Agenda Item	11
Report	PLA
No	26/17

HIGHLAND COUNCIL

Committee:	Places
Date:	16 August 2017
Report Title:	Onshore Wind Energy Supplementary Guidance – Landscape Sensitivity Appraisals
Report By:	Director of Development and Infrastructure

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Purpose/Executive Summary

- 1.1 This report presents for adoption the Landscape Sensitivity Appraisals and associated Strategic Capacity Conclusions for Black Isle, Surrounding Hills and Moray Firth Coast and for Caithness, following consultation on Draft Appraisals published last year.
- 1.2 The Appraisals have been prepared in accordance with the Council's adopted methodology set out in the Onshore Wind Energy Supplementary Guidance (SG). The SG's purpose is to provide an effective framework for guiding wind energy development in Highland.
- 1.3 Committee is asked to agree that, upon completion of the necessary procedures, the Appraisals and associated Strategic Capacity conclusions be statutorily adopted as an addition to the already adopted SG.

2 Recommendations

- 2.1 Members are asked to:
 - i. consider the comments received on the Draft Landscape Sensitivity Appraisals and agree the Council's responses as set out in **Appendix 1**;
 - ii. agree to adopt the Appraisals and associated Strategic Capacity Conclusions as an addition to the Onshore Wind Energy Supplementary Guidance, being statutory Supplementary Guidance to the Highland-wide Local Development Plan (2012), as set out in **Appendix 2**, subject to any feedback from Scottish Ministers during the statutory process for adoption;
 - iii. agree for the Appraisals to be used as a material consideration for planning decisions and advice with immediate effect; and
 - iv. note the progress on further landscape sensitivity and strategic capacity work as set out in **section 6** of this report.

3 Background

- 3.1 The Onshore Wind Energy Supplementary Guidance (including Landscape Sensitivity Appraisal and associated Strategic Capacity conclusions for the Loch Ness study area) was statutorily adopted by the Council as part of the Development Plan on 24 November 2016. Upon its adoption we launched public consultation on the next two Landscape Sensitivity Appraisals which, with input from Scottish Natural Heritage (SNH), had been drafted for:
 - Black Isle, Surrounding Hills and Moray Firth Coast; and
 - Caithness.
- 3.2 The draft Appraisals were produced following our agreed methodology and presented in a manner fundamentally consistent with the guidance for the Loch Ness area. Consultation ran from 25 November 2016 to the extended deadline of 31 January 2017.
- 3.3 A list of respondents, together with a summary of comments received and our recommended Council response by issue is in Appendix 1. The resultant Appraisals and associated Strategic Capacity conclusions for Committee's consideration is in Appendix 2 (online only). Section 6 of the report sets out progress with the ongoing programme of Appraisals. Though not forming part of the consideration of the Appraisals, the opportunity has been taken to also provide Members with an update on the issue of Wild Land Areas, in Section 7 of the report, and on the progress of renewable energy development in Highland in Appendix 3.

4 Highlights of Comments Received on the Draft Appraisals and Recommended Council Response

- 4.1 A number of general issues in comments were previously raised when we consulted on the SG (including Appraisal for Loch Ness study area); these were considered by the Council at that time and our established position is reflected in the responses now provided.
- 4.2 Within our response to comments we are comfortable to defend the draft Appraisals in a number of key respects, providing further explanation of our approach where necessary, particularly bearing in mind the strategic nature and the purpose of the Appraisals. However, we have also identified a number of improvements, for example to provide additional clarity and greater consistency, and these are incorporated within the amended Appraisals.
- 4.3 Concern was raised that not all of the area around Ardross was included within the Black Isle, Surrounding Hills and Moray Firth Coast study area. We have justified the extent of the study area and, as explained in our response, the next Appraisal now being worked on Sutherland and Ross-shire will cover the area in question. Concern was similarly raised that the study area had taken in only part of the Dava area. In our response we have acknowledged that it would make sense to extend coverage up to the Cairngorms National Park boundary. However, rather than delay finalisation and adoption of the Black Isle, Surrounding Hills and Moray Firth Coast Appraisal into the SG pending completion of that work, an Appraisal for the extension will be prepared and consulted on alongside the Sutherland and Ross-shire Appraisal and therefore added in to the SG later.

