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Agenda Item	6.14
Report No	PLN/023/25

## HIGHLAND COUNCIL

**Committee:** North Planning Applications Committee  
**Date:** 12 March 2025  
**Report Title:** 25/00638/MAR: Port Of Cromarty Firth  
Port Of Cromarty Firth, Queens Dock, Shore Road, Invergordon  
**Report By:** Area Planning Manager - North

### Purpose/Executive Summary

**Description:** Invergordon Service Base Phase 5 - Erection and operation of a 450m long berth, comprising land reclamation to create quayside and laydown space for a multiuse facility, targeting component storage, assembly, and pre-commissioning of fully integrated offshore wind turbines, with capacity to accommodate up to 3 wind turbines with a maximum blade tip height of 330m to blade tip above mean sea level, heavy load pad to facilitate a ring crane of up to 250m in height, crawler cranes, berth with roll-on roll-off capability, dredging and ancillary infrastructure including lighting.

**Ward:** 06 – Cromarty Firth

**Development category:** N/A – Marine Licence Consultation

**Reason referred to Committee:** Area Managers Discretion

All relevant matters have been taken into account in the initial stages of appraising this application. It is considered that the proposal is capable of according with the principles and policies contained within the Development Plan and could be acceptable in terms of all other applicable material considerations, subject to the potential introduction of additional mitigation measures and conditions.

### Recommendation

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

## **1. PROPOSED DEVELOPMENT**

- 1.1 The Council has been consulted by the Scottish Government's Marine Directorate on two marine license applications (MD reference 00011084 and 00011085) submitted under Part 4 of the Marine (Scotland) Act 2010. These are to construct and operate the proposed Invergordon Service Base Phase 5 Development which involves the expansion of the existing port, targeted primarily to support the deployment of offshore wind farms. The applications are to be determined by Scottish Ministers.
- 1.2 Separate planning permission is not required owing to the development being located offshore within the Cromarty Firth and given that there are no permanent buildings proposed.
- 1.3 The offshore development shares similar characteristics and environmental effects to applications for onshore development. This report therefore gives consideration to those terrestrial effects in so far as they relate to the interests of the Council. This primarily relates to those effects on the human environment, as opposed to the marine environment. The Marine Directorate is best placed to consider effects on the latter.
- 1.4 The proposed development comprises erection and operation of a 450m long berth, which would form a continuation to the existing 372m Quay West Berth to provide a 822m long extended quay. This would be formed via land reclamation to create an extended quayside and laydown space measuring 450m by 245m, creating a further 11.05ha of laydown space finished in crushed stone and formed to a level of 5.9m above Chart Datum. The extended port area would comprise a piled quay wall on the south / south west faces and rock armour on the north and north west faces.
- 1.5 The proposal targets component storage, assembly, and pre-commissioning of fully integrated offshore wind turbines, with capacity to accommodate up to 3 wind turbines with a maximum blade tip height of 330m to blade tip and a hub height of up to 200m above mean sea level. These operational activities include:
  - manufacture of major wind turbine components (such as anchors, mooring components, or concrete gravity substructures);
  - production of concrete floating substructures, with substructure being poured and built onsite;
  - final assembly of steel or concrete floating substructures, where the structures are fabricated elsewhere, delivered in several 'mega-blocks' (for ease of transport) and the assembly is completed at the port;
  - turbine integration, where the turbine components are manufactured elsewhere and delivered for integration onto substructures;
  - pre-commissioning and initial testing, where turbines are tested and potentially powered up to ensure they are working effectively prior to being towed to the wind farm site; and
  - major maintenance support, where floating turbines are brought back to port for major component exchange or maintenance.

1.6 Other ancillary elements of the proposal comprise:

- formation of a heavy load pad (70m x 70m) to facilitate a ring crane of up to 250m in height which would be temporarily erected as required;
- temporary use of crawler crane(s) of an unspecified number / height;
- creation of the Queens Dock West Berth - a 226.5m long quay wall replacing the existing rock armour and adjustment alignment;
- creation of roll-on roll-off ramp measuring 30m wide and 12m long;
- widening of access to Quay West (additional area measuring 31m x 29m);
- dredging to 14m below Chart Datum; and
- other related infrastructure, including quayside furniture, lighting and site security measures.

1.7 Although the proposals are targeting the offshore wind farm market, the extended port could equally be used for supporting a wide range of port related activities on a project by project basis subject to these activities being marine related. The assessment of this consultation is predicated on the basis that this represents the worst case scenario. Should the proposal facilitate the full integration of offshore turbines, this process is anticipated to take over a week ready for pre-commissioning, however, as the process matures, it is envisaged that one turbine could be integrated in 2-3 days. As deployment to windfarm sites will be weather dependent, it is presumed that integration will avoid the winter months, although preparatory works will be completed year-round. Hence, it is predicted that in the region of 25 to 40 turbines could be integrated and pre-commissioned per year. Once pre-commissioning activities are complete, up to three tugs will be used to manoeuvre the complete floating turbine from the quay and take it out of the Cromarty Firth and onwards to the wind farm site.

1.8 The scope of the project would facilitate the potential to commission fully erected floating turbines. The more likely scenario is for cold pre-commissioning to take place, involving the checking of turbine electrical connections with turbine blades being feathered to catch the least amount of wind possible; they will rotate in the wind at very slow speeds (approximately <1RPM).

1.9 Whilst considered unlikely at present, should a suitable grid connection be forthcoming at a later date, the development would also enable the hot commissioning of turbines, i.e. testing of their operation before deployment to their fixed offshore location out at sea. Hot pre-commissioning will require the turbine rotor to rotate up to 7 times per minute (RPM) for 4 to 6 hours, with occasional short overspeed tests increasing the rotational speed up to 12 RPM for a maximum of 1 minute. Only one turbine will be tested at a time, and assuming there are no issues each turbine will be tested on one occasion. No more than two turbines are likely to be tested in any one day (8-12 hours of testing), and testing is unlikely to take place for more than two consecutive days. The total number of hours there will be a turbine rotating at >1RPM is expected to be around 240 hours per year, most likely within daylight hours between March and September.

1.10 If the development is consented by Scottish Ministers, it is anticipated that construction would commence in Autumn 2025 with the construction phase anticipated to take between 2 years, 3 months and 3 years. Thereafter, it is

anticipated it would have an unrestricted operational life, with the site operating in perpetuity.

