

Agenda item	6.1
Report no	PLN/015/19

THE HIGHLAND COUNCIL

Committee: North Planning Applications Committee

Date: 5 March 2019

Report Title: 17/02436/FUL Mr Phil Davidson, Navidale Farm.
On land 3,290m NE of Church of Scotland, West Helmsdale.

Report By: Acting Head of Development Management – Highland

Purpose/Executive Summary

Description: Navidale Wind Farm comprising 5 wind turbines (3MW each) with a tip height up to 125m and associated infrastructure.

Ward: 04 East Sutherland and Edderton.

Development Category: Local application.

Reason referred to Committee: Request by Local Members

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

Recommendation

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

1. PROPOSED DEVELOPMENT

- 1.1 The application proposes the erection of 5 wind turbines and associated infrastructure. This will form Navidale wind farm. The principal components include: -
- Five wind turbines (each rated 3MW) measuring up to max 125m tip height;
 - Turbine foundations with associated hardstanding areas for cranes;
 - 4.6km of on-site access tracks (of a minimum 4m and maximum 6m width);
 - Four water crossings, where the access track crosses water courses;
 - A single site entrance from the public road network, located on the old A9;
 - Drainage works;
 - An on-site electrical and control building (11.9m x 3.7m by 3.9m height);
 - A network of buried cables;
 - A temporary construction compound, including parking, and welfare facilities;
 - A borrow pit with the potential to supply 50,000m³ located within the landholding, with the required haul road and borrow pit reinstated following construction.
- 1.2 Access to the site is from the Navidale Road using an existing estate access. The Navidale Road was previously the A9(T) road, but it now forms part of the local road network. The estate track serving the site area is in poor condition. Therefore it is proposed that a new track, from an upgraded access point, will be formed, which is suitable for the construction of the wind farm. The existing track would then be re-instated thereby leaving only one track (permanent) on this part of the estate holding. The port of entry for the turbine parts (abnormal loads) remains to be determined. Until improvements are made to the A9(T) road - Berriedale Braes section this is most likely to be from the south, thereby Invergordon.
- 1.3 The 125m to tip height turbines will be located between the 328m - 385.5m AOD contours and thereby will all extend above the local hill top of Creag Thoraraidh (404m AOD). A micro-siting allowance of 50m has been requested for the key components. Between the principal site area and the A9(T) road, the applicant manages commercial woodland, a small part of which forms part of the application site. It is proposed to operate a borrow pit from land within the woodland to source material for the construction of the access roads, turbine / crane pads, etc.
- 1.4 Construction is expected to last for a period of 12 months. A temporary construction compound is to be developed at the south westernmost end of the site to the east side of the Allt Briste. Slightly further north east, on the east side of the Feith Dubh water course the proposed substation is to be located. Both elements, together with the borrow pit will lie to the south side of the existing 132kv Beauly to Thurso Grid Line, which transverses the estate including a portion of the application site.
- 1.5 All wind farms are expected to have an operational life of 25 years (manufacturer's warranty) after which time they are expected to be dismantled and the site decommissioned / restored or potentially repowered via a future application for

development. Site restoration would involve the retention of the principal access track, although it would be reduced in scale (width) more in keeping with expected estate usage.

- 1.6 The application is supported by an Environmental Statement (ES) (the equivalent of the current EIA Report set out in the 2017 Regulations). It sets out the likely impacts of the development on the environment and describes the measures proposed to reduce any of the principle environmental impacts ('mitigation'). In line with the EIA Directive and the local planning policies, the Environmental Statement covers the key environmental, technical and social issues associated with the proposed development. It comprises information on Ecology; Ornithology; Landscape and Visual; Noise; Cultural Heritage and Archaeology; Surface and Groundwater Hydrology and Hydrogeology; and Infrastructure.

- 1.5 **Variations:** None.

2. SITE DESCRIPTION

- 2.1 The site is 3.1km north of Helmsdale, set to the west and above of the Inverness Thurso A9(T) road at the Ord of Caithness. Other settlements in the wider area include Portgower (6.4km) and Brora (19.6km) which both lie to the south. The nearest properties are located to the south-west (Kilbreck / Ord View)) and east-north-east (Ousdale) of the site. The closest of these properties is located over 1.9km from the nearest turbine (unnamed property adjacent to the property named Kilbreck). The immediate area to the north and west of the site is sparsely populated. The site has open coastal outlooks to the east, across a wide area of the Moray Firth.
- 2.2 The wind farm site extends to approximately 61ha. However the actual footprint of built development is significantly less (<5ha). The key components are set on an elevated plateau above Navidale farm between the localised summits of Cnoc an Tubhadair (332m AOD) on the north east side and Creag Thoraraidh (404m AOD) to the south east. This latter hill top also accommodates telecommunications masts (BT Links; Airwave; EE; Arquiva; Vodaphone; Links). These lie outwith the application site. These facilities have their own access tracks from Navidale Road.
- 2.3 The land surrounding the development site forms the western end of Navidale estate in the ownership of the applicant. The site largely comprises moorland, where peat (carbon rich soils / priority peatlands) underlies the majority of the area. A detailed peat depth survey has highlighted that peat depths are typically between 1-3m, but deeper areas of peat exist. The turbine envelope is set within the north eastern portion of the estate in the valley which contains the Ord Burn, the spring line of which lies close to Turbine 4, and flows eastwards to the Moray Coast. The south western portion of the site has similar short watercourses flowing from the high ground to the coast and includes the Spu Burn and Allt Briste. The site and wider area include Ground Water Dependant Terrestrial Ecosystems (GWDTEs) which are protected under the Water Framework Directive.
- 2.4 From an ecological perspective, the site is not covered by any formal designation. Designated sites prevail approximately 2km from the site including the Berriedale Cliffs Site of Special Scientific Interest (SSSI) and East Caithness Cliffs Special

protection Area (SPA) designated for its various seabirds, including herring gull and greater black backed gull as well as peregrine falcon. Protected species / wildlife in the area includes for example bats, otter and red deer who will use this site as part of the wider local countryside.

- 2.5 With regard to landscape matters the turbines are located within an Area of Wild Land “Causeymire – Knockfin Flows” at its south easternmost corner of the feature. In landscape character terms the site is located within Moorland and Sloping Hills, which are evident across much of the East Sutherland area. It also lies close to the coastal strip that runs between Helmsdale and Berridale and in general terms the Moray Firth. The site does not fall within any designated landscape site, however there are a number of interests located away from the site including: -

Special Landscape Area (SLA)

- Loch Fleet, Loch Brora and Glen Loth SLA (to the south)
- Berriedale, Langwell and Knockfin SLA (to the north)
- Ben Griams and Loch nan Clar (to the north west).
- Ben Kilbreck and Loch Choire (to the south west).

Garden and Design Landscapes

- Dunrobin Castle
- Kildonan Lodge
- Langwell Lodge
- Dunbeath Castle

- 2.6 A total of 50 Scheduled Monuments were found to be located within a 10km study radius around the application site. There are no Conservation Areas, Inventory Battlefield or World Heritage Sites located within 10km of the proposed development site. A number of the identified historic features within the study area, which are located in areas where there are no views of the proposed wind farm.
- 2.8 Recreational interests in this area include a variety of interests including local golf courses at Helmsdale and Brora; cyclists using local roads; Estate offering deer stalking and fishing on the River Helmsdale and Brora. Visitor attractions including the Timespan Heritage Museum for visitors, artists and researchers; Dunrobin Castle; Gold Panning at Kildonan Burn and the North Coast 500. For mountaineers Morven, the highest hill on the east coast between the Dornoch and Pentland Firths is a significant destination and landmark in the landscape. Morven, Scaraben and Beinn Dobhrain are classified as Grahams and thereby attract walkers / climbers.
- 2.9 When assessing a wind farm proposal, consideration of similar developments in proximity of the proposal for cumulative effects is required. The list below sets out the projects in the wider area that are operational, approved or have been submitted but not yet determined. This takes into account wind energy developments within 35km radius and potential to have some level of cumulative impact with the proposed turbines potentially appearing simultaneously or successively in view.

Operational

Gordonbush.
Boulfruich.
Kilbraur (including its extension).
Causeymire.
Beatrice Offshore (Demo).
Burn of Whilk.
Camster.

Consented

Navidale Estate (2 turbines).
Rumster Forest.
Enerquip (single turbine).
Bad a'Cheo.
Halsary.
Achlachan (under construction)
Achlachan (2)
Beatrice Offshore.
Gordonbush Extension.
Moray East Offshore

Under consideration

Hill of Lychrobbie.
Golticlay (Council objection / outcome of PLI awaited).
Lower Rumster.
Moray West Offshore

3. PLANNING HISTORY

3.1 **16.09.2016** – Environmental Impact Assessment Scoping exercise for a project comprising the construction of a wind farm consisting of 5 turbines of up to 125m to tip and associated infrastructure, including upgraded and new access tracks and a substation building. (Navidale wind farm) 16/03581/SCOP.

30.09.2015 – Pre application submission for the construction of a wind farm expected to be between 7 and 11 turbines of up to 119m to tip. Other onsite infrastructure would comprise upgraded and new access tracks and a substation building 15/03054/PREAPP.

4. PUBLIC PARTICIPATION

4.1 Advertised: EIA: 16.06.2017

Representation deadline: 07.07.2017

Timeous representations: 204 151 Objections 53 In support.

Late representations: None

4.2 Material considerations raised in objection to the proposal are summarised as follows:

- Conflict with Development Plan including Natural Built and cultural heritage features; Species and habitats; Visual impact and impact on landscape character; amenity and sensitive locations, amenity of users of paths and recreational facilities; tourism and recreation and interests.
- Conflict with National Policy.
- Adverse impact on two Special Landscape Areas / natural beauty of the area.
- Adverse impact on wild land / areas of wild land (e.g. Viewpoint 4 Wag).
- Adverse impact on valued peat.
- Adverse visual impact on users of the A9(T) road between Berriedale / the Ord.
- Impact on a scenic section of the North Coast 500 tourist route.
- Impact on local mountains and ridge lines as viewed from Glen Loth towards Morven, Strath of Kildonan, West Helmsdale, Gartymore and East Sutherland coastline.
- Adverse impact as viewed from Brora and Dornoch / East Sutherland coastline.
- Planning history of refusal of such development on local hilltops.
- Adverse impact on local tourism / walkers / local tourism businesses.
- Conflict with raptors that frequent this area.
- Ornithological assessment is based on one year not two years data.
- Blight / negative impact on the landscape and economy.
- Visual assessment is not of an adequate standard / compliant with standards / guidance.

4.3 Material considerations raised in support of the proposal are summarised as follows:

- Investment in renewable energy / site with good wind resource.
- Will bring valued construction employment.
- Need to take advantage of this development opportunity.
- Small site with limited impact / well screened.
- The wind farm is remote from housing.
- The majority of people will never realise its presence.
- Valued investment into the local economy / local businesses.
- Limited impact on the landscape.
- Limited impact on Helmsdale and other nearby villages.
- Landscape already impacted by telecommunication masts / oil and gas installations.
- Will reduce our reliance on fossil fuels.
- Will bring long term benefits to the area.

4.4 All letters of representation are available for inspection via the Council's eplanning portal which can be accessed through the internet www.wam.highland.gov.uk/wam. Access to computers can be made available via Planning and Development Service offices.

5. CONSULTATIONS

- 5.1 **Helmsdale Community Council** refrained from responding. Community divided.
- 5.2 **Brora Community Council** has not objected to the application. Concerns are raised with regard to the need to consider impact as viewed from Brora golf course, the interests of the Loch Fleet, Loch Brora and Glen Loth Special Landscape Area (SLA) and generally the need to keep the East Sutherland hills / coastline free of wind farm development.
- 5.3 **Access Officer** has no objection to the application. A request is made for conditions to safeguard access for walkers through construction and operational phases.
- 5.4 **Archaeology Unit** has no objection to the application.
- 5.5 **Contaminated Land Team** has no objection to the application.
- 5.6 **Environmental Health** has no objection to the application. A request is made for a condition addressing operational noise levels, construction noise / working hours and dust mitigation.
- 5.7 **Transport Planning Team** has no objection to the application. A condition would be required to secure a wear and tear agreement on the use of the local road network.
- 5.8 **Transport Scotland** has no objection to the application. A request is made for planning conditions to maintain the safety and free flow of traffic on the Trunk Road.
- 5.9 **Scottish Natural Heritage (SNH)** object to the application. It raises two key issues including significant adverse effects on a nationally important area of wild land (Wild Land Area (WLA) 36 Causeymire – Knockfin Flows) and upon an area of Class 1 Carbon - rich soils, deep peat and priority peatland habitat.
- 5.10 **Scottish Environmental Protection Agency (SEPA)** has no objection to the application. A request is made for conditions to be attached to any approval of the development.
- 5.11 **Highlands and Islands Airport Ltd (HIAL)** has no objection to the application. It requests for a omnidirectional steady red aviation warning light (not infra-red) to be fitted at the hub height on turbine located at OS Grid Reference 304152E 918955N.
- 5.12 **Ministry of Defence (MOD)** has no objection to the application. Planning conditions are required within any approval in respect of investment in radar networks. Information for aviation mapping and safety lighting is also requested.
- 5.13 **National Air Traffic Service En Route (NATS)** has no objection to the application.

5.14 **Scottish Water (SW)** has not objected to the application. It has highlighted specific requirements to protect existing water assets / resource should the application be supported.

5.15 **Historic Environment Scotland (HES)** has no objection to the application.

