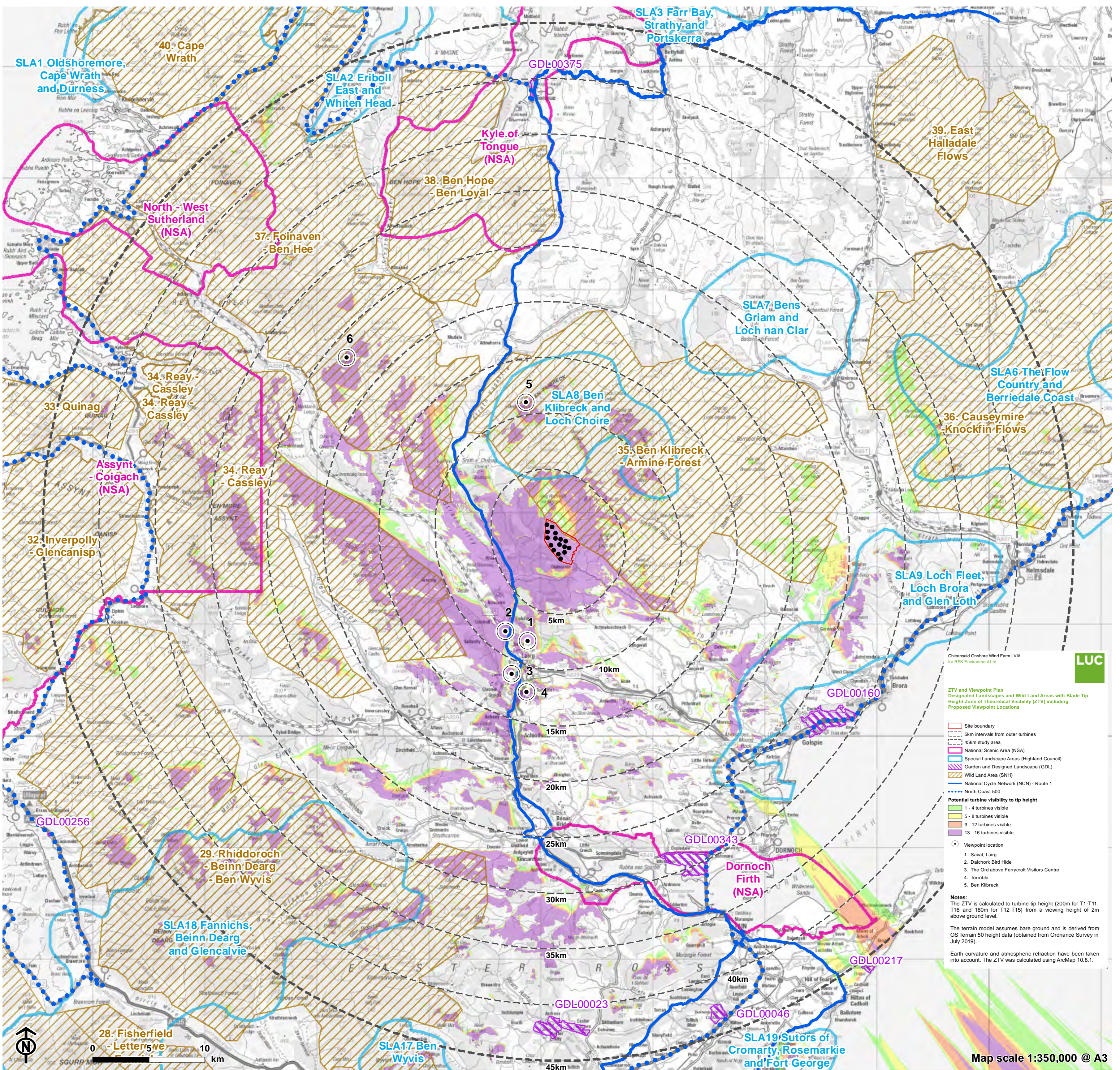
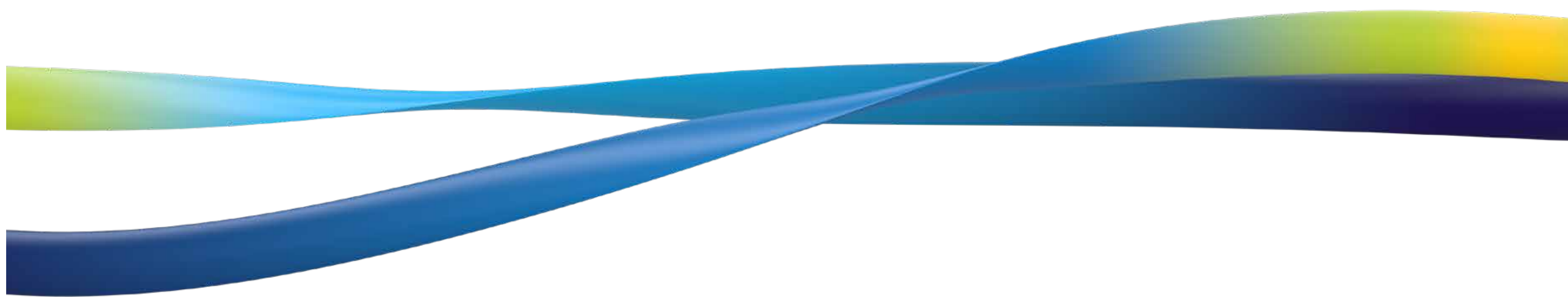


THE ZONE OF THEORETICAL VISIBILITY



PHOTOMONTAGE



Viewpoint 1 (7.9 km): Saval, Lairg. Photomontage of the proposed Chleansaig turbines from Saval, above Lairg, taken from Grid Reference 258780 908492 set up with a 53.5 degrees horizontal field of view. (note: very limited visibility from Lairg itself).



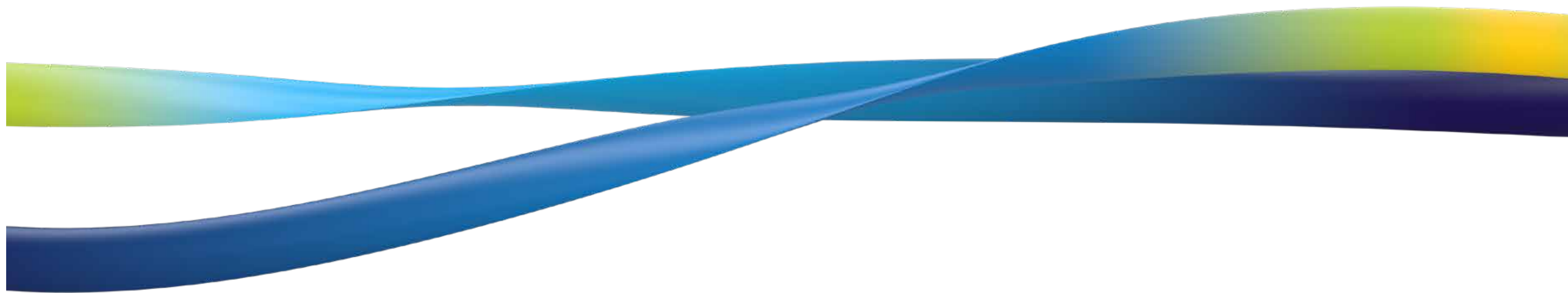
Viewpoint 2 (8.2 km): Dalchork Bird Hide. Photomontage from the bird hide at Dalchork near the A836, taken from Grid Reference 256833 909361 set up with a 53.5 degrees horizontal field of view.



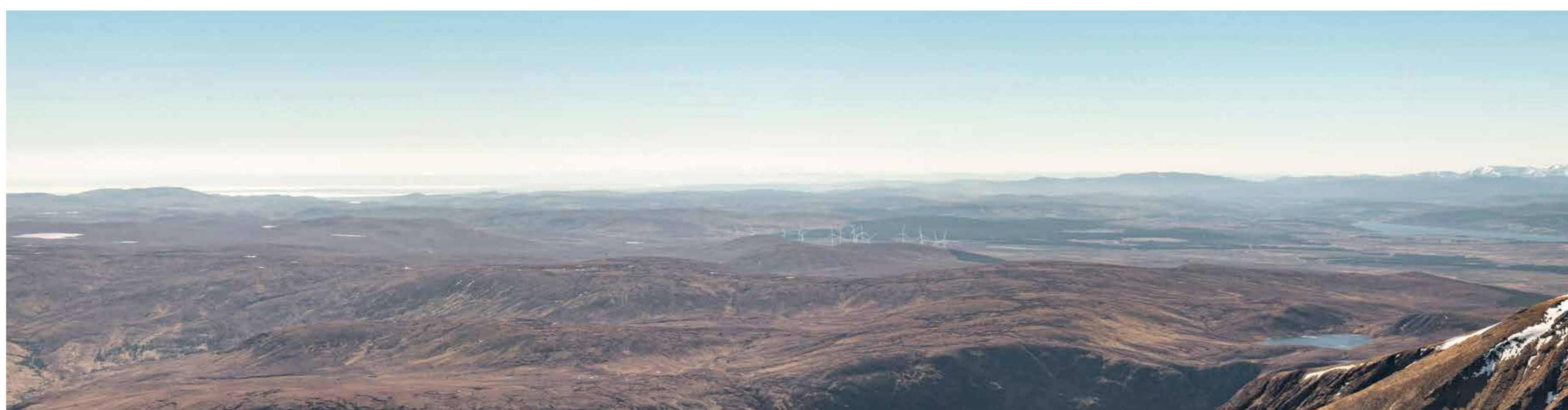
Viewpoint 3 (11.20 km): The Ord above Ferrycroft Visitor Centre. Photomontage of the proposed Chleansaig turbines from the Ord, taken from Grid Reference 257400,905563 set up with a 53.5 degrees horizontal field of view. This represents a view from a local high point in Lairg, visibility from lower lying areas in Lairg is very limited.



PHOTOMONTAGE



Viewpoint 4 (12.3 km): Torroble. Photomontage of the proposed Chleansaig turbines from Torroble, east of the A836, taken from Grid Reference 258724 903914 set up with a 53.5 degrees horizontal field of view. (note: roadside vegetation limits views from the A836 on the northern approach to Lairg).



Viewpoint 5 (11.1 km): Ben Klibreck (Meall nan Con). Photomontage of the proposed Chleansaig turbines from summit of Ben Klibreck, Meall nan Con, taken from Grid Reference 258639 929881 set up with a 53.5 degrees horizontal field of view.



Viewpoint 6 (23.35 km): Ben Hee. Photomontage of the proposed Chleansaig turbines from summit of Ben Hee, taken from Grid Reference 242654 933940 set up with a 53.5 degrees horizontal field of view.



CULTURAL HERITAGE AND ARCHAEOLOGY

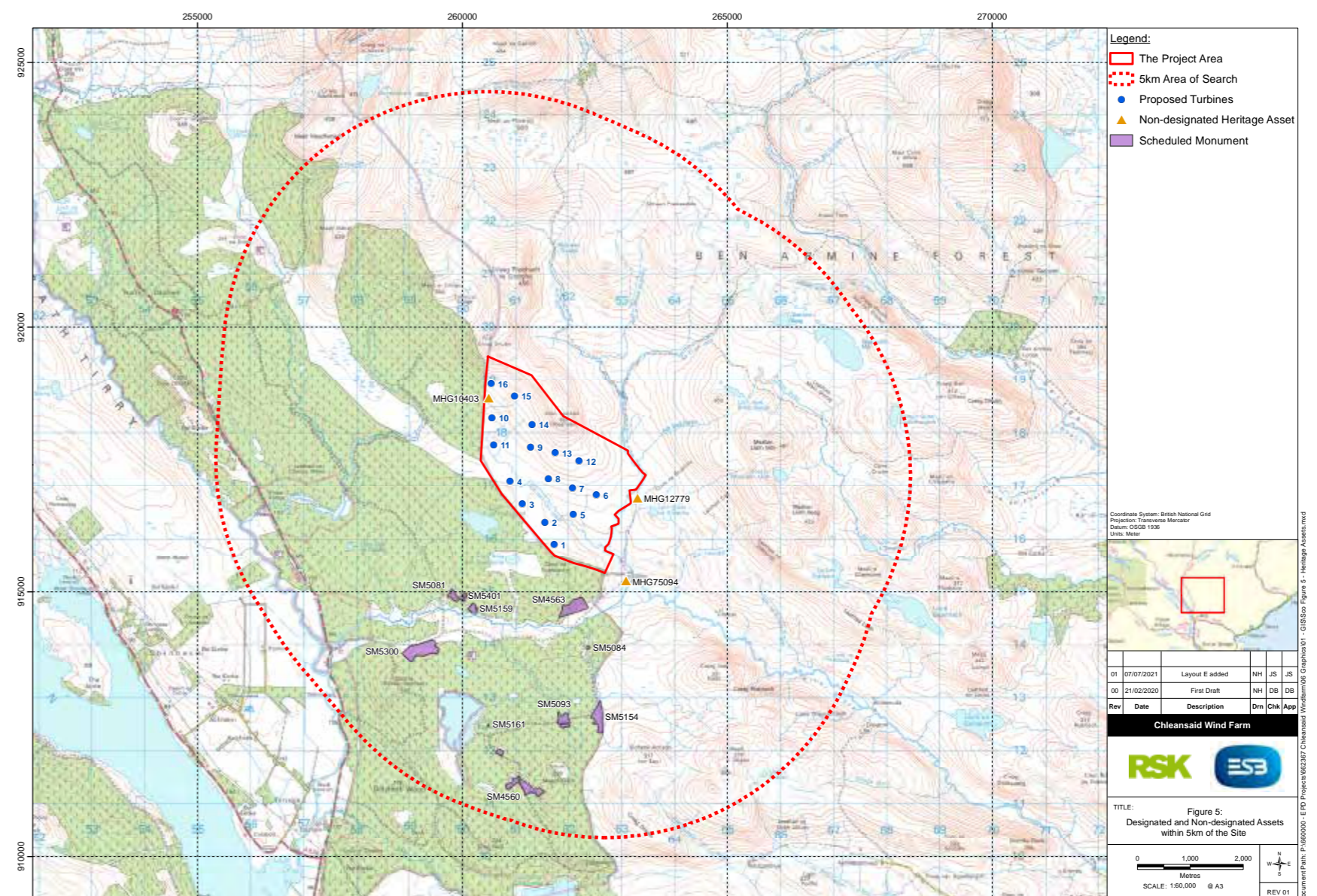


The effects of the proposed development on the historic environment, including cultural heritage and archaeology, will be assessed.

This study will consider the wind farm's direct and indirect effects on known and potential receptors. The potential impacts include

- Construction impacts (direct or indirect physical impacts on the setting) on designated and non-designated heritage assets
- Construction impacts on previously unrecorded heritage assets
- Operational impacts on designated heritage assets.

Once the known heritage assets have been established and the potential for the presence of previously unknown heritage assets has been assessed, the environmental impact assessment will assess the impact magnitude and significance on heritage assets in the area.



ECOLOGY AND ORNITHOLOGY



A programme of ecological and ornithological surveys is being carried out on the site. The results will be used to ensure that any impacts on wildlife are mitigated.

In addition, opportunities for biodiversity enhancements that the development could deliver will be explored in consultation with specialist interest groups.

Ornithology surveys

A comprehensive survey programme is under way to identify the use of the site and its wider surroundings by sensitive bird populations.



Ecology surveys

The ecology surveys include

- A phase 1 habitat survey
- A National Vegetation Classification survey
- Terrestrial mammal surveys
- Bat surveys
- Fish habitat surveys.

The site is a mosaic of open moorland habitats, with semi-mature and clear-felled forestry plantations abutting the site to the south and west.

