Agenda Item	**6.3**
Report No	**PLN/038/20**

HIGHLAND COUNCIL

Committee: North Planning Applications Committee

Date: 20 October 2020

Report Title: 20/01595/S37: Scottish Hydro Electric Transmission Plc
Land 300M West Of Achunabust Farm, Reay

Report By: Acting Head of Development Management – Highland

1. Purpose/Executive Summary

1.1 **Description:** Install and keep installed the proposed Limekiln Wind Farm 132 kV Grid Connection overhead electric line

1.2 **Ward:** 02 – Thurso and North West Caithness

Development category: National Development

Reason referred to Committee: Consultation on national development

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

2. Recommendations

2.1 Members are asked to agree the recommendation to Raise no Objection to the application as set out in section 11 of the report.

3. PROPOSED DEVELOPMENT

3.1 The Highland Council has been consulted by the Scottish Government's Energy Consents and Deployment Unit on an application made under Section 37 of the Electricity Act 1989 (as amended) for the construction and operation of a new 132kV overhead transmission line (OHL) to connect Limekiln Wind Farm to the national grid. This application comes under the category of "National Development" as set out in the Scottish Government's third National Planning Framework Plan (NPF3).

3.2 The development will comprise of approximately 5km of 132 kilovolt (kV) overhead line and approximately 1km of underground cable. The underground cable will be at the northern end of the development and is considered to be permitted development. The line will start at a new substation at Limekiln Wind Farm and a proposed sealing end structure at a location around 900 metres to the south of Dounreay substation.

3.3 The line will be supported by "H" formation wooden poles with a maximum height of 13.25m, spaced approximately 80m to 100m apart depending on ground conditions and topography. The overhead line will comprise a combination of "H" pole structures:

- 50 pairs of Suspension Poles, suspension poles used for the straight sections of the line (2 x wooden poles placed 2.5m apart with supporting steel cross-arm linking the poles at the top);
- 9 pairs of Angle Poles used where the route of the OHL changes (same design as the suspension poles but these also may require stays depending on ground conditions); and
- 1 Sealing End Structure located to the northern end of the OHL to allow for connection to the underground cable.

3.4 During the construction of the OHL existing access tracks will be utilised and upgraded where required. If this is not possible then new temporary access routes will be created. In this case two existing accesses will be utilised, Limekiln Wind Farm access will be utilised, located to the eastern edge of Reay on the A836 road and an existing access track at Achunabust will be upgraded. Two new access tracks will be formed one to the south of the OHL (approximately 478m) and one to the north of Achunabust (approximately 257m).

3.5 It is not expected that any permanent or temporary new stone tracks would be required to facilitate access by construction vehicles. The anticipated vehicles are low ground pressure bearing, where required trackway panels would be installed to provide a temporary surface for construction vehicles.

3.6 The construction period is anticipated to last 14 months, between July 2021 to September 2022. Development will be delivered in 4 distinct phases:

- Phase 1 – Enabling works
  - Works to existing distribution network; Road Improvements and Access and Forestry Removal;
- Phase 2 – Construction Works
  - Foundation and H-Pole Construction and Conductor Stringing;

- Phase 3 – Commissioning of the line; and
- Phase 4 - Reinstatement of all areas disturbed during construction.

3.7 The application is for the line to be sited and contained within Limits of Deviation (LOD). The LOD are designed to allow flexibility in the final siting of individual towers to reflect topographical, engineering and environmental constraints. The following parameters have been identified for the LOD:-

- 50m horizontal LOD either side of the proposed OHL alignment; and
- Maximum vertical LOD of 14m (maximum pole height).

3.8 The applicant undertook public consultation in May 2018, inviting members of the public from the local area to an exhibition in Reay Village Hall to allow them to comment on the development. The applicant advised that 35 members of the public attended and 1 member of the public provided comments. A further public consultation event was undertaken in July 2019 at Reay Village Hall to update the local community on the preferred route, no comments were made in relation to the proposed development. However, one question was posed around the planning process and opportunities to make representations. Further to the events, consultation documents were also produced and made available online.

3.9 In bringing forward the proposal the applicant considered a total of five alternative alignment options. The preferred route (Route Option B) is presented in this application.

3.10 The application is supported by an Environmental Impact Assessment Report (EIAR) which considers the proposals implications for: Landscape and Visual Impact; Ecology; Ornithology; Cultural Heritage; Hydrology, Hydrogeology, Geology and Soils; and Forestry. The EIAR ecology; ornithology; water environment; soils; landscape and visual; forestry; and cultural heritage chapters also contains a schedule of environmental mitigation.

4. SITE DESCRIPTION

4.1 The site is located approximately 2.3km south of Reay, and to the north of the Limekiln Wind Farm site (ref: 16/02752/S36). The OHL would follow a south-east alignment from the wind farm's substation for around 920m passing through existing forestry, before angling north-east for approximately 1 km to pass between the rocky knolls of Creag Leathan and Creag Mhòr. It would then cross over the Achvarasdal Burn and then angle northwards for around 1.5km, taking a route to the east of Achvarasdal and west of Achunabust, before crossing the C1001 road running east – west between Reay and Shebster. The OHL then proceeds north-west for 1.2km, passing west of Loch Achbuiligan to reach the A836 road connecting Reay to Thurso. The OHL would terminate at the proposed sealing end structure on the south side of this road.

4.2 The route of the OHL was identified after an Environmental Route Options Appraisal was undertaken. This assessed the constraints to the development of five routes within the corridor. This included an assessment of natural heritage, cultural heritage, landscape and visual, and land use to select the route that would have the least impact on these constraints.

4.3 The proposed development would pass through the Limekiln and Broubster forest areas before traversing open agricultural land to a point south of the A836 road at Dounreay. It should be noted that some of this woodland is to be felled, however it is to be replanted.

4.4 The application site crosses the Dounreay Burn and the Achvarasdal Burn. The development would require three new temporary watercourse crossings and use of one existing crossing (two on Dounreay Burn and one at Achvarasdal Burn).

4.5 The Sandside Bay North Site of Special Scientific Interest (SSSI), The North Caithness Cliffs Special Protection Area (SPA), East Halladale SSSI, The Caithness Lochs SPA and Caithness and Sutherland Peatlands Special Area of Conservation (SAC), SPA and Ramsar site are all within the 5km study area of the application site.

4.6 The application sits within Farmed Lowland Plain Landscape Character Type as identified on the Scottish Landscape Character Type Map. The applicant has identified that the site sits within an open horizontal landscape with a windswept and coastal feel. The character transitions from north to south with the northern part of the corridor comprised of flat, open fields. To the south, a large-scale pattern of uniform forest cover becomes more influential with the ground rising into low rounded hills, made more prominent by the horizontal character of the surrounding landscape. A low, slightly rolling landscape forms the transition between two landscape types characterised by a patchwork of small fields delineated by post and wire fences and distinctive Caithness slab-on-end fences, and areas of scrubby woodland and trees.