6. DEVELOPMENT PLAN POLICY

6.1 The following policies are relevant to the assessment of the application.

Highland Wide Local Development Plan 2012

- 6.2
- Policy 28 - Sustainable Design
 - Policy 30 - Physical Constraints
 - Policy 31 - Developer Contributions
 - Policy 51 - Trees and Development
 - Policy 52 - Principle of Development in Woodland
 - Policy 53 - Minerals
 - Policy 55 - Peat and Soils
 - Policy 57 - Natural, Built and Cultural Heritage
 - Policy 58 - Protected Species
 - Policy 59 - Other important Species
 - Policy 60 - Other Importance Habitats
 - Policy 61 - Landscape
 - Policy 62 - Geodiversity
 - Policy 63 - Water Environment
 - Policy 64 - Flood Risk
 - Policy 65 - Waste Water Treatment
 - Policy 66 - Surface Water Drainage
 - Policy 67 - Renewable Energy Developments
 - Natural, Built and Cultural Heritage
 - Other Species and Habitat Interests
 - Landscape and Visual Impact
 - Amenity at Sensitive Locations
 - Safety and Amenity of Individuals and Individual Properties
 - The Water Environment
 - Safety of Airport, Defence and Emergency Service Operations
 - The Operational Efficiency of Other Communications
 - The Quantity and Quality of Public Access
 - Other Tourism and Recreation Interests
 - Traffic and Transport Interests
 - Community Renewable Energy Developments
 - Policy 68 - Electricity Transmission Infrastructure
 - Policy 69 - Pollution
 - Policy 72 - Air Quality
 - Policy 73 - Public Access
 - Policy 77 - Long Distance Routes

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

- 6.3 The Plan's Vision and Spatial Strategy promotes the area as an internationally renowned centre for renewable energy and aims to maximise opportunities arising from the energy sector.

Highland Council Supplementary Planning Policy Guidance

- 6.4
- Developer Contributions (March 2013)
 - Flood Risk and Drainage Impact Assessment (Jan 2013)
 - Highland Historic Environment Strategy (Jan 2013)
 - Highland's Statutorily Protected Species (March 2013)
 - Highland Renewable Energy Strategy and Planning Guidelines (May 2006)
 - Managing Waste in New Developments (March 2013)
 - Onshore Wind Energy: Supplementary Guidance (Nov 2016)
 - Physical Constraints (March 2013)
 - Special Landscape Area Citations (June 2011)
 - Standards for Archaeological Work (March 2012)
 - Trees, Woodlands and Development (Jan 2013)

7. OTHER MATERIAL CONSIDERATIONS

Scottish Government Planning Policy and Guidance

- 7.1 Scottish Planning Policy (SPP) 2014 advances principal policies on Sustainability and Place-making, and subject policies on:
- A Successful, Sustainable Place;
 - A Low Carbon Place;
 - A Natural, Resilient Place; and
 - A Connected Place.
- 7.2 SPP sets out its continued support for onshore wind and requires Planning Authorities to develop a spatial framework to identifying areas that are most likely to be most appropriate for onshore wind farms as a guide for developers and communities. It lists likely considerations to be taken into account, including: -
- Net economic impact;
 - Contribution to renewable energy targets;
 - Effect on greenhouse gas emissions;
 - Cumulative impacts;
 - Impacts on communities and individual dwellings;
 - Landscape and visual impacts, including wild land;
 - Natural heritage;
 - Carbon rich soils;
 - Public access;
 - Historic environment;
 - Tourism and recreation;
 - Aviation and defence interests;
 - Telecommunications

- Road traffic;
- Trunk roads;
- Hydrology and flood risk;
- Decommissioning;
- Energy storage;
- Planning obligations for site restoration.

7.3 Other Scottish Government advice is provided via its web site or via Scottish Government Agencies such as SNH. This includes for example: -

- National Planning Framework for Scotland 3 (June 2014).
- Scottish Energy Strategy (Dec 2017).
- Onshore Wind Energy (Statement) (Dec 2017).
- PAN 1 / 2011- Planning and Noise.
- Plan 60 - Planning for Natural Heritage.
- 2020 Routemap for Renewable Energy.
- Onshore Wind Turbines.
- Wind Farm developments on Peat Lands.
- Siting and Designing wind farms in the landscape.
- Description of Wild Land Areas – 2017.

8. PLANNING APPRAISAL

8.1 Section 25 of the Town and Country Planning (Scotland) Act 1997 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

Determining Issues

8.2 This means that the application requires to be assessed against all policies of the Development Plan relevant to the application, all national and local policy guidance and all other material considerations relevant to the application.

Planning Considerations

8.3 The key considerations in this case are: -

- a) Development Plan
- b) Onshore Wind Energy – Supplementary Guidance;
- c) National Policy;
- d) Access and Traffic Impact;
- e) Water, drainage including flood risk;
- f) Peat, including peat slide risk;
- g) Natural heritage, including ornithology;
- h) Built and cultural heritage;
- i) Design, landscape and visual impact including
 - a. Landscape Character Assessment
 - b. National Scenic Areas
 - c. Special Landscape areas
 - d. Wild Land Areas;

- e. Council's SG – Landscape and Visual Effects
- f. Visual Impact
- j) Economic Benefits including Recreation;
- k) Cultural Heritage:
- l) Aviation
- m) Telecommunications and TV Reception;
- n) Noise and shadow flicker;
- o) Construction impacts;
- p) Decommissioning and Restoration;
- q) Other material consideration;.
- r) Other considerations..

Development Plan

- 8.4 The Development Plan comprises the adopted Highland-wide Local Development Plan (HwLDP) and the Caithness and Sutherland Local Development Plan. There are no site specific allocations for this site within the Caithness and Sutherland Local Plan. However, it is noteworthy that this recent plan recognises in full the nearby Special Landscape Areas (e.g. Loch Fleet, Loch Brora and Glen Loth SLA, and it's supporting citations, without refinement or amendment.)
- 8.5 The principal HwLDP policy on which the application needs to be determined is Policy 67 - Renewable Energy. The other HwLDP policies listed at 6.2 of this report are also relevant and the application must be assessed against all these matters and considered in the round. For example:
- Policy 29 seeks to address “new development” which should make a positive contribution to the architectural and visual quality of the place in which it is located. The policy highlights that “applicant’s need to demonstrate sensitivity and respect towards the local distinctiveness of the landscape, architecture, design and layouts in their proposals” Further that “where relevant, the Council will judge proposals in terms of their contribution to place making..... proposals should have regards to the historic pattern of development and landscape in the locality ...” In this regard the effect of the development upon the east coast of Sutherland and communities of Helmsdale (including the crofting community of Gartymore) and Brora is relevant.
 - Policy 61 Landscape advises that new developments should be designed to reflect the landscape characteristics and special qualities identified in the landscape character assessment of the area in which they are proposed. This policy also advises that THC will take account of its Supplementary Guidance on Siting and Design and Sustainable Design and highlights the link to Policy 28 Sustainable Design. Given the size, scale and location of the development this policy is relevant.
- 8.6 Policy 67 sets out that renewable energy development should be well related to the source of the primary renewable resource needed for operation, the contribution of the proposed development in meeting renewable energy targets and positive / negative effects on the local and national economy as well as all other relevant policies of the development plan and other relevant guidance. In that context the Council will support proposals where it is satisfied they are located, sited and designed such as they will not be significantly detrimental overall individually or

cumulatively with other developments having regard to 11 specified criteria (as listed in para 6.2). Such an approach is consistent with the concept of Sustainable Design (Policy 28) to achieve the right development in the right place but it is not to allow development at any cost.

- 8.7 Tests against all appropriate policies of the Development Plan will be considered further through the assessment of relevant material considerations. However if the Council is satisfied that there will be no significant adverse impact from the proposals then the application can be supported.

Onshore Wind Energy : Supplementary Guidance (Dec 2016)

- 8.8 The Council's Supplementary Guidance (SG) on Onshore Wind Energy is now adopted as part of the Development Plan. This highlights the application site falls across two identified areas when considering national policy and associated designations. The lower portion of the site presenting the access track, borrow pit and substation areas fall within a Group 3 Area where it is considered there is potential for wind farm development. However and more significantly the area hosting the proposed turbines lies within a Group 2 Area – Area of significant protection. The latter standpoint is on account of its location within an Area of Wild Land (Area 39) and an area of likely high conservation value – peatland habitat. This requires the proposal to be assessed against these interests in particular, all as noted within Policy 67 of the HwLDP.
- 8.9 The SG expands on the considerations / criteria set out in the Development Plan policy. The SG seeks to advance its consideration on the Strategic Capacity of the Highlands for wind energy development. The guidance notes that it does not introduce additional constraint to those set out in the Spatial Framework for Onshore Wind Energy, nor should it be used as part of a sequential approach to wind farm planning.
- 8.10 The SG provides strategic considerations that identify sensitivities and potential capacity for wind farm development. One of the six areas to be examined is the area of East and Central Sutherland. The Council has yet to progress with its own assessment for this area. However, its approach methodology to the assessment of proposals is applicable and is set out in the SG para 4.16 – 4.17. It provides a methodology for a judgement to be made on the likely impact of a development on assessed “thresholds” in order to assist the application of Policy 67. The 10 criterion will be particularly useful in considering landscape and visual impacts, including cumulative impacts.

National Policy

- 8.11 Scotland's Third National Planning Framework (NPF3) published by the Scottish Government on 26 June 2014. NPF3 considers that onshore wind has a role in meeting the Scottish Government's targets to achieve at least an 80% reduction in greenhouse gas emissions by 2050, and to meet at least 30% overall energy demand from renewables by 2020, including generating the equivalent of at least 100% of gross electricity consumption from renewables. This is not disputed and the Council do not consider these targets to be a cap.

- 8.12 In 2017 the Scottish Government published a number of further documents including the Scottish Energy Strategy and Onshore Wind Policy. The Scottish Energy Strategy, provides two additional targets:
- The equivalent of 50% of the energy for Scotland's heat, transport and electricity consumption should be supplied from renewable sources by 2030;
 - The productivity of energy use across the Scottish economy should increase by 30%.
- 8.13 The Scottish Energy Strategy comments that renewable electricity could rise to over 140% of Scottish electricity consumption by 2030 in order to meet the first target. This may require in the region of 17 gigawatts of installed renewable generation capacity by 2030 (as compared with 9.5 gigawatts in June 2017). The strategy also clarifies that Scotland's long term climate-change targets will require the near complete decarbonisation of the energy system by 2050, with renewable energy meeting a significant share of needs.
- 8.14 Scottish Planning Policy (SPP) as published by the Scottish Government is a material consideration which should be attributed some significant weight in the decision making process. The Council recognises a policy principle in favour of development that contributes to sustainable development requires to be balanced against the other environmental and social objectives of SPP. However, for the avoidance of any doubt the support from the Scottish Government towards renewable energy has not altered the continuity of its policies directed at environmental protection.
- 8.15 Set out in SPP are a number of criteria against which proposals for on-shore wind energy development should be assessed. These criteria are primarily reflected in Policy 67 (Renewable Energy) of the Highland-wide Local Development Plan. A failure against one of these criteria does not mean that a development fails, all these criteria must be given consideration and it is up to the decision maker to attribute weight to these criteria on a case by case basis.

Access and Traffic Impact

- 8.16 The development is to be accessed from an existing estate access from the old A9(T) road (now Navidale Road) which leads from the realigned A9(T) road north of Helmsdale. All construction traffic will use this access including abnormal loads which are expected to arrive to site from Invergordon. The development is unlikely to significantly increase traffic flows on the A9(T) road.
- 8.17 No objections to the application have been raised by either roads authority. Planning conditions have been requested to secure minor work improvements associated with traffic deliveries including for abnormal loads in order to maintain the safety and free-flow of traffic on the network. Should the application be supported a condition requesting the submission of a Construction Traffic Management Plan (CTMP) for approval prior to the commencement of development. This should also require the establishment of a community liaison group for the duration of the construction phase of the development. Such a group, to be managed by the developer would help ensure construction traffic is

effectively managed with local input to take account of local events / school bus times, etc. It has the added benefit of providing strong liaison between the local community and on site contractors, which has proven very beneficial to many such projects across Highland. The Council's Transport Planning Service has requested a Roads bond be secured for the use of the local road, which may also require pre-commencement mitigation works to ensure the integrity of the road is sufficient for the anticipated traffic impact at the outset. This will be influenced by the finalised Construction Traffic Management Plan (CTMP).

- 8.18 The site, like most land in Scotland, is subject to the provisions of the Land Reform (Scotland) Act 2003. There are no core paths running over the site however, the wider area is rich in opportunities to access the outdoors. The most likely direct impact is during the construction phase where some access will be restricted. Any impacts arising through the construction or operational phases of development can be managed through outdoor access management which should cover both construction and operation of the wind farm. This can be secured by condition.

Water, Drainage, including Flood Risk

- 8.19 The Environmental Statement (ES) has highlighted the key hydrological assets and drainage provisions within and around the site including local watercourses, private water and public water interests. Scottish Water has confirmed that whilst the development will not impact upon water catchment or abstraction sources it has assets in the area including a raw water main. It is important that construction engineers locate, recognise and where necessary protect such assets from damage. The Environmental Health Officer (EHO) has advised there are no private water supplies within the application study zone.
- 8.20 Construction of the access tracks, sub-station and crane hard-standings will result in localised changes to the surface water hydrology. The cambered tracks may interrupt natural flow paths which will shed water more quickly than the existing ground. An increase in runoff in the area can compound various other predicted impacts, such as chemical pollution, erosion and sedimentation. Furthermore, increased runoff could add to a flood risk in the area. Through the proposed mitigation set out in the ES the potential effects are predicted to be reduced to acceptable levels.
- 8.21 No objections have been raised by consultees on these matters subject to any approval being conditioned to secure effective construction mitigation. SEPA in particular has requested a condition to ensure all works be carried out in accordance with the submitted Schedule of Mitigation and Planning Drawings as highlighted within Volume 6 of the ES and Planning Drawings contained within Volume 7 of the ES. In this regard the requested mitigation during the pre-application stage and subsequent design revisions has been delivered within the current proposal.

