development Plan 2012

A3.2 28 - Sustainable Design

29 - Design Quality and Place-making

30 - Physical Constraints

31 - Developer Contributions

56 - Travel

57 - Natural, Built and Cultural Heritage

58 - Protected Species

59 - Other important Species

60 - Other Importance Habitats

61 - Landscape

63 - Water Environment

67 - Renewable Energy Developments – inclusive of the following 11 criteria:

- natural, built and cultural heritage features;
- species and habitats;
- visual impact and impact on the landscape character of the surrounding area (the design and location of the proposal should reflect the scale and character of the landscape and seek to minimise landscape and visual impact, subject to any other considerations);

- amenity at sensitive locations, including residential properties, work places and recognised visitor sites (in or outwith a settlement boundary);
- the safety and amenity of any regularly occupied buildings and the groundsthat they occupy- having regard to visual intrusion or the likely effect of noise generation and, in the case of wind energy proposals, ice throw in winter conditions, shadow flicker or shadow throw;
- ground water, surface water (including water supply), aquatic ecosystems and fisheries;
- the safe use of airport, defence or emergency service operations, including flight activity, navigation and surveillance systems and associated infrastructure, or on aircraft flight paths or MoD low-flying areas;
- other communications installations or the quality of radio or TV reception;
- the amenity of users of any Core Path or other established public access for walking, cycling or horse riding;
- tourism and recreation interests;
- land and water based traffic and transport interests.

69 - Electricity Transmission Infrastructure

72 – Pollution

Caithness and Sutherland Local Development Plan 2018 (CaSPlan)

A3.3 There are no site-specific policies or allocations covering the application site. As a result, the application requires to be against the policies of NPF4 and the Highland-wide Local Development Plan. It is noted, however, that the CaSPlan does identify the Special Landscape Areas (SLA) within the plan area. SLAs within the EIAR's Study Area are: Oldshoremore, Cape Wrath and Durness, Eriboll East and Whitten Head, Farr Bay, Strathy and Portskerra and Dunnet Head.

Highland Council Supplementary Planning Policy Guidance

A3.4 The Onshore Wind Energy Supplementary Guidance (OWESG) provides additional guidance on the principles set out in Policy 67 of the Highland-wide Local Development Plan for Renewable Energy Developments. This document is a material consideration in the determination of onshore wind energy planning applications following its adoption as part of the Local Development Plan in November 2016. However, it also provides a useful assessment methodology for consideration of landscape and visual matters. This can usefully be applied to aid assessment of offshore wind energy development.

A3.5 The document also contains the Loch Ness Landscape Sensitivity Study, the Black Isle, Surrounding Hills and Moray Firth Coast Sensitivity Study, and, the Caithness Sensitivity Study (adopted 2017). The site is not within the Caithness Sensitivity Study area but it is located immediately to the north of the study area, with this document identifying key routes, gateways and views in Caithness. The proposed development would be visible from much of the northern section of the study area and in particular the following landscape character areas:

- CT4 – Central Caithness
- CT5 – Dunnet Interior
- CT7 – Sandside Bay, Melvich, Dunnet Bay and Keiss and Ackergill Links
- CT8 – Rhubha Bhra to Dunbeath
- CT9 – North Caithness

Other Highland Council Supplementary Guidance

A3.6
- Biodiversity Enhancement Planning Guidance (May 2024)
- Developer Contributions (Mar 2018)
- Highland Historic Environment Strategy (Jan 2013)
- Highland's Statutorily Protected Species (Mar 2013)
- Physical Constraints (Mar 2013)
- Roads and Transport Guidelines for New Developments (May 2013)
- Special Landscape Area Citations (Jun 2011)
- Standards for Archaeological Work (Mar 2012)
- Sustainable Design Guide (Jan 2013)

OTHER MATERIAL POLICY CONSIDERATIONS

Emerging Highland Council Development Plan Documents and Planning Guidance

A3.7 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 in 2026 following undertaking evidence gathering and Gate Check.

A3.8 In addition, the Council has further advice on delivery of major developments in a number of documents. This includes Construction Environmental Management Process for Large Scale Projects (Aug 2010) and The Highland Council Visualisation Standards for Wind Energy Developments (Jul 2016).

A3.9 The Pilot Pentland Firth and Orkney Waters Marine Spatial Plan (PFOWMSP) was published by Scottish Government in 2016. It was a jointly published document by Marine Directorate, The Highland Council and Orkney Islands Council. It is non-statutory planning guidance that can be used as a material consideration in the determination of applications. As well as guiding development in the Pentland Firth and Orkney Waters, it is also proposed to be a useful basis for the preparation of the North Coast Scottish Marine Plan.