- 1.11 The applicant has been in contact with the Planning Authority in advance of submission of the application seeking advice on the Scope of the Environmental Impact Assessment (reference 23/06045/MAR). The applicant has also undertaken pre-application consultation in line with the provisions of the Marine Licensing (Pre-Application Consultation) (Scotland) Regulations 2013. This included project updates via: quarterly joint community council and port meetings; annual public meetings; engagement with potential port users; and undertaking a public consultation event held on 29 October 2024.
- 1.12 The application is supported by an Environmental Impact Assessment Report (EIAR), with chapters on:
- Project description
  - Methodology
  - Legislation and policy
  - Cumulative impacts
  - In-Air noise
  - Coastal processes
  - Archaeology and cultural heritage
  - Landscape and visual
  - Socio-economics and human health
  - Climate change
  - Biodiversity
  - Ornithology
  - Marine biodiversity
  - Traffic, transport and navigation
  - Aviation
  - Major accidents and disasters
  - Schedule of mitigation
- 1.13 No variations were made to the application since receipt of the consultation from the Marine Directorate on 17 February 2025, with the 30 day consultation period for responding ending on 19 March 2025.

## **2. SITE DESCRIPTION**

- 2.1 The 36.3ha site is located on the southern edge of the town of Invergordon on the north shore of the Cromarty Firth, 7 miles west of the mouth of the Firth, which is known as the Sutors. Invergordon lies 14 miles north of the city of Inverness, and 65 miles southwest of Wick. The existing port has 8 berths, over 1 km of quayside, up to 14 metres (m) water depth to accommodate the largest vessels and land space totalling 22.6ha. The proposed development is primarily to the west of the existing established port, adjoining the previous phases (Phase 3 and Phase 4) collectively known as Quay West. It also includes elements in the Queens Dock.
- 2.2 The first land reclamation in Invergordon took place in the 1860s and the area became a 'dockyard port' for the Royal Navy. With oil reserves being discovered in

the North Sea in the early 1970s, the economic opportunities for the Cromarty Firth increased. It was deemed to be in the public interest to encourage further development in the area, and an Act of Parliament formally established the Cromarty Firth Port Authority as a Trust Port in 1973, which now trades under the name Port of Cromarty Firth (PoCF). Since the 1970s, the site has grown to support industrial developments, including aluminium smelting and fabrication. Improvements to onshore transport links, such as the opening of the Cromarty Bridge in 1979 and the Kessock Bridge in 1982 allowed industry on the north shore of the Cromarty Firth to prosper. In recent years port activities have included: oil and gas asset inspection, repair and maintenance; subsea engineering; decommissioning of marine structures; bunk cargo deliveries including for the renewable energy industry and support to the cruise tourism sector with approximately 100 ships regularly docking each year (around 10-20 cruise ships a month are planned between April and September 2025).

2.3 In terms of natural heritage, there are several statutory designated sites near the site that are designated for a range of marine sediment features:

- The Cromarty Firth Site of Scientific Special Interest and Ramsar site are both designated for mudflats and sandflats; whilst these are predominantly found in the sheltered bay areas of the Cromarty Firth (such as Nigg Bay and Udale Bay), the footprint of the designations run round the entire Cromarty Firth, with the exception of a small break at the port.
- The Cromarty Firth Special Protection Area (SPA) shares the same footprint and is designated for ornithology.
- The Moray Firth Special Area of Conservation (SAC) is designated for subtidal sandbanks. Although the designated site extends into the mouth of the Cromarty Firth at the Sutors, there are no sandbanks in this area. The sandbanks are found offshore approximately 1km from the disposal site.

2.4 The historic environment marine interest in the area comprise non-designated heritage assets within the firth out with the application site. Most notably this includes the shipwreck of WWI Armoured Cruiser HMS Natal 5km to the east of the application site. Other terrestrial designated assets include several listed buildings within Invergordon, as well as more distance listings on the Black Isle and to the north and west of Invergordon, including Old Rosskeen Parish Church and Burial Ground. Two scheduled monuments: Clach A' Mheirlich, Symbol Stone (SM1675) located to the north west, and Newhall Point, Chapel and Burial Ground, Balblair (SM5950) located across the firth to the south also lie within the study area.

2.5 The following landscape designations / interest within Highland are present in vicinity:

#### **National Scenic Areas**

- Dornoch Firth 17km north (scoped out of assessment owing to temporary wind farm blade tip visibility)

#### **Wild Land Area**

- WLA29 - The Rhiddoroch - Beinn Dearg - Ben Wyvis 18km west

#### **Special Landscape Areas**

- Sutors of Cromarty, Rosemarkie and Fort George (Sutors) 9km east
- Ben Wyvis 18km west

#### **Landscape Character Types (scoped in within 15km)**

- LCT 345: The Farmed and Forested Slopes – Ross and Cromarty - covering the immediate terrestrial setting of the application site and within the immediate study area up to 5km to the north, as well as extending along the north shore of the inner firth landscape up to and beyond 15km to the east and west, plus the most of the southern area of the Black Isle.
- LCT 346: Open Farmed Slopes – covering the northern coastal areas of the Black Isle and most of the northern Sutor adjacent to Nigg.

#### **Gardens and Designed Landscapes (within 10km)**

- Novar 7km west;
- Ardross Castle 8km northwest;
- Balnagown Castle 8km northeast; and
- Cromarty House 9km southeast.

- 2.6 In relation to visual receptors much of the study area is characterised by a range of coastal towns and settlements, small clusters of houses, dispersed farmsteads and individual dwellings. It also includes the larger industrial working town and port of Invergordon. Several housing developments and individual dwellings lie within 1km. The most densely settled areas are those within Invergordon, including much of the High Street (LVIA Viewpoint 3). The closest of these is at Cromlet Drive, adjacent to Viewpoint 2 at 0.5km to the northeast. The remaining largely residential parts of Invergordon lie within 1.5km, with some dispersed dwellings to the west of the town and a coastal line of houses at Saltburn at 2.5km east. There are also small clusters of dwellings at Newhall Point and Balblair, across the Cromarty Firth to the south between 1.3 to 1.5km. Several other settlements lie between 2 and 5km on the lower ground either side of the firth. The closest of these is at Jemimaville on the Black Isle. Alness, the largest settlement in the Ross and Cromarty area lies some 4.5km to the northwest. All have varying degrees of theoretical visibility of the proposal.
- 2.7 Other visual receptors with theoretical visibility include users of recreational routes and roads. The National Cycle Network (NCN) Route 1 makes use of the ferry at Cromarty to allow a circuit of the Cromarty Firth to be made during the summer. The southern route takes in Munlochy, Belmaduthy, Cromarty, Nigg, Balintore, joining the northern route at Tain. The northern route passes through Dingwall, Evanton, Alness and Scotsburn, coming within circa 3.8km of the site to the east of Alness. Key nearby roads include:
- the B817 which runs adjacent to the northern shore of the Cromarty Firth;
  - the A9 further to the north, meeting the B817 at Dalmore to the west;
  - the B9163 which runs above the southern shoreline of the Cromarty Firth connecting Balblair with the A9 to the west and with the B9160 which heads south from Balblair.
- 2.8 Wind farm projects in proximity of the proposal are recorded on the Councils onshore wind map. These must be taken into account when assessing the cumulative landscape and visual impacts of the proposal, with the applicant's

assessment detailing 45km study area. To date consented commercial scale onshore wind development has been well set back from the Cromarty firth and is confined to the northern hills and elevated land to the north west, including Novar and the cluster comprising Strathory, Coire na Cloiche, Beinn Tharsuinn, and Beinn nan Oighrean. Further to the south west lies Fairburn. There are however applications pending / at EIA Scoping stage located further to the west. The most notable is Abhainn Dubh situated close to the foot of Ben Wyvis some 15km west of the site, which gives rise to potential cumulative intervisibility and sequential effects across the inner firth landscape.