- 8.22 With regard to flood risk it will be important to ensure that the proposed construction works are undertaken in a manner where by the surface water management plan is consistent with the requirements of SUDs design, ensuring adequate provision for a 1:200 flood event plus 20% for climate change. This can be addressed within conditions should the application be supported.

Peat, including peat slide risk

- 8.23 The applicant has submitted reports in respect of the peat within the site and considered the impacts of the development on this resource. The ES submission highlights the extent of peat deposits / habitats across the development site and presents peat probing results to establish the extent of peat depths across the site and the nature of the peat in respect of peat slide risk. It advises the development has by design sought to avoid areas of deep peat and also minimise areas where peat slide risks are high. Consultee responses have presented a range of views for consideration in the final planning balance.
- 8.24 SEPA has advised that the peat survey demonstrates that areas of deep peat have generally been avoided. It welcomes the Peat Management Plan proposals within the schedule of mitigation, including the restoration of the historic track. The proposed borrow pit avoids GWDTE, waterbodies, existing water abstractions and deep peat. The proposed re-use of peat for restoration should convey ecological benefit provided it is carried out in accordance with the schedule of mitigation and the Borrow Pit Section Plan. It is noteworthy that the total peat to be excavated is 50,000m³ and all is being re-used on site, the majority in the borrow pit restoration but to depths that should convey ecological benefit.
- 8.25 However SNH has raised an objection to the development. It has advised that the majority of this proposal is located within a 'Class 1 Area of nationally important carbon-rich soils, deep peat and priority peatland habitat' (SNH Carbon and Peatland Map 2016). It forms part of the nationally important peatland resource referred to in Scottish Planning Policy (SPP) as "Areas of significant protection". As an "Area of significant protection", SPP requires that significant effects on Class 1 areas be "substantially overcome by siting, design or other mitigation".
- 8.26 All five proposed turbines, as well as a significant proportion of their access tracks lie within a Class 1 Area of Carbon-rich soils, deep peat and priority peatland habitat. The majority the application area is blanket bog with dry dwarf shrub heath present on the lower slopes (Fig 3.1). In SNH's view, the quality of peatland habitat within the application area is high quality and, as a result, there is limited scope for restoration. The peat survey shows that peat depths across the application area range from less than 1m to >4m with the majority of the turbines, hard standings and access tracks on peat depths of over 2m (Fig 7.2). SNH advice is that the impacts of this proposal on blanket bog would be significant. It notes that the majority of the blanket bog within the mapped area would be impacted by the proposal.

Natural Heritage, including Ornithology

- 8.27 The supporting Environmental Statement has highlighted the results of a broad range of ecological and ornithological survey work including assessment of habitat; Groundwater Dependent Terrestrial Ecosystems (GWDTES); bats; deer; otters; birds including wintering populations, breeding birds, etc. and including collision risk assessment on key species such as peregrine falcon. The conclusions drawn are that there would be some valued habitat lost through the development and displacement through construction periods the impact of these consequences are limited / negligible.
- 8.28 SNH in its response to the application was content to accept the findings of the assessment, simply noting that should the application be supported and proceed to construction, pre- commencement surveys for protected species / breeding birds should be set out as a requirement by condition. The Council's policy approach and standard condition for Construction and Environmental Management plans would address this request.
- 8.29 SNH also considered that the deer management statement provided as part of the Supplementary Environmental Information underestimates deer use of the wind farm site and the surrounding area. The A9 trunk road between Navidale and the Ord is a high risk area for deer - vehicle collisions. SNH highlighted its concern that during construction of the wind farm, deer could be displaced across the A9 thereby increasing the risk of a road traffic accident. In its view, the current statement on deer management does not provide a definitive commitment to address this significant risk to public safety. It suggests that a Deer Management Plan is produced by condition prior to any construction work commencing, to address potential displacement of deer during the construction of a wind farm onto the A9.

Design, Landscape (including Wild Land) and Visual Impact

Design

- 8.30 The development is for a largescale wind farm of 5 turbines, each 125m to tip height. This is significantly larger than its nearest neighbour, the consented Navidale Estate (2 turbines - (46.5m to tip)).
- 8.31 The applicant has advised that its application has been designed after consideration of a variety of options, and considers that: -
- turbine size and number have been chosen to 'fit' with the scale of the surrounding landscape and not to provide an overbearing presence on receptors within Helmsdale, at the Ord of Caithness and Strath of Kildonan.
 - the skyline in this area is already affected by the telecommunication masts. By positioning the turbines sensitively along the Creag Thoraraidh plateau they should be able to be accommodated without causing any visual clutter on the skyline.

- the layout should appear balanced and even, with regular spacing and minimal overlapping. The spacing between the turbines has been kept consistent and the layout simple, to reflect the simplicity of the skyline and the plateau at Creag Thoraraidh.

- 8.32 The design features highlighted by the applicant can be seen from local viewpoints including for example VP1 – Navidale, VP 2 – Helmsdale, VP 3 Ord of Caithness and VP 6 Strath of Kildonnan. However representations highlight that Viewpoints 4 - South of Berriedale and 9 - Latheron highlight a layout that “is far from being evenly spaced, and indeed sprawls unevenly across the skyline” and “occupies a much wider area than might be expected of a scheme of five turbines.”
- 8.33 In addition, the view, as presented by the applicant, that the skyline is already affected by telecomm pasts, and indeed also pylons, does not in itself justify the introduction of 125m turbines, which will rotate on the skyline. This is a point picked up in the objection from the Mountaineering Council for Scotland who highlight that “the existing, very much smaller, static, visually permeable tele-comms towers can be close to invisible at distance and certainly do not attract attention to themselves from hill viewpoints.”
- 8.34 Advice and guidance on the siting and design of wind farm is available from SNH. It suggests that with regard to other infrastructure wind turbines can create an over-complex visual image in association with transmission lines and other infrastructure. Such judgment is therefore required for example at VP 4 South of Berriedale, where the turbines would be seen through grid transmission lines / towers. However, more significantly SNH guidance advises that wind farms should be sited and designed so that adverse effects on landscape and visual amenity are minimised; so that areas which are highly valued for their landscapes and scenery are given due protection. This will be an important consideration in the final determination of this application.

Landscape

- 8.35 The applicant was made aware through pre-application discussion that its wind farm proposal (at that time advanced 11 turbines) faced some key challenges. This was with regard to the landscape of the area including some policy considerations (i.e. Areas of Wild Land (AWL) and designated landscape (i.e. Special Landscape Areas). Planning history was also highlighted, given earlier proposals for large scale wind farms in the general location (East Sutherland coastline) had not been successful on account of landscape matters. Such decision making was sustained within the determination of the West Garty project during 2018.
- 8.36 At the time of submission the West Garty wind farm application had not been determined, but has since been refused. Thereby cumulative impact concerns in association with that project can now be set aside.
- 8.37 The current position on consented and operational wind farms for cumulative impact assessment relates to the projects highlighted in Para 2.9. It is noteworthy that the current pattern of largescale wind farm development in the locality of the

East Coast of Sutherland is more set back from the coastline (e.g. Kibraur; Gordonbush). Development further north into Caithness is however more coastal (Burn of Whilk) as well as being set back from the coastline (Camster). That said a community scale project (2 turbines (46.5m to tip) has been granted planning permission on Navidale estate on land 1,530m NE of Caen Cottage, Thorpe, Helmsdale. There is little evidence in the supporting ES that highlights what influence the consented Navidale Estate proposal has had with the design of the proposed development.

Landscape Character Assessment

- 8.38 The applicant advises that its proposals *“is located within the Moorland Slopes and Hills LCA, within the Caithness and Sutherland Landscape Character Assessment and would affect a proportion of part of this area. The site is located on an area of moorland which contains man made elements such as telecommunications masts and electricity pylons, the assessment has found that this section of the landscape as a lesser landscape sensitivity than the rest of the Moorland Slopes and Hills LCA. The Stepped Moorland is a vast landscape that covers a large section of the Sutherland landscape, and would be suitable for a development of this scale, as it is able to accommodate these features without losing any of its existing features or altering its character.”*
- 8.39 There is agreement that the project is located within a large area of Moorland Slopes and Hills and that generally this is a landscape type that is very likely to be able to accommodate largescale wind farm development, with or without the presence of man made elements such as telecommunication masts. What is perhaps more critical to the consideration of this application is the fact that this site falls within an Area of Wild Land, albeit at its southern edge, but also because of the proximity to other landscape character areas and designations which make the consideration of landscape impact more complex. This includes in particular the east Sutherland coastline. These matters are considered below. That apart the Council can agree with the applicant that the development will not significantly impact on the many other LCA areas within the ES study area across Sutherland and Caithness.

National Scenic Areas

- 8.40 With regard to designated sites, for reason of distance and also topography, and as illustrated by the applicant's presentation of the Zone of Theoretical Visibility (ZTV), the proposal is unlikely to have significant adverse impact in respect of the National Scenic Areas (e.g. Dornoch Firth NSA). SNH has raised no concerns on this matter.

Special Landscape Areas (SLA's)

- 8.41 The development does not fall within a Special Landscape Area, but as highlighted within the supporting ES, two Special Landscape Areas lie relatively close to the site, one to the north (Knockfin Flows and Berriedale Coast) and one to the south (Loch Fleet, Loch Brora and Glen Loth). Here too the assessment of impact on these designated sites, for reasons of distance and topography, is seen to be

limited. That said, numerous representations have highlighted concerns in respect of the likely impact on the Glen Loth area of the associated SLA. Loth residents' and other individuals have sustained their views (objection) across several applications in this area, that such development (wind farms) remain unacceptable in term of impact on the Loch Fleet, Loch Brora and Glen Loth SLA and the East Sutherland coastal landscape.

- 8.42 Having assessed the likely impact of the development upon the Special Landscape Areas, particularly to the north (Knockfin Flows and Berriedale Coast) and south (Loch Fleet, Loch Brora and Glen Loth SLA) there are no significant concerns / impacts arising from the proposed development. The impact of the project from within these sites is quite limited and the special qualities of Glen Loth for example will remain. Here, the impact of the development arises primarily on the north east of Beinn Dhorain, including from the public road as it passes over into Kildonan. It is considered the impact of the development at this location (upper end of Glen Loth) is relatively marginal upon the SLA.
- 8.43 That said there remains the impact of the development across the coastline, which falls within the SLA. The Council's citations highlight "*The linear coastal shelf, is defined on its interior side by the edge formed by the adjacent hill slopes, the elevation which provide expansive views both along the coastal edge and outwards across the open sea. Interior views are limited by the convex nature of the hill slopes. To the east lies a narrow but relatively fertile coastal shelf contains the main road and rail routes in this area, and small farms and settlements at fairly regular intervals.*" Within the SLA the impact of the wind farm is less pronounced on account of the topography, but there are concerns regarding the general vista that road travellers on the A9(T) road travelling north and the impact of turbines to this landscape as viewed from locations such as Brora. It is noteworthy that SNH has not objected to this application on account of the East Sutherland coastline, a key concern it highlighted in association with the West Garty development. In a similar manner Brora Community Council has not objected to the current application.

Wild Land Areas

- 8.44 The site falls within the SPP Policy Area of Wild Land - Causeymire and Knockfin Flows. This is a large area that straddles land within Sutherland and Caithness. The application sits very much at the southern end of the WLA. As such it requires, from a SPP perspective, significant protection where wind farms may be appropriate only in some circumstances. Applicants need to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation.
- 8.45 The applicant has undertaken assessment of its proposals with regard to the "Causeymire and Knockfin Flows" Area of Wild Land. It advises that : -
- the WLA primarily consists of upland moorland, with the distinctive peaks of Morven, Scaraben and Maiden Pap rising within the central section.
 - the key qualities of the WLA are more common and evident further north and north-west.

- the Navidale site sits on the margins of the WLA, with the turbines located just inside the boundary, which is marked as a distinct geometric line, indistinguishable in the landscape.
- the setting and character of the WLA has already been affected by infrastructure on Creag Thoraraidh.

8.46 The applicant's conclusions are that there will be no significant effects on any of the five key attributes which provide the Causeymire and Knockfin Flows WLA its character and setting. However this conclusion conflicts with the views of others including Scottish Natural Heritage and many public representations.

8.47 SNH in particular has advised that *“Navidale wind farm lies within this WLA close to its south eastern boundary. The visibility and most of the significant effects of the proposed turbines would be concentrated in the south of the WLA due to screening by the mountains of Scaraben, Morven and Creag Scalabsdale. South of these peaks, the turbines would be widely visible from most hills and some glens. The proposed turbines would be a human artefact of significantly greater scale, contrast and visibility than the existing communications masts, tracks and isolated buildings in the south of the WLA. The turbines would introduce tall vertical features into views which will detract from the currently wide open simple landscape and largely unbroken skyline beyond. In addition, the turbines would be a prominent feature in this landscape limiting the expansiveness of views whilst disrupting the overarching simplicity of the landform and land cover.”*

8.48 SNH considers the wind farm would result in significant adverse impact on the following three of the five qualities of WLA, including: -

- 1) **Rolling, interlocking hills in the south containing remote, sheltered glens with limited visibility** - This quality of the wild land area is only found to the south of the Morven and Scaraben ridgeline. The topography of this area means that the turbines will be widely visible across this part of the wild land area. The scale and blade rotation of the turbines mean that they would be an order of magnitude more prominent than any of the existing human artefacts.
- 2) **An extensive remote interior with few visitors in contrast to the margins of the area from which many people view into the WLA.** - Views of the turbines from the prominent mountains and hills, including Morven and Scaraben, within the remote interior would diminish the perceived remoteness and sense of solitude in this part of the WLA.
- 3) **Awe inspiring simplicity of wide open peatland from which rise isolated, arresting, steep mountains.** - The turbines would have a significant adverse effect on the panoramic views from all of the mountain summits and south facing slopes within the WLA, as a cluster of prominent, large scale, vertical, rotating man-made structures.