4.7 A limited part of the applicants' 3km study area for landscape and visual impact assessment includes the south-western extend falling within the East Halladale Flows Wild Land Area 39, which lies around 1.2km from the southern extent of the development. The application site is outwith the WLA.

4.8 When assessing proposals such as these, 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 or approved.

<u>Within 10km of the application site</u>

- Ballie – 21 x 115m (tip height turbines)
- Limekiln Wind Farm – 15 x 139m to tip turbines and 9 x 126m to tip turbines
- Limekiln Substation
- Forss - 4 x 78m and 2 x 99.5m to tip turbines;
- Dounreay Substation and Dounreay West Substation
- 275KV Transmission Line from Dounreay - Spittal

5. PLANNING HISTORY

5.1	16/00066/SCOP Proposed erection of 24 wind turbines and associated infrastructure at the Limekiln Estate.	Decision Issued	24.02.2016

5.1	16/02752/S36 Proposed erection of 21 wind turbines (9 Turbines at 126m to blade tip and 15 turbines at 139m to blade tip) and associated infrastructure at the Limekiln Estate with a generating capacity of up to 72MW	Approved by Scottish Ministers	21.06.2019
5.2	18/04660/SCOP Proposed section 37 application for Limekiln wind farm 132kv grid connection	Decision Issued	05.11.2018
5.3	20/00279/SCOP Limekiln Wind Farm Extension - Erection of 7 wind turbines and associated infrastructure	Decision Issued	27.02.2020
5.4	20/01905/S36 - Limekiln Wind Farm Extension - Erection of 5 wind turbines and associated infrastructure	Pending Determination	

6. PUBLIC PARTICIPATION

6.1 Advertised: Environmental Impact Assessment (advertised by the Energy Consents Unit)

Date Advertised: 12th and 14th August 2020 in the John O'Groats Journal and Edinburgh Gazette.

Representation deadline: 13th September 2020

Timeous representations received by Highland Council: 0

Timeous representations received by Energy Consents Unit: 0

6.2 Material considerations raised are summarised as follows:

a) None

6.3 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.

7. CONSULTATIONS

Consultations undertaken by The Highland Council

7.1 **Caithness West Community Council** : **Objec**t to the application. The Community Council raised concerns in relation to the route and length of the OHL. The principle concerns relate to the visual impact, cumulative impact and the impact on wildlife and protected species. It also raised concerns that the development is not the same as was previously proposed in the Limekiln Wind Farm application and that the promoter of the overhead line has not taken into account public opinion.

7.2 **Access Officer** does not object to the application subject to appropriate conditions to ensure any access control (gates, fences etc) which are installed or modified by the development are accessible to the public upon completion of the development, in particular access into the forest by Blarmore. It is also requested that public access remains open at all times during the construction and operation of the proposed development. It seeks the above measures to be secured through an Access Management Statement.

7.3 **Environmental Health Officer** does not object to the application. Construction noise managed plans are requested should be complied as part of the Construction Environment Management Document.

7.4 **Flood Team** do not object to the application. It requests that any new water crossing should be designed to pass surface water runoff from 1 in 200-year storm flood event. It notes that if the applicant proposes to construct any permanent water crossings then a condition should be imposed to ensure that outline calculations are provided to the Flood Team to review. These should demonstrate that any permeant water crossings will be designed to allow the passage of storm water from a 1 in 200-year storm flood event.

7.5 **Historic Environment Team** do not object to the application subject to a condition securing a watching brief being maintained on any earthworks or excavation associated with the development as there remains the potential for buried remains to survive and be impacted by the construction works.

7.6 **Transport Planning** do not object to the application. While noting that there is limited information submitted regarding access, traffic and transport, it is accepted that the operational traffic associated with the development will be limited.

It highlights that much of the information related to impact of construction traffic and the mitigation required will not be available until the appointment of a principal contractor. A condition to secure a Construction Traffic Management Plan (CTMP) is requested. This condition should also secure the full extent of all mitigation/improvement works required for general construction traffic

It notes that the developer may be required to enter into a Section 96 Wear and Tear Agreement with associated Road Bond. If required, the agreement will need to include before and after road condition surveys and regular monitoring of traffic levels and road conditions during the construction phase of the development.

Consultations Undertaken by the Energy Consents Unit

7.7 **Crown Estate Scotland** do not object to the application. It notes that the development will not affect any Crown Estate Scotland assets.

7.8 **British Telecom** do not object to the application. It explains that the power lines would cross under a BT Core Radio Network but as the maximum height is 14m, the proposed development will not cause interference.

7.9 **Highlands and Islands Airports Limited** do not object to the application. The proposed development would not impact the safeguarding criteria of Wick Airport.

7.10 **Historic Environment Scotland (HES)** do not object to the application. HES consider that the criteria around "sensitivity/importance" could have been improved as they do not consider that assets dating to any specific period are by definition any more or less sensitive or important than assets dating to another period. HES also disagree with methodology for determining "sensitivity of setting" and do not think that determining the extent to which the setting can be seen on the ground necessary step.

HES note that there is potential for a direct impact on Knoch Urray, broch 400m NNE of Gunnscroft (SM 564) as a result of an underground cable linking the OHL to other infrastructure. It explains that the cable should be routed outwith the scheduled area and contractors should be made aware of the presence of the scheduled monument and the need to avoid accidental damage.

HES is content that the impact of the Clach Clais and Tuire, standing stone 1000m SE of Loanscorribest (SM 441) scheduled monument will not be significant. Should the section of track around the monument (within 50m buffer) be used then additional fencing on either side of the track will be required to protect the monument.

HES are also content that the development would not have a significant impact on Knock Urray, broch 400m NNE of Gunnscroft (SM 564) or Achunabust, broch (SM 513) scheduled monuments due to the scale of the OHL and the distance from the monument.

HES considered assets in the wider area and found that it was unlikely that the development would have a significant impact on their settings.

7.11 **Joint Radio Company (JRC)** do not object to the application. JRC do not foresee any potential problems based on known interference scenarios.

7.12 **Marine Scotland** do not object to the application. The potential impacts of the present proposal on fish population and their habitats should be considered and construction should be undertaken in accordance with the Construction Environmental Management Plan (CEMP) to ensure best practice measures and pollution prevention.

It notes that there is no mention of routinely monitoring the water quality of watercourses within the EIAR to ensure no deterioration of the water quality. It requests that the appointed Ecological Clerk of Works (ECoW) undertake water monitoring and carry out regular visual inspections of all watercourses particularly during and after periods of prolonged precipitation and downstream of where construction work is taking place, where traffic is frequenting, and at watercourse crossings.