### **3. PLANNING HISTORY**

3.1	27.03.2024	23/06045/MAR- MS-LOT consult scope: SCOP- 0035 - Invergordon Service Base, Phase 5, Invergordon	EIA Scoping Consultation Response Issued
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### **4. PUBLIC PARTICIPATION**

- 4.1 The application is not advertised by the Council with this being undertaken and managed by the Marine Directorate.
- 4.2 Timeous representations received by THC: None recorded to date
- 4.3 Timeous representations made to Marine Directorate: None recorded to date
- 4.4 Material considerations raised are summarised as follows:
- None
- 4.5 All letters of representation received by the Council are available for inspection via the eplanning portal which can be accessed through the internet [www.wam.highland.gov.uk/wam](http://www.wam.highland.gov.uk/wam). Those representations received by Marine Directorate can be accessed via <https://marine.gov.scot/marine-licence-applications>. It should be noted that some representations may have been submitted to both The Highland Council and Marine Directorate.

### **5. CONSULTATIONS**

#### **Consultations Undertaken by the Planning Authority**

Consultees listed below with no summary are yet to respond to the consultation and any forthcoming responses will be passed onto the Marine Directorate.

- 5.1 **Invergordon Community Council (Host)**
- 5.2 **Alness Community Council**
- 5.3 **Ardross Community Council**
- 5.4 **Avoch and Killen Community Council**

- 5.5 **Cromarty Community Council**
- 5.6 **Ferintosh Community Council**
- 5.7 **Fortrose and Rosemarkie Community Council**
- 5.8 **Kiltearn Community Council**
- 5.9 **Kilmuir and Logie Easter Community Council**
- 5.10 **Nigg and Shandwick Community Council**
- 5.11 **Resolis Community Council**
- 5.12 **Saltburn and Westwood Community Council**
- 5.13 **Access Officer**
- 5.14 **Coastal Planning Officer**
- 5.15 **Development Plans Team**
- 5.16 **Ecology Officer**
- 5.17 **Environmental Health**
- 5.18 **Flood Risk Management Team**
- 5.19 **Forestry Officer**
- 5.20 **Historic Environment Team (Archeology))**
- 5.21 **Historic Environment Team (Conservation)**
- 5.22 **Landscape Officer**
- 5.23 **Transport Planning Team**
- 5.24 **Other Consultees** - Further consultations have been undertaken by the Marine Directorate, with the Marine (Scotland) Act 2010 (section 27(4)) setting out who must be consulted. This includes those specified in The Marine Licensing (Consultees)(Scotland) Order 2011 and in relation to any particular application, those persons or bodies who the Scottish Ministers consider it appropriate to consult. These are the four statutory consultees under the 2011 Order:
  - Commissioners of Northern Lighthouses;
  - the Maritime and Coastguard Agency;
  - Scottish Environmental Protection Agency; and
  - NatureScot.

All consultation responses are to be sent directly to the Marine Directorate.

## **6. DEVELOPMENT PLAN POLICY**



- 6.1 Appendix 2 of this report provides details of the documents that comprise the adopted Development Plan, including details of pertinent planning policies as well as adopted supplementary guidance, and other material policy considerations which are relevant to the assessment of the application.

## **7. PLANNING APPRAISAL**

- 7.1 The Council has been consulted by the Scottish Government's Marine Directorate on two marine license applications submitted under Part 4 of the Marine (Scotland) Act 2010 (the Act). A comprehensive detailed planning appraisal to help inform the decision making process is not however provided. This is because this is not an application for planning permission, for an electricity generating station, or for transmission infrastructure. As such, the Council is not the determining authority or a statutory consultee. The consultation period for the application has also been set by Marine Directorate is also restricted to 30 days. Although Council officers sought an extended period to respond this has not been agreed between the parties, owing to the project's consenting pathway being a particularly tight timescale with the applicant targeting a Scottish Ministers decision in Autumn 2025.

- 7.2 The Act (section 27(1)) specifies the following as matters which the Scottish Ministers must have regard to when determining a marine licence application:

- The need to protect the environment;
- The need to protect human health; and
- The need to prevent interference with legitimate uses of the sea.

The Act also gives some discretion to Scottish Ministers to consider 'other such matters' as they consider relevant.

- 7.3 It should also be noted that for applications under the Act, that the Development Plan is just one of a number of considerations. As such Section 25 of the Town and Country Planning (Scotland) Act 1997 which requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise, is not engaged.

### **Planning Considerations**

- 7.4 The key considerations in this case are the overall compliance with the Development Plan and Other Government Policy, the related energy and economic benefit of the scheme, and all other material considerations. This report focuses in the pertinent matters the Council wish to bring to the attention of the Marine Directorate as decision maker.

### **Development Plan / Other Government Policy**

- 7.5 The Development Plan comprises National Planning Framework 4 (NPF4), the adopted Highland-wide Local Development Plan (HwLDP), the adopted Inner Moray Firth Local Development Plan 2 (IMFLDP2), and statutorily adopted supplementary guidance.