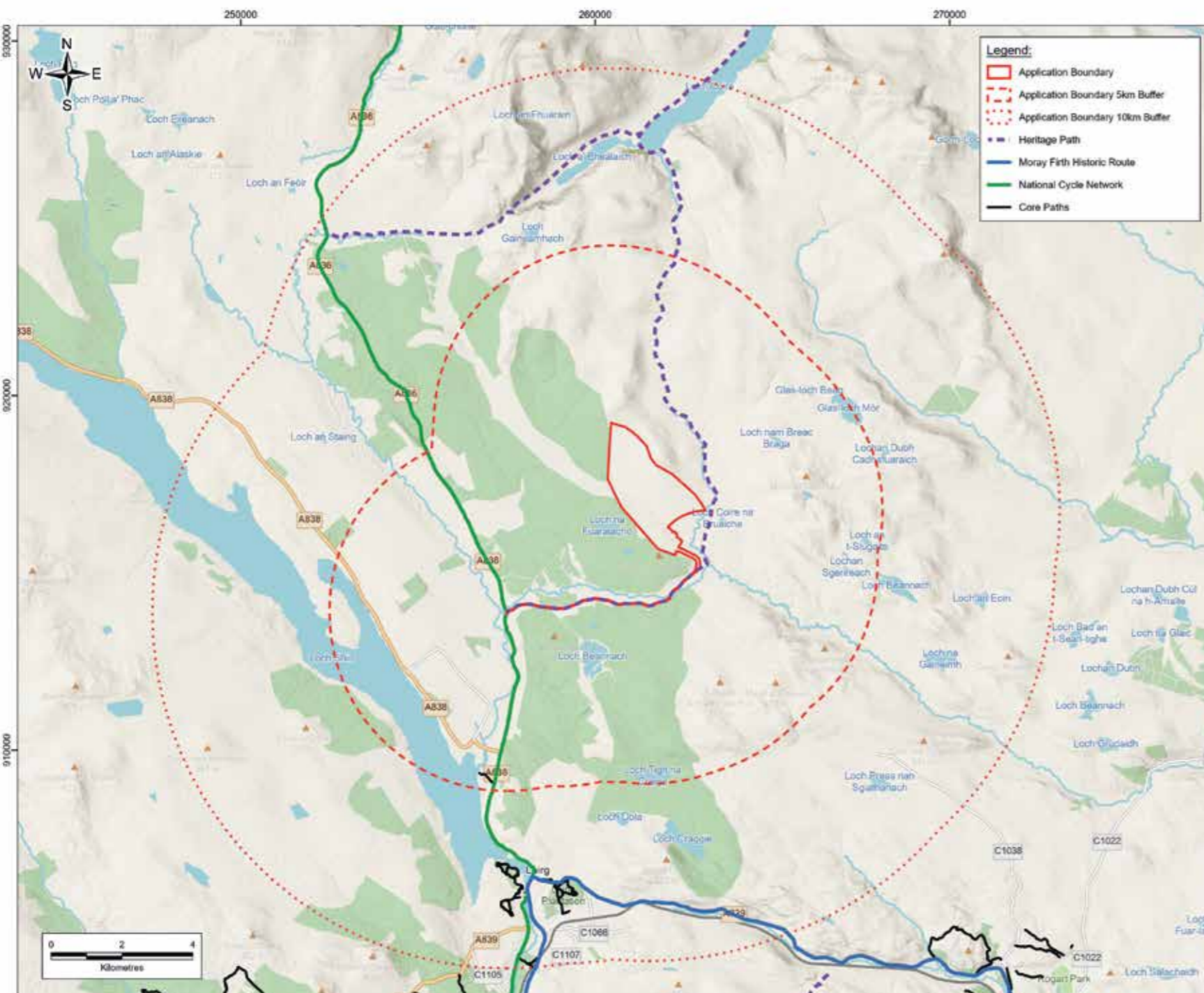
A few watercourses pass through the site, including the Allt nan Con-uisge and its tributaries, which flow into the River Brora that flows to the east from the boundary of the site.

TRANSPORT AND RECREATION



Stock photography

A number of areas on the proposed route may require oversail or overrun to accommodate the delivery of turbine components, and work is ongoing to identify and agree these requirements.



Recreational routes in the area of proposed development site.



Proposed delivery route.



THE LOCAL COMMUNITY



ESB will work closely with local communities, businesses and residents in seeking to ensure that it will bring real benefits and help to meet national climate change targets through the Chleansaيد Wind Farm proposal.

Business, employment and investment

ESB would like to hear from businesses across the Highlands and Scotland to ensure that it can fully consider the skills and services of local people and suppliers if the Chleansaيد Wind Farm receives approval.

The opportunities available include those for

- An engineering, procurement and construction contractor
- Construction material suppliers: concrete, aggregate and building materials
- Electrical contractors: supply and installation of plant, cabling, earthing, etc.
- Plant and equipment hire contractors: excavation earthworks, craneage, welfare units, etc.
- Labour hire companies: engineers, plant operatives and general labourers
- Transport: taxis and minibuses for local labourers.

Local accommodation providers

Construction projects of this nature inevitably require some specialist technicians from outside the area, so they will require local accommodation and catering facilities.

To be considered, please register with the local suppliers' database on our project website: www.esbenergy.co.uk/chleansaيد-wind-farm

Community benefit

ESB is committed to community benefit. We are currently exploring the options for community benefit and want to work with the community to create a workable and targeted package up to the value of £5,000 per megawatt of installed capacity.

We welcome feedback from the local community on community benefit structures.

Community shareholding

ESB is keen to consult the community about interest in investing in owning a share of Chleansaيد Wind Farm.



WHAT NEXT?



ESB hopes to submit its application for consent for the Chleansaid Wind Farm project to the Scottish Ministers towards the end of 2021. Scottish Government will undertake its own consultation process when the public will be invited to make formal comment on the proposals.

In the meantime, we would welcome your feedback on our proposals and can provide further information if required. Details of the feedback provided to us via our public consultation will be captured and included in a statement of community consultation provided to the Scottish Government alongside the application for consent. Note that comments made to ESB are not representations to the Council or Scottish Ministers.

This second public consultation period being held from 15 October until 5 November 2021, both in public and online, follows the COVID-19 guidance currently in place in Scotland.

You can view more detailed information on our website:

www.esbenergy.co.uk/chleansaid-wind-farm

Contact points

Telephone: **0800 612 8250**

Email: chleansaid@esb.ie

Post:

██████████ (Project Director)
ESB Asset Development UK Ltd
Inovo Building
121 George Street
Glasgow
G1 1RD



Energy for
generations



Appendix D – THC Pre-Application Pack

Reference No:	20/02047/PREMAJ	Date of Issue:	22 July 2020
Proposal:	Chleansaid wind farm - 20 turbines will be constructed on the site with a blade tip height of up to 200m, blade length up to 75m	Address:	Land 2375M NW Of Keepers Cottage Dalnessie Lairg
Case Officer:	██████████	Email:	██████████@highland.gov.uk
Confidentiality Requested	YES		

This pre-application advice has been specifically prepared for **ESB AD UK Ltd** as the applicant and **RSK Environment** as the agent for the proposed development at **Land 2375M NW Of Keepers Cottage, Dalnessie, Lairg**.

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Description of Proposal
Wind farm Section 36 application likely to be made to the Scottish Ministers. Up to 20 turbines with a height to blade tip not exceeding 200m, with a blade length not exceeding 75m and associated ancillary infrastructure. The generating capacity is anticipated to be up to 100MW and the operational lifetime of the project is expected to be between 30 - 35 years excluding commissioning and decommissioning.
Summary of Key Issues
<p>Whilst the Council is supportive of renewable energy developments in principle, this must be balanced against the environmental impact of development. Given the range of landscape designations in proximity, this is a particular sensitive area to accommodate the scale of wind farm envisaged.</p> <p>The visual influence of the proposed development, as indicated by the submitted ZTV, appears to be relatively contained for a development of this size. Views from the road appear to be largely contained to the A836 within the 15km radius of the site. Nevertheless, the Council still have significant concerns in relation to the landscape and visual impacts which are likely to arise as a result of this development individually, as well as cumulatively and sequentially with other developed and consented wind farms in the surrounding area.</p> <p>Such impacts may arise for receptors at several key locations including those within and adjacent to the Ben Klibreck and Loch Choire Special Landscape Area (SLA). Given the proposal's scale, there is substantial concern that the integrity of the SLA may be compromised as a result of the impact of the proposed development on the special qualities of the SLA and its strong sense of wildness and exceptional panoramic views.</p> <p>Further, the key gateway settlement of Lairg already experiences wind energy in several directions and this development would increase that effect to the north and potentially dominate the initial stretches of the A836 (national cycle route and recognised national tourist route) northbound from the settlement. The extent to which the proposal contributes to perception of the settlement's encirclement by wind energy development would be a key determining factor, as would the extent of visibility from the A836, particularly in northbound views towards the elevated Ben Klibreck and Loch Choire SLA.</p> <p>The proposed development is also located just to the south of Wild Land Area (WLA) 35: Ben Klibreck -</p>

Armine Forest. WLA 37 Foinaven - Ben Hee is approximately 9 km north west and WLA 34 Reay - Cassley is approximately 10 km west of the site. Figure 4, blade tip ZTV indicates that there is likely to be an intensity of visibility across the western part of WLA 35, and more dispersed visibility across the south-eastern part of this WLA. Visibility across WLA 34 is likely to be from the summit of Ben More Assynt along the eastern flank to the west of Loch Shin. Due to the proximity, height and nature of the proposal, SNH also consider that the development has the potential to result in significant adverse effects on the experience of wildness and ultimately the qualities of WLAs. These effects may be to the degree that an SNH objection is warranted.

It is also noted that the 200m tip height proposed is also significantly higher than neighbouring wind farm developments (e.g. Lairg II between 150m to maximum 180m tip heights). The scale of the proposed turbines would also result in the need for aviation lighting requirements which may extend the impacts of the development into hours of darkness.

If you decide to proceed towards application, detailed information and comprehensive assessment will be required in order to establish the significance of any impacts and you are encouraged throughout the process to explain the design iterations and how they have responded to assessment of impacts. The assessment should also clearly set out the benefits of the proposed development and you should clearly set out how, in your view as the applicant, the significant impacts of the development would be outweighed by the benefits of the proposed development.

Based on the submitted information and the information presented at the meeting it is unlikely that the Council would be in a position to support the proposed wind farm should it be brought forward as an application.

Background Information

Site Area	6772079 m ²	
Land Ownership	Unknown	
Existing Land Uses	Moorland	
Grid Reference	261641 (E)	917360 (N)

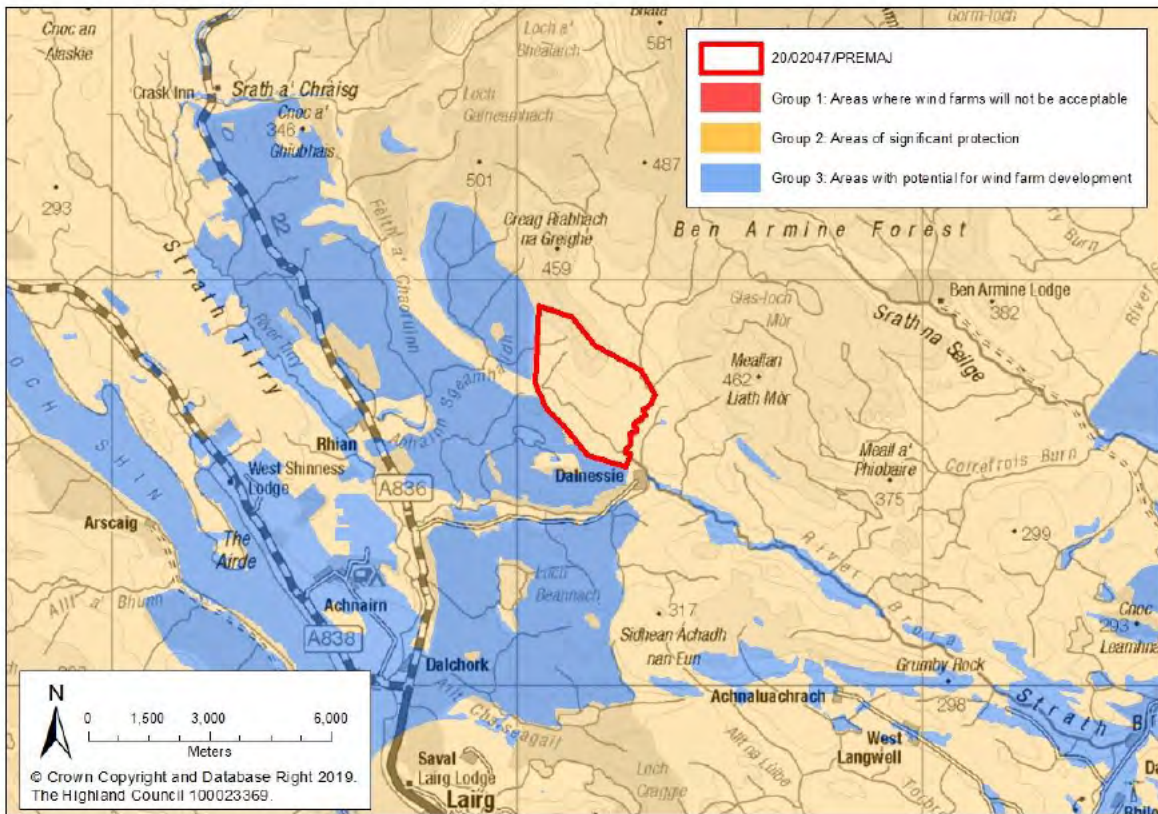
Consents Required

You are advised that the following consent(s) will be required for the proposed development:

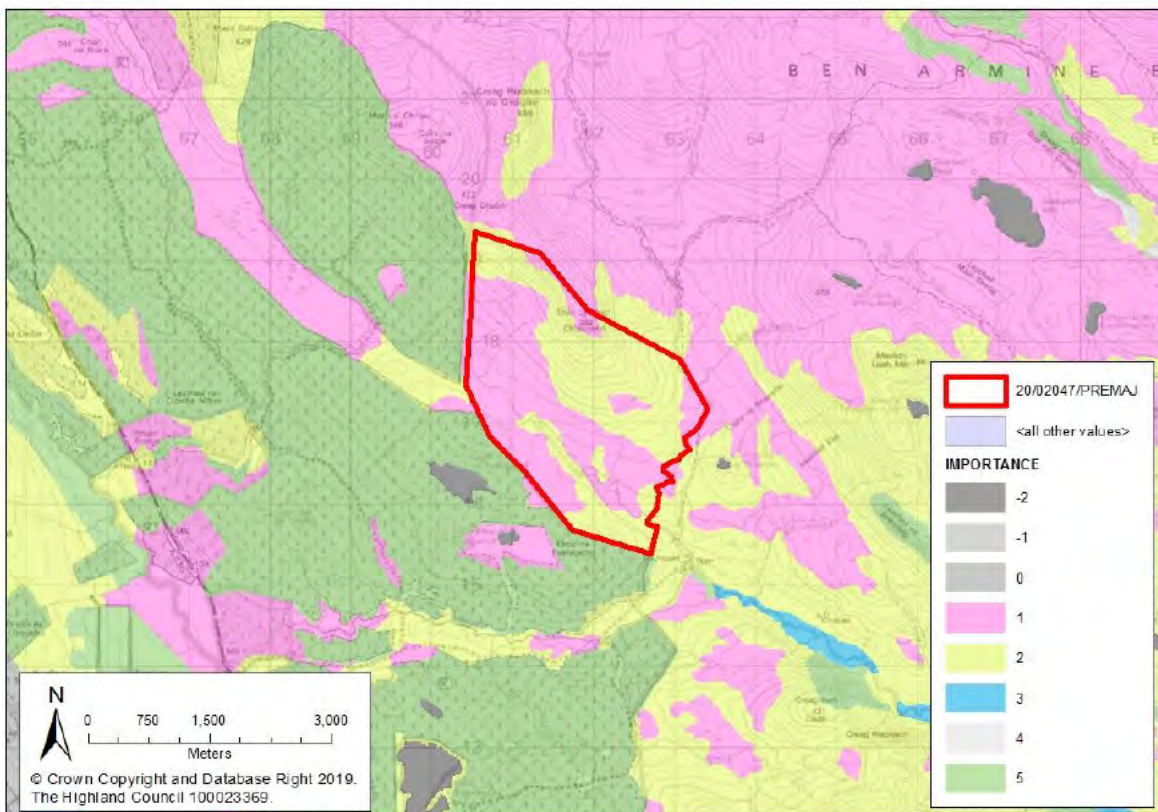
- Section 36 of the Electricity Act 1989