8.49 Using Viewpoint 7 Morven and Additional Viewpoint 3 Wag help understand the objection raised by Scottish Natural Heritage. It is accepted that through the pre-application process the applicant has reduced in scale its initial project design. However, the siting and scale of the proposed development is not successful in

overcoming the concerns raised by SNH over its impact on the landscape in this location. Receptors walking and experiencing this wild land area, would have a lesser experience within the WLA should this development proceed.

Council's SG – Landscape and Visual Effects.

8.50 To assist its assessment of landscape impact, the Council through its adopted Supplementary Guidance, has sets out its methodology / key issues for assessing the acceptability of proposals in terms of their landscape and visual effects. Ten criterions have been identified and although an assessment of Strategic Capacity has not yet been undertaken by the Council for East Sutherland, the criterion remain useful in the assessment of applications.

8.51 With Appendix A to this assessment a summary is presented of the likely impact of the proposal in the context of the 10 Criterion when considering Landscape and Visual Effects. The conclusion drawn are that: -

- The threshold for acceptable impacts is **unlikely** to be met for criteria: -
 - 2 - Key Gateway locations and routes are respected;
 - 6 - The existing pattern of wind energy development is respected;
 - 8 - The perception of landscape scale and distance is respected;
 - 9 - Landscape setting of nearby wind energy developments is respected; or
 - 10 - Distinctiveness of Landscape character is respected.
- In combination with offshore development at Beatrice, West and East Moray, the development would be **unlikely** to meet the threshold for: -
 - Criteria 1 – “Relationship between Settlements/Key locations and wider landscape respected”.

8.52 The Council's Landscape Architect has advised that: -

- *“overall, the screen of hills on the east Sutherland coastline which face out over the outer Moray Firth are a significant landscape feature and while not captured within one landscape designation are an important factor for both local people and visitors in building an appreciation of scale and distance within the landscape and in creating a setting for the coastal settlements.”*

In addition –

- *“While there are aspects and vantage points from which this development would not be problematic, these are outweighed by those wider impacts on perception of landscape scale and character and the protection of the distinctive gateway qualities and settlement setting and respect for the existing pattern of development”.*

Visual Impact

- 8.53 The applicant has undertaken an assessment of the expected visual impact of the development using both plans that highlight the Zone of Theoretical Visibility (ZTV) across the surrounding topography and using 19 representative viewpoints and additional wirelines highlighting impact on key receptors be they within local communities, upon local roads or generally within the surrounding landscape (hill tops). The conclusion drawn by the applicant highlights that *“views from the closest residential areas such as Navidale and Helmsdale are minimal and when seen will only be blade tips of a couple of the turbines, having not more impact than the telecommunications mast which is currently seen on the horizon.”*
- 8.54 It further highlights that *“it is rare that the entire development is seen at once, with screening from topography common and even when seen the development forms a simple layout with even spacing which is in scale with the surrounding landscape. The layby at the Ord of Caithness and the short stretch of the A9 which passes the layby, would be the only place where the development would form the dominate feature in views, with all other locations that are predicted to have visibility, only being affected minimally. Out of the 19 viewpoints/wirelines, only three significant effects were found. While these effects are significant, in its view they are not deemed unacceptable, particularly as there were no magnitudes of change that were considered to be 'high'.”*
- 8.55 Of the 19 Viewpoints submitted, 6 were from locations required to assist with the assessment of wild land / from a range of hill tops. 13 Viewpoints were used to help address the visual impact upon nearby communities and roadways, together with one distant location on the Moray Coast. It is clear from the ZTV that the visual impact of the proposed turbines is relatively contained, given the surrounding hills. That said from some of the hill tops and coastal locations, the development generates significant visual impact for many receptors.
- 8.56 From a consideration of the viewpoints it is clear that from the nearest communities visual impact of the development will not be a significant concern. This is demonstrated by: -
- Viewpoint 1 Navidale at a distance of 2.5km;
 - Viewpoint 3 West Helmsdale at a distance of 4.1km; and
 - Viewpoint 5 Gartymore at a distance of 5.4km.
- 8.57 However, at Brora as seen from Viewpoint 8 and the Additional Viewpoint 1 Brora A9(T) road, at distances approximately 20km, the visual impact on the village / residents / road users is assessed as moderate (two turbines below hub weight and three turbines blades only). This is in EIA terms significant and requires particular assessment / consideration. What is noteworthy here is that whilst the turbines are distant from the village, the impact will be significant to many who travel, live and / or work in this area.
- 8.58 As highlighted within the consideration of the West Garty wind farm, the impact of turbines on the sky line of the East Sutherland coastal hills is considered to be pronounced. (For example: - the 30m Statue of Duke of Sutherland demonstrates

extent of impact of such development). The pattern of development in this locality is for turbines to be located back from the coastline, relatively unseen from local communities, route-ways and coastal views. It is acknowledged that the visual impact of the Navidale wind farm will be less than the impact of the West Garty proposal. However in local terms the visual impact of the Navidale proposal upon receptors in and around Brora / east Sutherland coastline is unwelcome.

8.59 In a similar manner the view points in the north present locations that raise visual impact concerns to those traveling south, including at: -

- Viewpoint 9 - Latheron 21 km distance (2 turbines hubs and 3 turbine blades only);
- Viewpoint 4 - South of Berriedale 5.2km distance (5 turbine hubs); and
- Viewpoint 3 - Ord of Caithness 1.1km distance (4 turbines below hub).

8.60 Collectively from these locations the impact of the development is significant upon the many receptors in this area, principally the road traveller on the A9(T) road. The visual impact of the development comes and goes, but nevertheless presents an unwelcome impact to those travelling south.

8.61 The applicant's assessment recognised the significant visual impact of the development at the Ord of Caithness, but does not fully appreciate the significance of the location, because of the number of travellers who pass this way. This includes in many tourists including those on the North Coast 500 route, John O'Groats / Lands-end route and generally those travelling from Caithness / Orkney south. It is suggested the applicant underplays the weight that needs to be given to this factor with its assessment of the proposal.

8.62 The other key visual impact concern as reflected within the ES highlight significant impact from Viewpoint 7 Morven at a distance at 9.8km and potentially at other hilltops to the north and west of the development including Scaraben at a distance of 7.7km. The views obtained by climbers from these mountain tops are spectacular in all directions.

8.63 The Scottish Mountaineering Council for Scotland has highlighted its concerns to receptors on these popular peaks. It advises "the proposed 125m pale turbines would be a prominent feature and an unwelcome focal point viewed from the hills around. With blade-tips reaching up to 450-500m AOD, they would stand around 50-100m taller than the summit of Creag Thoraraidh. "There is no simple relationship between the size of a wind development and its impact. Context is extremely important and a small number of large turbines in a prominent location, visually disconnected from a settled landscape ...can have an adverse impact out of all proportion to the number of turbines involved."

Economic Benefits and Recreation

- 8.64 The development is anticipated to take 12 months to construct before the turbine become operational (25 years). The overall value of the project is estimated to be almost £8m, with approximately £1.1m to benefit the immediate local economy. The latter would arise from local contracts to deliver concrete, stone, electrical works, plant hire, transportation, accommodation and subsistence.
- 8.65 During the operational stage to benefits are significantly smaller, given the more limited need for a local work workforce. Business rate contributions to the Scottish Government are estimated at over £4m during the lifespan of the wind farm. Although not a material planning consideration a community benefit package for the local community is being proposed in line with the Council's Corporate Policy. The operational wind farm is expected to launch further economic initiatives within the estate and a commitment to procure goods and services locally wherever possible in order to maximise local benefit.
- 8.66 The ES has assessed the likely impacts on surrounding businesses, tourist and recreational interests. The most significant impacts on such interests are the visual impacts, particularly on the A9(T) road travellers, walkers, cyclists and other recreational users in the area. The ES advises that the socio-economic effects are either negligible or minor, with the exception of moderate impact on travellers on the A9(T) road on short sections north of Helmsdale. The overall conclusion as presented in the ES is that the proposed wind farm would have only a limited impact at the local level upon tourism.
- 8.67 Representations however have highlighted their own particular concerns, particular in respect of the valued fishing and golf experiences / business nearby / travellers on the A9(T) / North Coast 500 / etc.. The Mountaineering Council for Scotland for example has advised that the proposal is detrimental to a nationally significant mountaineering resource, in particular being within 10km of Morven, the highest hill on the east coast between the Dornoch and Pentland Firths, in an area currently characterised by the lack of turbines between the Gordonbush - Kilbraur and Caithness wind farms. In part this impact also includes the issues raised within the assessment of landscape and visual impacts, cumulative impacts and impact on area of wild land / wildness.
- 8.68 Conclusions drawn by the Reporter in respect of the West Garty Wind Farm development noted that there is no evidence that wind farms have a significant impact on tourism and recreational interests. However she did note that the location of the West Garty project was in an area popular with tourists and thereby not consistent with the expectations of the Scottish Parliament and Economic Energy and Tourism Committee.
- 8.69 Whilst the impact of this project is smaller in scale, and less prominent in several viewpoints (e.g. within Helmsdale) to that as assessed under the West Garty project, there are areas where the impact of the proposal remains a consideration (e.g. Ord of Caithness, Brora, Morven). Care has to be taken that assessment of this matter does not simply duplicate the assessment of Landscape and Visual Impact. In this regard, it is accepted that visitor accommodation in the area is

predominantly provided by BandB's and self-catering units which tend to be located within the small settlements and communities located along the A9. Impact on these communities has already been taken into account within the earlier landscape and visual assessment of the project.

Cultural Heritage

- 8.70 A walkover survey identified six archaeological sites, four disused areas of peat cutting, the remains of a possible structure on the east bank of the Ord Burn and a square pit by the Ord Burn (Figure 3). The proposed locations of the five turbine sites do not impact upon any significant areas of archaeological interest and therefore no mitigation is proposed required. There is no recommendation to preserve or further record the areas of peat cutting. The Council's Historic Environment Team is content with the assessment and conclusions.
- 8.71 Within the wider area there are a number of features of historic interest. However the likely impact of the development on these features is limited on account of distance / separation and given that these lie within much lower lying areas / former communities away from the proposed development site. Historic Scotland has raised no concerns.

Aviation

- 8.72 The project has been assessed against local and national aviation interests. For some considerable time the application had objections from both HIAL and the MOD on account of concerns in respect of the current Air Traffic Control (ATC) radar. In December 2018 information was received that could overcome these concerns subject to investment in appropriate mitigation works.
- 8.73 HIAL advised that the turbines lie directly underneath the centreline of some of the Instrument Approach Procedures for Wick Airport. Highlands and Islands Airports Limited (HIAL) would object to this proposal, until it is assessed against the Instrument Approach Procedures (both Conventional and Global Navigation Satellite System procedures). The CAA expects HIAL to provide evidence that the safety of the Air Traffic Provision will not be compromised or degraded by the development, and a safety case/full assessment would need to be submitted to them. This would require more detailed work to be undertaken. This will incur a cost, and HIAL would look to pass any charges incurred onto the developer. HIAL would also require an omnidirectional steady red aviation warning light (not infra-red) to be fitted at the hub height of at least one of the turbines.
- 8.74 The Ministry of Defence (MOD) had also objected to the application advising that the turbines will be detectable and will cause unacceptable interference to the ATC radar used by RAF Lossiemouth. Wind turbines have been shown to have detrimental effects on the performance of Primary Surveillance Radars. If the developer is able to overcome the radar concerns the MOD would further request that all turbines be fitted with MOD accredited 25 candela omni-directional red lighting or infrared lighting with an optimised flash pattern of 60 flashes per minute of 200m/s to 500m/s duration at the highest practicable point. The Council's preference is for infra red lighting only.

- 8.75 Aviation interests have also highlighted the need to be kept informed and notified of the progression of planning applications and submissions relating to wind farm proposals to verify that they will not adversely affect key interests. If planning permission is granted it would like as a requirement of a specific planning condition to be advised prior to commencement of the following to assist with project mapping on aviation charts; -
- the date construction starts and ends;
 - the maximum height of construction equipment;
 - the latitude and longitude of every turbine (including any subsequent micro-siting changes made during construction).

Telecommunications / TV Reception

- 8.76 Wind turbines have the potential to affect television reception, fixed telecommunication links used by utility companies. Consultation with relevant telecommunication and utilities is a routine part of wind turbine development. With four communication masts in close proximity the impact on telecommunications was given particular attention in the initial stages of the project development. Mitigation by design has impacted the proposed project, with turbines needing at least 100m set back from microwave links deployed by telecom operators. No objections have been raised by existing operators to the current application, which has been reduced since the pre-application enquiries.
- 8.77 Digital televisions are now much better at coping with signal reflections arising from operational turbines. Therefore any potential impacts are considered to be significantly reduced from the earlier days of analogue TV. The applicant has highlighted that if the development is found to cause interference to TV signals there are a number of options available to mitigate the effects, such as re-aligning the aerial or installing a satellite dish. As potential television reception problems are difficult to predict and identify, assurance that the developer will rectify any problems is normally requested by planning condition which has been standard practice with approved wind applications for many years.