### **National Policy**

- 7.6 National Planning Framework 4 (NPF4) forms part of the Development Plan and was adopted in February 2023. The Spatial Strategy sets out that we are facing unprecedented challenges and that we need to reduce greenhouse gas emissions and adapt to future impacts of climate change. It sets out that Scotland's environment is a national asset which supports our economy, identity, health and wellbeing. It sets out that choices need to be made about how we can make sustainable use of our natural assets in a way which benefits communities. The spatial strategy reflects legislation in setting out that decisions require to reflect the long term public interest. However, in doing so it is clear that we will need to make the right choices about where development should be located ensuring clarity is provided over the types of infrastructure that needs to be provided and the assets that should be protected to ensure they continue to benefit future generations. The Spatial Priorities support the planning and delivery of sustainable places, where we reduce emissions, restore and better connect biodiversity; liveable places, where we can all live better, healthier lives; and productive places, where we have a greener, fairer and more inclusive wellbeing economy.
- 7.7 The proposed development supports the delivery of the national Spatial Strategy, whereby in principle support for the development of offshore wind is established. Although not a national development in itself, the proposal constitutes a port expansion purposefully designed to facilitate the assembly of offshore wind turbines which are of a type and scale that benefit in principle support under NPF4 National Development 3 - Strategic Renewable Electricity Generation and Transmission Infrastructure.
- 7.8 At the high level, NPF4 considers that Strategic Renewable Electricity Generation and Transmission Infrastructure will assist in the delivery of the Spatial Strategy and Spatial Priorities for the north of Scotland, and that Highland can continue to make a strong contribution toward meeting Scotland's ambition for net zero. Alongside these ambitions, the strategy for Highland aims to protect environmental assets as well as to stimulate investment in natural and engineered solutions to address climate change. This aim is not new and will clearly require a balancing exercise to be undertaken, which is reflected throughout the document.
- 7.9 NPF4 Policies 1, 2, and 3 apply to all development proposals Scotland-wide, which means that significant weight must be given to the global climate and nature crises when considering all development proposals, as required by NPF4 Policy 1. To that end, development proposals must be sited and designed to minimise lifecycle greenhouse gas emissions as far as is practicably possible in accordance with NPF4 Policy 2, while contributing to the enhancement of biodiversity, as required by NPF4 Policy 3.
- 7.10 Specific to this proposal, as well as the support in Policy 1 (significant weight will be given to the global climate and nature crisis when considering development), Policy 11 of NPF4 supports all forms of proposals for renewable, low-carbon and zero emission technologies including wind farms and their supporting infrastructure. However, any project identified as a national development or otherwise requires to be considered at a project level to ensure all statutory tests are met, as set out in Annex 1 of the NPF4. This includes consideration against the provisions of the Development Plan, of which NPF4 is a part.

- 7.11 Complementing those policies is NPF4 Policy 4 Natural Places, which sets out that development proposals by virtue of type, location, or scale that have an unacceptable impact on the natural environment will not be supported. The policy goes on to clarify what that means for different designations. It sets out that proposals with likely significant effects on European sites (SACs or SPAs) require appropriate assessment, and that development proposals that will affect a National Park, NSA or SSSI will only be supported where: i) the objectives of designation and the overall integrity of the areas will not be compromised; or ii) any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.
- 7.12 Similarly, sites designated in Development Plans for local nature conservation or Special Landscape Areas (SLAs) are protected in NPF4 Policy 4 unless the development will not result in significantly adverse effects on its qualities or its integrity, or, these effects are clearly outweighed by social, environmental, or economic benefits of at least local importance.
- 7.13 Specific for energy developments, NPF4 Policy 11 states that the principle of all forms of renewable, low-carbon, and zero emission technologies is supported with the exception of wind farm proposals located in National Parks or NSAs. The policy goes on to state that while significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on reduction of greenhouse gas emissions targets, the development's impacts, including cumulative impacts, must be suitably addressed and mitigated against. In this regard, the Highland Council has consistently given significant weight to a development's contribution to environmental targets prior to the adoption of NPF4.
- 7.14 NPF4 Policy 11 Part e) sets out the additional project design and mitigation requirements for energy proposals. This includes a broad range of matters akin to those to be assessed under HwLDP Policy 67. This includes consideration of the landscape and visual impacts and advises that where impacts are localised and / or appropriate design mitigation has been applied such effects will generally be considered acceptable. Whilst this development proposal is offshore and for the potential assembly of offshore wind turbines, it will result in a number of onshore environmental effects, such as landscape and visual, meaning that the policy tests established in NPF4 remain applicable.
- 7.15 The other NPF4 policies relevant to this proposal are set out in the previous section of this report, the provisions of which are to be considered throughout the report of handling by the Marine Directorate.

### **Highland wide Local Development Plan**

- 7.16 At the Highland region level, the principal policies against which the applications requires to be determined are Policy 41 Business and Industrial Land, and Policy 67 Renewable Energy of the Highland-wide Local Development Plan (HwLDP). These policies offer support for the build out of allocated sites for industry and renewable electricity generation.
- 7.17 HwLDP Policy 67 sets out that renewable energy development should be well related to the source of the primary renewable resource needed for its operation.

Proposals are required to be judged according to their contribution in meeting renewable energy targets and positive/negative effects on the local and national economy, as well as against all other relevant policies of the Development Plan and other relevant guidance. In this regard, although the proposals are for the assembly and commissioning of wind turbines, with such effects being of an intermittent and somewhat temporary nature, the development would help to facilitate the construction and servicing requirements of offshore wind farms that make a significant contribution to meeting renewable energy targets. In that context the Council will support proposals where it is satisfied they are located, sited, and designed such as they will not be significantly detrimental overall, either individually or cumulatively with other developments, having regard to the policy's 11 specified criteria (as set out in Appendix 2 of this report). Such an approach is consistent with the concept of HwLDP Policy 28 Sustainable Design and NPF4 Policy 11 Energy, to achieve the right development in the right place, and to promote appropriate management of development and land uses in the long-term public interest; it is not to allow development at any cost.

### **Area Local Development Plan**

- 7.18 There is considerable support for the project established within the recently adopted Inner Moray Firth Local Development Plan 2 (IMFLDP2). Whilst the application site is offshore, the supporting narrative for the general policies within the IMFLDP2, Paragraphs 41 to 45, explain that:

Para 41: "This Plan supports the area to maximise local and Scotland-wide benefits from investment in renewable energy and place the Highlands at the heart of the drive towards net-zero. The area's legacy of strategically important oil and gas fabrication sites and abundance of renewable energy resources off its coast mean it is ideally placed to be at the forefront of the fast moving green energy revolution. The ScotWind alone is a multi-billion pound, 50 year pipeline of offshore wind projects planned for the Outer Moray Firth and offers a unique chance build a green, sustainable economy which places our natural assets at its centre. The Council's Indicative Regional Spatial Strategy and NPF4 highlight the importance which this industry can bring to both Highland and wider Scotland, and for supporting local and national outcomes relating to a just transition and decarbonisation. To ensure that these economic and regeneration opportunities are delivered alongside the protection of the environment, ongoing engagement will be necessary with key agencies, particularly in relation to safeguarding the integrity of the internationally and nationally important natural heritage of the Cromarty and Moray Firths."