5 Strategic Capacity of the Appraisal Areas

- 5.1 The Appraisals contain conclusions on the potential for wind energy development, for each landscape character area. Draft conclusions were contained in the Draft Appraisals and have therefore been subject of public consultation. Officers have used the resultant conclusions in further work, looking to identify any strategic capacity for wind farm development following the methodology set out in the adopted SG (paragraphs 5.24 and 5.25) and used previously for the Loch Ness study area.
- 5.2 For both the Black Isle, Surrounding Hills and Moray Firth Coast study area and the Caithness study area, no areas of strategic capacity were identified. The reasons for this are documented in the respective Strategic Capacity sections of **Appendix 2** to this report.
- 5.3 It is important to note that whilst the conclusions for the Black Isle, Surrounding Hills and Moray Firth Coast study area identify that there is no strategic capacity, there may still be opportunities for some limited further development proposals to be accommodated (and hence to be consented) within it. However, at a strategic level, there are no sufficiently unconstrained and expansive areas to which development may be steered. Interested developers would need to conduct their own site searches and in doing so should take into account the SG and the Landscape Sensitivity Appraisal (which is to become part of the SG).
- 5.4 Similarly it is important to note that whilst the conclusions for the Caithness study area identify that there is no strategic capacity, there may still be some opportunities for further development proposals to be accommodated (and hence to be consented) within it, particularly proposals of a smaller scale or in association with existing schemes. However again, at a strategic level, there are no sufficiently unconstrained and expansive areas to which development may be steered. Interested developers would need to conduct their own site searches and in doing so should take into account the SG and the Landscape Sensitivity Appraisal (which is to become part of the SG).

6 Programme of Landscape Sensitivity Appraisals and Strategic Capacity Assessment

- 6.1 Officers continue to progress the programme of landscape sensitivity appraisals and strategic capacity assessment set out in SG, following the methodologies set in that document and with continuing contribution from SNH in terms of officer time and expertise. We have recently begun working on an appraisal for 'Sutherland and Ross-shire' which includes the following areas we previously named in the adopted SG for appraisal:
 - East and Central Sutherland; and
 - North Coast.
- 6.2 We aim to consult on a draft appraisal in the autumn and after that bring the results, including associated conclusions on strategic capacity, to Committee for consideration and adoption. In parallel we intend to prepare, consult and report on an addition to the Black Isle, Surrounding Hills and Moray Firth Coast appraisal to fill the gap between that existing study area and the boundary of the Cairngorms National Park as explained elsewhere in this report.
- 6.3 After those, the final area for appraisal and assessment referred to in the adopted SG is Skye. The programme for undertaking that is not yet certain but we will be looking to begin work on it in late 2017 or early 2018.

7. Wild Land Areas – Update

7.1 In late January 2017 SNH published a description of each of the 42 Wild Land Areas in Scotland, in final form. At the same time SNH also published for consultation (and for use with immediate effect) a draft document "Assessing impacts on Wild Land Areas - technical guidance". Together these documents assist the consideration of the wild land issue through the Development Management process. The deadline for comments on the draft guidance was 7 April 2017 and officers provided a response. SNH is considering the results of the consultation and a finalised version of the guidance will follow.