It requests that the applicant follows the UK Forests and Water Guidelines particularly in relation to the removal of all felled material from within and adjacent to watercourses as felled material can result in the leaching of nutrients into watercourses which can lead to impacts on the aquatic fauna, especially as acidification is a known problem in the area.

7.13 **Ministry of Defence** do not object to the application.

7.14 **RSPB** do not object to the application subject to appropriate mitigation measures. It raises concerns over the potential impacts on priority species and habitats. It recommends that undergrounding the section of line between the proposed sealing

end structure (south of the A836 at NC985658) and the north of the road at Achvarasdal (at approximately NC990650); and the sections of line between NC991640 and NC991638, and NC991633 and NC988627 are underground avoiding sensitive habitats and Ground Water Dependent Terrestrial Ecosystems (GWDTEs). It explains that if this is not possible then it would be necessary to ensure this section of line is marked at 5m intervals according to NatureScot guidance. The section of OHL between NC999627 and NC981624 should be suitable marked.

It recommends that sections of the line (whether overhead or underground) is constructed outwith the breeding season. It requests that if this is not possible then pre-construction surveys be undertaken, and the results reviewed by NatureScot and an Ecological Clerk of Works before construction commences. If line deviation cannot avoid breeding birds without a risk of disturbance and/or displacement, work must stop immediately and only recommence once the breeding season has finished. It notes that this should also apply for any future maintenance.

It requests that micro-siting is utilised to ensure poles avoid areas of blanket bog and deep peat, if this is not possible then a restoration plan should be produced to compensate this loss.

7.15 **Scottish Environment Protection Agency (SEPA)** do not object to the application subject to conditions being applied to secure details of the final route and details of decommissioning.

7.16 **Scottish Forestry** do not object to the application. It is recommended that an appropriate condition is attached to any consent to ensure the area and timing of delivery of compensatory planting. The compensatory planting should be a minimum of 4.78 hectares before the development becomes operational and the planting operation completed within 2 years from the date of the Compensatory Planting Plan (CPP). The newly planted woodland will need to be appropriately protected and maintained until established.

7.17 **NatureScot (formerly Scottish Natural Heritage)** do not object to the application. There are natural heritage interests of international importance on the site in connection to Caithness and Sutherland Peatlands Special Protection Area (SPA) and Caithness Lochs SPA but it is not considered that the development would adversely affect these. It considers that it is unlikely that the development would have a significant effect on any qualifying interests of the North Caithness Cliffs SPA either directly or indirectly.

7.18 **Transport Scotland** do not object to the application. It considers that the proposed route of the overhead line is sufficiently remote from the trunk road network and that construction activity would be unlikely to cause impacts on the trunk road network.

7.19 **Scottish Government – Advisor Report on Peat Landslide Hazard Risk Assessment (PLHRA)**

The ECU commissioned Ironside Farrar Ltd to assess the Peat Landslide Hazard Risk Assessment submitted by the applicant. The assessor is content with the mitigation measures set out in the PLHRA report in terms of peat stability and requests these measures be carried forward into the CEMP for the development.

Some of the measures include but not limited to a Geotechnical Risk Register, minimising of “undercutting” peat slopes, micrositing of the OHL pole locations and use of temporary floating tracks.

8. DEVELOPMENT PLAN POLICY

The following policies are relevant to the assessment of the application

8.1 Highland Wide Local Development Plan 2012

28 - Sustainable Design
30 - Physical Constraints
36 - Development in the Wider Countryside
42 - Previously Used Land
51 - Trees and Development
52 - Principle of Development in Woodland
53 - Minerals
54 - Mineral Wastes
55 - Peat and Soils
56 - Travel
57 - Natural, Built and Cultural Heritage
58 - Protected Species
59 - Other important Species
60 - Other Importance Habitats
61 - Landscape
62 - Geodiversity
63 - Water Environment
66 - Surface Water Drainage
68 - Community Renewable Energy Developments
69 - Electricity Transmission Infrastructure
72 - Pollution
77 - Public Access

8.2 Caithness and Sutherland Local Development Plan 2015

No Specific Policies Apply

8.3 Highland Council Supplementary Planning Policy Guidance

Construction Environmental Management Process for Large Scale Projects (August 2010)
Highland Historic Environment Strategy (Jan 2013)
Highland's Statutorily Protected Species (March 2013)
Physical Constraints (March 2013)
Special Landscape Area Citations (June 2011)
Standards for Archaeological Work (March 2012)
Trees, Woodlands and Development (Jan 2013)

8.4 Highland Council Supplementary Planning Policy Guidance

Construction Environmental Management Process for Large Scale Projects (August 2010)

Flood Risk and Drainage Impact Assessment (Jan 2013)
Highland Historic Environment Strategy (Jan 2013)
Highland's Statutorily Protected Species (March 2013)
Physical Constraints (March 2013)
Special Landscape Area Citations (June 2011)
Standards for Archaeological Work (March 2012)

Trees, Woodlands and Development (Jan 2013)

9. OTHER MATERIAL POLICY CONSIDERATIONS

9.1 Scottish Government Planning Policy and Guidance

Scottish Planning Policy (2014)

National Planning Framework 3 (2014)

Control of Woodland Removal Policy (2009)

10. PLANNING APPRAISAL

10.1 The application has been submitted to the Scottish Government for approval under Section 37 of the Electricity Act 1989 (as amended). Should Ministers approve the development, it will receive deemed planning permission under Section 57(2) of the Town and Country Planning (Scotland) Act 1997 (as amended). While not a planning application, the Council processes S37 applications in the same way as a planning application as a consent under the Electricity Act will carry with it deemed planning permission.

Schedule 9 of The Electricity Act 1989 contains tests in relation to the impact of proposals on amenity and fisheries. These tests should:

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

10.2 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

10.3 The key considerations in this case are:

a) compliance with the development plan and other planning policy;

b) Roads, transport and wider access;

c) Landscape and visual impact;

d) Water environment;

e) Natural heritage (including Forestry);

f) Peat

g) Built and cultural heritage;

h) Construction impacts; and

i) any other material considerations.

Development plan/other planning policy

10.4 The Development Plan comprises both the adopted Highland-wide Local Development Plan (HwLDP) and the Caithness and Sutherland Local Development Plan and statutorily adopted supplementary guidance.

10.5 The principal HwLDP policy on which the application requires to be assessed is Policy 69 (Electricity Transmission Infrastructure).

10.6 The Development Plan supports the broad principle of energy development and associated infrastructure. Policy 69 specifically highlights that the "Council will have regard to their level of strategic significance in transmitting electricity from areas of generation to areas of consumption." "It will support proposals which are assessed as not having unacceptable impact on the environment including natural, built and cultural heritage features." Where development is assessed as not having unacceptable significant impact on the environment, then the proposal would accord with the Development Plan.