Para 42 "The area's nationally important status has been further recognised through the Scottish Government and UK Government jointly identifying the Inverness and Cromarty Firth as one of the two new Green Freeports in Scotland. A cross-sector partnership is developing a series of proposals which includes the main ports in the Cromarty Firth and the Moray Firth; Port of Cromarty Firth, Port of Nigg, Port of Inverness, Ardersier and Highland Deephaven. These proposals aim to transform Highland's economy and help to regenerate communities. The ambitions of the Inverness and Cromarty Firth Green Freeport go beyond being the prime location for assembly, operation and maintenance services and extend to becoming an international base for

fabrication and manufacturing of renewable energy components and a leading research and educational hub. Together these components would establish the Inner Moray Firth as a global centre of excellence in renewable energy”.

Para 44: “In recognition of the Council’s support for the Inverness and Cromarty Firth Green Freeport project, and to maximise the benefits it can bring, this Plan seeks to enable its delivery. As part of the Council’s contribution to the partnership leading the Green Freeport project, advice is being provided on how prospective Green Freeport developments can address national and local planning policies. The Council is also supporting and facilitating work with communities and partners as part of its place based approach in the parts of the Inner Moray Firth most directly linked with the Green Freeport. It is recognised that a degree of flexibility will be required to maximise the opportunities which may arise during the Plan period.”

Para 45: “The Plan supports the growth of the sector by identifying a range of business and industrial sites, including each of the main ports in the region. The Council will also consider creating Masterplan Consent Areas (MCAs) for key ports and other strategically important sites, including for housing, to help assist the industry by streamlining the planning process.”

- 7.19 IMFLDP Policy 7 Industrial Land continues to support industry by: 1) seeking to protect allocated industrial land for its intended land use; 2) to offer support for new industrial land on land not allocated in the Plan, including land outwith settlement development areas in appropriate locations which ensure sustainable travel, safeguard residential amenity, and does not adversely effect the environment; and 3) explain that all development proposals must be considered against the Agent of Change principle and ensure that established noise and other nuisance-generating uses (including industrial sites) remain viable and can continue or grow without unreasonable restrictions being placed on them.
- 7.20 The IMFLPD Placemaking Priorities (16) for Invergordon also specify: support further business and industrial expansion at allocated and established employment sites; Identify necessary improvements to Tomich junction and, where appropriate, seek developer contributions towards these; and proposals must demonstrate no adverse impact on the Cromarty Firth SPA as well as avoiding disturbance to features of the Cromarty Firth SSSI.
- 7.21 Part of the site falls within Industrial site Allocation IG05 Invergordon Harbour which covers all previous developed phases of Invergordon Port. The allocation’s specified developer requirements are:

“Flood Risk Assessment required if non harbour related development is proposed. No sensitive uses in areas shown to be at risk of coastal flooding; protected species survey; safeguard the fabric and historic character of historically important (WWII) buildings; improve active travel links between the Port and the town centre; demonstration of no adverse effect on the integrity of Cromarty Firth SPA and Ramsar and Moray Firth SAC by public sewer connection and comprehensive sustainable urban drainage system which safeguards water quality and avoids sedimentation and other pollution reaching the Firth, satisfactory submission of a Construction Environmental Management Plan and Operational Environmental Management Plan both

including prevention of sedimentation and pollution, noise and disturbance, Noise Mitigation Plan (including construction and operational phases and disturbance effects), Oil Spill Contingency Plan, Boat traffic Management Plan, Hydro-Dynamic study to assess the impact of altered flows on sediment movement in the firth in relation to subtidal sandbanks, full compliance with appropriate regulatory frameworks for ballast water discharge, dredging and disposal and ship-to-ship transfers including Marine Scotland dredging and disposal guidance (both for capital and maintenance spoil) and JNCC piling guidance. Recreational Access Management Plan including consideration of water based activities, must ensure disturbance to the Moray Firth SAC bottlenose dolphin are avoided, must include satisfactory provision and/or contribution towards open space, path and green network requirements, including mitigation associated with the Inverness to Nairn Coastal Trail, adherence to the Scottish Marine Wildlife Code and the WiSE scheme to help avoid, for example rafts of birds on the water surface. **Any green freeport proposals which would extend beyond the IG05 site boundary shown on Map 20 Invergordon should provide a masterplan (with input from and early engagement with key agencies and other stakeholders) and address the relevant developer requirements set out above.** [Case Officer bold text emphasis].

### **Onshore Wind Energy Supplementary Guidance (OWESG)**

- 7.22 The Council's Supplementary Guidance for Onshore Wind Energy is a material consideration in the determination of planning applications. It should be noted that the guidance does not provide additional tests to assess development proposals against over and above the Development Plan policy. Rather, the guidance compliments the policy by ensuring a consistent and robust methodology is adopted in the assessment of all applicable applications, in particular (although not exclusively) for consideration of landscape and visual impacts. In that way, the guidance provides a clear indication of the approach the Council takes towards the assessment of proposals.
- 7.23 The OWESG also provides strategic considerations that identify sensitivities and potential capacity for wind farm development called the Landscape Sensitivity Appraisals (LSA). The Black Isle Surrounding Hills and Moray Firth Coast Caithness LSA was published in 2017 and forms an integral part of the statutorily adopted OWESG. The findings of this study identifies key routes and key views which need to be given consideration in bringing forward development. While directed to onshore wind energy, the findings of the document are also applicable to offshore wind assembly and development given the similarities in development type.
- 7.24 Paragraphs 4.16 and 4.17 of the OWESG describe the 10 key design criterion that set the 'thresholds' developments should seek to achieve in order to ensure the development is appropriately sited and designed to avoid significant landscape and visual impacts, and in turn, comply with the applicable criteria of HwLDP Policy 67. The development's compliance or otherwise with the 10 criteria is expected to be appraised by the Marine Directorate in determining the application.

## **Other Government Policy**

- 7.25 In assessing compliance with Other Government Policy, there is a vast suit of recent government publications in support of the development of offshore wind to meet net zero objectives, to meet UK energy needs and in the interest of maintaining security of supply. Those publications are listed within Appendix 2 are expected to be fully considered in the determination of the application.
- 7.26 In summary, in principal support for the proposal is established within the Development Plan, set out at both the national and regional level policy. Such support is not however unqualified. There are a considerable list of site specific developer requirements to be addressed by the application, particularly for the marine environment, all of which take time to assess through the determination of the application.