Site Constraints Mapping

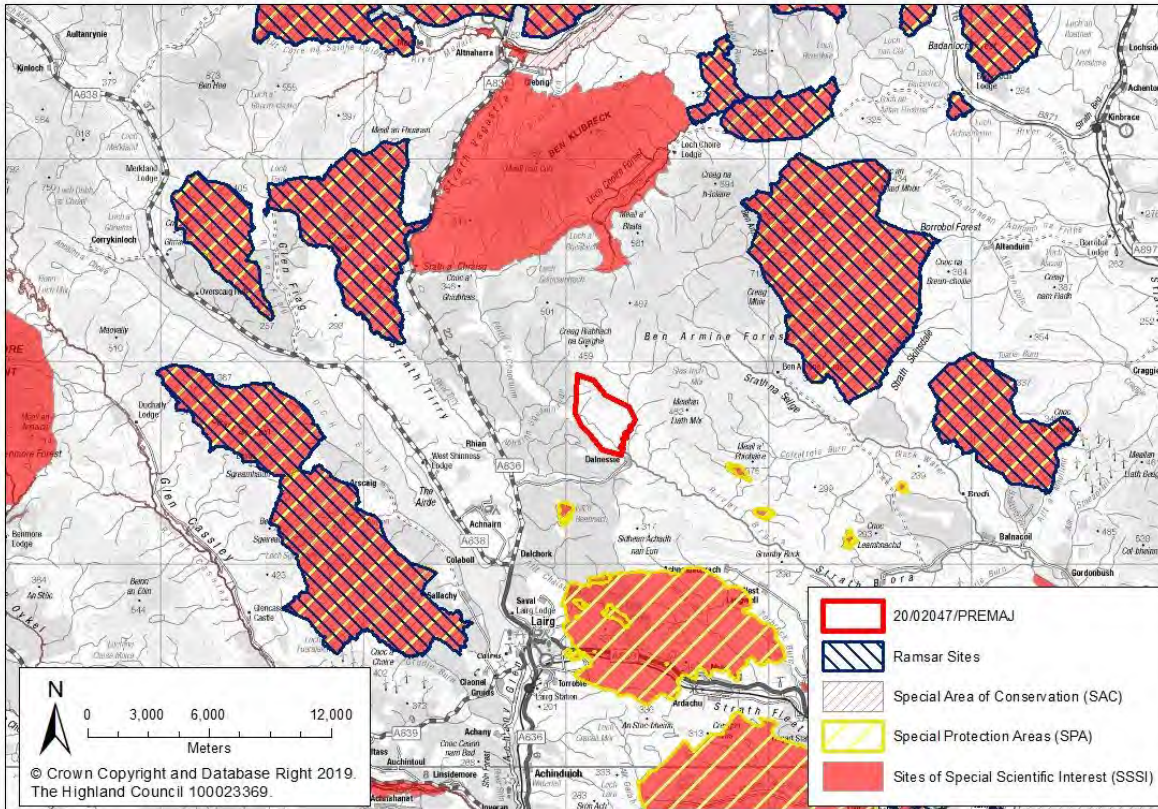
Spatial Framework



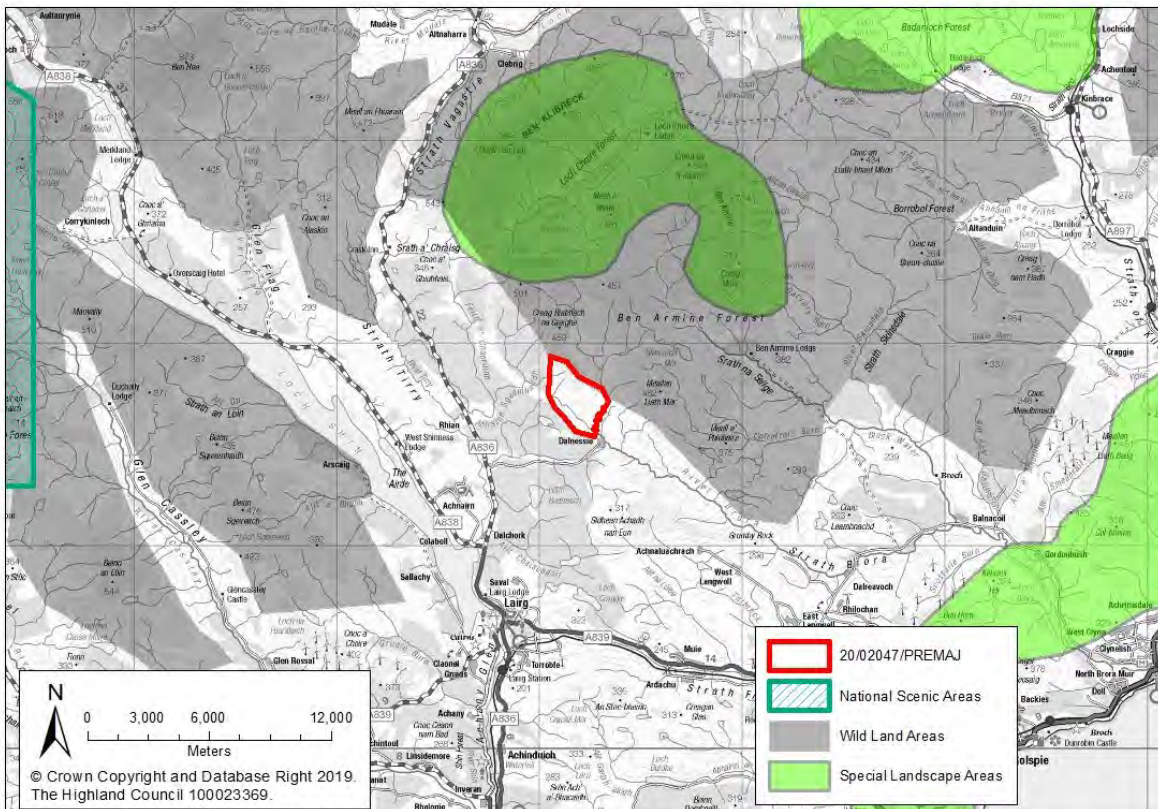
Carbon Rich Soils



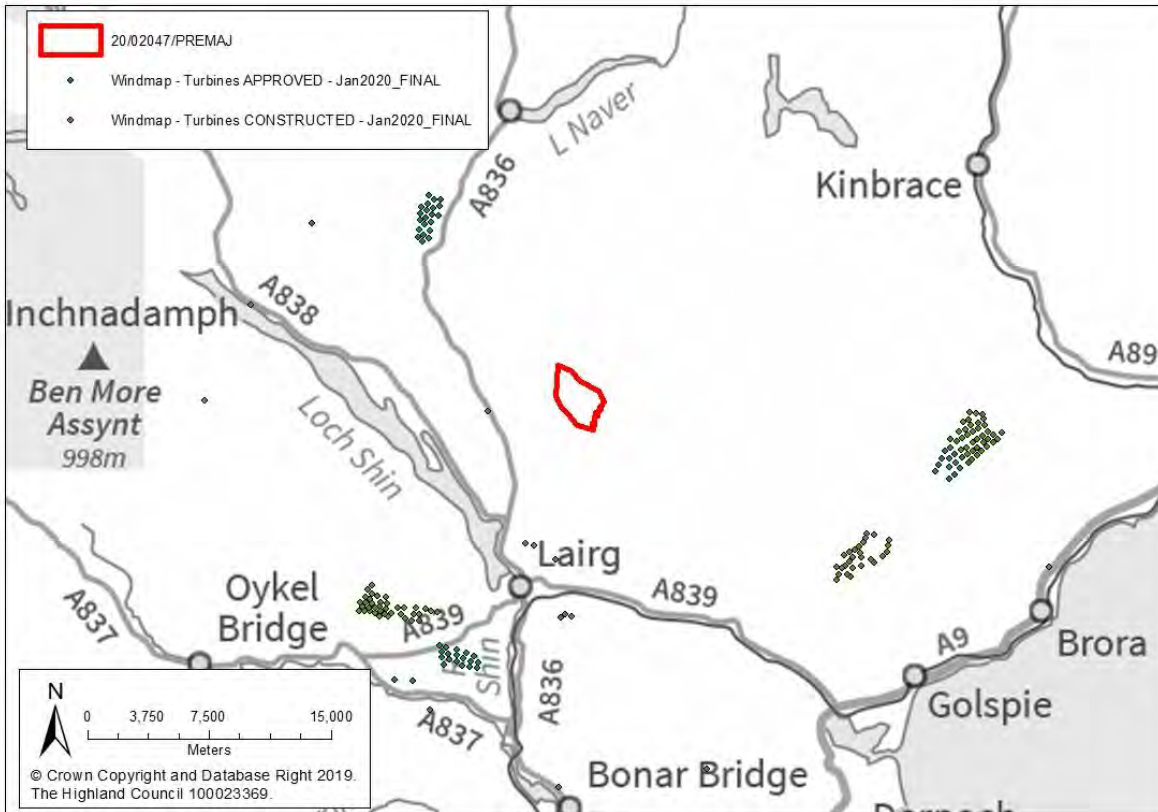
Natural Heritage Designations



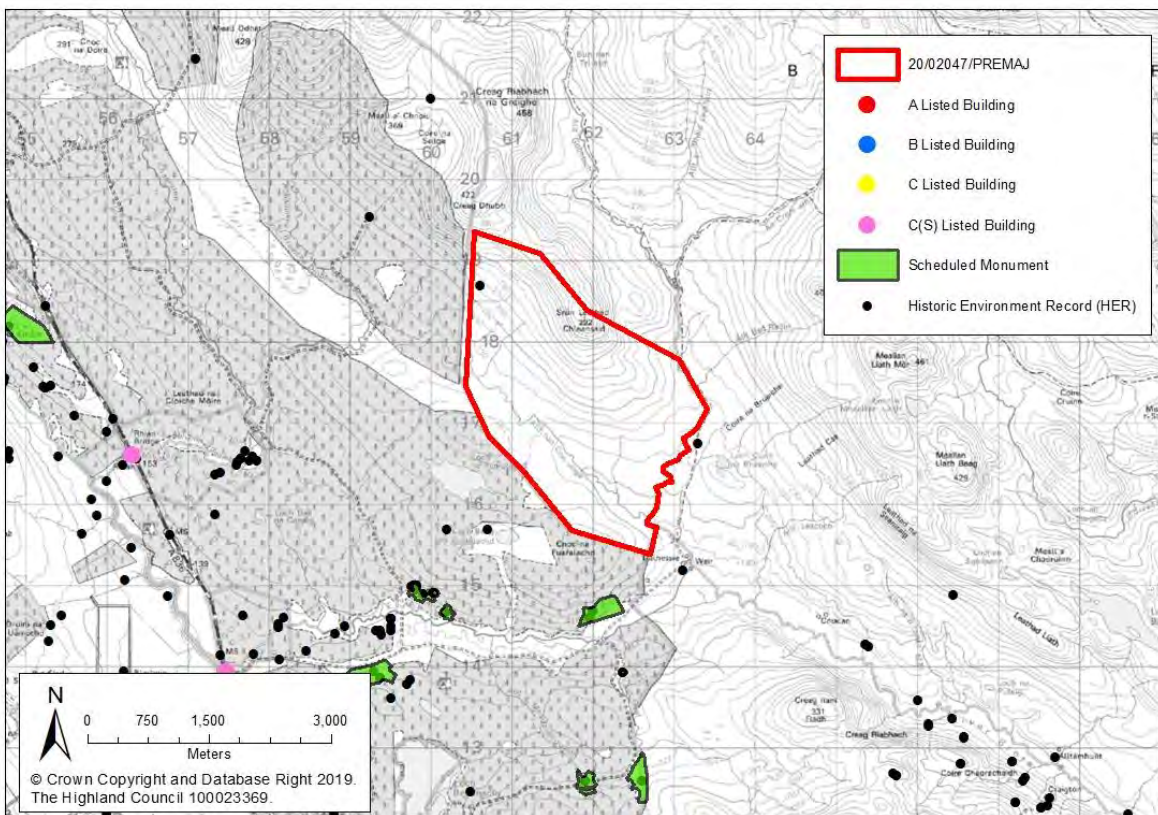
Landscape Designations



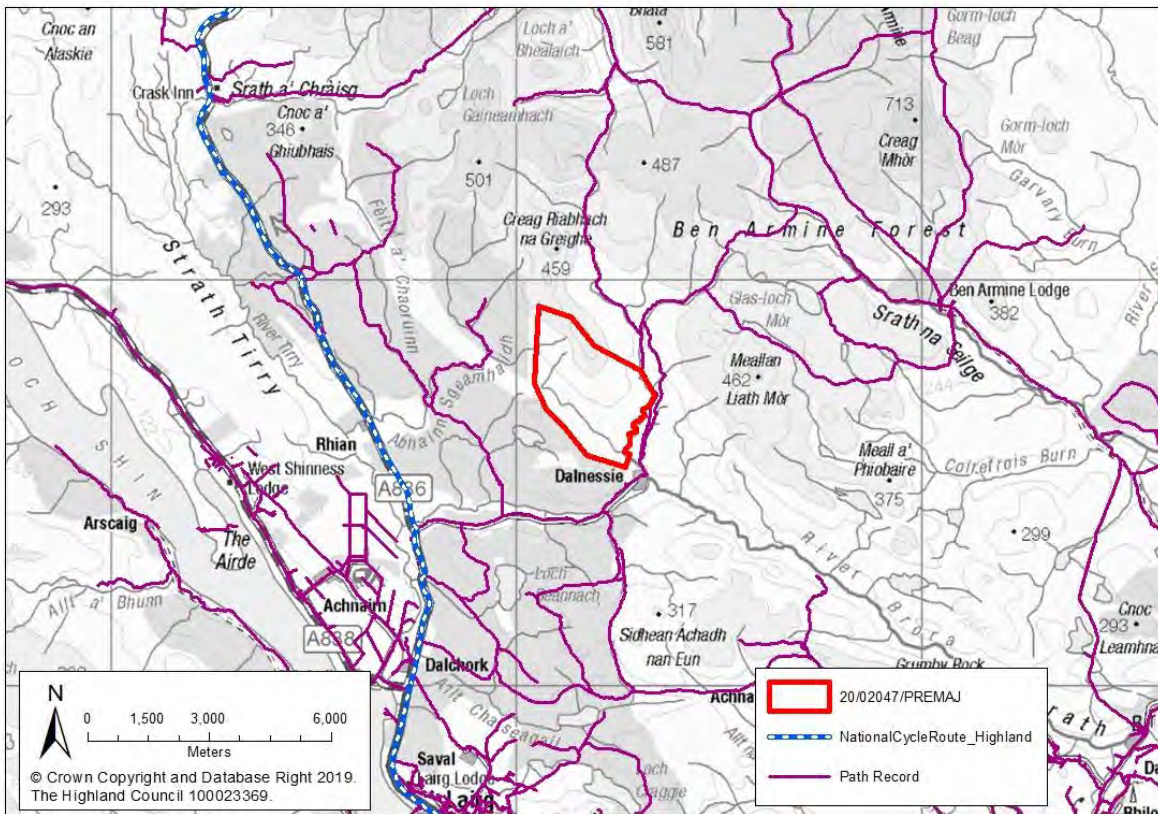
Onshore Wind Map



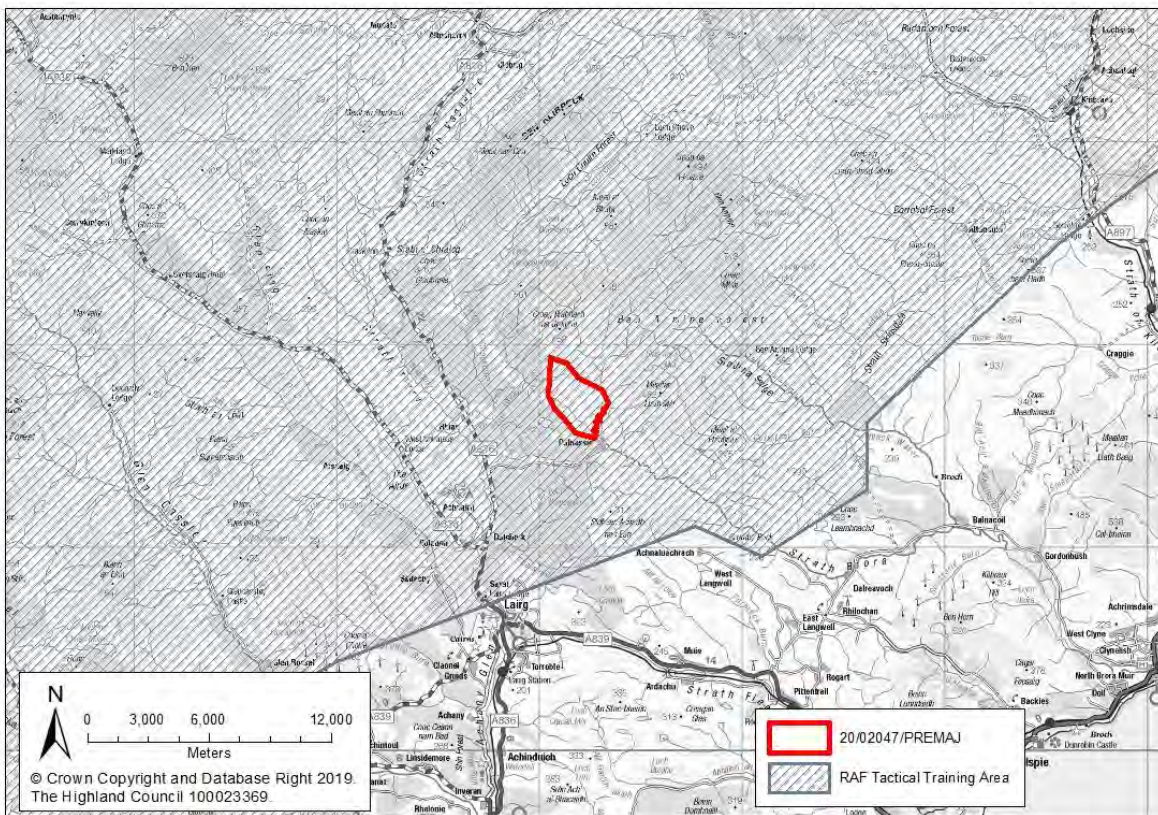
Listed Buildings



Wider Access



Aviation – RAF Tactical Training Area



Supporting Information Requirements			
Abnormal Load Assessment	X	Open Space Strategy	
Access Management Plan	X	Operational Noise Assessment	X
Arboricultural Impact Assessment	X	Peat Management Plan	X
Archaeological Site Investigations	X	Planning Statement	X
Assessment of Impact on Historic Environment	X	Pre-Application Consultation Report	X
Aviation Impact Assessment	X	Private Water Supplies Survey	X
Borrowpit Management Plan	X	Protected Habitat Survey	X
Carbon Balance Assessment	X	Protected Species Survey	X
Compensatory Planting Plan	X	Restoration / Decommissioning Plan	X
Construction Noise Assessment	X	Retail Impact Assessment	
Construction Environmental Management Plan and Construction Traffic Management Plan	X	Schedule of Mitigation	X
Contaminated Land Report		Shadow Flicker Assessment	X
Design and Access Statement	X	Street Elevations	
Development Brief		Structural Survey	
Drainage Impact Assessment	X	Sustainable Design Statement	X
Dust Survey	X	Swept Path Analysis	X
Electric Car Charging Strategy	X	Transport Assessment	X
Flood Risk Assessment	X	Transport Statement	
Forest Residual Waste Strategy	X	Tree Constraints Plan	X
GWDTE Assessment	X	Tree Protection Plan	
Habitat Management Plan	X	TV / Radio Impact Assessment	X
Landscape and Visual Impact	X	Vibration Assessment	
Landscape Maintenance/Management Plan		Visualisations	X
Landscape Plan		Waste Strategy	
Masterplan			
Other (Please Specify):			
• Cumulative LVIA (CLVIA)			X
• Wild Land Assessment			X
• Aviation Lighting Assessment			X
• GIS shape files of ZTVs			X

PLEASE NOTE THAT THE ABOVE LIST DOES NOT REPLACE THE NEED TO UNDERTAKE A SCOPING EXERCISE FOR THE ENVIRONMENTAL IMPACT ASSESSMENT REPORT.

Planning History			
Previous Reference	Description	Date of Decision	Outcome
20/01270/SCOP	Chleansaid wind farm - 20 turbines(to be confirmed through EIA) will be constructed on the site with a blade tip height of up to 200m, blade length up to 75m.	28 April 2020	SCOPING RESPONSE ISSUED

Planning Policy
<p><u>Highland-wide Local Development Plan (Adopted 2012)</u></p> <p>28 - Sustainable Design 29 - Design Quality & Place-making 30 - Physical Constraints 31 - Developer Contributions 36 - Development in the Wider Countryside 42 - Previously Used Land 51 - Trees and Development 52 - Principle of Development In Woodland 53 - Minerals 55 - Peat and Soils 56 - Travel 57 - Natural, Built & Cultural Heritage 58 - Protected Species 59 - Other Important Species 60 - Other Important Habitats</p> <p>61 - Landscape 62 - Geodiversity 63 - Water Environment 64 - Flood Risk 66 - Surface Water Drainage 67 - Renewable Energy Developments 68 - Community Renewable Energy Developments 69 - Electricity Transmission Infrastructure 72 - Pollution 73 - Air Quality 74 - Green Network 77 - Public Access 78 - Long Distance Routes</p>
<p><u>Caithness and Sutherland Local Development Plan (CaSPlan) (2018)</u></p> <p>No site-specific allocations apply.</p>
<p><u>Highland Council Supplementary Guidance</u></p> <p>Developer Contributions (November 2018) Flood Risk & Drainage Impact Assessment (Jan 2013) Green Networks (Jan 2013) Highland Historic Environment Strategy (Jan 2013) Highland's Statutorily Protected Species (March 2013) Highland Renewable Energy Strategy & Planning Guidelines (May 2006) Onshore Wind Energy Supplementary Guidance (OWESG) (Nov 2016) and Addendum Part 2b (2017) Physical Constraints (March 2013) Roads and Transport Guidelines for New Developments (May 2013) Special Landscape Area Citations (June 2011) Standards for Archaeological Work (March 2012) Sustainable Design Guide (Jan 2013) Trees, Woodlands and Development (Jan 2013)</p>
<p><u>Scottish Planning Policy and Other Planning Guidance</u></p> <p>Scottish Planning Policy and Guidance Scottish Planning Policy National Planning Framework 3 (NPF3) and NPF4* Scottish Energy Strategy (Dec 2017) Historic Environment Policy for Scotland (HEPS, 2019) PAN 56 - Planning and Noise PAN 58 - Environmental Impact Assessment PAN 60 - Planning for Natural Heritage 2020 Routemap for Renewable Energy THC Visualisation for Standards for Wind Farm Development Onshore Wind Energy (Statement) (Dec 2017)</p>

Onshore Wind Turbines
SNH Siting and Designing Wind Farms in the Landscape
Wind Farm developments on Peat Lands
Scottish Government Energy Efficient Scotland Route Map (May 2018)

Policy Context

Policy Background

The Development Plan comprises the HwLDP, CaSPlan and relevant supplementary guidance, including the Onshore Wind Energy Supplementary Guidance (OWESG). References elsewhere in this advice pack to "the Council" are to The Highland Council, unless otherwise stated.

HwLDP

HwLDP was adopted in 2012 and sets out the general planning policies for the Highland Council area. It should be noted that a review of HwLDP commenced with the publication of a Main Issues Report in September 2015. This review is on hold until the secondary legislation associated with the Planning (Scotland) Act 2019 is introduced. The HwLDP contains the key policies relevant to this proposal.

Policy 67 Renewable Energy Developments sets out the Council's support in principle for renewable energy developments. This support is subject to addressing key issues and criteria. The Council must be satisfied that the development is located, sited and designed in a way that will not be significantly detrimental to a number of considerations as set out in the Policy. This includes both individual impacts and cumulative impacts with other renewable energy developments. Further detail is set out in the Onshore Wind Energy Supplementary Guidance to this policy. As the project progresses it will be important to maintain an up to date picture of development in the wider area, particularly for informing cumulative impact assessment. A starting point for this is the Council's Highland Wind Map - which is up to date to January 2020. Other key policies from HwLDP will also be relevant to this proposal, including those referred to above and elsewhere within this response.

CaSPlan

CaSPlan focuses on regional and settlement strategies and identifying specific site allocations. Much of the content is not particularly relevant to a wind farm proposal, however, certain aspects of the strategy for the local area/settlement may help to inform plans for community engagement or community benefit. The area plans define Settlement Development Areas (SDAs) and those are the areas to which the Spatial Framework in the OWESG applies the Community Separation Distance. CaSPlan also confirms the boundaries of Special Landscape Areas (SLAs) including: Ben Klibreck and Loch Choire.

The SLA citations provide the most up to date information on the SLAs. See:

https://www.highland.gov.uk/downloads/file/2937/assessment_of_highland_special_landscape_areas

Spatial Framework - Scottish Planning Policy and OWESG

As shown on the extract map provided, the site lies within Group 2 – Areas of significant protection (due to the presence of Carbon Rich Soils, Deep Peat and Priority Peatland Habitat – CPP). Another map provided is an extract of SNH's Carbon and Peatland Map 2016, being the mapping that should be referred to in order to confirm what land is identified under each of the defined Classes of CPP. The CPP mapping is a starting point, identifying likely presence of nationally important resource; the developer should undertake a specific peat assessment to inform the siting, design or other mitigation in order to at least substantially overcome significant effects on CPP. Attention is drawn to Para 4.34 on Page 24 of the Onshore Wind Energy Supplementary Guidance which discusses peat, including CPP.

HwLDP Policy 67 sets out the Council's support in principle for renewable energy developments. This support is subject to addressing key issues and criteria. The Council must be satisfied that the development is located, sited and designed in a way that will not be significantly detrimental to a the considerations as set out in the Policy. This includes both individual impacts and cumulative impacts with other renewable energy developments. Further detail is set out in the SG to this policy (discussed elsewhere). As the project progresses it will be important to maintain an up to date picture of development in the wider area, particularly for informing cumulative impact assessment. A starting point for this is the Council's Highland Wind Map - which is up to date to January 2019 and will be refreshed in early 2020.

Developer Contributions and Community Benefit

Under the terms of HwLDP Policy 31 and the Council's [Developer Contributions Supplementary Guidance \(2018\)](#) energy developments may be required to make contributions towards: transport; green infrastructure; water and waste; and public art. In addition, whilst Community Benefit is a separate issue to planning, the Council wants to make sure that local communities benefit directly from the use of their local resources and are compensated for the disruption and inconvenience associated with large scale development work. Further details are set out within the Council's Community Benefit policy:

<http://www.highland.gov.uk/info/198/planning - long term and area policies/639/community benefit>

*NPF4

The NPF4 (incorporating SPP) early engagement period is currently underway with a draft due in Parliament for consultation in Autumn 2021. Public consultation will run alongside Parliament's consideration. Following this formal consultation, Scottish Government aims to lay the final version in Parliament in 2022. For the first time, the National Planning Framework will become part of the Development Plan.

As part of early engagement for the preparation of NPF4, the Scottish Government undertook a Call for Ideas and the Highland Council made [submissions](#) to this. Subsequently the Economy and Infrastructure Committee was asked on 1 July 2020 to homologate those responses and Committee agreed to do so.

Depending upon the timing of your application, should you proceed with the proposals, NPF4 may be part of the consideration. Until such time as NPF4 receives final approval, NPF3 and SPP (both 2014) remain as current national planning policy and material considerations in decision-making.

Sustainability

The Council's Sustainable Design Guide SG provides advice and guidance on a range of sustainability topics, including design, building materials and minimising environmental impacts of development. A Sustainable Design Statement is required.

Wind farms produce a sustainable form of energy, however, the Council will need to be satisfied in reaching a conclusion on any consultation or application that the development in its entirety is in fact sustainable development. In order for us to do so we recommend that matters related to the three pillars of sustainable development are fully assessed in the information which supports the application. The wind farm needs to be considering the provision of energy systems within the holistic demand cycle of the network. The developer needs to consider the impact of the installation and the prospective long-term use of the energy to accommodate the requirements of a decarbonised energy provision for Scotland and the Highlands. The application should include a statement on how the development is likely to contribute to the Scottish Government Energy Efficient Scotland roadmap and provide the Highlands with secure and clean electricity supplies.

Energy storage technology is of interest to the Council as an emerging new aspect of renewable energy developments with considerable potential benefits for energy generation, efficiency and supply. In broad principle the inclusion of infrastructure for energy storage in renewable energy proposals can be supported, given the benefits. Any associated buildings with the wind farm scheme must be designed in a way which is sympathetic to the local area and existing pattern of development. However, in considering the detail the Council would need to understand the type and nature of storage facility proposed, such as scale and appearance, and it would be beneficial to have information to explain the specific electricity network benefits and capacity proposed.

The developer should also consider the potential for generation of alternative fuels as part of the development. Consideration to be given to what redundancy is built into the operation and use of the power generated. An element of local use of the energy and particularly development of Hydrogen production may be possible from any projected downtime. The Council also encourage the inclusion of electric car charging facilities within all new developments. A strategy for the provision of charging points within the development should be submitted with the application.

Design Evolution

HwLDP Policy 29 Design Quality and Place requires development to be designed to make a positive contribution to the architectural and visual quality of the area. Furthermore development proposals must demonstrate sensitivity and respect towards the local distinctiveness of the landscape, architecture, design and layouts of their proposals. This policy is equally applicable to wind farm layout and design as well as the design of any supporting infrastructure. A thorough chapter in the EIAR on design evolution of the wind farm will be required. This should identify what the key design drivers were for the wind farm and also where the wind farm is designed to be viewed from. This section of the EIAR should also consider the proposed turbine heights and scope of avoiding the need for aviation lighting.

The candidate turbines should be clearly set out in the EIAR and there should be consistency through each of the chapters with the same candidate turbine used for all chapters. If there are alternatives they should be identified in the EIAR.