10.7 Scotland's Third National Planning Framework (NPF3) is the spatial expression of the Government's Economic Strategy and plans for investment in infrastructure. In doing so it identifies a series of national developments, which includes a High Voltage Electricity Transmission Network. The current application falls into the category of National Development as it is a new 132 kilovolt (kV) onshore electricity transmission cable and supporting pylons. Whist identification of a project as "national development" establishes a need for the project, all necessary assessments and consents are still required for such development. Appropriate levels of mitigation would still be expected to help avoid or reduce environmental effects and demonstrate "no adverse effect" on the integrity of European protected sites.

10.8 The aim of the planning system is to achieve the right development in the right place; not to allow development at any cost. SPP introduces a presumption in favour of development that contributes to sustainable development. The connection of approved renewable energy projects to the grid, which would be enabled by this project, advances its sustainable development credentials. The expansion of the grid transmission network in the north of Scotland not only is a short-term economic construction boost, but also a long-term infrastructural benefit to the area. A priority of the Scottish Energy Strategy (2107) is to champion Scotland's renewable energy potential, creating new jobs and supply chain opportunities.

Roads, transport and wider access

10.9 It is anticipated that the A9 and A836 roads would be utilised for construction traffic. In some instances, the C1101 minor road may be used for access to the north end of the proposed development and appropriate mitigation would be in place to reduce traffic effects, such as debris control and ensuring no obstruction of public rights of access.

10.10 Vehicular access to the location of each H-pole will be required during the construction period. The applicant has stated that they will utilise existing tracks that will require some minor improvements to allow safe access by construction and delivery vehicles. This will also include the laying of temporary panels to act as a surface for vehicles in areas of boggy or soft ground. Minor improvements of existing bellmouths off the public road are also anticipated, which would be discussed and agreed with the Roads Authority beforehand. Details of these improvements can be secured through a condition on construction traffic management. The wood poles would be transported to each location then erected using one or two excavators.

10.11 Considered alone, the impact on the local road network is significant over a limited period due to the nature of the development. However, it is likely that construction of the OHL will be progressing at the same time as the permitted Limekiln Wind Farm. The cumulative impact of construction of these schemes will likely be significant in the short term. Transport Planning have identified the likely need for a Section 96 Agreement under the Roads (Scotland) Act 1984 to be entered prior to an agreement on the Construction Traffic Management Plan for the proposed development. This is accepted. The Construction Traffic Management Plan will be required to give due consideration to the other large scale construction projects, including the consented Limekiln Wind Farm, that are being brought forward in the area and the construction traffic management provisions agreed for those proposals.

10.12 Transport Scotland do not consider there will be implications for the trunk road network unless abnormal loads are required.

10.13 In terms of recreational access, the Council's Access Officer is content that it is unlikely that there will be an impact on the nearby core path as the proposed development will be accessed from an upgraded existing track by Achunabust and off the new windfarm access track (to be constructed). However, the upgraded track is partly used for recreational access and as such it is required to be managed during construction with any access control (gates, fencing etc) which is installed or modified by the development is accessible to the public upon completion of the development. Access should be kept open for public use or suitable signage in place to manage any restrictions during construction activity. A statement on maintaining public access can be secured by condition.

Landscape and visual impact

10.14 Given the location and scale of the proposal it sits across two of Landscape Character Types (LCTs); Sweeping Moorlands and Farmed Lowland Plain. Each of these LCTs cover much wider areas than would be subject to the effects of this application. The assessment undertaken by the applicant has identified a number of sub-sets to the LCTs reflecting the characteristics of the local landscape within the 1.5 km from the centreline of the proposed development that forms the study area. The assessment methodology is considered appropriate. Having considered the effect during the construction and operational period, the applicant has not identified significant effects on any of the LCTs in the study area of the application and have therefore scoped out further assessment. This is not disputed.

10.15 There are some cumulative landscape effects with similar existing and proposed development such as the existing network of steel lattice and wood pole OHLs within the study area, the Dounreay Substation development and the proposed Limekiln Wind Farm Substation and Dounreay West Substation. The applicant has concluded that OHL development forms an existing, well established characteristic of the landscape within the study area and would not increase the perception of OHL development as a characteristic within the landscape when seen in the context of other existing OHL development. This is not disputed, however it is considered that the cumulative impact has been underplayed as the proposed development would add further large scale development into the landscape particularly to the north when there is no screening afforded.

10.16 The application site or the study area does not sit within any landscape designations within 1.5 km radius study area. However, the south-western extent of the study area falls within the East the East Halladale Flows Wild Land Area (WLA)(WLA 39) which lies around 1.2km from the southern extent of the proposed development at the Limekiln Wind Farm substation.

10.17 WLA 39 – East Halladale Flows lies around 1.2km to the west / south-west of the proposed site, and rises to include Beinn Ratha (251m AOD) which forms part of the WLA. Scottish Natural Heritage published descriptors for each of the 42 Wild Land Areas across Scotland in January 2017. These descriptors set out wild land qualities for each of the Wild Land Areas and are based on the particular combinations of the wild land attributes and influence when experienced.

10.18 The applicant has assessed the impact of the proposed development on this WLA as not being significant due to the distance from the proposed development, the existing effects from commercial forestry and the consented Limekiln Wind Farm. The applicant has therefore not undertaking Wild Land Assessment on the qualities and integrity of the WLA. This is not disputed by NatureScot. The applicant's appraisal can be accepted given the position of the development in relation to the WLA and the particular qualities of this WLA which are best expressed to the west of the Beinn Ratha ridgeline and to the south west of the proposed development site.

10.19 The applicant has undertaken a proportionate Visual Impact Assessment within the EIAR. In doing so it has considered the impacts of the proposed development on receptors at 16 representative viewpoints within a study area of 1.5 km buffer from the proposed alignment of the OHL. The study area having been informed by the production of a Zone of Theoretical Visibility (ZTV) model. Visual receptors include views from residential receptors, users of the local road network and recreational routes. In this case the applicant has subdivided visual receptors that have been identified into two separate categories:

- Those obtaining views from building locations; and
- Those obtaining views from routes.

10.20 **Views from Buildings**

The applicant found that of the 16 visual receptor groupings assessed, three were identified has having potential for significant effects:

- Receptor Location 2 – a single storey house to the south of the C1001 near Achunabust;
- Receptor Location 5 – Loch Side a recently constructed house; and

- Receptor Location 6 – Shebster View and neighbouring properties (a group of three residential properties located on a small street near Achvarasdal).

10.21 **Receptor Location 2 (near Achunabust)**

The proposed development would be located approximately 150m to the east and would be present in views from the workshop and oblique views from the house. During the construction the applicant has concluded that the visual effect would be significant reducing to not significant once construction is completed as the individual poles would only affect small parts of the view.