Noise and Shadow Flicker

- 8.78 The proposed turbines are relatively distant from local housing (2km) and local roads and located high in the local topography when compared with the scatter of housing generally south east and north west of the wind farm. As a consequence there is no expectation that the proposed development would give any particular cause for concern in respect of shadow flicker, operating noise and construction noise. Should the application be supported the applicant and consultees highlight the use of standard planning conditions being applied to ensure construction work including deliveries are managed to standard day time periods to minimise nuisance to housing close to the site access route. Furthermore the operation of the turbines be required to be limited to below 35dBA noise levels both individual and cumulatively in relation to the nearest existing noise sensitive properties.

Construction Impacts

- 8.79 The development of a wind farm is well understood by statutory consultees, communities and especially by many construction companies who work in Highland. This has already been recognised through the pre-application discussion with this applicant and from the information presented within the supporting Environmental Statement. The latter in particular presents draft elements of a Construction and Environmental Management Plan and a Schedule of Mitigation. Through these provisions the applicant has given a commitment to deploying best practice methods during the construction phase of this project to minimise the risk of adverse environmental impacts. This includes development for final approval statements in respect of: -
- Construction and Environmental Management Plan (CEMP) including a commitment to employing an Environmental Clerk of Works.
 - Peat Management Plan
 - Pollution Prevention Plan
 - Decommissioning Environmental Management Plan.
- 8.80 The approach set out by the applicant has generally been welcomed by statutory consultees, some of which however have requested assurance that its provisions are properly secured, potentially enhanced, within planning conditions to any project approval. For example SEPA has highlighted the need for a more detailed CEMP at project finalisation (pre-commencement) stage. In this manner the development approach being deployed by the engaged contractor can be tested against the environmental constraints associated with this site. It is important to recognise that at this pre commencement stage CEMP submissions are expected to be map based highlighting environmental buffers; finalised construction areas with micro-siting allowances; measures put in place to adequately mitigate potential areas of environmental conflict, etc.
- 8.81 In as much as the applicant has offered the employment of an Ecological Clerk of Works (ECoW), planning authority would also seek engagement of a Planning Monitoring Officer (PMO) by condition. The role of the PMO, amongst other things, would include the monitoring of, and enforcement of compliance with, all conditions, agreements and obligations related to this permission (or any superseding or related permissions) and shall include the provision of a quarterly compliance report to the Planning Authority. The roles of the ECoW and PMO can often be combined and can also be particularly informative to the developer and the associated project community liaison group highlighted earlier in respect of the Construction Traffic Management Plan.

Decommissioning and Restoration

- 8.82 The applicant has advised that at the end of their operational life the turbines would be removed from the site, and the foundations and hard-standings would be covered over with topsoil and re-seeded. The access tracks are likely to remain in-situ to aid farming and forestry operations, although slightly reduced in width. The electrical cables would be de-energised and left in place, with any cable marker signs removed. The electrical sub-station building would be removed and the

building demolished to ground level with the foundations covered with topsoil and re-seeded. The decommissioning process would take between two and four months to complete.

- 8.83 The requirements to decommission and restore a wind farm site at its end of life (25 years) is relatively standard and straight forward, with any request for re-powering to be considered with the submission of a relevant future application. Given that the main access track will replace an existing estate track there is justification for the retention of the replacement section. However the Planning Authority will require the removal of other sections of new tracks which serve individual turbines, where there is no need to retain estate access. SEPA also require that best practices at the time of decommissioning may require buried cables to be removed. The key concern is to ensure that any approval of this project secures by condition a requirement to deliver a draft decommissioning and restoration plan for approval prior to the commencement of any development and ensure an appropriate financial bond is put in place to secure these works.

Other material considerations

- 8.84 There are no other relevant material factors highlighted within representations for consideration of this application by the committee.

Other Considerations

- 8.85 In line with The Highland Council policy and practice, community benefit considerations are undertaken as a separate exercise in parallel to the planning process.

Matters to be secured by Section 75 Agreement

- 8.86 The development if approved would require a legal agreement to secure: -
- A “wear and tear agreement” for the use of the local road network, particularly given the volume of construction traffic and expected delivery of abnormal loads.
 - A site decommissioning and final ground restoration bond to ensure resources are available to restore the site following project completion or failure.
- 8.87 The applicant will be given four months from the date that the Council's solicitor writes to the Applicant / Applicant's solicitor indicating the terms of the legal agreement, to deliver to the Council a signed legal agreement. Should an agreement not be delivered within four months, the application shall be refused under delegated powers.

9. CONCLUSION

- 9.1 The Scottish Government gives considerable commitment to renewable energy and encourages planning authorities to support the development of wind farms where they can operate successfully and where concerns can be satisfactorily addressed. The £8m project has the potential to provide a further 15MW

generation of renewable energy towards Scottish Government targets. This investment opportunity and energy contribution needs to be given weight in the decision making process, but also balanced against the progress already made by the renewable energy sector in fulfilling these needs (Target of 17gigawatts by 2030). As with all applications the benefits of the proposal must be weighed against potential drawbacks and then considered in the round, particular against the policies of the Development Plan.

- 9.2 A number letters of support (53) have been made for the proposal which would add to the expansion of renewable energy endeavour in this location, including off shore. Most consultees were content with the proposed development subject to particular planning conditions being put in place. For example with controls in relation to construction traffic provisions, the protection of water courses and for the impact on local ecology, with key interests being effectively managed through appropriate construction practices. In particular aviation interests are seeking investment contributions to overcome potential radar concerns.
- 9.3 However the application has drawn 151 objections. Many highlight concerns which have been raised within the objection from Scottish Natural Heritage, specifically founded on the policy of protection for Areas of Wild Land, but also on account of high quality peatlands. Objections have also raised a range of other matters pertaining to additional landscape and visual impacts concerns and potential impacts on recreational, tourist and business interests.
- 9.4 The Council has to strike a balance between the delivery of proposals which make a contribution towards meeting the renewable energy generation targets and the protection of natural resources which contribute to the overall character of the Highland area. The decision on any application usually hinges on a few key matters that are pivotal to the assessment outcome. The objections raised by Scottish Natural Heritage highlight matters (areas of wild land and priority peatlands) which as a matter of policy are both of national importance and are difficult to set aside. The question is whether or not the applicant has sufficiently demonstrated that any effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation.
- 9.5 With regard to peat, it is clear that the development, particularly within the turbine array is located within an area of blanket bog, with turbines sited in areas of peat depths of between 1- 2m. SEPA has rationalised its consideration of the proposal and raised no objection. If this was the only concern, then the case for supporting the project in the face of priority peatland conservation might be set aside, given the actual footprint of the proposal. However, the additional objection raised by SNH related to SPP policy on Areas of Wild Land, cannot easily be overcome by siting, design or other mitigation given the size of the turbines as would be experienced in the landscape south of Morven (VP 7). The objection, from SNH, raises significant matters of national interest, based on conflict with three of the five qualities of Causeymire and Knockfin Flows WLA.
- 9.6 The Council has also undertaken its assessment of the application taking into account a range of landscape and visual impact concerns. This has recognised the acceptance of a smaller scale community wind farm project nearby but also the

history of planning refusals for largescale wind farms across the east Sutherland coastline, most recently the West Garty project. It is accepted that this application will not have the same impact as the larger West Garty project, but there are elements whereby the project remains less than acceptable in landscape and visual terms.

- 9.7 The current pattern of onshore development in East Sutherland is set back from the coastline (i.e. Kilbraur, Gordonbush). The East Sutherland coastline is a significant landscape feature which is experienced by both local people and visitors. This landscape is experienced from a number of valued viewpoints (i.e. The Ord) or more generally when passing through the area both south to north (for example Brora) or north to south (south of Berriedale and Latheron). In these locations the development on the qualities of the landscape are to be considered adverse, but not to a degree that impacts on the designated landscapes in this location (National Scenic Areas or Special Landscape Areas). The visual impact of the development that would be seen by many receptors in or travelling through the area / landscape is considered unwelcome, and to a significant degree on account of the scale and anticipated movement of the turbines.
- 9.8 The application requires determination against policies set out in the Development Plan, principally Policy 67 of the Highland-wide Local Development Plan with its eleven tests which are expanded upon with the Onshore Wind Energy Supplementary Guidance. This policy also reflects policy tests of other policies in the plan, for example policies 28 Sustainable Design; Policy 55 Peat and Soils, Policy 60 Important Habitats, Policy 61 Landscape; etc. In this regard the application is seen to be significantly detrimental to two matters of national importance including the Scottish Government Policy on the protection of Areas of Wild Land and Priority Peatlands. It is also in conflict with Policy 67 in respect of visual impact and impact on the landscape. More specifically, it is with regard to the project wider impacts on perception of landscape scale and character and the protection of the distinctive gateway qualities and settlement setting and respect for the existing pattern of development. In is not anticipated that any further measures can be forwarded by the applicant to mitigate these concerns.
- 9.10 All relevant matters have been taken into account when appraising this application. It is considered that the proposal does not accord with the principles and policies contained within the Development Plan and is unacceptable in terms of applicable material considerations.

10. IMPLICATIONS

- 10.1 Resource: Not applicable
- 10.2 Legal: Not applicable
- 10.3 Community (Equality, Poverty and Rural): Not applicable
- 10.4 Climate Change/Carbon Clever: Not applicable
- 10.5 Risk: Not applicable

10.6 Gaelic: Not applicable

11. RECOMMENDATION

Action required before decision issued	N
Notification to Scottish Ministers	N
Notification to Historic Scotland	N
Conclusion of Section 75 Agreement	Only if approved.
Revocation of previous permission	N

Subject to the above, it is recommended that planning permission be **REFUSED** for the following reasons:

1. The application is in conflict with the Council's Development Plan Policy 67 Renewable Energy and its supporting Adopted Supplementary Guidance – Onshore Wind Energy particularly on account of the anticipated landscape and visual impact of the development at a distinctive gateway (Ord of Caithness (VP 3 and VP 4); settlement setting (Brora VP 8 and additional VP No 1.) and respect for the existing pattern of development on the East Sutherland coastline / A9 transport corridor.
2. The application is in conflict with Scottish Planning Policy 2014 (Para 200) and in particular the Causeymire and Knockfin Wild Land Area (as demonstrated within Viewpoint 7 Morven and the additional Viewpoint 3 Wag) as highlighted within the consultation response from Scottish Natural Heritage.
3. The application is in conflict with Scottish Planning Policy 2014 (Para 169 and 241) and in particular valued peatlands; and blanket bog in particular as highlighted within the consultation response from Scottish Natural Heritage.

Designation: Acting Head of Development Management – Highland

Author: Ken McCorquodale Principal Planner (01463 785037)

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

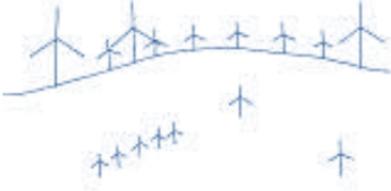
Relevant Plans: VOL VII: PLANNING DRAWINGS and Supporting ES.

Appendix A - Landscape Capacity Criterion / Assessment	
1	Relationship between Settlements / Key locations and wider landscape respected.
	<p>Assessment: In respect of West Helmsdale and Navidale the development does not achieve the criteria threshold where turbines are not visually prominent in the majority of views within or from settlements/Key Locations or from the majority of its access routes.</p> <p>Detail:</p> <p>In the assessment of impacts at West Helmsdale and Navidale, the LVIA understates the change on the settlements' relationship to their landscape setting caused by the development.</p> <p>The majority of visibility of the development from the settlements will be in the form of blade tips intermittently breaking the skyline, with hubs and towers obscured. In these locations the landform, including skyline is a defining element of the settlement location and local landscape. The settlements are seen and experienced in relation to the skyline as the most significant built element within the natural landform.</p> <p>SNH's 'Siting and Designing Wind Farms in the Landscape' advocates caution where turbines break the skyline and calls particular attention to the impact of the intermittency of blade tips.</p> <p style="padding-left: 40px;">'3.28 Care should be taken to ensure that the wind farm does not overwhelm the skyline. Distinctive and prominent skylines should not be interrupted by turbines. If the skyline is 'simple' in nature, for example over moorland and hills, it is important that wind turbines possess a simple visual relationship to this feature, avoiding variable height and spacing, the overlapping of turbines, or blade tips intermittently 'breaking' the skyline'</p> <p>The development will be visible from many of the properties in Navidale and West Helmsdale and from the access roads to all of them. The offshore turbines of Moray East and West, plus Beatrice will be within the main direction of view from many of the properties and also from the minor roads which access the settlements.</p> <p>Helmsdale itself will be seen in association with the turbines on approaches from the south, where the turbines will be perceived to be more clearly separated from the settlement.</p>
2	Key Gateway locations and routes are respected
	<p>Assessment: Ord of Caithness is a key gateway location, located on the primary access route on the east Highland coast. In dominating this location the development does not reach the threshold where turbines or other infrastructure do not overwhelm or otherwise detract from landscape characteristics which contribute the distinctive transitional experience found at key gateway locations and routes.</p> <p>Detail:</p> <p>The view from the Ord of Caithness layby is representative of the view on the A9 from the sudden 'reveal' which occurs at a right hand bend just north of the lay-by location. This represents the first significant southward view of the Sutherland coast.</p> <p>Although the turbines are stated to have been specifically chosen to 'fit' with the scale of the surrounding landscape and not provide an overbearing presence on receptors at sites including the Ord, in the montage for VP 3 the turbines appear to loom over the receptor and dwarf the scale of the existing pylons.</p> <p>The applicants' assessment for this viewpoint talks of the turbines and pylons being equally prominent. This is unrealistic as pylons are static, recessive in colour and visually permeable. As a</p>