8 Implications

- 8.1 Resource We have resources to finalise, adopt and issue the Landscape Appraisals as part of the SG. Our approach to the ongoing programme for the identification of strategic capacity, including undertaking landscape sensitivity appraisals, is taking into account resource pressures.
- 8.2 Legal Planning law sets out requirements for development plans and development management. A distinction is made between documents forming part of the development plan (our adopted LDPs, adopted Local Plans as continued in force and adopted SG), and any other material considerations. LDPs and SG are prepared in accordance with legal requirements.
- 8.3 Community (Equality, Poverty and Rural) Equalities Screening was undertaken during the evolution of the SG. The SG covers the whole of the Highlands. The main pressures for wind energy development are in rural areas. The SG assists in the identification of opportunities for renewable energy development and assists in the consideration of planning impacts and the documentation now for approval for adoption will be a key part of the SG in that respect.
- 8.4 Climate Change/Carbon Clever The SG assists in identification of opportunities for renewable energy development, which will contribute towards Carbon Clever and responding to Climate Change. It helps consideration and balancing of positive and negative effects of development. Strategic Environmental Assessment (SEA) and Habitats Regulations Appraisal (HRA) were undertaken during evolution of the SG. The Landscape Sensitivity Appraisals themselves have been scoped out.
- 8.5 Risk Each planning application must be considered on its own merits, and there would be a risk of challenge if any part of the Council's policy and guidance framework were used as a 'traffic-light' style indication of the acceptability, or otherwise, of particular developments without reference to the development plan as a whole and material considerations.
- 8.6 Gaelic We will ensure that the documentation complies with the Council's requirements for publications.

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Date:	3 August 2017
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Background Papers:

On the Council's development planning consultation portal at <u>http://consult.highland.gov.uk</u>:

- Landscape Sensitivity Appraisals for Black Isle, Surrounding Hills and Moray Firth Coast and for Caithness (draft, November 2016)
- Responses received to the Draft Appraisals

On the Council's website www.highland.gov.uk:

- Onshore Wind Energy Supplementary Guidance (adopted, November 2016)
 <u>www.highland.gov.uk/onshorewind</u>
- Online interactive map of Wind Turbines: <u>www.highland.gov.uk/windmap</u>
- Storymap of Hydro energy developments: <u>www.highland.gov.uk/hydromap</u>

On SNH's website www.snh.gov.uk:

 Wild Land Areas – descriptions; and draft document "Assessing impacts on Wild Land Areas - technical guidance"; both available at: <u>http://www.snh.gov.uk/protecting-scotlands-nature/looking-after-landscapes/landscape-policy-and-guidance/wild-land/</u> List of Respondents

Customer Type	Organisation
Charity/ Club/ Third Sector Organisation	John Muir Trust
Community Council	Grantown-on-Spey & Vicinity Community Council
Community Council	Ardross Community Council
Community Council	Ferintosh Community Council
Community Council	Tarbat Community Council
Government/ Statutory Body/ Other Public Organisation	Historic Environment Scotland
Campaign Groups	Save Our Dava
Industry	Muirden Energy LLP
Industry	Coriolis Energy
Industry	Limekiln Wind Ltd
Industry	Wind 2 Limited
Members of Public & Other Individuals	5

Black Isle, Surrounding Hills and Moray Firth Coast

Туре	Summary of Comment	How issue has been addressed
Community	There is a gap in coverage of the	The suggestion for the additional area to be
Council &	study area in the Dava Moor	included has been considered and it will be
Campaign	between the National Park	appraised. The results will be consulted on
Group	boundary and southern-most LCAs.	alongside the next study area for Sutherland
	This area is important and requires	and Ross-shire, for subsequent inclusion in the
	safeguarding and is under	Supplementary Guidance.
	consideration for inclusion as part	
	of the Cairngorms National Park.	
Industry	Object to the principle of the	The Landscape Sensitivity Appraisals do not
	document because it contradicts	create a sequential approach to decision
	SPP by creating additional	making, nor do they include additional
	constraints to the Spatial	constraints in the Spatial Framework. Rather,
	Framework; ignores previous	in line with Policy 67 of HwLDP, the appraisals
	comments about these concerns	ensure that developers are aware of the key
	and applies development	constraints to development. Policy 67
	management considerations (e.g.	requires the consideration of landscape and
	cumulative effects) to policy.	visual effects, including cumulative effects. No
		change required.
Public	The references to different scales	References to different scales of turbines are
	of wind turbines should be defined	relative to those in a particular area. Any
	with height values.	assessment should take account of what
		scales of development are consented, under
		construction, constructed and operational at
		the time of assessment. No change required.
Government	Welcome the appraisal and	Noted. No change required.
or Statutory	consideration given to the historic	
Body	environment.	