Other National Legislation, Policy and Guidance

A3.10
- Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 – interim and annual targets replaced by Climate Change (Emissions Reduction Targets) (Scotland) Bill in November 2024
- Climate Change Committee Report to UK Parliament (July 2024)
- UK Government Clean Power Action Plan (Dec 2024)
- Draft Energy Strategy and Just Transition Plan (2023)
- Offshore Wind Investment Roadmap Policy (2023)
- British Energy Security Strategy (2022)

- Sectoral Marine Plan for Offshore Wind Energy in Scotland (2020)
- Offshore Wind Sector Deal (2020)
- Offshore Wind Policy Statement (2020)
- Scottish Energy Strategy (2017)
- Scotland's National Marine Plan (NMP) (2015, reviewed in 2018 and 2021)
- 2020 Routemap for Renewable Energy (2011)
- Draft Scottish Biodiversity strategy to 2045: tackling the nature emergency (2023)
- 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)
- NatureScot: Landscapes of Scotland, Descriptions 4 – North Coast (Last updated: 22/08/2024)
- NatureScot: Guidance on Aviation Lighting Impact Assessment (2024)

Appendix 4 – Visual Assessment Appraisal (Operational only)

			Proposed Development (EIA Addendum Layout)			**Cumulative** (in combination with other developments) Scenario 1: Operational / under construction / consented projects Scenario 2: Application scenario - the proposed development in addition to the operational / under construction / consented and application stage projects		
Viewpoint / distance to development - EIA Addendum Layout	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	Magnitude of Cumulative Change	Level of Cumulative Effect	Significance
VP1 Faraid Head 28.69km	APP	High	Medium	**Major/Moderate to Moderate**	**Significant**	Medium	**Major/Moderate to Moderate**	**Significant**
	THC	High	Medium	**Major/Moderate to Moderate**	**Significant**	Medium	**Major/Moderate to Moderate**	**Significant**
	Viewpoint is from within the Oldshoremore, Cape Wrath and Durness SLA. Applicant's assessment is agreed. The offshore Project would not intervene in views of the distinctive coastal landforms, and appears as a relatively tight cohesive array.							
VP2 Ben Hope 42.56km	APP	High	Low	Minor	Not significant	Medium	Moderate/Minor	Not Significant
	THC	High	Medium	**Moderate**	**Significant**	Medium	**Moderate**	**Significant**
	Viewpoint is from the munro summit of Ben Hope within the Kyle of Tongue NSA. Panoramic views across Caithness and Sutherland. Applicant's assessment is contested. The open ocean to the north features as the special quality of monumental scale contrasting with the small-scale coastal shores and as such the proposals would contrast with the 'scale' of the settled coast with the open ocean and the incised interior of the Kyle. The elevated coastal edge brings the development visually closer to the coast in this view. Although the array is low down in the seascape, and would not intervene in the view towards Hoy, the elevated view over the sea is a key attraction of this summit, with the vast uninterrupted seascape being diminished by the scale of this proposal, with this northern view capturing the full horizontal extend and depth of the wind farm, with its compositing potential being less coherent as a result of outlier turbines located at the western edge of the array. The lack of integration of these limited number of turbines is to the detriment of the scheme, albeit that this is an indicative layout with scope remaining for further refinement.							
VP3 A838 A'Moine 31.5km	APP	High-Medium	Low-negligible	Minor	Not significant	Low-negligible	Minor	Not significant
	THC	High	Low	Minor	Not significant	Low	Minor	Not significant
	The applicant's assessment is broadly agreed. A glimpse of the sea towards the development is discernible through the depression which lies in between the shallow landforms. The applicant considers that only the front row of turbines would be discernible owing to distance; this is disputed							