Design and Access Statement

The Design and Access Statement should also outline the design principles and concepts that have been applied to the development and:

- explain the policy or approach adopted as to design and how any policies relating to design in the development plan have been taken into account;
- describe the steps taken to appraise the context of the development and demonstrates how the design of the development takes that context into account in relation to its proposed use; and
- state what, if any, consultation has been undertaken on issues relating to the design principles and concepts that have been applied to the development; and what account has been taken of the outcome of any such consultation.

Further advice is available in PAN 68 and the Council's guidance note on Design and Access Statements: https://www.highland.gov.uk/downloads/file/2645/design_and_design_and_access_statements_advice_note

Natural Heritage

Designated Sites

HwLDP Policy 57 considers impacts on natural, built and cultural heritage designations and features. All development will be assessed taking into account the level of importance and type of heritage features, the form and scale of development and any impact on the feature and its setting. Of particular relevance are those landscape and other natural, built and cultural heritage features in proximity to the proposal identified in the constraints maps provided.

Of particular note are the range of landscape designations and features in proximity, including:

- Wild Land Area (WLA) 34: Reay-Cassley;
- WLA 35: Ben Klibreck-Armine Forest;
- WLA 37: Foinaven-Ben Hee;
- Ben Klibreck and Loch Choire SLA;
- Caithness and Sutherland Peatlands Ramsar, SPA, SAC, SSSI;
- River Naver SAC;
- Strath Camaig and Strath Fleet Moors SPA and SSSI;
- Lairg and Strath Brora Lochs SPA and SSSI; and
- Built heritage with several Scheduled Monuments located in the valley of Feith Osdail adjacent to the proposed site.

Information on the legislative requirements of European sites can be found at: <http://www.snh.gov.uk/docs/A423286.pdf>

Information regarding the status and qualifying features of all the site can be found at:

<http://www.snh.org.uk/snhi/>

World Heritage Site (Tentative)

The [Flow Country](#) is on the tentative list for World Heritage Site status and as part of the process for the bid for it to become a World Heritage Site, in December 2019 the Peatlands Partnership submitted a Technical Evaluation of The Flow Country to the UK Government's Department for Digital, Culture, Media and Sport (DCMS). A formal decision is awaited from DCMS on whether or not to nominate The Flow Country as the UK's next candidate for World Heritage Site status. That DCMS decision is expected imminently. If DCMS decides to do so, the next and final stage of the process would be to submit a full nomination to UNESCO, who would determine whether or not The Flow Country meets the criteria for World Heritage Site status. It is worth noting that SPP (2014) indicates WHS as part of Group 2 in the spatial framework.

Landscape and Visual

HwLDP Policy 61 Landscape requires new development to reflect the landscape characteristics and special qualities identified in the relevant, recently refreshed and published (2019) SNH Landscape Character Assessments (LCAs). The LCAs are a starting point on which to base assessment of landscape and visual impact. It is important to set out who the visual receptors of the development are, what the landscape impacts are and how these two factors relate.

The proposed development would sit almost on the boundary between an area of Sweeping Moorland and Flows Landscape Character type and an area of Rounded Hills - Caithness and Sutherland.

In the relevant section of the Sweeping Moorland and Flows LCA (i.e. the area north west of Strath Fleet) views northwards are into WLA 37 and WLA 35 and to the Ben Klibreck and Loch Choire SLA. The LCA is dominated in this area by commercial forestry which covers the convex slopes of Strath Tirrey.

The Rounded Hills LCA covers Loch Choire and hills to its south within the Ben Klibreck and Loch Choire SLA and a series of lower hills which surround Strath na Seilge and the River Brora's upper reaches.

The LCA is very secluded, with views into the area generally limited to those available from elevated viewpoints such as Ben Klibreck or from within the LCA itself.

Assessment of landscape impacts should address local interactions between the two LCAs, as well as the characteristics of individual landscape character types.

Assessors should be alert to the role the two landscape areas play in appreciation of the Special Qualities of the Assynt-Ciogach NSA when seen from the higher points in the SLA; e.g.:

- Spectacular scenery of lone mountains - *'This is a land where lone mountains rise dramatically above cnocan, moorland and loch, where rocky hills dominate the scenery and stay long in the memory. The peaks are afforded a platform, a broad stage from which they thrust upwards, often with striking, steep-sided profiles recognisable from many miles away.'*

And also to the appreciation of Qualities of the Ben Klibreck and Loch Choire SLA; e.g.:

- A very large-scale, open and exposed landscape in which a prominent, high isolated mountains rise conspicuously from the surrounding moorland with its very distinctive profile; and
- Special Quality: Distinctive Mountains.

The SLA citation notes the following Sensitivity to Change:

- This area is very sensitive to development that could interrupt the relationship between the open moorland and the isolated mountains.

In bringing forward the LVIA chapter of the EIAR, it is critical that it can be easily understood and interpreted. The use of a matrix approach to show the effects on sensitivity of receptor and the magnitude of change is strongly encouraged. To support this the Council will require a clear definition for each scale of magnitude of change and what receptors it considers to be of high, medium and low sensitivity.

THC Request for Additional Viewpoints

The visual influence of the proposed development, as indicated by the submitted ZTV, is relatively contained for a development of this size. Views from the road appear to be largely contained to the A836 within the 15km radius of the site. The viewpoints currently indicated appear acceptable, but I would recommend inclusion of additional locations:

1. On the A838 around the north of the river Fiag, just on the 15km radius. While the view here would be brief it would be in the direction of travel for southbound road users and view from here may be important in understanding the cumulative effects with such developments as Dalchork, Strath Tirrey, Sail achy, Lairg II and Garvary;
2. A839 above Lairg to ensure that effects on the sense of arrival at Lairg are assessed and to represent the Lairg residences which site at a higher level than the existing viewpoints; and
3. A836 junction at Dalchork Hide; to allow understanding of effect on road users sense of moving into the wilder landscapes north of Lairg.

Landscape Sensitivity

Pages 18-20 of the OWESG list ten landscape and visual criteria that the Council will use as a framework for assessing proposals. They are not absolute requirements but set out key considerations of the Council that the developer should be aware of and take into account within design and assessment of the proposal. The criteria should influence the proposals and the supporting documents for any application should include the developer's assessment against these criteria. The following criteria are likely to be of particular significance:

- *1 - Relationship between settlement / key locations and wider landscape respected:*

Lairg already experiences wind energy development in several directions and this development would increase that effect to the north and potentially dominate the initial stretches of the A836 northbound from the settlement. The extent to which the proposal contributes to perception of the settlement's encirclement by wind energy development shall be a key determining factor.

- *2 - Key Gateway locations and routes are respected:*

While THC has not published an assessment for this area at present, Lairg itself should be considered as a gateway location, due to its position both at the head of Strath Fleet and as the last significant settlement on the road north.

- *3 - Valued natural and cultural landmarks are respected:*

Ben Klibreck is a significant landmark on the route north, a clear understanding will be required of the degree to which the development does or does not affect its prominence or relationship to its setting.

- *4 - The amenity of key recreational routes and ways is respected; and 5 - The amenity of transport routes is respected:*

The A863 carries NCR1 north of Lairg and south of Lairg forms part of the Moray Firth National Tourist Route, which continues along the A839 through Strath Fleet. It will be particularly important to ensure that cumulative effects on these routes do not breach the criteria thresholds.

- *6 - The existing pattern of Wind Energy Development is respected:*

The high sensitivity of the environment has led to a high number of refusals and withdrawals of applications in this area between Lairg and Creag Riabhach, which means that no strong existing pattern has emerged here.

South of Lairg a general pattern may be described as approved developments having a strong relationship to the topography, generally being clearly related to a landform within the Rounded Hills but above a Strath, that combination of landscapes does not exist around the proposed site and therefore is limited as a reference.

- *8 - The perception of landscape scale and distance is respected:*

The views from summits, particularly views between the NSA and SLA should be protected from any effect of the size of turbines diminishing the apparent scale and distance between these mountains.

Landscape Sensitivity Appraisals

The Council has been undertaking work on appraising the sensitivity of the landscape to onshore wind energy development and identifying strategic capacity. This has been completed for a number of other areas of Highland and forms part of the adopted SG. The site lies out with the area of assessment published to date. This work is currently on hold and until a draft appraisal is available for public consultation, likely in early 2021.

Wild Land and Landscape Impacts – SNH Response

Study Area

The scoping report sets out an initial study area of 45k from the turbines however states that the detailed study area is likely to be between 15 and 20km. Given the predicted height of the turbines of up to 200m to blade tip, SNH consider that this detailed study area is likely to be insufficient to capture all likely significant landscape and visual effects.

Viewpoints

SNH advise that careful consideration is given to those viewpoints where wireframes only are produced as some viewpoints although distant (beyond 15km) may be representative of significant effects on sensitive landscapes or receptors. We would welcome consultation on the finalised list of viewpoints and those which will only be represented by wireframes prior to submission of the EIAR.

Two locations within WLA 35 have been included as assessment points, both of which are elevated (Ben Klibreck and Ben Armine) and both are over 10km from the proposal. In order to fully understand the likely effects on how the qualities of this area are appreciated, we advise that further assessment locations will be required closer to the proposal and from lower elevations where the simplicity of the landform which is a dominant characteristic of the remote interior of the WLA can be appreciated. The route that runs from Dalnessie to Loch Choire would be a good starting point and SNH are happy to advise further once a ZTV on a 1:50k as basemap is produced.

There are no assessment points selected within WLA 34 other than at Ben More Assynt which is at some distance from the proposal. SNH advise that due to the likely visual intrusion of the proposal, both during daylight hours and after dusk, into this adjacent WLA that an assessment point to the west of Loch Shin should be included.

Wild Land Assessment

The proposed development is just to the south of WLA 35: Ben Klibreck - Armine Forest. WLA 37 Foinaven - Ben Hee is approximately 9 km north west and WLA 34 Reay- Cassley is approximately 10 km west of the site. Figure 4, blade tip ZTV indicates that there is likely to be an intensity of visibility across the western part of WLA 35, and more dispersed visibility across the south-eastern part of this WLA. Visibility across WLA 34 is likely to be from the summit of Ben More Assynt along the eastern flank to the west of Loch Shin.

The Scoping report states: *"Following on from the direction contained within the Limekiln 2 Wind Farm decision (case ref WIN-270-B and endorsed by Scottish Ministers), the assessment will use the 2007 guidance, as updated in 2014, with the published descriptions of the wild land areas."* We however highlight that other Reporter's have taken a different approach and used the draft 2017 guidance. SNH strongly advise that the 2017 draft guidance is used when preparing the wild land assessment for this proposal. This is due to it being more relevant now that the WLAs are in existence and the wild land descriptions are published. SNH's experience in using and advising on the 2017 guidance over the past three years on numerous cases has confirmed that this approach will better ensure that the assessment draws out the range of likely significant effects on this WLA. SNH encourage the applicant to discuss the application of the wild land methodology further with us to ensure that the EIAR contains all the necessary information to allow us to advise on this wind farm.

Conclusion

Due to the proximity, height and nature of the proposal, we consider that it has the potential to result in significant adverse effects on the experience of wildness and ultimately the qualities of WLAs. These effects may be to the degree that an SNH objection is warranted.

Aviation and Lighting

The proposal sits within the RAF tactical training range (map provided) and an aviation impact assessment will be required. Turbines of a height of 150m or greater currently require aviation lighting. As the current proposals are below this threshold no lighting should be required. That said, this is an area where there is on-going discussion around the requirements of lighting and possible technological solutions. Any lighting strategy for the site must be prepared in agreement with CAA/HIAL. Consideration should also be given to limiting light pollution associated with this. Details of any potential lighting scheme must be provided at the application stage. Guidance on this can be found at:

<https://www.nature.scot/professional-advice/planning-and-development/advice-planners-and-developers/planning-and-development-renewable-energy>

An assessment of the impact of aviation lighting on the nightscape must be submitted with the application. This should include visualisations at a range of viewpoints to be agreed with the Council and SNH. The visualisations should be produced following a methodology agreed with SNH. The developers are however reminded that the latitude of the site has consequences for the methodology used. SNH in their guidance make reference to 30 minutes after sunset being an appropriate time for photography. However, the further north one is, the slower the transition from technical sunset to actual darkness in the summer, and the faster in the winter. Therefore, THC's Landscape Officer suggests that the timing be decided according to the time of year photography is carried out and should be based around the end of 'Civil Twilight' rather than sunset.

Further SNH Lighting Advice

The current CAA requirement in the UK is a steady red light to be installed on the nacelle of all turbines over 150m at 2000 candela intensity (akin to radio masts lights) with intermediate lights at 52m on the towers. This light intensity is visible over around 30 - 40km however we have not assessed enough applications yet to test what distance significant effects are likely to occur.

Rural Scotland is a dark place and this is a valued quality of the landscape. People do actively seek out dark skies and this group of receptors will be very sensitive to this form of landscape change. Lights are switched on approx. one hour before dusk and stay on for an hour till after dawn therefore the magnitude of effects will be substantially greater duration during the winter months.

SNH advise that the following information should be included within the EIAR to aid consultees and decision makers on this evolving issue:

- a ZTV showing the extent of visibility of the lighting;
- a narrative describing the effects of any lighting proposed on landscape sensitivities;
- a consideration of available mitigation; and
- a small number of visualisations demonstrating the effects of the lighting proposed. SNH are happy to advise further on the locations of these but they must include locations within the WLA.

SNH would encourage the applicant to explore all available forms of lighting mitigation and, in particular, to seriously consider the potential for proximity activated lighting. It is our understanding that this proximity activated lighting technology could potentially be a very effective solution to lighting related impacts and would likely mean that turbines lights would be switched off for over 98% of the time. Discussion of case-specific permissibility issues for proximity activated lighting should be taken forward with the Civil Aviation Authority (CAA) (contact ██████████@caa.co.uk).

Visualisations

The landscape and visual impacts are key issues which will inform our position in relation to this proposal. Visualisations provided are expected to accord with the Council's latest Visualisation Standards for Wind Energy Developments. Assessments should cover impacts of all elements of the development, not just the turbines, where they are not covered under a separate application. **It would be highly beneficial for THC's volume of visualisations to be provided in an A3 ring bound folder for ease of use and extracting individual visualisations for fieldwork.**

Applicants are strongly encouraged to provide information on all aspects of their proposal as far as possible at application stage, including information on intended grid connection, in order that the Council has the fullest understanding of the scheme. The wirelines accompanying the visualisations should include details of turbine numbering, with the sequence of numbering running in order without any omissions. The proposed finalised list of viewpoints should be shared with the Council for further consideration, and it is likely that this would also require ongoing dialogue with the Council and SNH thereafter.

Initial Draft Wirelines

SNH and THC are unfortunately not able to provide advice on the wirelines within the required consultation deadline. SNH and THC can if requested, submit further advice on this at a later date and are keen to discuss the scope of the assessment with the applicant's landscape consultants.

Peat

The proposed development site includes areas of carbon rich soils, deep peat and priority peatland habitat, the importance of which has been identified in SPP. This includes areas identified as class 1 and 2 on the Carbon Peatland 2016 map provided above. Class 1 and 2 areas are considered to be nationally important carbon-rich soils, deep peat and priority peatland habitat, areas likely to be of high conservation value or areas of potentially high conservation value and restoration potential. These areas are afforded significant protection under SPP.

SNH consider that it may be possible to build a wind farm of the scale proposed without significant effects on deep peat and priority peatland habitat. The EIAR will need to address, in detail, how a wind farm can be constructed without compromising this national interest. Opportunities to mitigate impacts through siting, design and other measures should be fully considered within the EIAR. This may include options for significant habitat restoration to mitigate any loss and damage to this peatland interest.