	<p>vertical, static and visually permeable feature which the blades pass behind, more attention to the movement of the blades.,</p> <p>The viewpoint image has been taken from a point approximately 40m south of the A9/layby junction and significantly downslope from the road. Given that the A9 is not itself visible in the image, it is not clear how much this perspective differs from that available to road viewers. Assessment of the impact on road users should consider the effect of the road's abrupt changes of direction and gradient on the alternating of off-shore coastal views on inland turbine views.</p> <p>In this location the development is likely to create a significant visual presence which detracts from or overwhelms landscape characteristics which contribute to the transitional experience of the gateway location.</p>
3	Valued natural and cultural landmarks are respected
	<p>Assessment: The development achieves a threshold where development does not, by its presence, diminish the prominence of the landmark or disrupt its relationship to its setting.</p> <p>Detail:</p> <p>The landmark of the Duke of Sutherland monument sits on the summit of Beinn Bhraggie and is seen in association with the development in longer views from the south. However the intervening distance and the fact that turbines would not appear higher than existing skyline features such as Creag Scalabsdale, Beinn Mealaich and Beinn Dhorain which lie between the monument and the windfarm limit any adverse impacts and meet the threshold.</p> <p>Scaraben and Morven are significant landmarks of Regional importance, however the turbines would not appear to impinge on significant views towards the hills and therefore meets this threshold.</p>
4	The amenity of key recreational routes and ways is respected.
	<p>Assessment: The development achieves a threshold where wind Turbines or other infrastructure do not overwhelm or otherwise significantly detract from the visual appeal of key routes and ways.</p> <p>Detail:</p> <p>On the A879 Kinbrace to Helmsdale road the visibility is of a more immediate intermittence with views being gained and lost in quick succession from approximately 10km out of Helmsdale. For a significant part of that distance the development is visible as a skyline element in a relatively complex visual environment. The turbines will also be seen in association with the smaller turbines at Navidale Estate and this combination may tend to cause a degree of confusion or distortion of perception of scale, or to increase the perceived scale of the proposed development. This is discussed further under criterion 9.</p> <p>In relation to the <i>overall</i> amenity of the route, while the development will create an adverse effect as seen from approximately 2km of the route, it will not breach the threshold of development overwhelming or significantly detracting from the visual appeal of the route as a whole. (The A9 and A99 are considered under Criterion 5 although they also serve as key recreational routes.)</p>
5	The amenity of transport routes is respected
	<p>Assessment: While the development will have visibility from routes and be locally prominent in some areas, for the routes as a whole within the study area, the development achieves the threshold of Wind Turbines or other infrastructure not overwhelming or otherwise significantly detracting from the visual appeal of transport routes.</p>

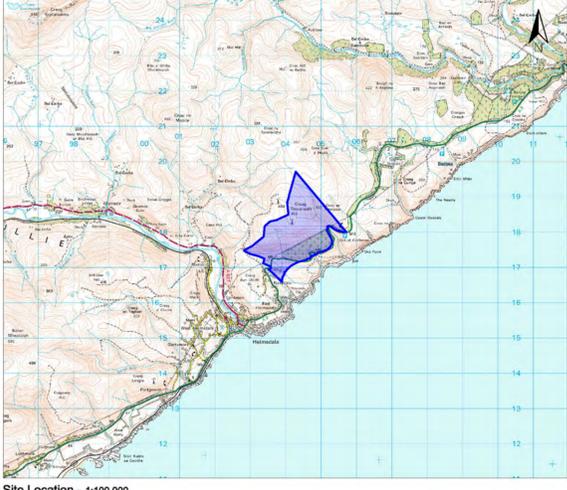
	<p>Detail:</p> <p>A99 and A9: The development would theoretically be in view for approximately half of the southbound journey between Lybster and Navidale, with that visibility punctuated emphatically at the southern extent by the hairpin turn at the Ord of Caithness. Within that stretch the visibility is focused at either end with a long section in between left unaffected.</p> <p>Traveling North on the A9 the visibility is limited within the study to: a 5km stretch of the A9 south of Loch Fleet where much of the visibility is currently tempered by woodland; 6km centred on Brora, between Inverbrora and Clynemilton and intermittent visibility from Port Gower to the hairpin bend at the Ord of Caithness.</p> <p>Overall the effect on these routes is more than negligible but could not be described as becoming a dominating feature, more one that is intermittently prominent. The intermittency is such that it allows for relatively prolonged stretches of no visibility, making that 'respite' more meaningful.</p> <p>Notwithstanding local effects on visual receptors and on the gateway qualities at Ord of Caithness, overall the threshold is met.</p>
6	<p>The existing pattern of Wind Energy Development is respected.</p>
	<p>Assessment: The development does not achieve a threshold where the proposal contributes positively to existing pattern or objectives for development in the area.</p> <p>Detail:</p> <p>The existing pattern of wind energy development locally, in terms of typical relationship to the landscape is for</p> <ul style="list-style-type: none"> • large turbines to be sited: <ul style="list-style-type: none"> ○ in sizeable groups sites in extensive open landscapes ○ north west of the line of summits that form the coastal hills ○ 8-10 kilometres from the coast ○ Around the landscape transition between Moorland Slopes and Hills and Sweeping Moorland. • Medium size turbines (as approved at Navidale Estate) are sited <ul style="list-style-type: none"> ○ On north west slopes of Creag Thoraidh, 80-100m below the summit ○ approximately 2.5km inland • Small and Micro turbines are sites: <ul style="list-style-type: none"> ○ Within the more populated and lower lying landscape character areas, typically adjacent to the coast ie Small Farms and Crofts and Coastal Shelf. <p>Applications which do not accord with this pattern have consistently been refused by the Planning Authority, in the interests of protecting landscape and visual amenity.</p> <p>The proposed development would site five Large turbines on coastal hills. The turbines would wrap around the upper glen of the Ord Burn with turbines close to the summits of Creag Thordhair and Cnoc an Tubhadair and within 5km of the coast.</p> <p>This development would be significantly out of character with the prevailing pattern of developments' relationship to the landscape and therefore fails to meet the threshold of contributing positively to the existing pattern or objectives for development in the area.</p>

7	<p>The need for separation between developments and/ or clusters is respected</p> <p>Assessment: The development achieves the threshold where proposal maintains appropriate and effective separation between developments and/ or clusters.</p> <p>Detail:</p> <p>The proposed development would sit at a distance of approximately 17km from the closest turbines in the Kilbraur/Gordonbush cluster and maintains appropriate and effective separation from those developments, with limited overlapping visibility or intervisibility.</p> <p>The proximity to the consented turbines on the Navidale estate is less than a kilometre and in some views from the A879 Kinbrace to Helmsdale road the two developments will be seen in close association with the current proposal siting on the skyline above the Navidale estate turbine pair. The close association, while not creating a very legible composition, does contain the development to one portion of the view and on sites in close proximity, making the developments seem linked, despite their differences.</p>
8	<p>The perception of landscape scale and distance is respected</p> <p>Assessment: The development does not fully meet the threshold where the proposal maintains the apparent landscape scale and/or distance in the receptors' perception, though this effect is limited to receptors within visibility of the development on the coast west of Helmsdale, and to restricted section of the A879 Kinbrace to Helmsdale road.</p> <p>Detail:</p> <p>SNH Siting and Designing Windfarms in the landscape states that:</p> <p>'wind farm should be:</p> <ul style="list-style-type: none"> – of minor vertical scale in relation to the other key features of the landscape' <p>This does not suggest a literal physical comparison between turbine heights measured against landform height, rather, where the <i>perceived</i> vertical scale of landform is an important attribute of the landscape, the perception of vertical scale should not suffer a reduction by the introduction of turbines.</p> <p>The site lies between SLA06 The Flow Country and Berriedale Coast and SLA09 Loch Fleet, Loch Brora and Glen Loth Special landscape Areas. While not designated, Creag Thordhair and Cnoc an Tubhadair form an extension of the coastal hills that are a key feature of SLA09 and characteristic of Sutherland's Moray Firth coast beyond the bounds of the SLA.</p> <p>This chain of coastal hills is important to the character of views and perception of landscape scale in views along the coast. This is most strongly experienced from locations where the screen of hills is seen over water, with oblique views and lack of intervening detail lending a degree of forced perspective enhancing the impression of a long and continuous line of massive hills leading the eye into the distance.</p> <p>In those views where the development would be visible, the simplicity of this landscape composition is interrupted with a skyline feature which is at odds with the linearity of the rest of the scene and which will tend to reduce the perceived height of the hills and distance from the viewer.</p> <p>Where the turbines will be seen from the A879 Kinbrace to Helmsdale road, the contrast with the scale of the consented Navidale Estate turbines, as 46.3m to blade tip, will be readily apparent and tend to cause a distorted perception of scale. These issues are discussed further under Criterion 9.</p>

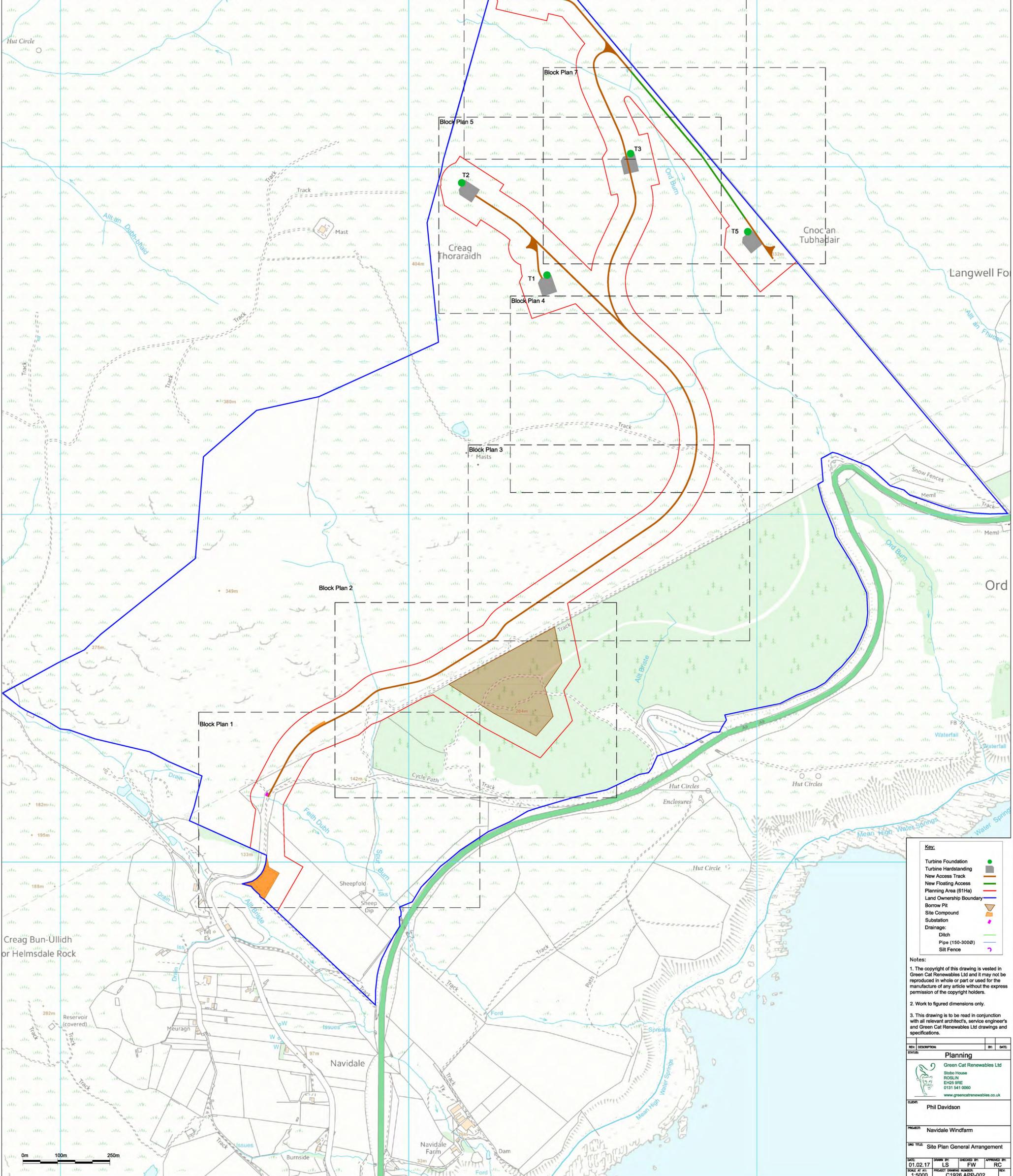
9	<p>Landscape setting of nearby wind energy developments is respected</p> <p>Assessment: The development does not achieve the threshold where the proposal relates well to the existing development's landscape setting and does not increase the perceived visual prominence of surrounding wind turbines. However, this effect is primarily restricted to portions of the A879 Kinbrace to Helmsdale road</p> <p>Detail:</p> <p>The turbines will appear in the same general portion of the view as the Navidale Estate turbines, when seen from sections of the A897 in the Strath of Kildonan and from West Helmsdale.</p> <p>From the Kildonan approach the Navidale Estate turbines will be visible backdropped by the slopes of Creag Thoraidh and seen below the blades of the proposed Navidale Wind Farm. In this composition the contrast in scale between the turbines will be readily apparent and tend to cause a distorted perception of scale, as identified in <i>Siting and Designing Windfarms in the Landscape 2017</i> para 3.33</p>  <p><i>'Careful consideration is [...] needed in the siting and design of wind farms, and between wind farms, to avoid confusing our sense of perspective. This is particularly the case where different turbine sizes are used and/or where there are gaps between groups of wind turbines at varying distances to viewers.'</i></p> <p>This effect is likely to be underlined by the presence of the existing masts on the hilltop which are presently the tallest manmade structures on the skyline.</p> <p>Perception of scale and distance seems distorted due to variable sizes of wind turbines combined with an absence of reference points and size indicators</p>
10	<p>Distinctiveness of Landscape character is respected</p> <p>Assessment: The development does not achieve a threshold where the integrity and variety of Landscape Character Areas are fully maintained.</p> <p>Detail:</p> <p>The proposed development site is not designated, but sits between SLA06 The Flow Country and Berriedale Coast and SLA09 Loch Fleet, Loch Brora and Glen Loth Special landscape Areas. As discussed under criterion 8, this ground forms part of the chain of coastal hills that is important to the character of views and perception of landscape scale in views along the coast.</p> <p>The coastal landscape compositions of SLA06 and SLA09 are subtly different, with the Flow Country and Berriedale Coast SLA being characterised by Moorland Slopes and Hills linked to the shore by the High Cliffs and Sheltered Bays LCT, and Loch Fleet, Loch Brora and Glen Loth SLA being characterised by Moorland Slopes and Hills linked to the shore by Coastal Strip LCT. The intervening area which would be occupied by the proposed development is characterised by Moorland Slopes and Hills LCT covering Creag Thordhair and Cnoc an Tubhadair, linked to the shore by an alternating sequence of areas of Coastal Strip and High Cliffs and Sheltered Bays LCTs.</p> <p>While location of wind energy development can seem appropriate within the wider swathes of the Moorland Hill and Slopes Landscape Character Type, that tends to be the case where they appear inferior to the surrounding landscape scale. In these coastal locations where the Moorland Hills roll down quite abruptly to a coastal edge, that vastness of extent is not apparent and the development can come to dominate the limited area of the moorland hill that is visible from the coastal side, particularly where visible track construction serves to further break of the moorland</p>