10.22 **Receptor Location 5 (Loch Side)**

The development would be located approximately 100m to the north and north east of this property and would feature directly and obliquely within the main view. There is another OHL in the view with some screening from vegetation. The applicant has therefore concluded that the visual effect would be significant during construction reducing to not significant once construction is completed as the poles would appear relatively small and the main valued aspects of the view would remain.

10.23 **Receptor Location 6 (Shebster View)**

The proposed development would cross through views from this group of properties, however garden vegetation would limit the views. Construction works will distract one's views resulting in a significant visual effect. However as only a small number of poles will be visible when operational the effect would not be considered as significant.

10.24 It is disappointing that the applicant has not provided any visualisations from these views to support their assessment. Nevertheless, the Planning Authority is in broad agreement with the applicant's assessment. In assessing visual impacts in particular, it is important to consider that the viewpoint is representative of particular receptors i.e. people who would be at that point and experiencing that view of the landscape not just in that single view but in taking in their entire surroundings. For residential receptors this includes their journey to and from their house and the use of the land surrounding their property not just the view from the windows of the house. In taking this approach, it appears that the visual impact assessment may have underestimated the impacts of the proposed development. However, in each of the residential receptors considered it is not considered that this underestimation of effect would lead to an increase in significant effects beyond what has been identified by the application.

10.24 **Views from Routes**

Four key routes were identified within the study area with the potential for views of the proposed development:

- A836 (route receptor location R1)
- C1001 (route receptor location R2)
- Core Paths in Achvarasdal Wood (route receptor R3)
- Core Paths in Limekiln Forest (route receptor R4)

10.25 Of these four routes assessed within the study area the applicant found that significant effects were anticipated during construction on the C1001 (R2). In undertaken the assessment, the applicant has provided visualisations to support their assessment. These visualisations show the views from route receptors R1 and R2.

10.26 A836 (route receptor location R1)

The A836 (R1) is located to the north side of the study area. This route is on the main North Coast 500 (NC500) tourist route and is therefore considered a key route. The development would come into views as one travels along the A836, along with the existing steel lattice towers. The applicant has underplayed the sensitivity of the view, reducing the sensitivity as the development would be seen with the adjacent existing steel lattice towers. However, the effect is not disputed as the development will only be viewed for a short time and is therefore not significant, this impact will be reduced further when the construction has finished.

10.27 C1001 (route receptor location R2)

The C1001 (R2) is located to the east side of the study area and consists of a single carriageway minor road which forms part of the National Cycle Route 1 and is therefore also considered a key route. The visual effect on this route is anticipated to be significant during construction works due to passing views of construction works which would cross over the route, leading to potential scaffolds and construction adjacent to the route. Again, this view would be contained to a small section of the route and would therefore reduce to not significant once the construction works are completed.

10.28 The applicant does anticipate some significant visual effects during the construction phase of the development. On this basis the effects are short-term and are therefore considered to be acceptable.

10.29 Considering the matter of visual impact in the round, the siting and design of the OHL significantly limits the effects of the proposed development. This includes 1 km of line to the north section of the development being routed underground between the sealing end structure and Dounreay substation, completing the connection to the National Grid. Furthermore, a significant length of the line is located within commercial forestry (2.6 km). Other areas of the forestry will be removed during the lifetime of the development based upon the Limekiln Forest Plan. In the areas where the OHL is not located within forestry, it is considered to be well sited and while the wooden poles which will support the line are not diminutive structures, being up to 14m in height (depending on ground conditions and topography), it is likely they would fit relatively well within the landscape. Furthermore, there would be limited areas where receptors would be subject to significant effects of the proposed development cumulatively with other large scale projects in the area.

10.30 The overall conclusion reached by the applicant in relation to visual impact being not significant, is agreed.

Water Environment

10.31 No issues related to flood risk or drainage have been identified. While temporary watercourse crossings are required, details of these can be secured by condition and will be required to ensure that they do not contribute to flooding by virtue of their design.

10.32 Marine Scotland Science has identified that the watercourses feed the Achvarasdal Burn and Dounreay Burn. Electrofishing surveys carried out for the Limekiln wind farm reported both salmon and trout populations present in the Achvarasdal Burn. As a result, Marine Scotland would like to ensure that the applicant considers the impact of the construction of the proposed development with construction of others in the area. This can be secured as part of the Construction Environment Management Document given it is not anticipated that there would be any significant effects.

10.33 Water quality can be impacted by construction in proximity of a watercourse. Although the applicant is not working within or adjacent to the watercourse during the construction of the proposed OHL, Marine Scotland Science recommend that the appointed Ecological Clerk of Works regularly inspects the watercourses in proximity of the site for evidence of sediment release, particularly in periods of heavy rain.

Natural Heritage (including Forestry)

10.34 The application will have an impact on two coniferous plantations, with both plantations having approved Forest Plans and are at the restructuring stage where a programme of felling and replanting has been agreed with Scottish Forestry. The study area for the impact on forestry is extended to include the requirement to form an 'Operational Corridor'. Approximately 2.6 km of the proposed development would be routed through forest / woodland plantation and associated open ground.

10.35 The area to be felled and not replanted, following the alignment has been determined by the Operational Corridor width of 60m. This will result in 4.78 hectares of direct permanent woodland being removed to facilitate safe operations and maintenance of the OHL. Due to windthrow effects a further 7.30 hectares will need to be felled outwith the Operational Corridor. Therefore, the total area of woodland loss resulting from the proposed development would thus be 12.08 hectares. Only the direct felling and permanent woodland loss associated with the Operational Corridor requires to be compensated. The applicant has committed to 4.78 hectares of compensatory planting but the form that this planting comes in still requires to be agreed by Forestry Scotland and the Council's Forestry Officer.

10.36 The EIAR has identified signs of water vole, otter and pine marten within the study area. As a result, pre-commencement protected species surveys and species protection plans will be required to be secured by condition. Mitigation is also proposed in the form of an Ecological Clerk of Works to ensure any required mitigation is implemented.

10.37 The EIAR does not predict any significant effects of the proposed development on ornithological interests.

10.40 The site is located within 2.8 km north east of the Caithness and Sutherland Peatlands SPA with the potential to disturb foraging birds (golden plover, hen harrier and short-eared owl). NatureScot conclude that it is unlikely that the proposal would adversely affect the SPA population due to the large area of foraging habitat available in the wider countryside.

10.41 The application site is located 4km north west of the Caithness Lochs SPA that is protected for its important population of wildfowl (Icelandic greylag goose and whooper swan). However, as no feeding greylags were recorded during the winter surveys and the availability of foraging habitat doesn't appear to be a limiting factor for Icelandic greylag geese wintering in Caithness and Sutherland. Disturbance / displacement from this proposal will be short lived and will not reduce the available foraging range significantly. Furthermore, collision mortality in not considered to be significant. Similarly, no feeding whooper swans were recorded during the wintering surveys and the availability of foraging habitat doesn't appear to be a limiting factor for whooper swans therefore any disturbance / displacement will be temporary. Collision mortality is not considered to be significant either and the proposal is unlikely to adversely affect the SPA population.