An assessment of the impact of this proposal on this resource should be made and the EIAR should contain details of any mitigation measures which have been incorporated to ensure the protection of the carbon rich soils, deep peat and priority peatland habitats. The assessment should consider and if necessary quantify any loss of this resource and any impacts on the functioning of the habitats associated with it.

SNH expects the applicant to carry out a peat depth survey and peat stability assessment to determine the location of infrastructure, the risk to habitats and species, and for this information to be presented in the EIAR. Their map and supporting guidance is available here:

<http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/soils-and-development/cpp/>

A Peat Slide Risk Assessment should also be undertaken following the latest 2017 guidance on peat slide risk assessments available from; <http://www.gov.scot/Publications/2017/04/8868>.

SNH advise that a Peat Management Plan is produced as part of the EIAR. Further to this SNH advise that a Habitat Management Plan will be required, particularly to ensure that there is no overall loss of peatland habitat or the services that delivers, but also to take account of other habitats subject to loss and damage. The plan should clearly demonstrate that any impacts on peatland habitats can be substantially overcome and that there will be no overall loss of peatland habitat or the services that peatland delivers. The plan should also take into account other habitats subject to loss and damage from the proposal.

The EIAR must also provide further information on the potential carbon dioxide emissions and 'payback' timescales as part of the description of the proposed development, with reference to the Scottish Government Carbon Calculator tool:

<http://www.scotland.gov.uk/Topics/Business-Industry/Energy/Energy-sources/19185/17852-1/CSavings>

Disturbance and re-use of excavated peat and other carbon rich soils

SPP Para 205 states that *"Where peat and other carbon rich soils are present, applicants should assess the likely effects of development on carbon dioxide (CO₂) emissions. Where peatland is drained or otherwise disturbed, there is liable to be a release of CO₂ to the atmosphere. Developments should aim to minimise this release."* The submission should therefore a) demonstrate how the layout has been designed

to minimise disturbance of peat and consequential release of CO₂ and b) outline the preventative/mitigation measures to avoid significant drying or oxidation of peat through, for example, the construction of access tracks, drainage channels, cable trenches, or the storage and re-use of excavated peat. Such measures should be set out within a site-specific Construction Environmental Management Plan (CEMP).

The application submission should a) demonstrate how the layout has been designed to minimise disturbance of peat and consequential release of CO₂ and b) outline the preventative/mitigation measures to avoid significant drying or oxidation of peat through, for example, the construction of access tracks, drainage channels, cable trenches, or the storage and re-use of excavated peat. The developer should outline any local peatland restoration work opportunities which could help compensate for the new disturbance of peat caused by the development. The submission must include:

a) A detailed map of peat depths. This must be to full depth and follow the survey requirement of the Scottish Government's Guidance on Developments on Peatland - Peatland Survey (2017) with all the built elements (including peat storage areas) overlain to demonstrate how the development avoids areas of deep peat and other sensitive receptors such as Ground Water Dependent Terrestrial Ecosystems (GWDTEs).

b) A table which details the quantities of acrotelmic, catotelmic and amorphous peat which will be excavated for each element and where it will be re-used during reinstatement. Details of the proposed widths and depths of any peat to be re-used and how it will be kept wet must be included.

To avoid delay, and a potential SEPA objection, proposals must be in accordance with Guidance on the Assessment of Peat Volumes, Reuse of Excavated Peat and Minimisation of Waste and SEPA's Developments on Peat and Off-Site uses of Waste Peat. This information should be provided in a Peat Management Plan. Note that SEPA do not validate carbon balance assessments, but SEPA's advice on peat management options may need to be taken into consideration when you consider such assessments. The application should also include proposals for peatland restoration and other enhancement opportunities across this extensive site. Consideration should be given to what other enhancement opportunity there may be on this large site. For example, improvement to riparian edges, removal of any redundant watercourse crossings, or improvements to well-used informal crossings.

Management of surplus peat or soils may require an exemption under The Waste Management Licensing (Scotland) Regulations 2011. Proposed crushing or screening will require a permit under The Pollution Prevention and Control (Scotland) Regulations 2012. Consider if other environmental licences may be required for any installations or processes. The submission also needs to demonstrate that there will be no discarding of materials that are likely to be classified as waste as any such proposals would be unacceptable under waste management licensing. Further guidance on this may be found in the document *Is it waste - Understanding the definition of waste*.

At this stage, SEPA have no further advice than what was previously provided at the scoping stage. SEPA does however encourage further early engagement and discussion as the project develops. The NVC and Phase 1 peat probing surveys should be submitted for consultation once they are complete. SEPA welcomes that wider habitat restoration and improvement opportunities will be investigated as part of the development and would be happy to provide comment on the areas identified.

Protected Species and Ornithology

SNH are satisfied with the proposed survey scope however we offer some advice below. The proposal is within connectivity distance of the following sites:

- *The Caithness and Sutherland Peatlands Ramsar*

The Ramsar site is located within 8km of the application site and is designated for its breeding bird assemblage including greylag goose.

- *Dornoch Firth and Loch Fleet Special Protection Area (SPA) & Ramsar*

The Dornoch Firth and Loch Fleet SPA is classified for its populations of non-breeding water and wildfowl and also breeding osprey. In addition to these features the Ramsar site is also protected for its coastal habitats and otter. These site is located approximately 15km south east of the application site.

Due to the distance between the application site and the above sites there is potential for connectivity with their greylag goose features. SNH however advise that the application area not located within any known greylag goose foraging site and therefore the potential for connectivity is considered to be unlikely.

- *Lairg and Strath Bora Lochs SPA*

The proposal is located within 3.1km of the SPA and therefore within foraging range of black-throated divers which are a qualifying feature for the SPA.

The scoping report states that given the location of the project area to the SPA then it is considered unlikely that breeding divers will pass through the project area. SNH are in agreement with this since black-throated divers will approach to the SPA lochs along Strath Fleet and Strath Brora to the east and up the Kyle and along Loch Shin from the south.

- *Golden Eagle in Natural Heritage Zone 5*

Golden eagles recorded within the application site are unlikely to be connected with the population within the Caithness and Sutherland SPA since the proposed site is located outwith the 6km core range for golden eagle. However the analysis of survey work in this particular location will be helpful to put adult golden eagle observations within the proposal area into context.

For golden eagle not linked to the SPA, SNH advise that the effects of the proposal upon the Natural Heritage Zone 5 population of golden eagle should be considered within the EIA report, indicating the likelihood and significance of any direct or indirect impacts upon these populations.

SNH bird survey work guidance can be found at:

<http://www.snh.gov.uk/planning-and-development/renewable-energy/onshore-wind/windfarm-impacts-on-birds-guidance/>

SNH welcome the proposals to undertake protected species surveys as outlined in the scoping report. Further information on methods etc. for protected species surveys can be found on our website at:

<http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/>

Wild deer may also be present on or will use the development site, and an assessment of the potential impacts on deer welfare, habitats, neighbouring and other interests (e.g. access and recreation, road safety, etc.) is required within the EIAR. Appropriate deer management will be vital in ensuring habitat restoration is successful and SNH advise that this should be referenced within the Habitat Management Plan. SNH encourage the applicant, in line with The Code of Practice on Deer Management to collaborate with neighbours and other interested parties during the assessment and any subsequent management. The assessment and plan should comply with the Best Practice Guidance on Deer Management Plans which is available from <http://www.bestpracticeguides.org.uk/planning/dmps>

Forestry

There is a large area of woodland adjacent to the site which may be affected. If the development (including site access) would result in the loss of woodland this must be addressed with compensatory planting calculations provided to accords the Scottish Governments' Control of Woodland Removal Policy. Please refer to further comments provided at the EIA Scoping stage for further submission requirements.

Built and Cultural Heritage

Impact on the Historic Environment, Historic Environment Scotland

From the information provided we note that there is a potential for impacts on nearby heritage assets in our remit and their settings. We therefore consider that the EIAR includes a detailed assessment of impacts on Cultural Heritage. We recommend that this assessment is undertaken by a suitably qualified professional and meets the requirements of SPP, the Historic Environment Policy for Scotland (HEPS, 2019) and associated Managing Change Guidance Notes. Further guidance can also be found in the Cultural Heritage Appendix to the EIA Handbook (SNH, HES, 2018).

There are, for example, several scheduled monuments located in the valley of Fèith Osdail adjacent to the proposed development site. These monuments are listed in the attached Annex and are predominantly settlements dating from various periods that survive as upstanding remains. They all have important relationships to the surrounding landscape, for example they may have been built near particular natural resources. These relationships may be understood through views to and from the monuments. Some of these monuments will also have a distinct character related to a sense of abandonment that adds to their appreciation.

We note that there is a potential for direct impacts on these monuments caused by works associated with the development of the wind farm access tracks. There is also a potential for impacts on the setting of these monuments caused by the construction of wind turbines and access tracks in their vicinity. We therefore recommend that any assessment undertaken should give particular attention to this group of scheduled monuments. Any such assessment should carefully consider potential impacts and propose mitigation where appropriate to avoid or reduce adverse impacts. This may include reducing the visibility of proposed turbines or the access road by design. It may also include putting measures in place to ensure the monuments are protected from physical impacts.

We also recommend that ZTV analysis should be used to identify the potential for impacts on the setting of heritage assets located at a distance from the proposals. Given the height of the proposed turbines, we do not consider that the 5km study area suggested within the EIA Scoping Report (March 2020) is suitable in this instance. We therefore recommend that all nationally important assets located up to 10km from the proposals are appraised and included for detailed assessment where there is a potential for long distance views to be affected. Our initial appraisal suggests this may include Sallachy, Broch 425m NNE of Fruchan Cottage (Scheduled Monument, Index no. 1883) and The Ord, Chambered Cairns, Cairns, Settlements and Field Systems (Scheduled Monument, Index no. 1812), however this list is not exhaustive.

We recommend that impacts on the setting of heritage assets are assessed using photomontage and wireframe visualisations where impacts are likely to be highest. This is likely to include visualisations of the proposals from the scheduled monuments located in the valley of Fèith Osdail, as well as from heritage assets with longer sight lines, such as Sallachy, Broch 425m NNE of Fruchan Cottage (Scheduled Monument, Index no.1883). We also note the potential for cumulative impacts on the setting of heritage assets caused by the proposed development in combination with other existing, proposed and consented wind farms in the surrounding area. We would therefore also recommend that cumulative impacts are assessed and examined through the use of cumulative visualisations.

EIA Scoping Report (March 2020)

We have reviewed the EIA Scoping Report (March 2020) and are broadly content with the approach to assessment set out at Section 4.2.3 (Cultural Heritage and Archaeology). As set out above, we do not consider that a 5km study area is sufficient for the identification of impacts on the setting of heritage assets, and recommend that all nationally important heritage assets located within 10km are considered for assessment.

Further information

A new Historic Environment Policy for Scotland (HEPS, 2019) was adopted on the 1st May 2019, which replaces the Historic Environment Scotland Policy Statement (HESPS, 2016). The new Historic Environment Policy for Scotland is a strategic policy document for the whole of the historic environment and is underpinned by detailed policy and guidance. This includes our Managing Change in the Historic

Environment Guidance Notes. All of these documents are available online at www.historicenvironment.scot/heps

Practical guidance and information about the EIA process can also be found in the EIA Handbook (2018). This is available online at

<https://www.historicenvironment.scot/archives-andresearch/publications/publication/?publicationId=6ed33b65-9df1-4a2f-acbba8e800a592c0>

Impact on the Historic Environment, Historic Environment Team (HET)

A few features of historic interest are currently recorded within the boundary of the proposal area. These consist of the remains of historic land-use such as farmsteads, sheepfolds and areas of shieling settlement. Many other sites, including prehistoric settlement are recorded across the wider area and there remains the potential for further features or remains of prehistoric or later date to be present. Overall, direct impacts to cultural heritage are not envisaged to be a significant constraint in this case. There are, however, a number of important historic features in the wider area that may have their setting adversely impacted by a development in the location proposed.

The Cultural Heritage chapter of the EIAR will need to be undertaken by a professional and competent historic environment consultant. The assessment will need to follow Highland Council Standards for Archaeological Work, specifically Section 4 which deals with Environmental Statements and Section 3. The Standards are available at

https://www.highland.gov.uk/downloads/file/1022/standards_for_archaeological_work

The assessment will include a walkover survey of the development area (including any land required for associated infrastructure). The assessment will consider the potential direct impacts of the development to cultural heritage as well as indirect impacts. The indirect impact assessment must include a study of cumulative impacts. Where indirect impacts are predicted, these will be illustrated using photomontages. Where impacts are unavoidable, HET expect proposed methods to mitigate this impact to be discussed in detail, including both physical (Le. re-design) and where appropriate, compensatory/off-setting.

Water Environment

Flood Risk

The Allt nan Con-uigsie runs through the proposed site before joining the River Brora. SEPA's flood mapping shows that the watercourse may be subject to a degree of flooding during the 1 in 200 year return period storm event. With careful siting of new infrastructure, flood risk from this source can be avoided.

Should any infrastructure be located within close proximity to a watercourse, we would request that a Flood Risk Assessment is submitted to demonstrate that the development is not at risk from flooding and will not increase flood risk elsewhere. Development or landraising within any flood plain should be avoided. If this cannot be achieved, further consultation with the Flood Risk Management Team will be required. Culverting of watercourses should be avoided unless there is no practical alternative. Any new or upgraded culverts or bridges should be adequately designed to accommodate the 1 in 200 year flows (including a 20% allowance for climate change) to avoid increasing the risk of flooding. Analysis of the impact of any proposed new bridges/crossings should be submitted for review.

Drainage

The site layout must be designed to minimise impacts upon the water environment. Except for watercourses crossings and tracks leading up to them a buffer of at least 50m should be demarcated around each watercourse.

A Drainage Impact Assessment (DIA) is required. The DIA should include details relating to any existing field drains and the management of surface water drainage, which should be designed in line with general Sustainable Drainage Systems (SuDS) principles. The applicant should demonstrate, within the proposals submitted, any mitigation measures to manage the residual risk of overland flow/pluvial flooding.

Natural flood management techniques should also be applied to reduce the rate of runoff where possible. Tracks should not act as preferential pathways for runoff and efforts should be made to retain the existing drainage network. Appropriate drainage is required to restrict runoff to pre-development rates and to minimise erosion to existing watercourses. The DIA should ensure that post development runoff rate is no greater than pre-development runoff rate (i.e. greenfield runoff) for all return periods up to the 1 in 200 year event including an allowance for climate change.

Runoff from all events up to and including the 1 in 200 year event should be managed within the site boundary, with no flooding to critical roads or buildings, and evidence as to how this will be achieved should be included within the DIA. A minimum buffer strip of 50m should be kept free from development from the top of bank(s) of any watercourse/waterbody. Storage of materials within this area during construction is not permitted. Refer to the Council's Flood Risk and Drainage Impact Assessment SG for further detailed requirements.

Further advice and SEPA's best practice guidance is available within the water [engineering](#) section of SEPA's website. Guidance on the design of water crossings can be found in [Construction of River Crossings Good Practice Guide](#).

Reference should be made to Appendix 2 of SEPA's Standing Advice for advice on flood risk. Watercourse crossings should be designed to accommodate the 1 in 200 year flow, or information provided to justify smaller structures.

Ground Water Dependant Terrestrial Ecosystems (GWDTE)

GWDTE are protected under the Water Framework Directive and therefore the layout and design of the development must avoid impact on such areas. Please refer to [Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems](#) for further generic advice and the minimum information SEPA requires to be submitted. The application should include proposals for habitat improvement or creation to mitigate any loss of GWDTE.