slope.

Taken together, the transition of landscape character, important to the inter-relation of the two SLAs and the location at the coastal edge of the Moorland Slopes and Hills adds to the landscape character's sensitivity of the to this development, such that it is not well equipped to sustain this intervention.



Site Location - 1:100,000



Key:

- Turbine Foundation
- Turbine Herdstanding
- New Access Track
- New Floating Access
- Planning Area (81Ha)
- Land Ownership Boundary
- Borrow Pit
- Site Compound
- Substation
- Drainage:
 - Ditch
 - Pipe (150-300Ø)
 - Silt Fence

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REV	DESCRIPTION	BY	DATE
01	Planning		
PROJECT: Navidale Windfarm SHEET TITLE: Site Plan General Arrangement DATE: 01.02.17 SCALE: 1:5000 DRAWN BY: LS CHECKED BY: FW DESIGNED BY: RC APPROVED BY: RC			

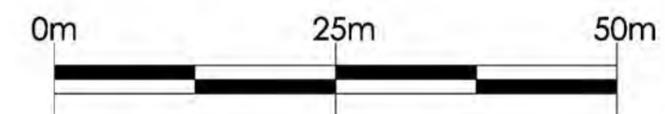
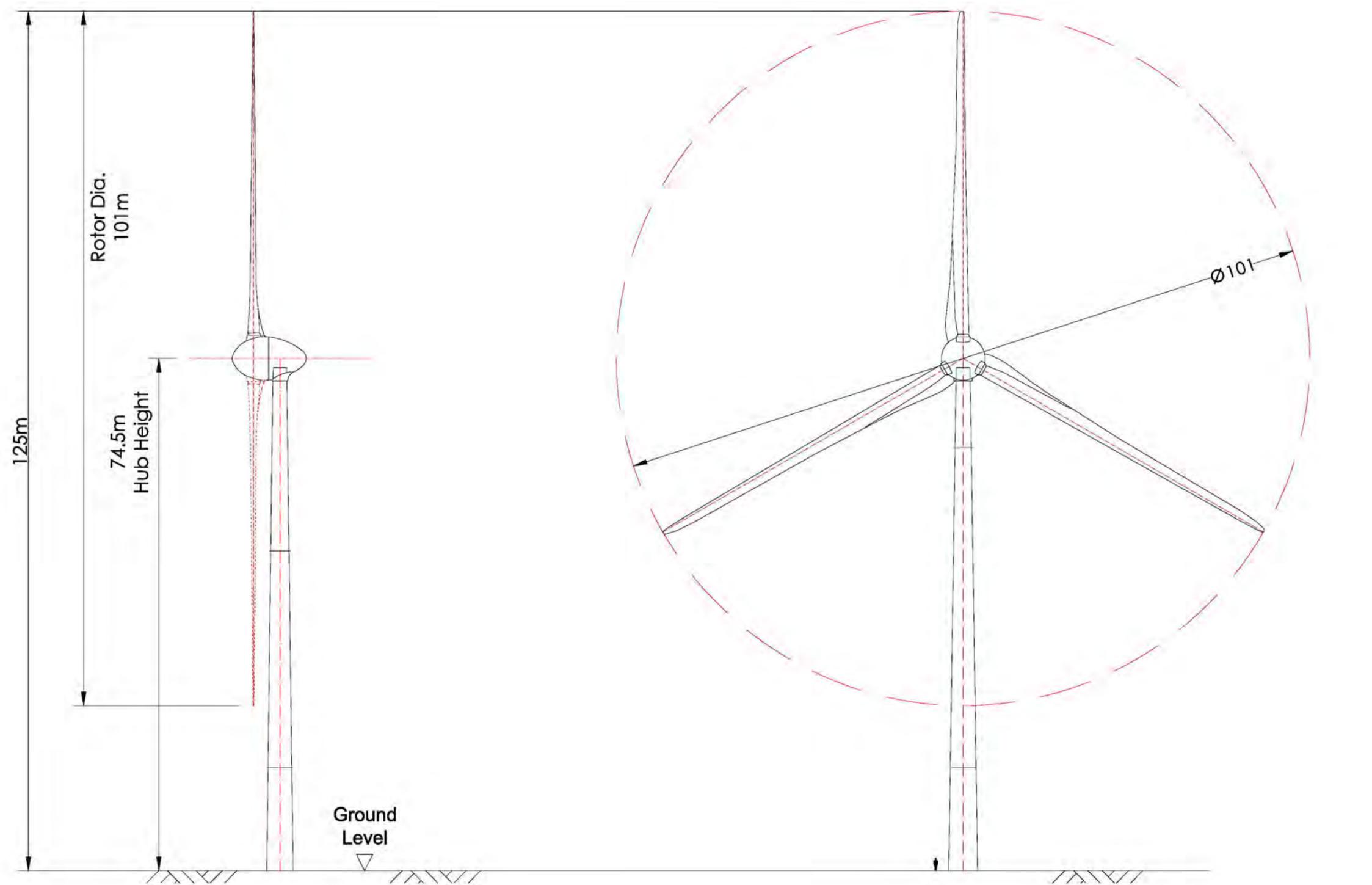


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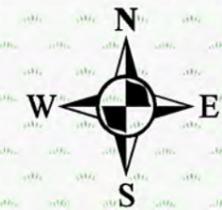
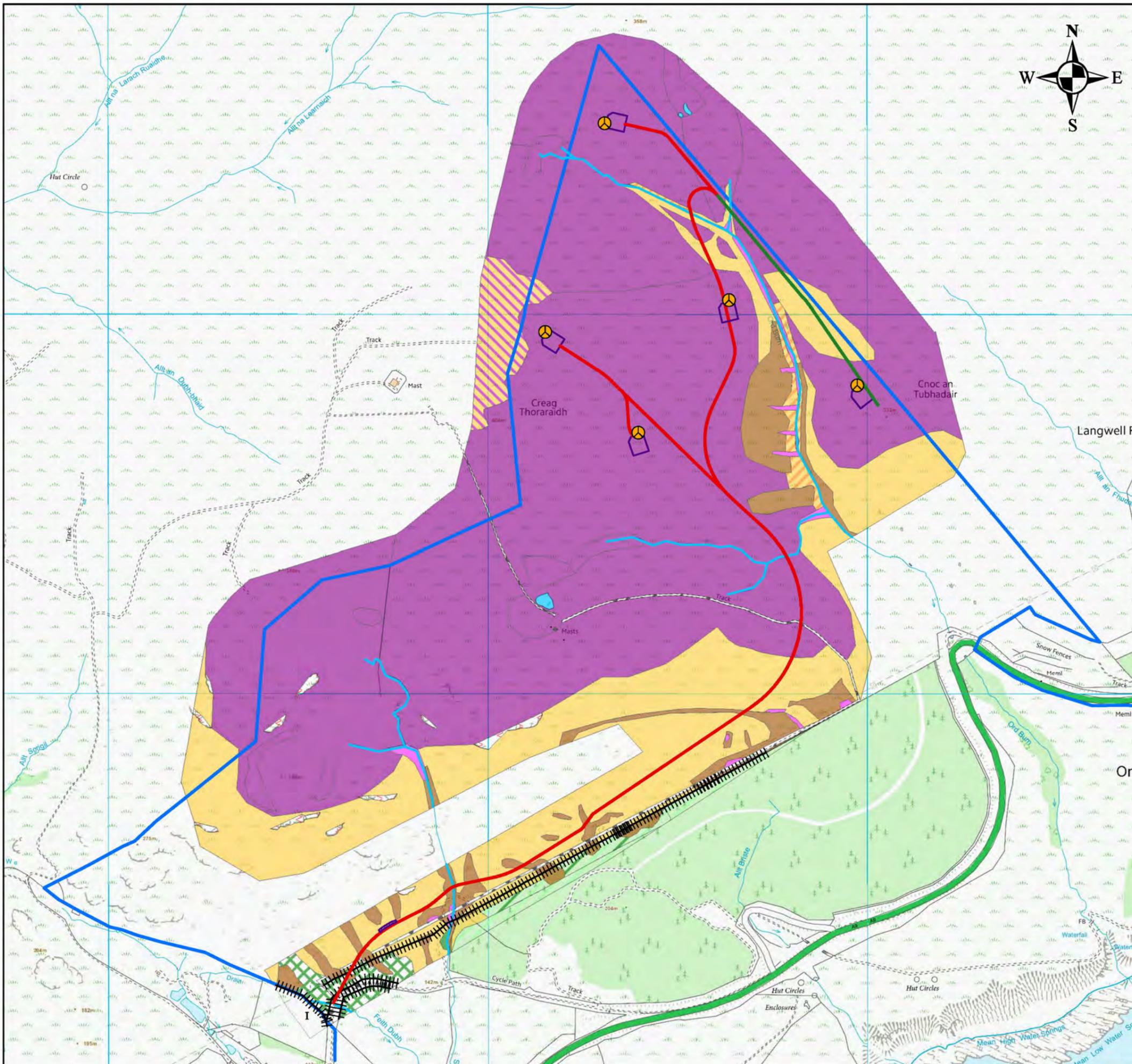
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REV:	DESCRIPTION:	BY:	DATE:
STATUS:		Planning	
 Green Cat Renewables Ltd Stoba House ROSLIN EH25 9RE 0131 541 0060 www.greencatrenewables.co.uk			
CLIENT: Phil Davidson			
PROJECT: Navidale Windfarm			
DRG TITLE: Turbine Elevation			
DATE:	DRAWN BY:	CHECKED BY:	APPROVED BY:
02.11.16	LS	FW	RC
SCALE AT A3:	PROJECT DRAWING NUMBER:		REV:
NTS	C1926 APP-016		



Project Name: **Navidale Wind Farm**

Document Title: **Phase 1 Habitat Plan**

Scale: **1:10,000 @ A3**

Key:

- A1.1.1 Broadleaved Woodland - Semi- Natural
- A1.2.2 Coniferous Woodland - Plantation
- A1.3.2 Mixed Woodland Plantation
- A2.1 Scrub - Dense/Continuous
- B4 Improved Grassland
- C1.1 Bracken - Continuous
- D1.1 Dry Dwarf Shrub Heath - Acid
- D2 Wet Dwarf Shrub Heath
- D5 Dry Heath/Acid Grassland
- E1.6.1 Blanket Bog
- E2.1 Flush - Acid/Neutral Flush
- G1 Standing Water
- I1.1.1 Inland Cliff - Acid/Neutral
- J3.6 Building
- Track
- G2 Running Water
- J2.4 Fence