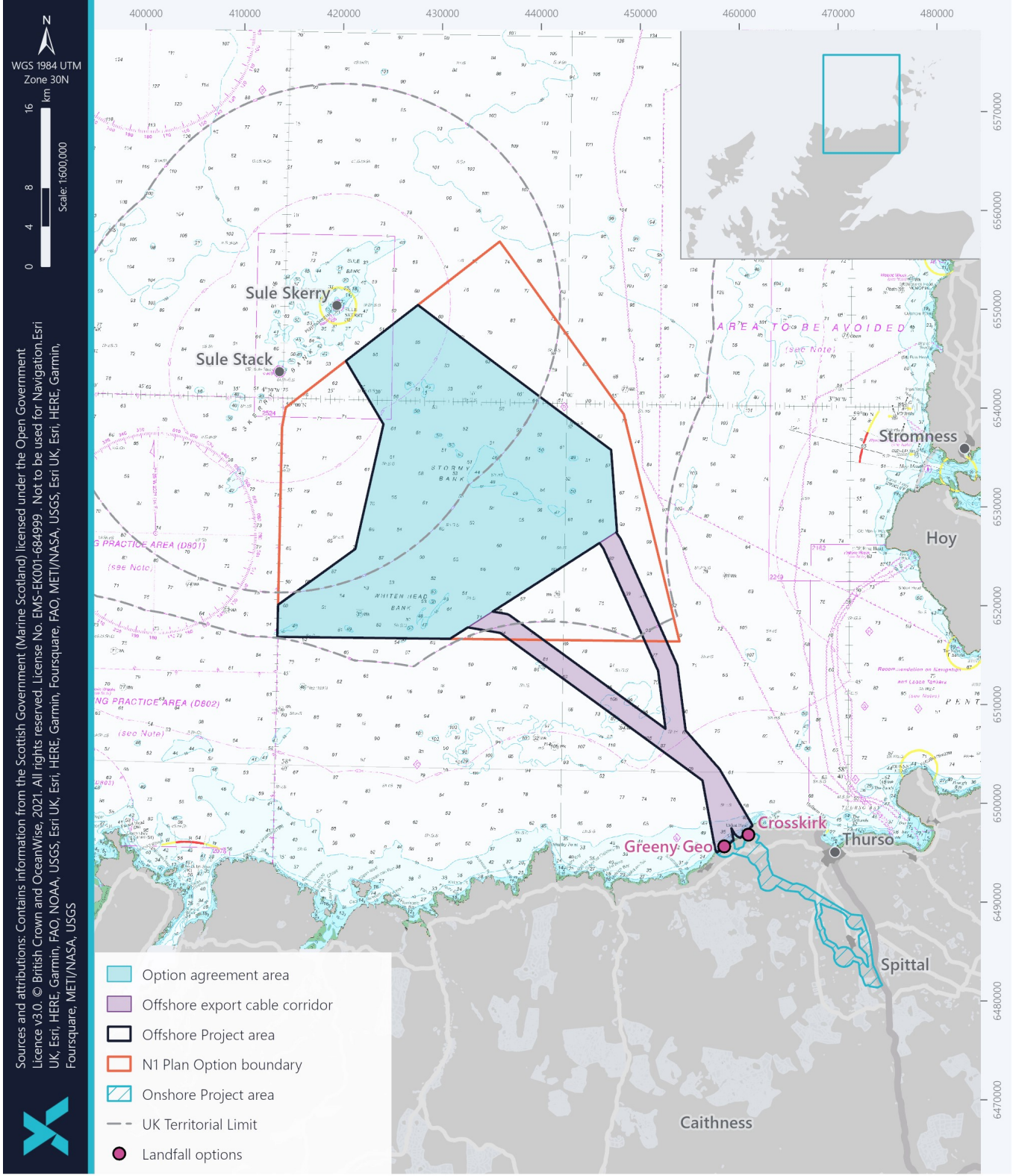
			Proposed Development (EIA Addendum Layout)			**Cumulative** (in combination with other developments) Scenario 1: Operational / under construction / consented projects Scenario 2: Application scenario - the proposed development in addition to the operational / under construction / consented and application stage projects		
Viewpoint / distance to development - EIA Addendum Layout	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	Magnitude of Cumulative Change	Level of Cumulative Effect	Significance
	given the scale of the proposed turbines. The proposal is however well framed by surrounding topography and its agreed that the overall magnitude of change is low.							
VP4 Achininver Beach 26.4km	APP	High	Medium	**Major/Moderate to moderate**	**Significant**	None	None	None
	THC	High	High/Medium	**Major/Moderate**	**Significant**	None	None	None
	The viewpoint is located within the Eriboll East and Whiten Head SLA. The applicant's assessment is broadly agreed. distant, the turbines would appear across the open aspect of the small bay, which is formed by the sea horizon. The applicant considers that the EIA Addendum would result in a reduced magnitude of change. It is considered by officers that this change is not immediately discernible and the original EIAR assessment findings remain unaltered. The array appears unbalanced in density and the level of effect would be reduced if the outlying turbines further west were removed.							
VP5 Torrisdale Bay 29km	APP	High	Medium	**Major/Moderate to Moderate**	**Significant**	None	None	None
	THC	High	High/Medium	**Major/Moderate**	**Significant**	None	None	None
	The viewpoint is located within the Kyle of Tongue NSA .The applicant's assessment is broadly agreed. The proposal would extend across much of the available sea horizon, with the array appearing unbalanced. Again, as per VP4, the EIA Addendum layout whilst welcome, in Officer's view does not alter the rating expressed in the EIAR. The magnitude of change is also regarded to be high / medium reflective of the extensive scale of the proposal.							
VP6 Strathy Point 25.7km	App	High	High/Medium	**Major/Moderate**	**Significant**	High /Medium	**Major/Moderate**	**Significant**
	THC	High	High	**Major**	**Significant**	High	**Major**	**Significant**
	The viewpoint is within the Farr Bay, Strathy and Portskerra SLA. Although the array would appear as an extensive offshore feature in much of the seaward view, turbines are already established onshore along the coast to the east. The Pentland Firth forms the foci of the view to the east and the proposal would not intervene in views in this direction. There are however also significant cumulative effects due to Pentland Floating Wind Farm and due to onshore wind farms. This cumulative effect would be intensified in Scenario 2 should Melvich Wind Farm and / or Kirkton Wind Farm also be consented, which would give rise to perceived encirclement of wind energy development as well as sequential cumulative effects in this locality.							