Excavations and other construction works can disrupt groundwater flow and impact on existing groundwater abstractions. Please refer to the aforementioned guidance on assessing impacts on GWDTE for further advice on the minimum information SEPA requires to be submitted.

Construction Environmental Management and Pollution Prevention

One of SEPA's key interests in relation to developments is pollution prevention measures during the period of construction. A schedule of mitigation supported by site specific construction maps and plans must be submitted. These must include reference to best practice pollution prevention and construction techniques (for example, the maximum area to be stripped of soils at any one time) and regulatory requirements. They should set out the daily responsibilities of ECoWs, how site inspections will be recorded and acted upon and any proposals to fund a planning monitoring enforcement officer. [Please refer to the Guidance for Pollution Prevention \(GPPs\)](#).

Amenity

Contaminated Land

The Council's contaminated land officer has no comments to make.

Noise Impacts – Operational

The applicant will be required to submit a noise assessment with regard to the operational phase of the development. The assessment should be carried out in accordance with ETSU-R-97 "*The Assessment and Rating of Noise from Wind Farms*" and the associated Good Practice Guide published by the Institute of Acoustics.

The target noise levels are either a simplified standard of 35dB LA90 at wind speeds up to 10m/s or a composite standard of 35dB LA90 (daytime) and 38dB LA90 (night time) or up to 5dB above background

noise levels at up to 12m/s. The night time lower limit of 43dB LA90 as suggested in ETSU is not considered acceptable in many areas of the highlands due to very low background levels. These limits would apply to cumulative noise levels from more than one development.

Cumulative Noise

The noise assessment must take into account the potential cumulative effect from any other existing or consented or, in some cases, proposed wind turbine developments. Where applications run concurrently, developers and consultants are advised to consider adopting a joint approach with regard to noise assessments. The noise assessment must take into account predicted and consented levels from such developments. The good practice guide offers guidance on how to deal with cumulative issues. Where existing development has consented limits higher than suggested above, the applicant should agree appropriate limits with the Council's Environmental Health Officer.

The assessment should include a map showing all wind farm developments which may have a cumulative impact and all noise sensitive properties including any for which a financial involvement relaxation is being claimed. The assessment should include a table of figures which includes the following:

- the predicted levels from this development based at each noise sensitive location (NSL) at wind speeds up to 12m/s;
- the maximum levels based on consented limits from each existing or consented wind farm development at each NSL. If any reduction is made for controlling property or another reason, this should be made clear;
- the predicted levels from each existing or consented wind farm development at each NSL;
- the cumulative levels based on consented and predicted levels at each NSL; and
- the assessment should also include a mitigation scheme to be implemented should noise levels from the development be subsequently found to exceed consented levels.

Noise Exposure

When assessing the cumulative impact from more than one wind farm, consideration must be given to any increase in exposure time. Regardless of whether cumulative levels can meet relevant criteria, if a noise sensitive property subsequently becomes affected by wind turbine noise from more than one direction this could result in a significant loss of respite.

Background Noise Measurements

If background noise surveys are required, these should be undertaken in accordance with ETSU-R-97 and the Good Practice Guide. It is recommended that monitoring locations be agreed with the Council's Environmental Health Officer. Where a monitoring locations is to be used as a proxy location for another property, particular care must be taken to ensure it is not affected by other noise sources such as boiler flues, wind chimes, etc. which are not present at that other property.

Difficulties can arise where a location is already subject to noise from an existing wind turbine development. ETSU states that background noise must not include noise from an existing wind farm. The GPG offers advice on how to approach this problem and in some cases, it may be possible to utilise the results from historical background surveys.

It is recommended that the developer's noise consultant liaises with Environmental Health at an early stage to discuss any issues regarding the proposed methodology.

Amplitude Modulation

Research has been carried out in recent years on the phenomenon of amplitude modulation arising from some wind turbine developments. However at this time, the Good Practice guide does not provide definitive Planning guidance on this subject. That being the case, any complaints linked to amplitude modulation would be investigated in terms of the Statutory Nuisance provisions of the Environmental Protection Act 1990.

Noise Impacts – Construction

Planning conditions are not used to control the impact of construction noise as similar powers are available to the Local Authority under Section 60 of the Control of Pollution Act 1974. However, where there is potential for disturbance from construction noise the application will need to include a noise

assessment.

A construction noise assessment will be required in the following circumstances:

- where it is proposed to undertake work which is audible at the curtilage of any noise sensitive receptor, out with the hours: Mon-Fri 8am to 7pm, Sat 8am to 1pm; or
- where noise levels during the above periods are likely to exceed 75dB(A) for short term works or 55dB(A) for long term works. Both measurements to be taken as a 1hr LAeq at the curtilage of any noise sensitive receptor. Generally, long term work is taken to be more than 6 months.

If an assessment is submitted it should be carried out in accordance with BS 5228-1:2009 "Code of practice for noise and vibration control on construction and open sites - Part 1: Noise". Details of any mitigation measures should be provided including proposed hours of operation.

Regardless of whether a construction noise assessment is required, it is expected that the developer/contractor will employ the best practicable means to reduce the impact of noise from construction activities. Attention should be given to construction traffic and the use of tonal reversing alarms.

Dust

Depending on the proximity of the working area to houses etc. the applicant may require to submit a scheme for the suppression of dust during construction. Particular attention should be paid to construction traffic movements.

Private Water Supplies

The applicant will be required to carry out an investigation to identify any private water supplies, including pipework, which may be adversely affected by the development and to submit details of the measures proposed to prevent contamination or physical disruption. THC has some information on known supplies but it is not definitive. An on-site survey will be required.

Transport and Wider Access

Trunk Road Network

Transport Scotland was consulted previously on this development by both RSK and by the Scottish Government Energy Consents Unit. A response was issued on 21 February 2020, which remains Transport Scotland's current position.

Local Road Network

The likely port of entry for turbine components and potential abnormal load route for the delivery of turbine components is from the Port of Invergordon. The site access will be from the A836. The specific means of access from the A836 is yet to be determined.

A Transport Assessment (TA), Construction Traffic Management Plan and an Abnormal Load Assessment will be required within the EIAR. The Scope of the TA should be agreed with all impacted Road Authorities. The Transport Assessment Methodology below sets out what the Council requires and further information is provided in our published Roads and Transport Guidelines for New Developments. When establishing a scope for the assessment consideration should be given to the use of the public roads in this area can be influenced significantly by tourist traffic.

Transport Assessment Methodology

The information below is not exhaustive and should be used as a guide to submitting all relevant information in relation to roads, traffic and transportation matters arising from the development proposals.

1. Identify all public roads affected by the development. In addition to transportation of all abnormal loads & vehicles (delivery of components) this should also include routes to be used by local suppliers and staff. It is expected that the developer submits a preferred access route for the development. All other

access route options should be provided, having been investigated in order to establish their feasibility. This should clearly identify the pros and cons of all the route options and therefore provide a logical selection process to arrive at a preferred route.

2. Establish current condition of the roads. This work which should be undertaken by a consulting engineer acceptable to the Council and will involve an engineering appraisal of the routes including the following:
 - assessment of structural strength of carriageway including construction depths and road formation where this is likely to be significant in respect of proposed impacts, including non-destructive testing and sampling as required;
 - road surface condition and profile;
 - assessment of structures and any weight restrictions;
 - road widths, vertical and horizontal alignment and provision of passing places; and
 - details of adjacent communities.
3. Determine the traffic generation and distribution of the proposals throughout the construction and operation periods to provide accurate data resulting from the proposed development including:
 - nos. of light and heavy vehicles including staff travel;
 - abnormal loads; and
 - duration of works.
4. Current traffic flows including use by public transport services, school buses, refuse vehicles, commercial users, pedestrians, cyclists and equestrians.
5. Impacts of proposed traffic including:
 - impacts on carriageway, structures, verges etc.;
 - impacts on other road users;
 - impacts on adjacent communities;
 - swept path and gradient analysis where it is envisaged that transportation of traffic could be problematic; and
 - provision of Trial Runs to be carried out in order to prove the route is achievable and/or to establish the extent of works required to facilitate transportation.
6. Cumulative impacts with other developments in progress and committed developments including other Renewable Energy projects, of which there are several which require to be accessed through Fort Augustus.
7. Proposed mitigation measures to address impacts identified in 5 above, including:
 - carriageway strengthening;
 - strengthening of bridges and culverts;
 - carriageway widening and/or edge strengthening;
 - provision of passing places;
 - road safety measures; and
 - traffic management including measures to be taken to ensure that development traffic does not use routes other than the approved routes.
8. Details of residual effects.

Abnormal Load Assessment

The TA should include an Abnormal Load Assessment of the roads utilised to convert abnormal loads to the site. The assessment will need to confirm the proposed port of entry for ALL components and justify the adequacy of the route for transporting them to the site. Early discussion with the Council's abnormal loads team (the contact is [REDACTED] [@highland.gov.uk](mailto:[REDACTED]@highland.gov.uk)) and the Council's structures team (the contact is [REDACTED] [@highland.gov.uk](mailto:[REDACTED]@highland.gov.uk)) is recommended.

Detailed Junction Design

Details of any new site access should be clearly set out on dimensioned drawings related to OS data and include confirmation of geometry, construction form, drainage details to prevent water running out onto the public road and evidence that appropriate visibility splays can be achieved. Vehicle swept paths should also

be provided to evidence that the proposed junction form will be suitable for its intended use. Details of reinstatement of any temporary site access at its junction with the public road, post construction is also required. Appropriate junction arrangements and visibility splay information can be found in our published Roads and Transport Guidelines for New Developments.

Road Construction Impacts

The TA should include a framework Construction Traffic Management Plan (CTMP) aimed at minimising the impact of the construction traffic. It shall include measures to ensure development traffic adheres to the approved routes and to prevent platooning during heavier flows such as any ready mix concrete pours. Consultation with the local community and the Local Area Roads Office will be required for the detailed content and implementation of the CTMP.

It should be noted that any works required on the public road or disruption to its use by others as a result of this scheme (e.g. temporary traffic management measures) will need the permission of the Local Roads Authority. We acknowledge that the detail of such measures may not be fully understood until the Contractors have been appointed. However, any such measures that are expected to be required should be set out in the Framework CTMP.

Even with suitable road improvements and traffic management measures, there may remain a risk of damage to Council maintained roads from development related traffic. In order to protect the interests of the Council, as roads authority, a suitable Wear and Tear agreement relating to Section 96 of the Roads (Scotland) Act and appropriate planning legislation is likely to be required. This would include the provision of an appropriate Road Bond or equivalent financial security.

Should there be overlaps with construction activities from other developments in the area, consideration should be given to a joint approach to the development of a CTMP and Wear and Tear Agreement.

Grid Connection Works

Should related grid connection and/or substation works be likely to impact on the local road network, it would be desirable to consider the impact of these works and the mitigation required in conjunction with the proposed wind farm.

Wider Access

The site itself is not an area well used for public recreational access. However as is noted on Figure 5 of the presentation, the National Cycle Route 1 passes along the A836 and the public right of way from the A836 towards Dalnessie will be impacted by the proposal. As such:

- Improvements to the A836 to access the site should therefore be made with consideration to bicycle users; and
- The public right of way should be open at all time to the public during the construction and operation of the development

The suggested viewpoint locations appear to be reasonable and as with similar developments a recreational Access Management Plan will be required to ensure any operational period use of the site for recreational use is maximised and appropriately managed.

Other Design and Layout Considerations

Site Layout, Tracks and Cabling

Existing built infrastructure should be re-used or upgraded wherever possible. The application should make clear what elements of the development are existing infrastructure, existing infrastructure which will require improvement works and new infrastructure. The layout should be designed to minimise the extent of new works in previously undisturbed ground. For example a layout which has a new long access track or makes use of lots of spurs or loops is unlikely to be acceptable.

Cabling must be laid in ground already disturbed such as verges. A comparison of the environmental effects of alternative locations of infrastructure elements, such as tracks, may be required.

All maps must be based on an adequate scale with which to assess the information. This could range from OS 1: 10,000 to a more detailed scale in more sensitive locations. Each of the maps must detail all proposed upgraded, temporary and permanent site infrastructure. This includes all tracks, excavations, buildings, borrow pits, pipelines, cabling, site compounds, laydown areas, storage areas and any other built elements.

Borrow Pits

Scottish Planning Policy (SPP) states (Paragraph 243) that "*Borrow pits should only be permitted if there are significant environmental or economic benefits compared to obtaining material from local quarries, they are time-limited; tied to a particular project and appropriate reclamation measures are in place.*" The submission should provide sufficient information to address this policy statement.

In accordance with Paragraphs 52 to 57 of Planning Advice Note 50 [Controlling the Environmental Effects of Surface Mineral Workings](#) (PAN 50) a Site Management Plan should be submitted in support of any application. A map of all proposed borrow pits must be submitted. The following information should also be submitted for each borrow pit:

- a) A map showing the location, size, depths and dimensions.
- b) A map showing any stocks of rock, overburden, soils and temporary and permanent infrastructure including tracks, buildings, oil storage, pipes and drainage, overlain with all lochs and watercourses to a distance of 250 metres. You need to demonstrate that a site specific proportionate buffer can be achieved. On this map, a site-specific buffer must be drawn around each loch or watercourse proportionate to the depth of excavations and at least 10m from access tracks. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse, drawings of what is proposed in terms of engineering works.
- c) The applicant needs to provide a justification for the proposed location of borrow pits and evidence of the suitability of the material to be excavated for the proposed use, including any risk of pollution caused by degradation of the rock.
- d) A ground investigation report giving existing seasonally highest water table including sections showing the maximum area, depth and profile of working in relation to the water table.
- e) A site map showing cut-off drains, silt management devices and settlement lagoons to manage surface water and dewatering discharge. Cut-off drains must be installed to maximise diversion of water from entering quarry works.
- f) A site map showing where soils and overburden will be stored including details of the heights and dimensions of each store, how long the material will be stored for and how soils will be kept fit for restoration purposes. Where the development will result in the disturbance of peat or other carbon rich soils then the submission must also include a detailed map of peat depths (this must be to full depth and follow the survey requirement of the Scottish Government's [Guidance on Developments on Peatland - Peatland Survey \(2017\)](#)) with all the built elements and excavation areas overlain so it can clearly be seen how the development minimises disturbance of peat and the consequential release of CO₂.
- g) Sections and plans detailing how restoration will be progressed including the phasing, profiles, depths and types of material to be used.

Life Extension, Repowering and Decommissioning

Proposals for life extension, repowering and/or decommissioning must demonstrate accordance with SEPA Guidance on the life extension and decommissioning of onshore wind farms. Table 1 of the guidance provides a hierarchical framework of environmental impact based upon the principles of sustainable resource use, effective mitigation of environmental risk (including climate change) and optimisation of long term ecological restoration. The submission must demonstrate how the hierarchy of environmental impact has been applied, within the context of latest knowledge and best practice, including justification for not selecting lower impact options when life extension is not proposed.

Other Comments

SEPA Regulatory Requirements

Authorisation is required under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR) to carry out engineering works in or in the vicinity of inland surface waters (other than groundwater) or wetlands. Inland water means all standing or flowing water on the surface of the land (e.g. rivers, lochs, canals, reservoirs). A construction site licence will be required for management of surface water run-off from the construction site. See SEPA's [Sector Specific Guidance: Construction Sites \(WAT-SG-75\)](#) for details. Site design may be affected by pollution prevention requirements and hence SEPA strongly encourage the applicant to engage in pre-CAR application discussions with a member of the regulatory services team in your local SEPA office.