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Client: **Phil Davidson**

Drawing by: **Green Cat Renewables Ltd**

Document Number: **C1926-471/Fig. 3.1**

Version: **1.0**

Author: **SS**

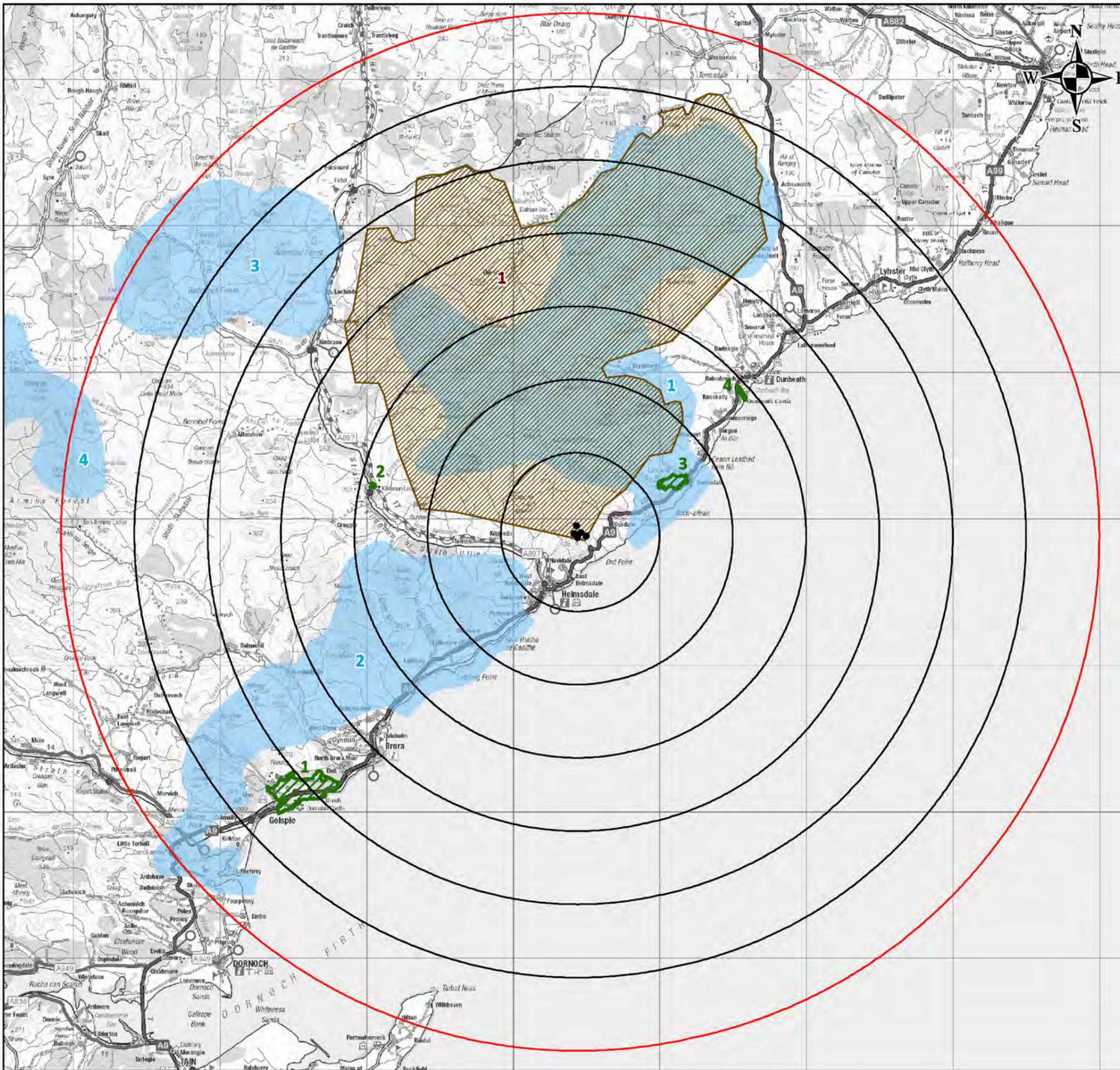
Checked by: **RC**

Approved by: **RC**

Date: **05/05/2017**

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Project Name: **Navidale Wind Farm**
 Document Title: **Planning Designations**
 Scale: **1:260,000 @ A3**

Key:
 ● Proposed Wind Turbine Locations
 □ 5, 10, 15, 20, 25 & 30km Radii from Outer Turbine
 □ 35km Landscape Study Area

□ Area of Great Landscape Value
 1. Knockfin flows and Berriedale Coast
 2. Glen Loth
 3. Badailoch Forest
 4. Ben Armine

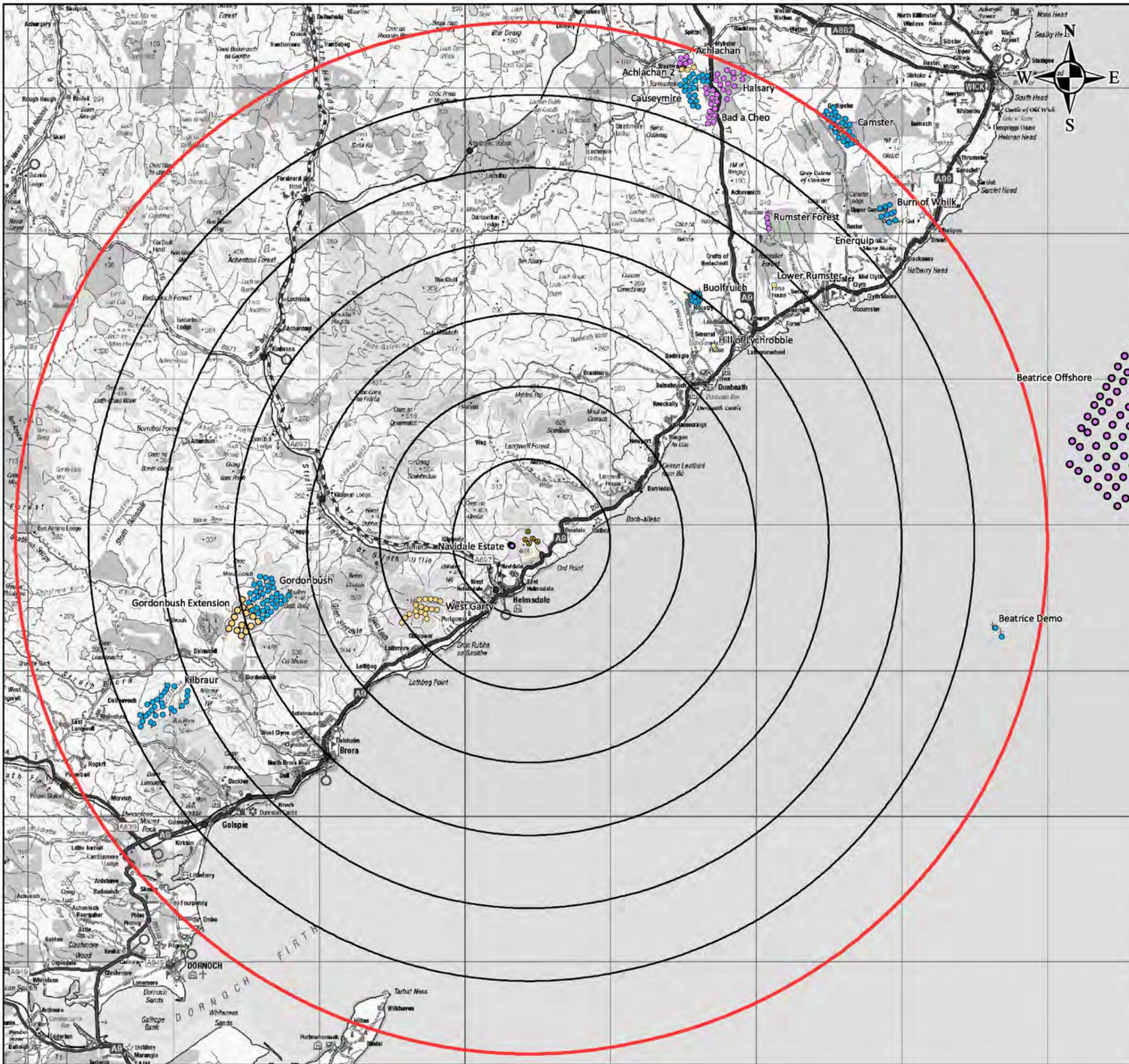
▨ Area of Wildland
 ▨ Garden and Design Landscapes
 1. Dunrobin Castle
 2. Kildonan Lodge
 3. Langwell Lodge
 4. Dunbeath Castle

Client: **Phil Davidson**
 Drawing by: **Green Cat Renewables Ltd**

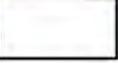
Document Number: **C1926-471/Fig 1.3**
 Version: **1.0**
 Author: **SS**
 Checked by: **AW**
 Approved by: **RC**
 Date: **05/05/2017**
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Project Name: **Navidale Wind Farm**
 Document Title: **Cumulative Basemap**
 Scale: **1:260,000 @ A3**

- Key:
-  Proposed Wind Turbine Locations
 -  35km Study Area
 -  5, 10, 15, 20, 25 & 30km Radii from Outer Turbine

- Cumulative Wind Farms (Status)**
-  Operational Turbines
 -  Consented Turbines
 -  Turbines in Planning

Client: **Phil Davidson**
 Drawing by: **Green Cat Renewables Ltd**

Document Number: **C1926-471/Fig 1.7**
 Version: **1.0**
 Author: **SS**
 Checked by: **AW**
 Approved by: **RC**
 Date: **05/05/2017**



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Project Name: **Navidale Wind Farm**

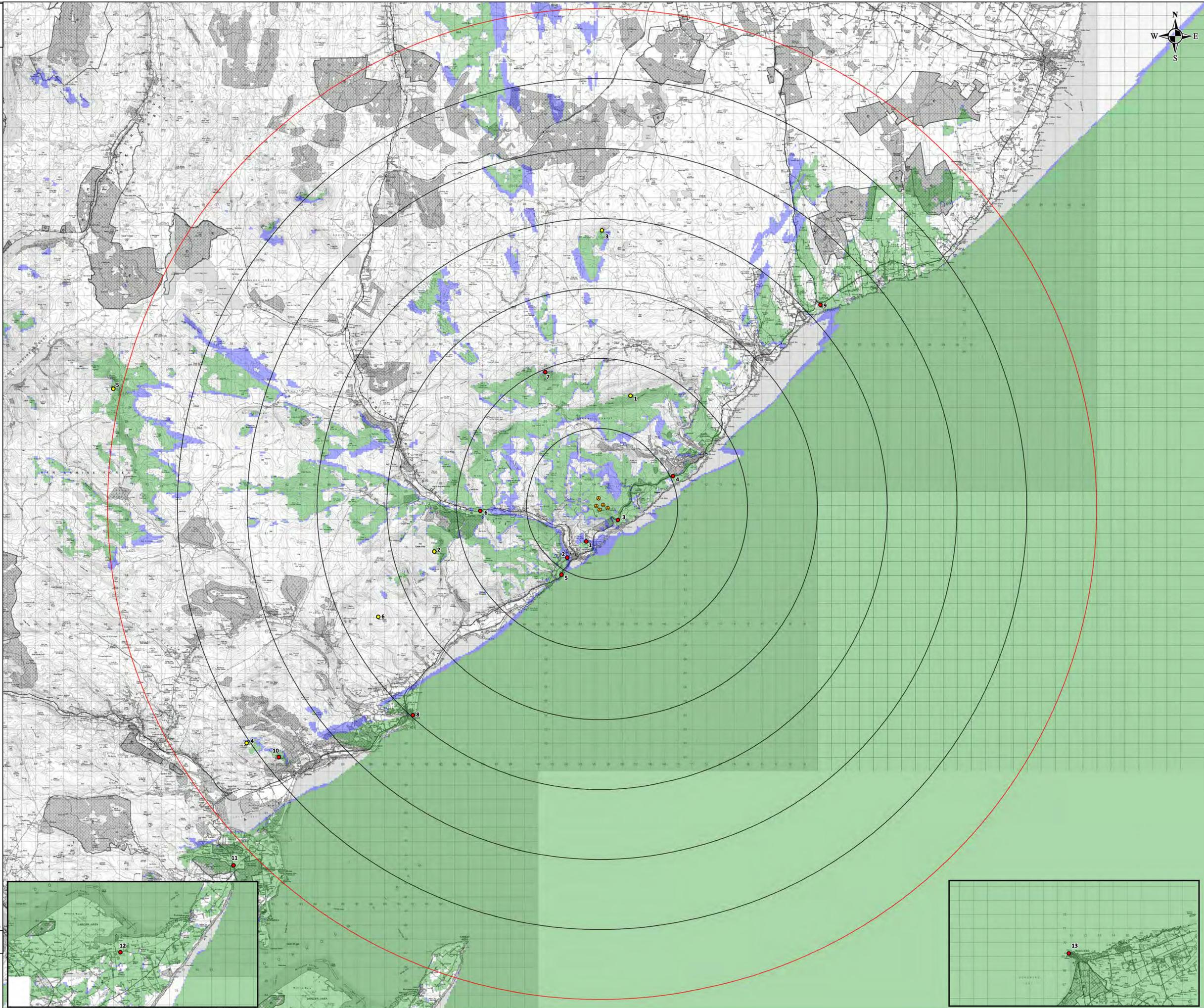
Document Title: **ZTV to 125m Tip Height**

Scale: **1:125,000 @ A3**

- Key:
- Proposed Turbine Locations
 - 5, 10, 15, 20, 25 & 30km Radii from Outer Turbine
 - 35km Landscape Study Area
- ZTV Key**
- 1-2 Turbine Tips Theoretically Visible
 - 3-5 Turbine Tips Theoretically Visible

- Viewpoint Locations
- Wireline Locations

- VP01 - Navidale
- VP02 - West Helmsdale
- VP03 - Ord of Caithness
- VP04 - A9 South of Berriedale
- VP05 - Gartymore
- VP06 - Strath of Kildonan
- VP07 - Morven
- VP08 - Brora
- VP09 - Latheron
- VP10 - Ben Bhraggie
- VP11 - A9 Dornoch
- VP12 - Dornoch Firth
- VP13 - Burghead
- WL01 - Scaraben
- WL02 - Beinn Dhorain
- WL03 - Ben Aliskey
- WL04 - Beinn Lunndiadh
- WL05 - Ben Armine
- WL06 - Col Bheinn



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