			Proposed Development (EIA Addendum Layout)			**Cumulative** (in combination with other developments) Scenario 1: Operational / under construction / consented projects Scenario 2: Application scenario - the proposed development in addition to the operational / under construction / consented and application stage projects		
Viewpoint / distance to development - EIA Addendum Layout	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	Magnitude of Cumulative Change	Level of Cumulative Effect	Significance
VP7 Melvich Beach 32.3km	App	High	Medium	**Major/Moderate**	**Significant**	None	None	None
	THC	High	High/Medium	**Major/Moderate**	**Significant**	High/Medium	High/Medium	High/Medium
	The viewpoint is within the Farr Bay, Strathy and Portskerra SLA. The applicant's assessment is broadly agreed. Although the increased distance would affect visibility, in clear weather conditions, the array would appear as a new prominent feature across the open sea horizon in an enclosed view. Should Melvich Wind Farm be consented, this would result in perceived encirclement at this location, with the combination effect leading to creation of a wind farm landscape when experienced from this bay.							
VP8 Beinn Ratha 38.7km	App	High	Low	Moderate	Not significant	Low	Moderate	Not significant
	THC	High	Medium/Low	Moderate	Not significant	Medium	**Moderate**	**Significant**
	The applicant's assessment is broadly agreed for solus effects. In cumulative Scenario 1 the magnitude of change is regarded to be underreported. Whilst the project would clearly read in a separate space, it would fill the backdrop off Pentland Wind Farm resulting in contrastingly designed layered windfarms in seaward views. In Scenario 2, the addition of Melvich Wind Farm would also contribute to the extent of cumulative effects in westward views, but this would not materially alter the in combination effects arising from this proposal.							
VP9 A836, Reay Kirk, Sandside Bay 36.41km	App	High	Medium/Low	Moderate	Not significant	Low	Moderate/Minor	Not significant
	THC	High	Medium	**Moderate**	**Significant**	High / Medium	**Major/Moderate**	**Significant**
	The applicant's assessment is contested. Much of the sea's horizon would be occupied by turbines. Effects attributable to the development would be pronounced due to its appearance as a distant feature within the sea in panoramic views. It is not agreed that the mid-ground intervening features make the project materially any less noticeable, as suggested by the applicant. For the cumulative Scenario 1, is agreed the presence of Pentland Wind farm would also appear as a prominent feature on the skyline in views across Sandside Bay. Whilst the project would clearly read in a separate space, it would fill the backdrop off Pentland resulting in contrastingly designed layered windfarms in seaward views. This coupled with the onshore wind farms, this increases the perception of Reay being encircled by wind farm development.							

			Proposed Development (EIA Addendum Layout)			**Cumulative** (in combination with other developments) Scenario 1: Operational / under construction / consented projects Scenario 2: Application scenario - the proposed development in addition to the operational / under construction / consented and application stage projects		
Viewpoint / distance to development - EIA Addendum Layout	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	Magnitude of Cumulative Change	Level of Cumulative Effect	Significance
VP10 Crosskirk, St Mary's Chapel 35.55km	App	High	Low	Moderate/Minor	Not significant	Low	Moderate/Minor	Not significant
	THC	High	Medium	**Moderate**	**Significant**	Medium	**Major/Moderate**	**Significant**
	The applicant's assessment is contested. The EIAR Addendum explains that significant effects have been avoided due to the increased setback of 1.8 km and more compact layout. Much of the sea's horizon would however still be occupied in the view. This location is heavily influenced by onshore wind, and with the addition of Pentland, the proposal would give rise to major cumulative effects. Such effects are judged to occur with the addition of Pentland, with the project exacerbating this impact with these schemes reading as layering of wind energy development across the sea.							
VP11 Ben Griam Beg, Hillfort 51.6km	App	High	Negligible	Negligible	Not significant	Negligible	Negligible	Not significant
	THC	High	Negligible	Negligible	Not significant	Negligible	Negligible	Not significant
	Viewpoint is from within the Ben Griam and Loch nan Clar NSA. The applicant's assessment is agreed. The development would be visible in very clear conditions in the far distance, low down in the seascape and above intervening onshore developments in the foreground and mid-ground.							
VP12 Dunnet Bay – at Caravan Park 46.5km	App	High	Low-Negligible	Minor	Not significant	Low-Negligible	Minor	Not significant
	THC	High	Low-Negligible	Minor	Not significant	Low-Negligible	Minor	Not significant
	Viewpoint is located within Dunnet Head SLA. The applicant's assessment is agreed. Pentland would have greater visibility owing to its proximity being 33.5 km, with the proposed array being barely perceptible due to the turbine hubs appearing on the horizon due to the curvature of the earth.							
VP13 Dunnet Head 41.3km	App	High	Low	Moderate	Not significant	Low	Moderate	Not significant
	THC	High	Low	Moderate	Not significant	Low	Moderate	Not significant
	Viewpoint is located within Dunnet Head SLA. The applicant's assessment is agreed. The proposed development would not intervene in views of the distinctive coastal landforms and would appear as a cohesive clustered array on the horizon. It would be well separated from Pentland further to the west.							