Public	No views listed from Ben Wyvis, Views from Tarbat Ness and Portmahomack out of the study area are included as 'views from', why not include views north from Ben Wyvis and Cnoc Fyrish? Views to the study area from Dornoch coast and central Inverness are included in 'views to' but not others like Carn Chuinneag or other hilltops. The LCA appraisal tables describe several views to Sutherland, why not more views out of the study area?	The role of Ben Wyvis to the study area is now described in the introduction to the appraisal and an additional key view from Ben Wyvis has been included. This is sufficient in response to the points raised, and maintains an appropriate coverage of views for this strategic-level appraisal.
Public	Support the purpose of the study, but suggest the whole area ban turbine developments. 'Routes through' the area should be prioritised over 'key viewpoints' to recognise the effects on local residents.	Scottish Planning Policy 2014 is clear at Paragraph 166 that <i>Moratoria on onshore</i> <i>wind developments are not appropriate.</i> Key Routes are listed for the study area, were part of the draft for consultation and taken into account in the appraisal; the Key Views listed refer to the broad views experienced within an area that are representative of the visual attributes of the landscape. No change required.
Community Council	Ardross needs to be covered in its entirety, it is only partially covered by this study and should be completely included in this study. It must not be omitted from the Sutherland study. A range of inaccuracies and inconsistencies about where the current wind energy developments are require to be addressed as well as confirming the extent of the study area boundary, which appears for the north west part (BL12 & BL40) to be arbitrary. Wild Land Areas are suggested as alternative features to use to define the study area extent.	Concerns regarding coverage of the landscape sensitivity appraisal in relation to Ardross are noted. The boundary at this location was drawn to provide an approximation of the horizon as seen from the main routes and areas of population i.e. the locations of most visual receptors. The rest of the Ardross area will be appraised as part of the next study for Sutherland and Ross-shire. Specific issues that have been raised about mapping inaccuracies have been reviewed and addressed where appropriate.
Community Council	The Wyvis range should have a special category like Loch Ness, but not as extensive. Recommend the Community Council liaise with the Council to achieve a special designation for the Wyvis range.	The Ben Wyvis Massif is already designated as a Special Landscape Area and this landscape appraisal provides an additional consideration in respect of wind energy development. No change required.

Key Routes

Туре	lssue	How issue has been addressed
Community	The description of the B9176 fails to	The B9176 Key Route is included because of
Council	appreciate the Ardross Castle	the access it enables over the Struie and the
	designed landscape that is prominent	views and gateways it provides. The route
	along the key route- the map on page	skirts the edge of the Ardross Castle Designed
	15 does not mention this route but	Landscape and views across it are limited and

	should.	restricted. However, this designed landscape
		is recognised within BL13 & 14 as described
		below.

Key Views

Туре	lssue	How issue has been addressed
Community	Highland Council argues at Glenmorie	The key view from Fyrish Monument is listed
Council	PLI for Cnoc Fyrish to be used as the	because it captures the 'iconic postcard
	key viewpoint rather than the	views' across the study area. The views are
	monument, this should be rectified in	described in the wider, more general sense,
	the study and views north into	rather a description of a specific viewpoint
	Sutherland included in the appraisal.	being used to consider the particular impacts
		of a specific development proposal. No
		change required.

<u>BL7</u>

Туре	Issue	How issue has been addressed
Campaign	The B9007 is missing from the list of Key	The B9007 Key Route has been added to the
Group	Routes for the LCA but is listed in the	list for BL7.
	study area's list of Key Routes.	The study is a strategic level appraisal and
	There is a gateway on the B9007 that	gateways are identified to illustrate those
	should be included in the study area's	landscape changes of wider or strategic
	list of Gateways where the route	significance, rather than describing every
	adjoins LCA BL10 where there is an	change.
	abrupt transition from an enclosed	The sensitivity of visual receptors (residents
	landscape to that of an open one.	and visitors to Ferness Village) is described in
	In the Sensitive Visual Receptors section	the Sensitive Visual Receptors in the
	an additional sentence should be added	references to 'residents of immediate
	that reads "The community hub for the	locality' and 'visitors/tourists including
	LCA, Ferness village lies immediately	cyclists and walkers'. It is not considered
	adjacent to the A939 gateway at the	appropriate or consistent with the appraisal
	"milestone"".	method that any place could be described as
		the 'hub' for an LCA as such.