## **Energy and Economic Benefits**

- 7.27 In terms of offshore wind, the draft Scottish Energy Strategy and Just Transition Plan and the Offshore Wind Policy Statement has identified a target of 8-11GW of installed offshore wind energy capacity in Scottish waters by 2030. As one of the cheapest forms of electricity, offshore wind is described as having a vital role to play in decarbonising our energy demand and securing a just transition to net zero. Subject to planning and consenting decisions and finding a route to market, there is 38 GW of offshore wind projects in the pipeline. When projects which are awaiting construction, under construction or already operational are added to this, the total potential capacity reaches over 40 GW – the equivalent to producing enough electricity to power every home in the UK for over a year and a half. The Draft Energy Strategy and Just Transition Plan's theoretical pipeline, if all delivered, would be well in excess of the 8-11GW target.
- 7.28 Further, the UK Government Clean Power Action Plan has also recently set a more ambitious target of 43-50 GW of offshore wind by 2030, to significantly reduce our fossil fuel dependency, with offshore wind being described as having a particularly important role as the backbone of the clean power system. The reported current offshore installed capacity stands at 14.8 GW (Q2 2024).
- 7.29 The proposed port facility would be one site of many assisting with the deployment of offshore wind. The port is strategically well placed to service this industry with planner arrays in relative close proximity across waters to the east and north of Scotland. If successful in targeting this market, the proposed site could construct 25 to 40 turbines per annum, make a significant contribution to Scottish and UK Government policy targets, British energy security, and the international commitments for renewable energy and electricity generation to facilitate net zero by 2045.
- 7.30 In terms of economic benefits, the proposed development anticipates a construction period of between 2 years, 3 months and 3 years with the project being operational for at least 50 years. Such a project can offer significant investment/opportunities to the local, Highland, and Scottish economy including for businesses ranging across construction, haulage, electrical and service sectors through the supply chain, with opportunities in research and development, design,

project management, civil engineering, component fabrication / manufacture, installation, and maintenance. The application is accompanied by a Socio-economics and Human Health assessment (EIA Chapter 10 and EIA Appendix J.1) which looks at both the construction and operational phases for the development covering the initial 25 to 26 year period.

- 7.31 Whilst this assessment covers a multitude of factors, a pertinent finding is that in terms of deprivation, Alness is represented by eight data zones, of which half are ranked in the top 20% of areas with the greatest relative deprivation across Scotland. One of these data zones is within the top 10%. Invergordon is represented by six data zones, of which four are in the top 20% of areas with the greatest relative deprivation across Scotland and two of these are within the top 10%.
- 7.32 During construction, at the **Inverness and Cromarty Firth** level, the project is reported to give rise to in the region of 170 FTE jobs, rising to up to 320 FTE jobs in the best case scenario. An estimated £30.3m of GVA and £15.2m of income is predicted as an outcome of the lowest construction scenario. This could be maximised to an estimated £73.1m of GVA and £39.1m of income under the highest scenario.
- 7.33 During construction, at the **Highlands and Islands** level, the project is reported to give rise to in the region of 200 FTE jobs, rising to up to 400 FTE jobs. An estimated £34.9m of GVA and £17.6m of income is predicted as an outcome of the lowest construction scenario. This could be maximised to an estimated £84.3m of GVA and £45.3m of income under the highest scenario.
- 7.34 During operation, the minimum design scenario is assessed as generating approximately 280 net additional FTE jobs per annum for the **Inner Moray Firth**, nearly £30m of net additional GVA per annum and £11.8m of net additional income per year at peak operation. In the maximum case, economic impacts include the creation of approximately 1,000 net additional FTE jobs per annum, almost £99m of net additional GVA per annum and £47.2m of net additional income per year for the Inner Moray Firth, at peak operation.
- 7.35 For the **Highlands and Islands**, the Phase 5 Development is assessed as generating an estimated 280 – 1,000 net additional FTE jobs per annum, £30m – £100m net additional GVA per annum and £11.9 – £47.7m of net additional income per year between the range of design scenarios. Figures for the Inner Moray Firth and wider Highlands and Islands region are very similar, demonstrating that a vast majority of the net additional economic benefit will be retained within the Inner Moray Firth.
- 7.36 Following consultation, the Highland Council's Community Wealth Building Strategy 2024-2027 was agreed by the Council on 19 September 2024. The strategy provides a framework that sets out how the Council will utilise different activities to maximise the impact of investment in local areas and support more local ownership of assets and wealth. Since the application has been submitted, the Council has also published the Social Value Charter for Renewables Investment in June 2024. This has been brought to the applicant's attention.
- 7.37 The socio-economic chapter of the EIA includes details of a Green Freeport Skills



Plan. One of the Inverness and Cromarty Firth Green Freeport's key priorities is explained as to raise awareness amongst the current and future workforce of the range and scale of career opportunities presented by the Green Freeport and the supply chain. This will be implemented through outreach to careers advisers, schools, tertiary education providers and parents/carers. The Inverness and Cromarty Firth Green Freeport also has outlined a 10-point skills plan in collaboration with its partners. The skills plan includes but is not limited to:

- Engagement targeted at young people to address competition for labour and migration (include secondary school support);
- STEM outreach;
- Entry-level sector specific recruitment support and targeted pre-employment support;
- Supporting and developing pathways to skilled green jobs through Foundation and Graduate Apprenticeships and other industry focussed green pathways (e.g., accelerated pathways for schools in the Green Freeport area, focusing on children from disadvantaged areas);
- Increasing apprenticeship uptake and graduate recruitment by stimulating applicant demand through the increased outreach, supporting employers to engage and recruit from a pipeline of future Foundation, Modern and Graduate Apprentices;
- A 5% target for new jobs in the Green Freeport being apprentices or graduates;
- Collaborate with the University of the Highlands and Islands and other Higher Education institutions on enhanced routes to careers;
- Providing scholarship funding for apprentices, further and higher education students using a Skills Fund. Scholarship funding is intended to encourage diversity and target at areas of deprivation within the Green Freeport area;
- Enhanced and new commercial training and further and Higher Education; and
- Attracting new, skilled people into the region.

7.38 The Green Freeport, now in its early operational phase, is continuing work on the implementation of the skills plan, to provide employment for local people in high value jobs. This initiative is being delivered by the Green Freeport and is not solely associated with the Phase 5 Development project. However, the objectives of the skills plan seek to maximise the positive effect on education and training to be realised associated with the Phase 5 Development proposal as well as other Green Freeport tax sites. The port are actively supporting these objectives and encouraging potential users of the port to engage with the plans.

7.39 Although no community ownership has been proposed to date, the commitments set out in applicant's indicate that the proposal is potentially capable of contributing towards the Highland Council's Community Wealth Building Strategy, particularly in terms of ensuring the use of local supply chains and service, and local job creation. As such, additional support for the project can be given under NPF4 Policy 25 Community Wealth Building. The socio-economic commitments reported in the EIAR could be secured by condition, with these being integral to the project and accordance with the provisions of the Council's Development Plan.