			Proposed Development (EIA Addendum Layout)			**Cumulative** (in combination with other developments) Scenario 1: Operational / under construction / consented projects Scenario 2: Application scenario - the proposed development in addition to the operational / under construction / consented and application stage projects		
Viewpoint / distance to development - EIA Addendum Layout	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	Magnitude of Cumulative Change	Level of Cumulative Effect	Significance
VP14 Castle of Mey LB & GDL 49.4km	App	High	Low-Negligible	Minor	Not significant	Low-Negligible	Minor	Not significant
	THC	High	Low-Negligible	Minor	Not significant	Low-Negligible	Minor	Not significant
	The applicant's assessment is agreed. The western part of the development is obscured by the prominent headland of Dunnet Head, with the array not materially diminishing its grandeur.							
VP15 St John's Point 50.7km	App	High	Low-Negligible	Minor	Not significant	Low-Negligible	Minor	Not significant
	THC	High	Low-Negligible	Minor	Not significant	Low-Negligible	Minor	Not significant
	The applicant's assessment is agreed. The array appears further set back from the coastline.							
VP16 Beinn Freiceadain Hillfort 48.9km	App	High	Low-Negligible	Minor	Not significant	Low-Negligible	Minor	Not significant
	THC	High	Low-Negligible	Minor	Not significant	Medium	**Moderate**	**Significant**
	Together with the slightly higher twin summit of Ben Dorrery, it is one of the highest hills in Caithness and a local landmark. The applicant's solus assessment is broadly agreed. The array would partially appear behind the intervening onshore wind farms on the sea horizon in the far distance and would only be visible in very clear conditions due to the long intervening distance. Cumulative effects would however arise and would be significant in both scenarios. The EIAR Addendum wireframe indicates a continuous band of wind farm development across the northern horizon covering land to the west at Limekiln and across the sea with the array engulfing Pentland and adding additional weight to the cluster of turbines at Baillie. The addition of Cairnmore Hill if consented would extend this effect further to the east.							
VP17 Kyle of Tongue – A838 causeway 32.6km	App	High	High	Negligible	Negligible	None	None	None
	THC	High	High	Negligible	Negligible	None	None	None
	The viewpoint is from within the Kyle of Tongue NSA. The applicant's assessment is agreed. The proposal is on the cusp of removing visibility from this causeway with only a select number of blade tips being visible above the Rabbit Islands.							