<u>BL10</u>

Turne	I e e · · · e	U.S. Same has been addressed
Туре	Issue	How issue has been addressed
Campaign	An addition should be made to the Key	The study is a strategic level appraisal and
Group	Views that acknowledges the key view	the key views identified capture the essence
	looking north from the A939	of an area's particular qualities rather than a
	approximately 1km north of Aitnoch	specific location. The list is not exhaustive
	down to the "milestone". The	and particular viewpoints may be identified
	panorama here captures the entire	for assessment of specific development
	study area. The list of Gateways for the	proposals as part of the development
	study area should include the sentence:	management process. The landscape and
	"Ferness village lies immediately	visual criteria listed in section 4 of the
	adjacent to the A939 gateway at the	Onshore Wind Energy SG address issues
	"milestone" as described for BL7".	about sensitivity of gateway locations and
	Further guidance should be added to	landscape character. No change required.
	the Potential for Wind Energy	
	Development section to state no	
	development located adjacent to	
	Gateways or Key Views or to	
	neighbouring LCAs where there is	
	greater sensitivity to development.	
Campaign	The conclusion for the LCA contradicts	The LCA is a varied landscape and whether a
Group	planning case history which has	particular development is considered

consensus that the area is sensitive to	appropriate will be considered on a case by
larger scale development.	case basis. The Landscape Sensitivity section
	reflects the LCA's higher sensitivity. No
	change required.

BL13 & BL14

Туре	Issue	How issue has been addressed
Community Council	Disagree that the area is shielded by the landform as described in the appraisal. Novar wind farms are not mentioned but are dominating across the area. Ardross Castle designed landscape is not mentioned. Supportive of the conclusions of the appraisal.	The statement made in the Key Views about views being shielded by landform has been qualified with additional text, and recognition that on ridges the area may be more visible. Reference to Ardross Castle Designed Landscape has been added for these LCAs for clarity over issues raised. Novar Wind Farm is not considered to be dominating across the LCAs but the visibility from upper straths in the north and west of Ardross Castle is noted. However, the appraisal does not seek to identify all visibility of existing developments. Impacts of such visibility on features like key routes and Designed Landscapes are assessed on a case by case basis in respect of specific development proposals; visibility of existing developments will be part of any cumulative assessment undertaken as part of that.

<u>BL20</u>

Туре	lssue	How issue has been addressed
Community Council	Further safeguarding of the Tarbat Ness Headland is required by restricting development only to limited scope for micro turbines. The conclusions for the LCA are too relaxed and threaten the area which is an important tourist asset.	The text for this LCA has been amended to recognise the Tarbat Ness Headland.

BL39

Туре	Issue	How issue has been addressed
Community	No focus on views to the north and	Where appropriate, key views to the north
Council	north west that reflects the study is	are referenced in the study, but the broad
	Inner Moray Firth-focused and not	focus of the study is 'towards the Inner
	objective. Supportive of the	Moray Firth'. The emerging study for the
	conclusions for the appraisal.	Sutherland and Ross-shire area will address
		views 'to the north.'