## **Other Material Considerations**

- 7.40 Other key terrestrial related material consideration which must be taken into account are listed below. Marine Directorate are required to give due regard to each of these potentially significant environmental effects in determining the application, with each of these topics expected to require the same level of scrutiny as any terrestrial renewables or industrial development application:
- a) Layout, design, masterplanning, and alternatives considered;
  - b) Landscape and visual impact, including cumulative effects and covering residential visual amenity assessment;
  - c) Construction and operational environmental management, including working hours, Community Liaison Group, and appointment of an Environmental Clerk of Works and a Planning Monitoring Officer;
  - d) Roads and transport (including impacts on the local and Trunk Road, particularly at the Tomich Junction);
  - e) Wider public access (including a Recreational Access Management Plan) and improved active travel links between the port and Invergordon town centre;
  - f) Water, flood risk and drainage (including public waste water connection and other safeguards for water quality);
  - g) Natural heritage (including designations, species protection, ornithology and biodiversity enhancement);
  - h) Built and cultural heritage;
  - i) Construction noise (including dredging) and operational noise (including turbine cold and hot commissioning potential) and cumulative noise effects;
  - j) Shadow flicker associated with turbine commissioning;
  - k) Telecommunications;
  - l) Aviation (including a reduce lighting scheme);
  - m) Decommissioning;
  - n) Major accidents, disasters and human health; and
  - o) Any other material considerations raised by consultees / through representations.
- 7.41 Owing to the necessity to respond within a 30 day period, the Council has not provided a planning appraisal to assist with the determination process but rather will provide internal consultation responses, with recommended mitigation and conditions to the Marine Directorate for their consideration.

## **8. Matters to be Secured by Legal Agreement**

- 8.1 The Council do not envisage to be party to any legal agreement required as part of the consenting process.

## **9. CONCLUSION**

- 9.1 The Development Plan and national planning policy expressly support the deployment of renewable energy development, particularly offshore wind. Much of the site is allocated for industrial development and has a long established industrial heritage. In principal support for the proposal is therefore established within the

Development Plan, set out at both the national and regional level. Such support is not however unqualified. There is a considerable list of site specific developer requirements, and further environmental matters still to be addressed, particularly for the marine environment, all of which take time to assess through the determination of this application.

- 9.2 When considering such proposals, NPF4's Spatial Strategy sets out that we are facing unprecedented challenges and that we need to reduce greenhouse gas emissions and adapt to future impacts of climate change. It sets out that choices need to be made about how we can make sustainable use of our natural assets in a way which benefits communities. In assessing such nationally important development proposals, NPF4 Policy 1 demands decision makers to place significant weight to be given to the global climate and nature crisis.
- 9.3 Whilst there is clear in principle support for the development, any proposal must still be considered at a project level to ensure all statutory tests are met. This includes consideration against the provisions of the Development Plan, of which NPF4 is a part and all other material considerations. The related energy and climate change benefits associated with the proposal have been considered, with the project predicted to give rise to a substantial number of both construction and long term operational full time jobs for the region. The site is one of several sites within the Green Freeport which can collectively deliver long term economic prosperity for this part of Highland. The socio-economic impacts weigh heavily in favour of the proposal, however, these benefits must be carefully balanced with the environmental effects of the scheme and its impact on the amenity of the area. Whilst this response does not consider all environmental matters set out within the applicant's Environmental Impact Assessment, area which must be fully appraised in the decision making process have been set out. The acceptability or otherwise of the proposal will likely hinge upon:
- the marine impacts including on surrounding designations;
  - landscape and visual impacts associated with the assembly if fully integrated offshore floating turbines at the site;
  - port operational cumulative noise impacts with other port related activities;
  - post operational lighting implications with other port related activities; and
  - securing transport infrastructure upgrades and related mitigation measures.

In the absence of available time to respond, Council department consultee responses will be forthcoming to cover these matters beyond the stipulated 30 consultation period.

- 9.4 Although offshore, significant adverse landscape and visual effect will be experienced. These effects will be most acute when turbines are being assembled and commissioned on a regular basis with these to be floated out to sea which would not take place over winter months. Subject to the end use scenario, the applicant's Environmental Impact Assessment has identified such significant effects to be relatively localised, experienced by residents, recreational areas and routes: in and around Invergordon (LVIA Viewpoints 1, 2 and 3); from Newhall Point and the north side of the Black Isle to the south (Viewpoint 4), as well as from Alness (Viewpoint 5). Officer's initial review of the LVIA however indicates that such significant effects are anticipated to be more widespread, potentially extended

along the A9 to the north (Viewpoint 11), and at Cromarty Beach (Viewpoint 7). The severity and precise extent of such landscape and visual effects have not however been fully appraised by the Council, although it can be expected that the proposal will undoubtedly intensify portside industrial activity which will impact upon the rural character of the surrounding area. This is however for an overriding cause to help address climate change with the proposal creating substantial long term employment opportunities for the region. Given this context, on balance, the proposal can be considered acceptable.

- 9.5 As such, is considered that the proposal is capable of according with the principles and policies contained within the Development Plan and could be acceptable in terms of all other applicable material considerations, subject to the potential introduction of additional mitigation measures and conditions. Consequently, it is recommended that the Council raises no objection to the application.

## **10. IMPLICATIONS**

- 10.1 Resource: There are significant staffing and financial resource implications if the application is to be subject to a Public Local Inquiry, albeit that in this case this process is not mandatory irrespective of the Council's response.
- 10.2 Legal: Not applicable as the Planning Authority are not the decision maker.
- 10.3 Community (Equality, Poverty and Rural): Not applicable
- 10.4 Climate Change/Carbon Clever: The proposed development may help facilitate the generation of significant amount of renewable energy and make a meaningful contribution towards achieving net zero.
- 10.5 Risk: Not applicable
- 10.6 Gaelic: Not applicable

## **11. RECOMMENDATION**

### **Action required before decision issued: N**

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

- A. Members grant delegated authority to the Area Planning Manager – North to respond to the Marine Directorate regarding any future Further / Supplementary Environmental Information, where that does not: i) materially increase the scale of the proposed development; and ii) result in any additional significant adverse environmental effects; and iii) does not undermine or remove mitigation to be secured within the Council's consultation response on the application;
- B. Members granting delegated authority to the Area Planning Manager - North to provide a subsequent response(s) Marine Directorate to supply all consultation responses received on the application, with scope to recommend further mitigation and conditions to regulate the development in

respect of terrestrial environmental impacts, and to ensure that socio-economic impacts are maximised.

Signature:	Dafydd Jones
Designation:	Area Planning Manager - North
Author:	Peter Wheelan, Strategic Projects Team Leader
Background Papers:	Documents referred to in report and in case file.
Relevant Plans:	Plan 1 – Location Plan
	Plan 2 – Consenting Red Line Boundary

## **Appendix 1 – Letters of Representation**

None received to date.