			Proposed Development (EIA Addendum Layout)			**Cumulative** (in combination with other developments) Scenario 1: Operational / under construction / consented projects Scenario 2: Application scenario - the proposed development in addition to the operational / under construction / consented and application stage projects		
Viewpoint / distance to development - EIA Addendum Layout	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	Magnitude of Cumulative Change	Level of Cumulative Effect	Significance
VP18 **A836 Between Thurso and Castletown** **45.1km**	App	High	Low-Negligible	Minor	Not significant	Low-Negligible	Minor	Not significant
	THC	High	Low	Minor	Not significant	Low	Minor	Not significant
	The applicant's assessment is broadly agreed. The array appears extensive and noticeable on the horizon, but sufficiently distant to not overwhelm the open aspect of the sea.							
VP19 **A836 Dounreay** **36.1km**	App	High	Medium-Low	Moderate	Not significant	Medium-Low	Moderate	Not significant
	THC	High	Medium	**Moderate**	**Significant**	Medium	**Moderate**	**Significant**
	The applicant's assessment is contested. The EIAR assessment's findings are not considered to be materially altered by the EIA Addendum layout, albeit it remains a welcome amendment. Whilst the open sea horizon is considerable at 140 degrees, the proposal would still occupy a large proportion of this with this stretch of road being of continuous straight nature allowing road users to take in more of the seascape. Should the staking effects remain unresolved, the layout appears to have continuous channel breaks the array lacking cohesion. The cumulative Scenario 1 with Pentland does not resolve this from where the VP is located, but this is a transient receptor so this effect may change as you travel. Pentland would draw the eye in this view with the proposal reading clearly as a separate scheme. The overlap would however exacerbate the cumulative effects, with the variance in distance and scale between the two schemes appearing of an ad hoc, unplanned nature. The suggested mitigation of information boards and parking places would assist to explain this relationship and differing technologies between the two schemes.							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AREA TO BE AVOIDED
(see Note)
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Crosskirk
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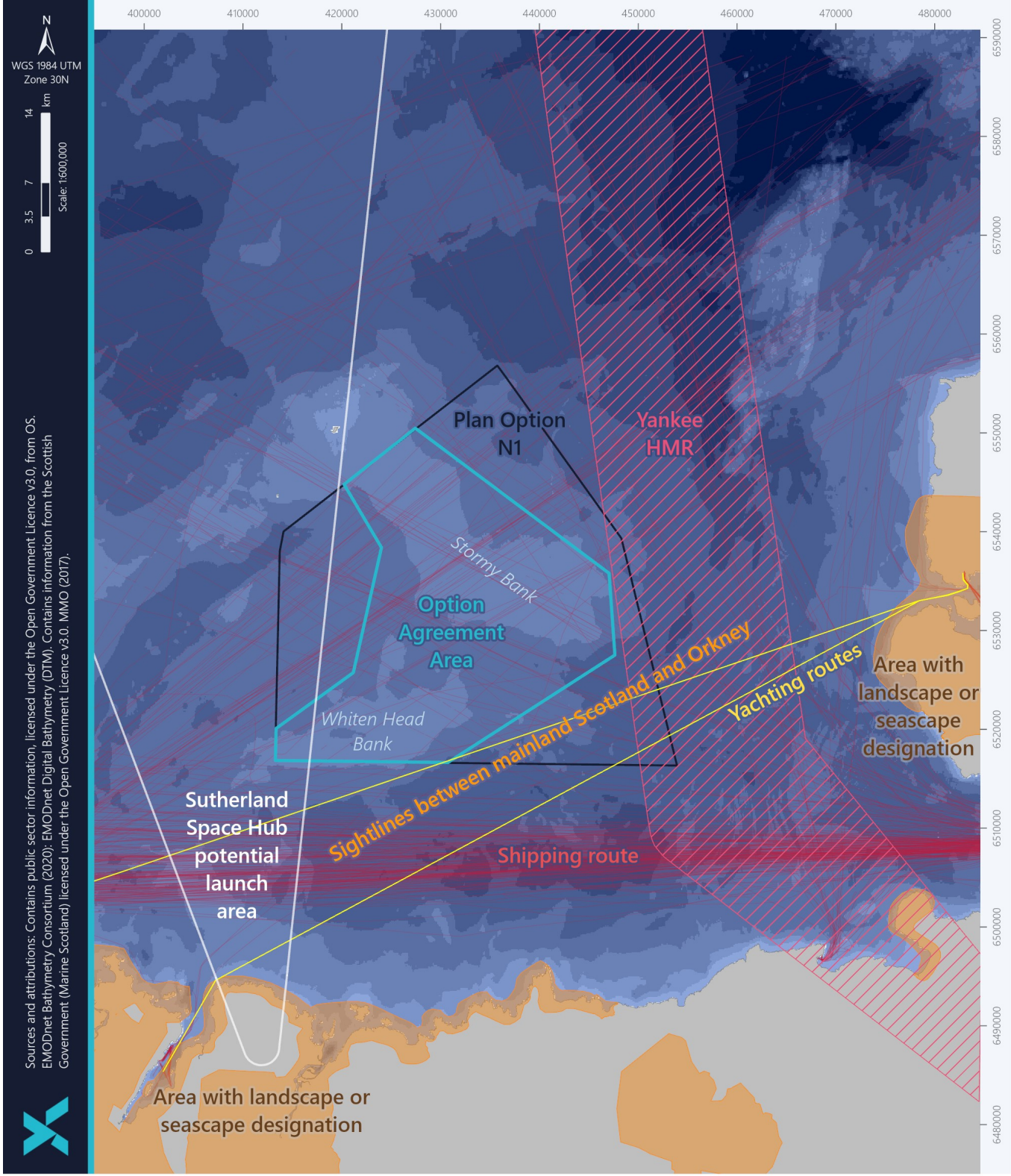
Spittal
Caithness
Option agreement area
Offshore export cable corridor
Offshore Project area
N1 Plan Option boundary
Onshore Project area
UK Territorial Limit
Landfall options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Plan Option N1
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Stormy Bank