10.42 RSPB suggest that impacts from collision risk could be further mitigated through additional sections of the line being diverted underground. If this is not possible then the OHL between NC5999627 and NC981624 should be marked at 5m intervals in order to reduce collision risk.

10.43 NatureScot are satisfied that any impacts on breeding birds can be mitigated by the timing of works and/or the use of buffers around breeding sites as identified within the EIAR and there is no requirement for any further mitigation.

10.44 The application site contains areas listed as Class 1 and 2 peatland and NatureScot welcome the assessment of these areas within the EIAR. NatureScot note that they have been extensively modified by commercial forestry plantation resulting in the peat being locally degraded and are therefore satisfied that these areas are not of national importance.

10.45 As there is potential for the proposal to impact on connected sites designated at a European level, the proposal needs to be assessed against the 'Habitats Directive' which is translated into Scots law through the Conservation (Natural Habitats, andc.) Regulations 1994 (as amended). Ministers will require to be satisfied that this is completed prior to making a decision on the application.

10.46 SEPA agree that the Ground Water Dependant Terrestrial Ecosystems (GWDTEs) within the buffer zone are not of high conservation value and most look to be associated with surface water flow channels. SEPA are also content that the schedule of mitigation addresses all their concerns regarding GWDTEs, habitat and peat. These will be further reviewed when the applicant seeks to discharge the relevant conditions.

10.47 The application site contains areas listed as Class 1 and 2 peatland. SNH are content that the information within the EIAR demonstrates that the areas of peat are not of national importance due to the peat being degraded through commercial forestry plantation. RSPB have recommended that the applicant should utilise

micro-siting of the development to avoid areas of blanket bod and deep peat. If this is not possible then a restoration plan should be produced to compensate for the loss of peat. As SNH are satisfied that the applicant has demonstrated there is no loss of valuable peat there is no need to compensate for the loss of peat.

10.48 The applicant provided a Peat Landslide Hazard and Risk Assessment (PLHaRA), outlining a number of mitigation measures. The Scottish Government's adviser is satisfied that the mitigation measures will mitigate any issues relating to peat stability and they should be included within the CEMP.

Built and Cultural Heritage

10.49 The applicant has undertaken an assessment of built and cultural heritage within a 2km study area of the OHL, this was increased eastwards to capture the effects on scheduled monuments located on the Hill of Shebster. The proposed development would be situated in an area containing a number of scheduled monuments, recorded archaeological sites and some previously unrecorded sites that were identified.

10.50 The EIAR found that of all the sites assessed, one is likely to experience a medium level of impact: the Clac Clais an Tuirc standing stone that is situated within a forest clearing on the east side of the Achvarasdal Burn. However, the development is not likely to have a significant impact due to the setting already being compromised by plantation forestry and mitigation is proposed to reduce the level of impact upon the site. HES agree that the impact would not be significant but do not agree with the proposed mitigation of reducing felling around wayleaves to mitigate any impacts resulting from the OHL. HES suggests that the applicant extends felling around the monument as the existing coupe of forestry currently restricts the ability to appreciate this monument.

10.51 HES are content that there is sufficient information within the EIA Report to not raise an objection subject to appropriate mitigation. This includes providing a buffer around the Clach Clais An Tuire, standing stone and it is recommended that visible fencing is used to mark out the buffer (outside the scheduled area) and workers should be briefed. Should the track within 50m of the monument be used then additional fencing will be required.

10.52 In relation to other heritage features it is considered that, with the application of mitigation, the impacts on recorded heritage assets will not be significant. The Council's Historic Environment Team (HET) are satisfied that any direct impacts have been mitigated through the proposed layout. HET recommend that micro-siting continues to avoid direct impacts so that the final access, compounds and layouts avoids all the sites detailed in the EIAR, with an appropriate buffer, with some sites marked-out in advance to avoid accidental damage. If it is not possible for impacts to be avoided in this way, then a programme of mitigation, starting with evaluative excavation must be undertaken.

Construction Impacts

10.53 The applicant has sought working hours of 0700 to 1900, 7 days a week in the summer and 0730 to 1700 (or as daylight allows) in the winter throughout the anticipated 11 month construction period. These hours are longer hours than would normally be applied under the Control of Pollution Act, however, Environmental

Health has not raised any concerns. Given the distance between the proposed development and noise sensitive receptors extended working hours, as proposed by the applicant is considered acceptable.

10.54 By using best practice construction management, the anticipated impacts on local communities and residential properties in proximity to the development. A Construction Environmental Management Document, inclusive of a recreational access management statement and construction traffic management plan, can be secured by condition.

Other material considerations

10.55 There are no concerns related to aviation safety.

10.56 There are no other material considerations.

Matters to be secured by Section 75 Agreement

10.57 None.

11. CONCLUSION

11.1 The proposed overhead transmission line will connect the permitted Limekiln Wind Farm to the national grid and forms part of the delivery of a fit for purpose transmission network, facilitating the move to net zero. Subject to the application of appropriate conditions, in particular in relation to compensatory planting, it is considered the impact of the proposed development can be managed.

11.2 The Highland Council has determined its response to this application against the policies set out in the Development Plan, principally Policy 69. Given the above analysis the application would be seen to accord with the Development Plan.

11.3 Schedule 9 of the Electricity Act requires sets out what an applicant shall do in relation of the preservation of amenity. It is considered that the proposal has had regard to the desirability of preserving natural beauty but through the design process has mitigated the effects of the development in relation to the effects on the natural beauty of the countryside.

11.4 Schedule 9 of the Electricity Act requires sets out what an applicant shall do in relation of the preservation of amenity. It is considered that the proposal has had regard to the desirability of preserving natural beauty but through the design process has mitigated the effects of the development in relation to the effects on the natural beauty of the countryside.

12. IMPLICATIONS

12.1 Resource: Not applicable.

12.2 Legal: Not applicable.

12.3 Community (Equality, Poverty and Rural): Not applicable.

12.4 Climate Change/Carbon Clever: Not applicable.

12.5 Risk: Not applicable.

12.6 Gaelic: Not applicable.

13. RECOMMENDATION

Action required before decision issued N

Subject to the above, it is recommended that the Council should **RAISE NO OBJECTION**, subject to the following:

Conditions and Reasons

1. All poles shall be constructed in the locations, and to the height, shown in table 1 of Volume 1 Figure 2 of the 2020 Environmental Impact Assessment Report. The location of the poles may be adjusted within the following Limits of Deviation:

    - No pole shall be positioned more than 100m on the horizontal axis of the proposed overhead line alignment;
    - No track shall be positioned more than 20m either side of their proposed locations;
    - No pole shall be more than a height of 14m above ordinance datum inclusive of all steel work and insulators.