<u>BL40</u>

Туре	Issue	How issue has been addressed
Community	Dispute the boundary and	The starting point for this appraisal was to
Council	descriptions of the landscape	look at SNH's recent revision of its Landscape
	character types (LCT) described for	Character Assessment. The strategic nature
	the LCA. Suggest area should be	of the appraisal means it would not be
	divided to distinguish between LCTs.	appropriate to sub-divide the LCA.
	Reference to Ardross Castle and Novar	Issues about dividing the LCA into different
	wind farms are missing. Disagree with	parts have been addressed by clarifying the
	the inclusion of the Balnagowan	boundaries on the map.
	designed landscape that is outwith	Land outwith the study area in this vicinity

the LCA. Disagree	with the conclusions	will be addressed in the next study for
of the appraisal a	nd question the	Sutherland and Ross-shire.
meaning of 'base	s of turbines are on	Reference to Ardross Castle Designed
the far side of the	e horizon to maintain	Landscape has been included in this LCA but
a containment of	space'.	Novar Wind Farm is not considered to have
		significant visibility from the key routes in the
		LCA.
		The description of 'turbine bases on the far
		side of the horizon' refers to being able to
		see turbines, but not their bases as they are
		hidden by the landform. Therefore whilst
		there may be visibility of parts of the
		turbines, they are perceived as being located
		in a different space from the receptor.

Caithness Landscape Sensitivity

	Caithness Landsca	ape Sensitivity
Туре	Summary of Comment	How issue has been addressed
Public	There should be a moratorium on windfarms because the cumulative and visual impacts are already unacceptable.	Scottish Planning Policy 2014 is clear at Paragraph 166 that <i>Moratoria on onshore wind</i> <i>developments are not appropriate.</i> No change required.
Industry	The references to different scales of wind turbines should be defined with height values.	The terms larger, medium and smaller refer to relative scales within the area being considered, taking into account existing turbines and the scale of the landscape. Therefore there is not one fixed definition for a whole study area or for the whole of Highland since landscape and development patterns vary. Any assessment should take account of what scales of development are already consented, under construction, constructed or operational at the time of assessment in or near that area. No change required.
Industry	Welcome caveats about the study not introducing additional constraints to those set out in the Spatial Framework. The strength of some conclusions for the appraisals contradict this and SPP (e.g. CT06).	Support for the explanation of the role of the appraisal is noted, which is clear that the studies do not introduce additional constraints to those set out in the Spatial Framework for Onshore Wind Energy [or form] part of a sequential approach to wind farm planning. The study only discusses landscape and visual sensitivities; the study's conclusions are intended to give a clear steer on what those sensitivities suggest for development potential, but there are other factors set out in the Supplementary Guidance to be considered. Assessment of specific schemes will take account of site and proposal-specific factors that will be weighed in the planning balance. No change required.
Government/ Statutory Body	Welcome the appraisal and consideration given to the historic environment.	Noted. No change required.

Industry	Should be greater encouragement for the consideration of appropriately located schemes.	Noted. No change required.
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<u>CT3</u>

Туре	Summary of Comment	How issue has been addressed
Charity/	Disagree that large scale wind farms	The landscape character type in this area is
Third	should be scored less sensitive than	capable of accommodating larger scale
Sector	smaller individual turbines.	development, hence the lower sensitivity rating
		applied. In the Potential for Wind Energy
		Development section only limited scope is
		identified for larger scale development where it
		aim[s] to consolidate and improve the existing
		layout of Stroupster [Wind Farm].
		The landscape is scored as being most
		susceptible to change in respect of smaller
		individual turbines because these would be
		unlikely to reflect the current pattern of
		development in the area and would therefore
		cause visual confusion between the simple
		moorland and coastal settlement landscapes.
		No change required.
Public	Disagree with conclusions of appraisal	The conclusions, that there is limited scope for
	because development in the LCA would	development in this LCA, are considered to be
	have far-reaching impacts across the	appropriate.
	wider study area. A Key Route is missing	NCN 1 is not listed as a key route because it
	from the LCA that is part of National	shares similar attributes to the A836 which is
	Cycle Network Route 1.	listed as a key route and is, for the purposes of
		this strategic-level appraisal, sufficiently
		representative of receptor experience. However
		at a proposal-specific level NCN1 may be
		relevant in its own right and it will be for such
		proposals to assess the relevance of NCN 1 and
		any potential impacts upon it. No change
		required.
Industry	Supportive of the approach to cluster	Noted. No change required.
CT 4	further development with existing.	