Management of surplus peat or soils may require an exemption under The Waste Management Licensing (Scotland) Regulations 2011. Proposed crushing or screening will require a permit under The Pollution Prevention and Control (Scotland) Regulations 2012. Consider if other environmental licences may be required for any installations or processes.

Details of regulatory requirements and good practice advice for the applicant can be found on the [Regulations](#) section of SEPA's website. If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the operations team in your local SEPA office at: Graesser House, Fodderty Way, Dingwall Business Park, Dingwall, IV15 9XB - Tel: 01349 862021.

Pre-Application Procedures

Public Consultation

Public consultation should be undertaken as the proposals develop to help both gauging the opinion of the local community and also scoping potential areas of conflict which could be addressed prior to submission of the application. When carrying out community consultation we recommend that full consideration is taken of Scottish Government Planning Advice Note 3/2010 - Community Engagement. This includes the standards for community involvement which should be adhered to. These standards are:

- Involvement
- Support
- Planning
- Methods
- Working together
- Sharing information
- Working with others
- Improvement
- Feedback
- Monitoring and evaluation

It is advisable to take into consideration all of the comments made by members of the public before an application is submitted to ensure that the public feel they have had an influence over the proposals. For public consultation it may be useful to use the SP=EEED tool developed by Planning Aid Scotland. This builds on the Standards for Community Engagement set out in PAN 3/2010. This is available online at <http://www.planningaidscotland.org.uk>

Please note that during the Covid-19 Pandemic there are exemptions related to Pre-Application Consultation with members of the public. If you are bringing forward your project in the coming months then it is highly recommended that you discuss these with the Case Officer at the earliest possible opportunity.

Community Councils

In terms of the appropriate Community Councils to consult, the proposal is located within the Rogart Community Council area. A development of the nature proposed may affect a number of adjacent Community Councils, as such it is recommended that adjacent Community Councils are also consulted. The Ward Manager Phil Tomalin can provide advice further in this regard if required. Contact details for Ward Managers can be found on the link below:

https://www.highland.gov.uk/info/695/council_information_performance_and_statistics/394/ward_managers.

Contact details for all community Councils can be found on the link below:

<http://www.highland.gov.uk/livinghere/communitiesandorganisations/communitycouncils/>

Access Panel

It would be beneficial to at this stage consult with the local Disability Access Panel. The contact details for your local panel are:

- Sutherland Access Panel, 22 Strathnaver, Kinbrace, KW11 6UA. Telephone: (01641) 561209.

Application Procedures

Processing Agreements

A processing agreement is a way of helping developers, the Council and relevant stakeholders work together through the planning process. It involves setting out the key stages involved in deciding a planning application, identifying what information is required from whom and setting time scales for the various stages of the process.

The Council actively encourages the use of processing agreements for major applications. You are advised to contact the Council's Strategic Projects Team with a view to agreeing a Processing Agreement at the earliest possible opportunity, in consultation with the Energy Consents Unit.

Councillors Code of Conduct

It would be beneficial for you to be familiar with the Councillors' Code of Conduct. This is available online [from the Scottish Government's website](#).

Scheme of Delegation

All applications will be determined in line with the Council's Scheme of Delegation. It would be beneficial for you to familiarise yourself with the scheme. This is available [online](#).

Application Gatecheck

Prior to the submission of the application we would like to review the submission with you to understand how the application has taken shape following the advice provided at the pre-application stage and ensure that sufficient information would be able to be able to determine the application timeously. Please contact the case officer to arrange this who may also invite consultees as appropriate.

As the Council can process files of a maximum size of only 10MB the submission must be divided into appropriately named sections. Preferably by individual figures and, in terms of text based sections, chapters / technical appendices.

Other Appropriate Information

Gaelic

In line with the Council's ongoing commitment to promote the increased use of Gaelic in developments within the Highlands, you are encouraged to consider the use of bilingual signs, both internal and external. Our Gaelic Translation Officers are able to provide additional advice and translations. Contact the Council's Gaelic Translation Officer on (01463) 724287 or visit <http://www.gaidhealtachd.gov.uk>

For bilingual signage grant funding advice please contact Comunn na Gàidhlig on (01463) 724287 or visit www.cnag.org.uk Further guidance is available at: <http://www.highland.gov.uk/yourenvironment/planning/planningapplications/Adviceandguidance.htm>

Contacts	
██████████ Case Officer	██████████@highland.gov.uk
██████████ Strategic Projects Team Leader	██████████@highland.gov.uk
██████████ Acting Head of Development Management	██████████@highland.gov.uk
██████████ Planner, Development Plans	██████████@highland.gov.uk
██████████ Scientific Officer, Contaminated Land	██████████@highland.gov.uk
██████████ Flood Risk Management	██████████@highland.gov.uk
██████████ Environmental Health	██████████@highland.gov.uk
██████████ Transport Planning	██████████@highland.gov.uk
██████████ Access Officer	██████████@highland.gov.uk
██████████ Landscape Officer	██████████@highland.gov.uk
██████████ Archaeologist, Historic Environment	██████████@highland.gov.uk
██████████ Transport Scotland	██████████@transport.gov.scot
██████████ SEPA	Planning.dingwall@sepa.org.uk
██████████ Operations Officer, Scottish Natural Heritage	██████████@nature.scot
██████████ Casework Officer, Historic Environment Scotland	██████████@hes.scot

Disclaimer

This advice is based on the information submitted and is given without prejudice to the future consideration of and decision on any application received by The Highland Council. Pre-application case files are not publicly available but can be the subject of Freedom of Information requests.

Useful Links

THC Development Plans and Supplementary Guidance A-Z:

https://www.highland.gov.uk/info/178/local_and_statutory_development_plans

https://www.highland.gov.uk/directory/52/a_to_z

SNH's Advice on Protected Species:

<https://www.nature.scot/professional-advice/safeguarding-protected-areas-and-species/protected-species>

<https://www.nature.scot/professional-advice/planning-and-development/natural-heritage-advice-planners-and-developers/planning-and-development-protected-areas>

Scottish Government's woodland strategy and associated policies:

<https://forestry.gov.scot/support-regulations/control-of-woodland-removal>

THC Guidance on Tree/Woodland Removal:

http://www.highland.gov.uk/info/1225/countryside_farming_and_wildlife/63/trees_and_forestry/

HES General advice on development affecting historic designations:

<https://www.historicenvironment.scot/advice-and-support/>

THC Highland Historic Environment Record (HER) contains detailed information about listed buildings, conservation areas and archaeological sites in the Highland area:

<http://her.highland.gov.uk>

Scottish Water guidance on connections to the public water/drainage network:

<https://www.scottishwater.co.uk/en/Business-and-Developers/Connecting-to-Our-Network/Pre-Development-Information/Planning-Your-Development>

SEPA's guidance on SUDS:

<https://www.sepa.org.uk/regulations/water/diffuse-pollution/diffuse-pollution-in-the-urban-environment/>

SEPA's flood risk map:

<https://www.sepa.org.uk/environment/water/flooding/flood-maps/>

CAR licensing:

https://www.sepa.org.uk/media/34761/car_a_practical_guide.pdf

Access Panel - The Council encourages applicants at pre-application stage to engage with the local Disability Access Panel to consider accessibility improvements for physically disabled and sensory impaired people. The Highland Council have published a [Planning Protocol for Effective Engagement with Access Panels](#), which you should take into consideration:

https://www.highland.gov.uk/downloads/file/2650/planning_protocol_access_panels

Access Panels Contacts:

https://www.highland.gov.uk/info/751/equality_diversity_and_citizenship/326/equality_and_diversity_contacts/4

For general advice in relation to the removal of barriers and the promotion of equal access for all people affected by disability for your development contact the [Scottish Disability Equality Forum](#), 12 Enterprise House, Springkerse Business Park, Stirling, FK7 7UF. Telephone: (01786) 446456.



Appendix E – Consultation Approach Letter to THC



17th June 2021

Our reference: G/P/662367/04/09/01

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UK

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www.rskgroup.com

██████████
The Highland Council

██████████ [@highland.gov.uk](mailto:██████████@highland.gov.uk)

██████████
Energy Consents Unit

██████████ [@gov.scot](mailto:██████████@gov.scot)

VIA EMAIL

Dear ██████████ and ██████████,

Public engagement strategy for Chleansaid Wind Farm, near Lairg

I trust you are both well.

RSK has been discussing with ESB Asset Development (UK) Ltd its planned approach towards public engagement for the above project (ECU Reference: ECU00002031; THC Reference: 20/02047/PREMAJ).

While not a statutory requirement for Section 36 applications in the same way as it is for Major applications, ESB is committed to undertake meaningful consultation with regulators, landowners, local authorities, community councils and members of the public. With the emphasis being in place on maintaining social distancing due to Covid-19, the commonly adopted approach of undertaking public engagement through holding face-to-face consultation events close to the Site is not going to be feasible in this instance.

With that in mind, we propose the broad strategy of what we wish to undertake, as follows:

- Holding an online public consultation event over the period late July/early August 2021
- All public consultation materials to be provided on the project website (<https://www.esbenergy.co.uk/chleansaid-wind-farm>). For information, we have recently written to the ward members and local/neighbouring community councils to notify them on the project website and offered to attend online community council meetings (which are now in progress for this summer).
- Postal distribution of information leaflets to members of the local community in advance of the public information period, within a radius of 20 km from the project area



- Letters notifying elected members, local MP, MSPs and local community councils of the planned event
- Following materials to be prepared and uploaded to a section of the project website:
 - A layout of the proposed project infrastructure
 - Wireline images from key viewpoints, including a photomontage.
 - Project frequently asked questions (FAQ) page identifying and responding to some of the more typically submitted queries
- Advert in local newspaper Northern Times with link to the website
- Consider opportunities for cross-posting (e.g. on local community Facebook pages)
- Hold a live webinar or Q&A session, to be based on running the materials available on the website with time for questions and answers afterwards. To be undertaken 1-2 weeks after the exhibition material is provided and adverts have been placed in local newspapers.

In terms of timescales, we plan to run the event over the summer, and to ensure that it extends until after the local schools return in August 2021.

I would welcome your thoughts in relation to the broad strategy we identify above.

Yours sincerely

For RSK Environment Limited



Associate Director



Appendix F – Applicant response to Rogart CC

Chleansaid Wind Farm Exhibition
26 October 2021 – Rogart Village Hall (Pittentrail Hall)
Rogart Community Council Questions

Q: Abnormal loads/transport route - a request to see studies/evidence regarding an alternative route via Bonar Bridge being ruled out.

A: The preliminary access assessment for the transport of abnormal indivisible loads (AILs) of the wind turbine generator components is one of several recent investigations for nearby wind farm developments – including Achany Extension, Creag Riabhach, Garvary, Lairg II, Sallachy and Strath Tirry.

It has been concluded that alternative routes via Bonar Bridge are not suitable because of the road geometry, topography and proximity of built properties. At the Bonar Bridge crossing and continuing northwest along the A836 at the Bonar Bridge/Lairg Road/Dornoch Road junction, AIL routing is not possible due to the bridge structure.

This applies to both types of transport vehicle available – [superwing](#) carrier and the self-propelled [blade lifter](#) (recently used for the Windy Rig wind farm in Dumfries & Galloway, a first in the UK). Whilst the blade lifter, on paper, would appear to be the solution to negotiating this pinch point – allowing the blade to be lifted vertically to between 40 and 60 degrees above the carrier, providing height to potentially clear the buildings – the combination of the blade length and location of the arch lattice structure prevents the use of this. The image below demonstrates an approximation of the safe lifting position of the hydraulic ‘root’ clamp to the rear of the lifter vehicle and the corresponding location of the blade tip (80m radius).



As can be seen the blade would come into conflict with the buildings to the rear of the Bridge Hotel and Spar store. Please note that the positioning of the blade is fixed along the central axis of the vehicle and the clamp mechanism cannot be swiveled horizontally to avoid the buildings.

Road geometry and topography through on the A949 Dornoch Road at some locations, for example Spinningdale, also presents difficulties for the transport of the AILs.

Q: Abnormal loads - will there be passing places on the Rogart road?

A: The assessment to date identifies the feasibility of transporting the largest turbine components using the A839 and any temporary mitigation required to assist this. The assessment does not consider the detail of a route transport plan which would define areas for safe temporary rest stops of the transport vehicle and load at intervals along the route to permit cars and other vehicles to pass and dissipate any queue that may have formed behind it.

This would be developed at later stages of the development planning process and in consultation with the community, roads authority and Police Scotland. The assessment will be finalised following a dry/test run using temporary rigging attached to the type of transport vehicle proposed, which would emulate the size (width and length) of the components to be transported.

If the project is consented, a full Transport Management Plan, in full consultation with Rogart Community Council, The Highland Council, Police Scotland and other consultees, will be finalised ahead of transport movements.

Q: Abnormal loads - what will happen if one of the transporters fails/breaks down - what contingency plan is put in place?

A: As noted above the full detail of a Transport Management Plan has not been developed at this stage. This would normally be prepared by the haulier chosen to transport the components after 'proving' of the route, as described above.

This Transport Management Plan would include details, including for example:

- Procedures for liaising with the emergency services to ensure that police, fire and ambulance vehicles are not impeded by the loads. This is normally undertaken by informing the emergency services of delivery times and dates and agreeing communication protocols and lay over areas to allow overtaking;
- A diary of proposed delivery movements to liaise with the communities to avoid key dates such as popular local events etc;
- A protocol for working with local businesses to ensure the construction traffic does not interfere with deliveries or normal business traffic; and
- Proposals to establish a construction liaison committee to ensure the smooth management of the project / public interface with the applicant, the construction contractors, the local community, and if appropriate, the police forming the committee. This committee would form a means of communicating and updating on forthcoming activities and dealing with any potential issues arising.

The hauliers shall be responsible for preparing their own contingency plan for use in the event that unforeseen circumstances arise during the course of the abnormal load deliveries. Their contingency plans will elaborate on issues such as road blockages and breakdowns. The contingency plan will take account of the results from any necessary trial runs conducted.

Q: What will be the standard of trucks/environmental credentials of them?

A: As you will appreciate, we are unable to comment on specific haulier companies at present. However, the principal hauliers providing specialist services in the transport of wind turbine components are recognised in their field and have been in operation for several decades. All hauliers to be considered operate vehicles that are maintained to the highest standards. Modern vehicles at their disposal will be manufactured to comply with the current emissions standards applicable at the time. Most hauliers operate accredited quality, safety and environmental management systems.

Q. Walking routes/cycle routes at the Chleainsaid Wind Farm site?

A: A Heritage Path runs alongside the site boundary, which would not be affected by the proposed development. If there is interest, we can consider how the project could improve the route, such as through signage.

Q: Community Benefit - who will receive it?

A: For community benefit, we have made the commitment to £5,000 per MW (index linked) per annum for the lifetime of the project, meaning £500,000 per annum if the current proposed layout at the second exhibition is submitted and eventually consented.

We have made no commitments to which organisation(s) the community benefit fund would be paid to but, following the Scottish Government's 'Good Practice Principles for Community Benefit', the first group to have detailed discussion on community benefit is the host community council - Rogart Community Council. We also recognise that Lairg Community Council and Bettyhill, Strathnaver & Altnaharra Community Council, as the two nearest neighbouring Community Councils, will have an interest in community benefit. We are committed to the community benefit staying in the local area and we are happy to be informed by the community how best to take forward community benefit discussions.

As well as community benefit, ESB is committed to community shared ownership of the Chleainsaid Wind Farm project. Community shared ownership gives a community the opportunity to invest in the wind farm and benefit from revenue generated by the project, which can then be used to invest in local initiatives. We would welcome discussions with the local community if there is interest in community shared ownership and we can organise a specific meeting to discuss both community benefit and shared ownership with Rogart Community Council if there is interest to do so.