    No later than one month after the date of Final Commissioning, an updated Site Layout Plan must be submitted to the planning authority showing the final position of the overhead line, all poles and associated infrastructure forming part of the Development. The plan should also specify areas where micro-siting has taken place and, for each instance, be accompanied by copies of the ECoW or planning authority's approval, as applicable.

    Reason: To control environmental impacts while taking account of local ground conditions.

2. No work or development associated with the proposed development shall take places outwith the hours of 0700 - 1900 Monday to Sunday between 01 March and 31 October and 0730 - 1700 Monday to Sunday between 01 November and 28 February, unless otherwise approved in advance in writing by the planning authority.

    Reason: To ensure that construction activity is carried out within defined timescales to control impact on amenity.

3. No development shall commence until a detailed Compensatory Planting Plan (including future maintenance) has been submitted and approved in writing by the planning authority, following consultation with Scottish Forestry and any other relevant stakeholders.

    The area of planting shall be no less than 4.78 hectares in size, consisting primarily of productive species and located within the Highlands.

All planting shall be implemented in full within 12 months following commencement of development, or as otherwise agreed with the planning authority. The planting shall be maintained thereafter in accordance with the approved scheme, until established to the full satisfaction of the planning authority.

Reason: To protect Scotland's woodland resource, in accordance with the Scottish Government's policy on the Control of Woodland Removal.

4. There shall be no Commencement of Development until a finalised Construction Environmental Management Document is submitted to and agreed in writing by the planning authority in consultation with Marine Scotland Science and other appropriate consultees as appropriate. The document shall include provision for:

    a. An updated Schedule of Mitigation (SM).

    b. Processes to control / action changes from the agreed Schedule of Mitigation.

    c. The following specific Construction and Environmental Management Plans (CEMPs):
        i. Method of construction of the pole foundations;
        ii. Residual Forest Waste Management Plan;
        iii. Water Quality Management Plan - highlighting drainage provisions including monitoring / maintenance regimes, water crossings, surface water drainage management (SUDs) and development and storage of material buffers (30m minimum) from water features;
        iv. Public Water Supply Protection Measures Plan;
        v. Pollution Prevention Plan;
        vi. Site Waste Management Plan;
        vii. Construction Noise Mitigation Plan;
        viii. Peat Stability, Slide Risk and Management (in accordance with the mitigation outlined in the Peat Landside Hazard and Risk Assessment document: July 2020);
        ix. Protection of Blanket Bog and Wet Heath Mosaic;
        x. Historic Environment Protection Plan including but not limited to:
            - A watching brief, where works must also be designed to minimise the impacts of development on the archaeological site;
            - Protection measures, inclusive of micrositing;
            - A marked buffer for Sites, particularly site 14;
        xi. An ornithological protection plan including:
            - Works will take place outside the breeding season for upland breeding birds 1st April – 30th August inclusive, if this cannot be achieved a survey within 30m of the proposal will take place and a 1km precautionary buffer applied to all nest sites; and
            - Line marking of the line between NC999627 and NC981624 to reduce collision risk;
        xii. Species Protection Plan(s).

d. A pre-construction survey for legally protected species is carried out at an appropriate time of year for the species, at a maximum of 12 months preceding commencement of construction, and that a watching brief is then implemented by the Environmental Clerk of Works (ECOW) during construction. The area that is surveyed should include all areas directly affected by construction plus an appropriate buffer to identify any species within disturbance distance of construction activity and to allow for any micrositing needs;
e. Provision of a communication plan to ensure all contractors are aware of the possible presence of protected species frequenting the Site and the laws relating to their protection.

Unless otherwise agreed in writing by the planning authority the development shall then proceed in accordance with the approved CEMD.

Reason: To secure the final detailed information on the delivery of all on-site mitigation projects and to protect the environment from the construction and operation of the development.

5. No development shall commence until a Construction Traffic Management Plan (CTMP) has been submitted to, and approved by, the Planning Authority in consultation with the relevant Roads Authority(s) and Transport Scotland. The CTMP, which shall be implemented as approved during all period of construction and decommissioning, must include:

i. Confirmation of the traffic volumes and type of vehicles to be used for construction giving maximum and average daily flows per month. This shall be linked to an indicative construction programme;
ii. A description of all measures to be implemented by the developer to manage traffic during the construction phase (incl. routing strategies), with any additional or temporary signage and traffic control undertaken by a recognised suitably qualified traffic management consultant;
iii. The identification and delivery of all upgrades to the public road network, including but not limited to upgrades to the local and trunk road network to make it suitable for construction traffic, to ensure that it is to a standard capable of accommodating construction related traffic to the satisfaction of the Roads Authorities;
iv. Identification of each of the access points onto the public road proposed to be used by Construction vehicles for the development. Details of appropriate traffic management which shall be established and maintained at these site access points for the duration of the construction period. Full details shall be submitted for the prior approval of Highland Council, as roads authority. The details shall include dimensioned drawings including photographs and shall show the measured visibility splay achievable at each access together with the proposals for the geometry and extent of surfacing of the access. These details shall be in accordance with the Councils 'Roads and Transport Guidelines for New Development'. Thereafter the visibility splays shall be maintained during the period that the accesses are in use by construction traffic for the development;
v. Identification of suitable proposals for delivery, collection and storage of materials and plant during construction and for parking of the workforce.

vi. Provision of a suitable proposals detailing the method of erection of the poles and over-head line including the plant to be used;
vii. Wheel washing measures and/or provision of a vacuum road sweeper as required to ensure water and debris are prevented from discharging from the site onto the public road;
viii. Measures to ensure that construction traffic adheres to agreed routes and access points onto the public road;
ix. A concluded agreement in accordance with Section 96 of the Roads (Scotland) Act 1984 under which the developer is responsible for the repair of any damage to the local road network that can reasonably be attributed to construction related traffic. This shall include monitoring and reporting of the construction vehicle movements to enable the cumulative impact of this development alongside the other large construction projects to be managed by the Council. As part of this agreement, pre-start and post-construction road condition surveys must be carried out by the developer, to the satisfaction of the Roads Authority(s).

Reason: To maintain safety for road traffic and the traffic moving to and from the development, and to ensure that the transportation of abnormal loads will not have any detrimental effect on the road network.

6. There shall be no works or commencement of development until a construction phase Restoration Method Statement has been submitted to and approved in writing by the Planning Authority. The Statement shall set out contingency restoration / reinstatement provisions for any temporary disturbed ground not required for the ongoing operation of the development, including: access tracks, storage areas, laydown areas, and all other temporary construction areas. The Statement shall include provision for review during the construction period with any amendments requiring the prior written approval of the Planning Authority. The approved Statement shall be implemented in full within 12 months of the final commissioning of the development.

Reason: To ensure the restoration of the site following construction to limit the environmental impacts of the development.