<u>CT4</u>

Туре	Summary of Comment	How issue has been addressed
Charity/ Third Sector	Disagree that large scale wind farms should be scored as level 3 because it is likely to be highly sensitive to any large scale development, particularly looking west to Wild Land Area 39.	The landscape character type in this area is capable of accommodating larger scale development. The scoring reflects this, but the potential identified is limited to that which can concentrate and consolidate existing development. Conversely the landscape is scored as being more susceptible to change from smaller individual turbines because they will be unlikely to reflect the existing pattern of development and could cause visual confusion. No change required.
Industry	Supports the draft appraisal's assertion that the LCA has low susceptibility to change to large scale wind farms. Highlight that the conclusions align with	Support noted. Clear reference is already made in the study to what potential for wind energy development there is. This study does not seek to assess individual proposals but to guide

	previous LUC study for Caithness. It should be more explicit that the LCA has capacity for development. A range of specific references to the proposed Limekiln Wind Farm are made in the comments.	development at a strategic level. No change required.
Industry	Support the indication that there is potential for development in the LCA and assert that this aligns with previous landscape capacity work undertaken by LUC.	Noted. No change required.

<u>CT6</u>

Туре	Summary of Comment	How issue has been addressed
Industry	Sensitivity and degree of wildness over emphasised. The LCA is not integral to the key sensitivities of the area. The conclusions are overly restrictive for this LCA and are contradictory, initially stating there is very limited potential, then stating the area should remain undeveloped.	Noted. The final appraisal has been amended to clarify that this area should remain undeveloped. This is because the area is limited in extent and contributes to continuity of this landscape character across the east of the study area.
Industry	Disagree that the open horizontal form of the LCA is small in scale due to its broad expanse.	The appraisal describes that "whilst small in scale the open horizontal form of the landscape allows wide 360 degree panoramas from any number of locations" so, although the LCA is itself small within the other character types that surround it, the views are expansive from this area. Therefore, development in this area could affect the way the existing clusters of development are read in the landscape, especially over different LCAs which have different sensitivities. Text has been added to clarify meaning. No change required.

<u>CT9</u>

Туре	Summary of Comment	How issue has been addressed
Public	The visual impacts of Dounreay and HMS Vulcan should be more accurately described. The LCA is already impacted by tall structures including wind farms.	Noted, minor amendments have been made to this section to reflect the issues raised.
Industry	The conclusions for the LCA appraisal are overly constraining and, subject to further detailed site considerations and assessments, development could be accommodated. The conclusion should be amended accordingly to provide flexibility for proposals to be considered on their merits.	The use of the term 'limited scope' is intentional because there are likely to be considerable siting and design challenges to accommodating larger scale development within the LCA. The introductory guidance provided within the Highland Strategic Capacity section of the Supplementary Guidance provides sufficient guidance about how the appraisal will be applied on a case by case basis. If a developer nevertheless wishes to pursue a larger scale proposal in this LCA they may seek to demonstrate through good siting and design that it can be accommodated, taking into account all

	relevant considerations including the issues identified in the appraisal. No change required.
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<u>CT10</u>

Туре	Summary of Comment	How issue has been addressed		
Public	No turbine present at Golval, concerns about cumulative associated infrastructure.	Noted. The section has been amended to reflect the turbine present at Kirkton Farm.		

Appendix 3 – Progress of Renewable Energy Development in Highland

- Earlier this year we published an updated version of our map of wind energy developments, available via the link <u>www.highland.gov.uk/windmap</u>. It now contains information on wind energy schemes that are "Constructed", "Constructed - Removed" or "Under Construction", "Approved", "In Planning", "Refused" and "Withdrawn". We also published a new storymap of hydro energy developments, available at <u>www.highland.gov.uk/hydromap</u>.
- 2. The following table (based on that data, with some corrections) summarises the progress of renewable energy development in Highland as at 1 January 2017:

Renewable Energy Progress, 1 January 2017								
	Capacity (MW)							
Technology	HRES-derived targets for 2017	Constructed & Under Construction	Consented	Total of: Constructed & Under Construction + Consented	In Planning			
	2908	2435	3543	5979	873			
Export Hydro	440	¹ 1078	² 629	1708	3			
Export Onshore Wind	1280	1261	798	2059	859			
Export Biomass	140	(Updated figures awaited)						
Export Offshore Wind	520	10	³ 2116	2126	12			
Export Wave	0	0	0	0	0			
Export Tide	220	86	0	86	0			
Local Micro	250 58	(All Hydro and Wind included in figures above, including non-export; updated figures for other technologies awaited)						

Notes:

1 Includes 'old' hydro schemes, whereas the HRES-derived target is exclusive of many 'old' schemes predating HRES.

2 Includes Coire Glas pump storage scheme – capacity of up to 600 MW.

3 Includes the maximum consented capacity for Beatrice Offshore Wind Ltd of 1000MW; however, we understand that it is the developer's intention to construct a lower figure of 588MW.

- 4 Figures may not total exactly, due to rounding of figures.
- 3. Our installed capacity of renewable energy, including all consented schemes, significantly exceeds the Highland Renewable Energy Strategy (HRES) target with respect to overall renewable energy capacity, although it may be noted that the implementation of consented schemes will depend also upon developers' commercial decisions to proceed (influenced by

funding) and connection to the grid.

- 4. The following further commentary in this section of the report focuses on generally larger scale onshore wind energy development, a sub-sector on which Scotland's Draft Energy Strategy continues to rely for a substantial contribution with further development going forward including new and repowered windfarm sites. This is in the context of growing pressure for onshore wind energy to be less dependent upon subsidies or similar assistance, which means greater emphasis on projects that are efficient in terms of costs and rewarding in terms of energy generation and income. Taken in isolation such increase in efficiency and contribution to meeting energy needs may be broadly welcomed; however we may experience growing interest in the development of sites which could be efficient and productive but some of which could raise significant planning issues.
- 5. From 1 January 2016 to 1 January 2017, in Highland: Creag Rhiabach received consent (now subject of a judicial review); Achlachan 2 received consent on appeal; Corriemoillie (increasing the capacity of the previously permitted scheme) received consent; Tom Nan Clach (alternative scheme to that previously consented) received consent on appeal. However, the 'dip' in additional onshore wind energy consents noted in our report to the Planning, Development and Infrastructure Committee in August 2016 largely continued. There was not much additional capacity consented for other types of renewables during that period, there generally not having been much additional capacity the subject of applications for consent. Like last year, there remained a considerable potential capacity for onshore wind energy 'In Planning'.
- It may be noted that since 1 January 2017: Lychrobbie received consent on appeal; Millennium South received consent; Aberarder received consent on appeal; Cnoc An Eas appeal against refusal was dismissed.
- 7. There are still a significant number of schemes 'In Planning', some of which have been so for a considerable length of time, and a number of schemes are subject of appeals together creating a significant element of uncertainty about the future pattern of wind energy development in parts of Highland and making it more complex to assess cumulative effects. Decisions are awaited on the following Section 36 applications that are or have been with the Scottish Government's Directorate for Planning and Environmental Appeals: Strathy South (report issued); Braemore (report issued); Cairn Duhie (report issued); West Garty; Caplich; Limekiln (resubmission). Decisions are awaited on the following appeals: Druim Ba (second proposal appeal against non-determination); Culachy; Cogle Moss. Decisions are awaited on the following other Section 36 applications which are with Scottish Government's Energy Consents Unit: Golticlay; Gordonbush Extension; Strathy Wood; Drum Hollistan. Decisions are still to be made on the following Planning Applications: Dell; Achlachan (application to increase tip height from that already permitted).
- 8. Members are reminded that a report is taken to each Planning Applications Committee as a standing agenda item, providing an update on progress of all cases within the 'Major' development category currently with the Planning and Development Service for determination and identifies those proposed applications subject of Proposal of Application Notices. That report also details progress on proposals submitted under S36 or S37 of the Electricity Act 1989 on which the Council is consulted.