Option Agreement Area
Whiten Head Bank
Yachting routes
Sightlines between mainland Scotland and Orkney
Area with landscape or seascape designation
Sutherland Space Hub potential launch area
Shipping route
Area with landscape or seascape designation
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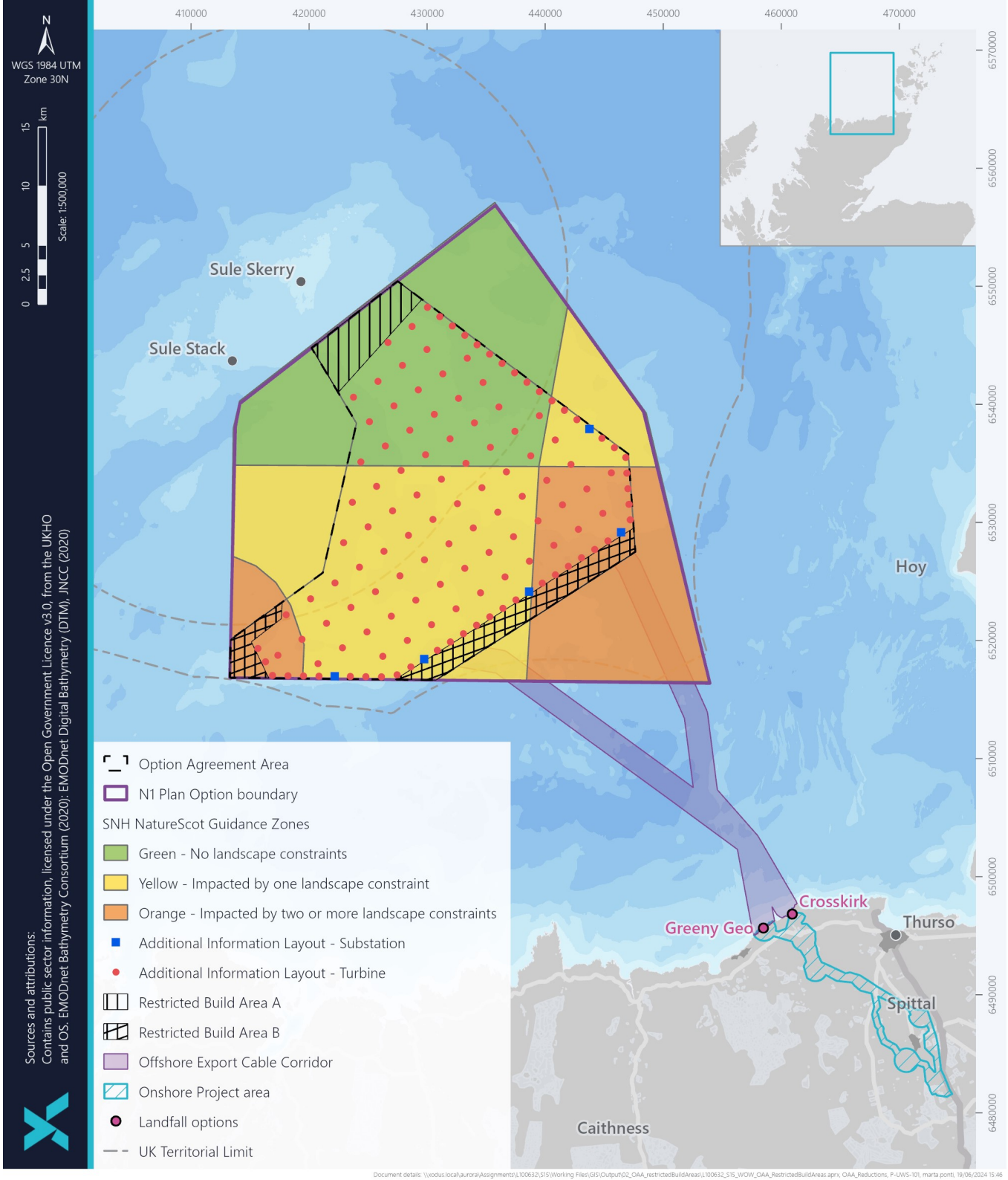
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Sources and attributions:
Contains public sector information, licensed under the Open Government Licence v3.0, from the UKHO and OS. EMODnet Bathymetry Consortium (2020); EMODnet Digital Bathymetry (DTM), JNCC (2020)
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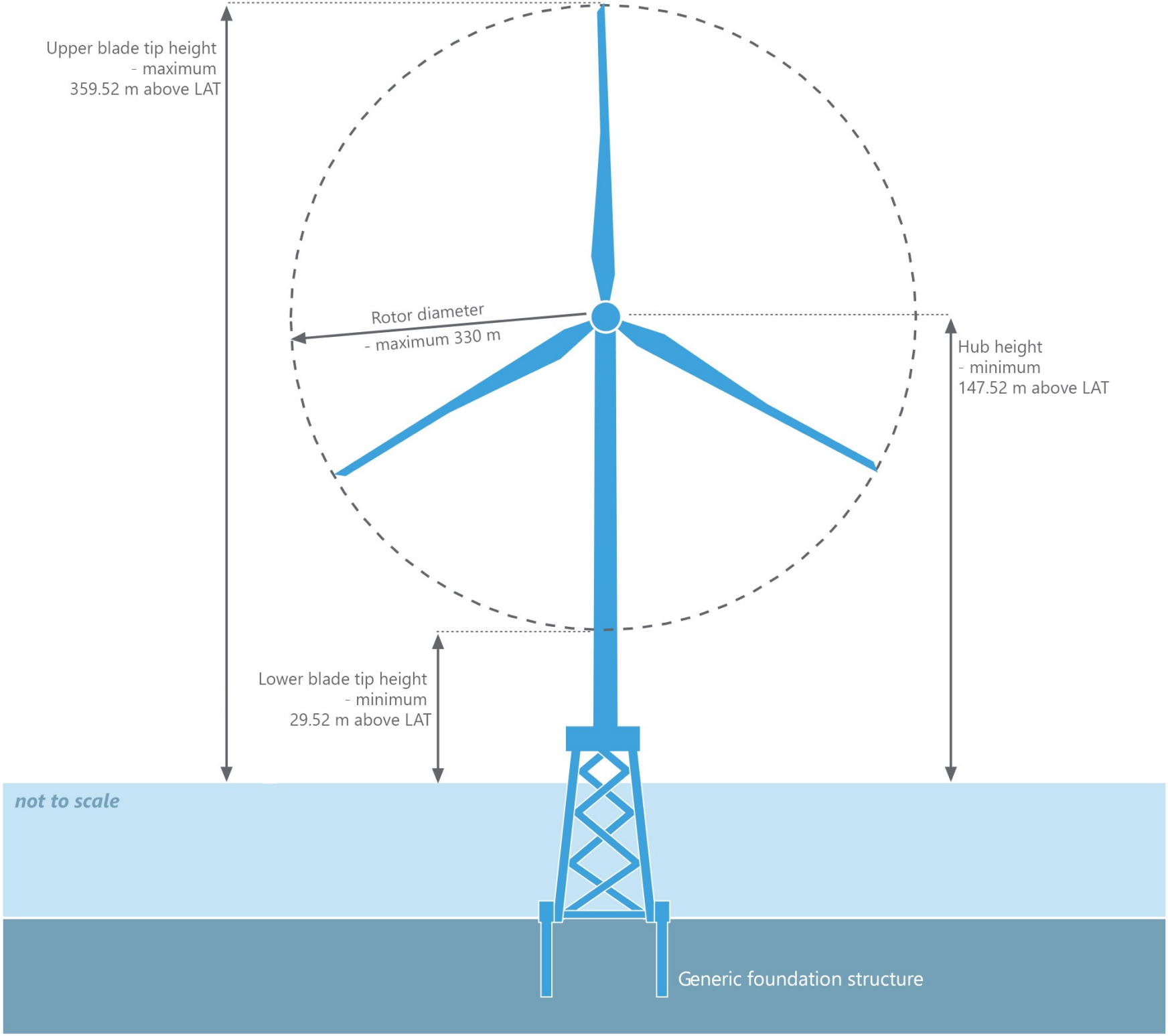
Crosskirk
Greeny Geo
Thurso
Spittal
Caithness
Option Agreement Area
N1 Plan Option boundary
SNH NatureScot Guidance Zones
Green - No landscape constraints
Yellow - Impacted by one landscape constraint
Orange - Impacted by two or more landscape constraints
Additional Information Layout - Substation
Additional Information Layout - Turbine
Restricted Build Area A
Restricted Build Area B
Offshore Export Cable Corridor
Onshore Project area
Landfall options
UK Territorial Limit


Upper blade tip height
- maximum
359.52 m above LAT
Rotor diameter
- maximum 330 m
Hub height
- minimum
147.52 m above LAT
Lower blade tip height
- minimum
29.52 m above LAT
not to scale
Generic foundation structure