7. In the event that the line is no longer required for the transmission of electricity a scheme shall be submitted to the planning authority for its written approval detailing how the development will be decommissioned. The scheme shall include, unless otherwise agreed in writing with the Planning Authority and in accordance with legislative requirements and published best practice at time of decommissioning, details about the removal of all elements of the Development, relevant access tracks and all cabling, including where necessary details of:

a) justification for retention of any relevant elements of the Development;
b) the treatment of disturbed ground surfaces
c) management and timing of the works
d) environmental management provisions;
e) a traffic management plan to address any traffic impact issues during the decommissioning period; and
f) details of financial provisions to ensure the scheme to be approved can be implemented in full.

Thereafter the scheme shall be implemented in accordance with the approved details and timetable.

Reason: To ensure that should the line no longer be required that an appropriate mechanism is in place for decommissioning of the development.

8. No development shall commence until an Access Management Statement for recreational users of the outdoors has been submitted to and approved in writing by the Planning Authority. The plans shall include shall details of all areas where access rights apply at present, how access will be managed during the construction process and all areas where access rights will apply following final commissioning of the development.

   Thereafter the approved Access Management Plan shall be implemented through out the construction period.

   Reason: In the interests of securing and enhancing public access rights.

9. There shall be no Commencement of Development unless the Planning Authority has approved in writing the terms of appointment by the Company of an independent Ecological Clerk of Works (ECoW) in consultation with NatureScot and Marine Scotland. The terms of appointment shall;

   a. Impose a duty to monitor compliance with the ecological and hydrological commitments provided in the environmental statement and other information lodged in support of the application, the Construction and Environmental Management Plan and other plans approved ("the ECoW works");

   b. Require the EcoW to report to the Company's nominated construction project manager any incidences of non-compliance with the ECoW works at the earliest practical opportunity;

   c. Require the ECoW to submit a monthly report to the Planning Authority summarising works undertaken on site;

   d. Have power to stop to the job / activities being undertaken within the development site when ecological interests dictate and/or when a breach or potential breach of environmental legislation occurs to allow for a briefing of the concern to the Company's nominated construction project manager; and

   e. Require the ECoW to report to the Planning Authority any incidences of non-compliance with the ECoW Works at the earliest practical opportunity.

   The EcoW shall be appointed on the approved terms throughout the period from Commencement of Development, throughout any period of construction activity and during any period of post construction restoration works approved.

No later than 18 months prior to decommissioning of the Development or the expiration of this consent (whichever is the earlier), the Company shall submit details of the terms of appointment by the Company of an independent ECoW throughout the decommissioning, restoration and aftercare phases of the Development to the Planning Authority for approval in consultation with NatureScot and SEPA. The ECoW shall be appointed on the approved terms throughout the decommissioning, restoration and aftercare phases of the Development.

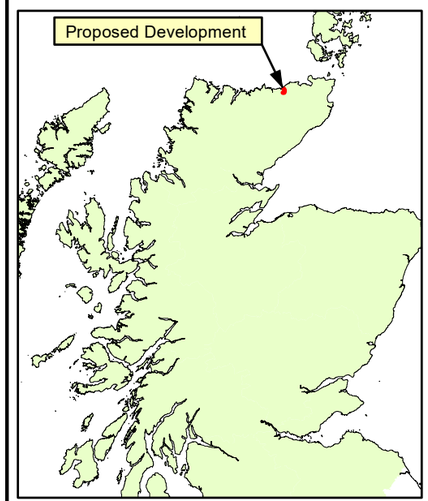
Reason: To secure effective monitoring of and compliance with the environmental mitigation and management measures associated with the Development.

Designation:	Acting Head of Development Management – Highland
Author:	Claire Farmer
Background Papers:	Documents referred to in report and in case file.
Relevant Plans:	Plan 1 - Volume 1: Figure 1 – Overview of the Proposed Development
	Plan 2 - Volume 1: Figure 2 – The Proposed Development
	Plan 3 - Volume 3: Figure 6.1 – Zones of Theoretical Visibility

Scottish & Southern Electricity Networks

Legend

- Proposed Alignment
- Limekiln Wind Farm Substation
- Proposed Sealing End Structure



Scale - 1:100,000@ A3

Project No: PT258/259

Project: Limekiln Wind Farm Grid Connection

Title: Figure 1 - Overview of the Proposed Develoment

Drawn by: TD Date: 06/04/2020

Drawing: 118015-D-NTS1-2.0.0

Scottish & Southern Electricity Networks

Lower Dounreay
Cnoc Urray
Gunnscroft
Harbour
Sandside Bay
Port Mòr
Cnoc Stanger
Isauld Ho
Isauld
Dunes
CH
Cemy
Reay
Cairn
Broch
Achvarasdal
Broch
Milton
Achunabust
Standing Stone
Chambered Cairn
Upper Dounreay
Achbuiligan
Tulloch
Loch Achbuiligan
Hill of Shebster
Borlum Ho
Blarmore
Cairns
Standing Stone
Creag Leathan
Creag Mhor
Helshetter
Milton Moss
23
39
52
65
64
63
38
10
20
30
40
50
120
127

0 0.25 0.5 km
Scale - 1:16,500 @ A3

Legend

- Limekiln Wind Farm Substation
- Dounreay Substation
- Limekiln Wind Farm access
- Underground Cable (Considered under the Applicant's Permitted Development Rights)

Section 37 Project Elements

- Proposed
- Limit of Deviation (LOD)
- Pole Locations
- Proposed Sealing End Structure

Deemed Planning Permission Project Elements

- Upgraded existing access point
- Upgraded existing access track
- New temporary access route
- Forestry Felling
- Temporary Protective Crossing

Project No: PT258/259

Project: Limekiln Wind Farm Grid Connection

Title: Figure 2 - The Proposed Development

Drawn by: TD Date: 06/04/2020

Drawing: 118015-D-NTS2-3.0.0

Scottish & Southern Electricity Networks

Legend

- LVIA Study Area
- Proposed Alignment
- Proposed Limekiln Wind Farm Substation (by others)
- Proposed Limekiln Wind Turbine Location (by others)
- Proposed Sealing End Structure

Zone of Theoretical Visibility (ZTV)*

Number of Poles Theoretically Visible Within 3 km

- 1 - 10
- 11 - 20
- 21 - 30
- 31 - 40
- 41 - 50
- 51 - 61

*The ZTV has been produced in accordance with parameters outlined in Chapter 6 of the EIA Report

N

0 0.15 0.3 0.6 0.9 1.2 1.5 1.8 Kilometers

Scale - 1:25,000 @ A3

Project No: PT258/259

Project: Limekiln Wind Farm Grid Connection

Title: Figure 6.1 - Zone of Theoretical Visibility (ZTV)

Drawn by: EM Date: 02/04/2020

Drawing: 118015-EIA-6.1-2.0.0