## **Appendix 2 - Development Plan and Other Material Policy Considerations**

### **DEVELOPMENT PLAN**

#### **National Planning Framework 4 (2023)**

A2.1 The NPF4 policies of most relevance to this proposal include:

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

1 – Tackling the climate and nature crisis

2 – Climate mitigation and adaptation

3 – Biodiversity

4 – Natural places

7 – Historic assets and places

11 – Energy

13 – Sustainable transport

22 – Flood risk and water management

23 – Health and safety

25 – Community wealth building

#### **Highland Wide Local Development Plan 2012**

A2.2 28 - Sustainable Design

29 - Design Quality and Place-making

30 - Physical Constraints

31 - Developer Contributions

41 - Business and Industrial Land

56 - Travel

57 - Natural, Built and Cultural Heritage

58 - Protected Species

59 - Other Important Species

60 - Other Importance Habitats

61 - Landscape

63 - Water Environment

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

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

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

## 72 – Pollution

### **Inner Moray Firth Local Development Plan (IMFLDP2)**

- A2.3 Whilst the application site is offshore, the supporting narrative for the general policies within the IMFLDP2, Paragraphs 41 to 45 is relevant as it sets the strategic context for the proposal. This is detailed within the main body of the report.
- A2.4 IMFLDP2 general Policy 7 Industrial Land is applicable.
- A2.5 Part of the site also falls within Industrial site Allocation IG05 Invergordon Harbour which covers all previous developed phases of Invergordon Port.
- A2.6 The IMFLDP2 also identifies the Special Landscape Areas (SLA) within the plan area.

### **Highland Council Supplementary Planning Policy Guidance**

- A2.7 The Onshore Wind Energy Supplementary Guidance (OWESG) provides additional guidance on the principles set out in Policy 67 of the Highland-wide Local Development Plan for Renewable Energy Developments. This document is a material consideration in the determination of onshore wind energy planning applications following its adoption as part of the Local Development Plan in November 2016. However, it also provides a useful assessment methodology for consideration of landscape and visual matters. This can usefully be applied to aid assessment of offshore wind related energy development.
- A2.8 The document also contains the Loch Ness Landscape Sensitivity Study, the Black Isle, Surrounding Hills and Moray Firth Coast Sensitivity Study, and, the Caithness Sensitivity Study (adopted 2017).



### **Other Highland Council Supplementary Guidance**

- A2.9
  - Biodiversity Enhancement Planning Guidance (May 2024)
  - Developer Contributions (Mar 2018)
  - Highland Historic Environment Strategy (Jan 2013)
  - Highland's Statutorily Protected Species (Mar 2013)
  - Physical Constraints (Mar 2013)
  - Roads and Transport Guidelines for New Developments (May 2013)
  - Special Landscape Area Citations (Jun 2011)
  - Standards for Archaeological Work (Mar 2012)
  - Sustainable Design Guide (Jan 2013)

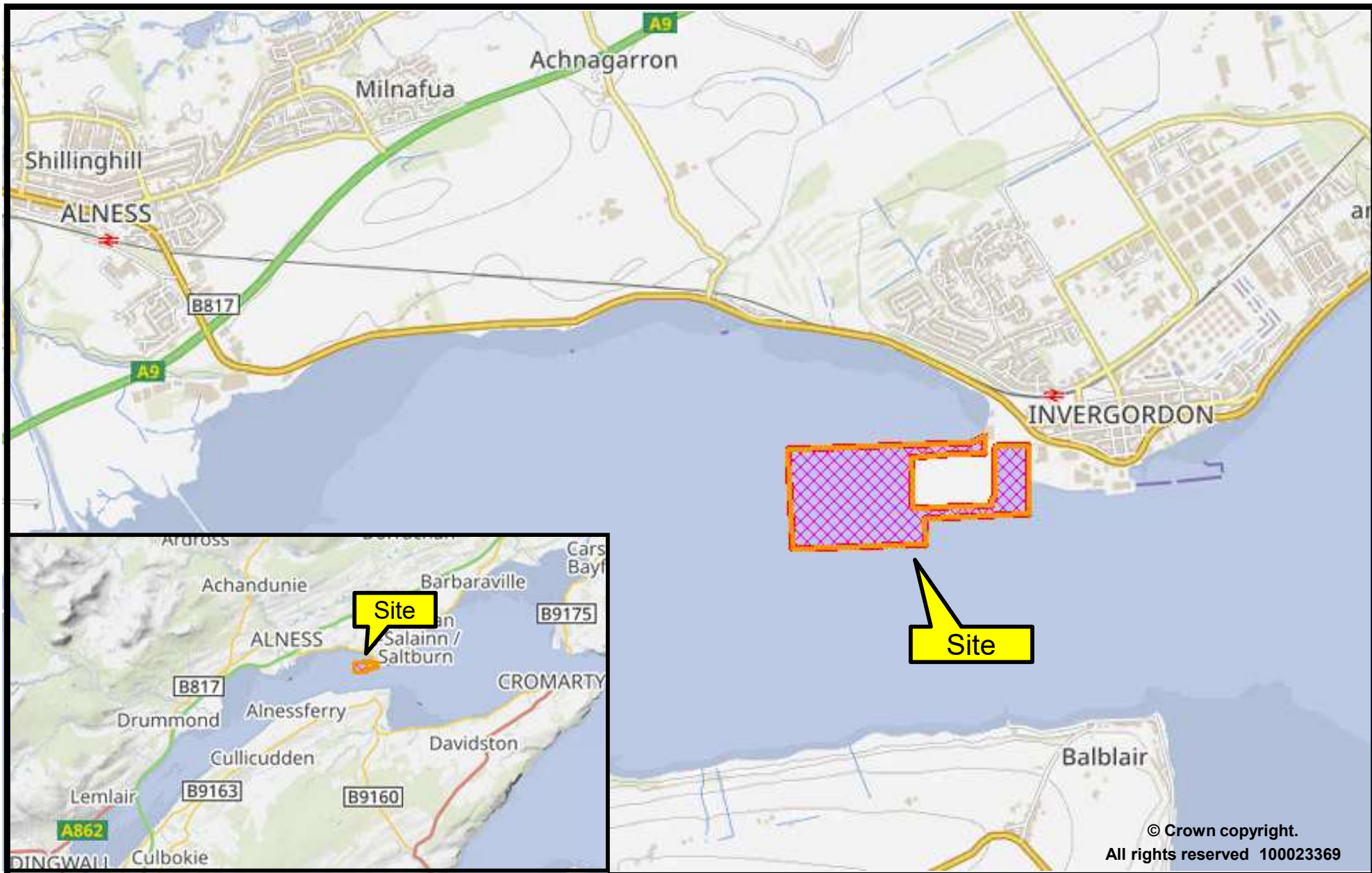
### **OTHER MATERIAL POLICY CONSIDERATIONS**

#### **Emerging Highland Council Development Plan Documents and Planning Guidance**

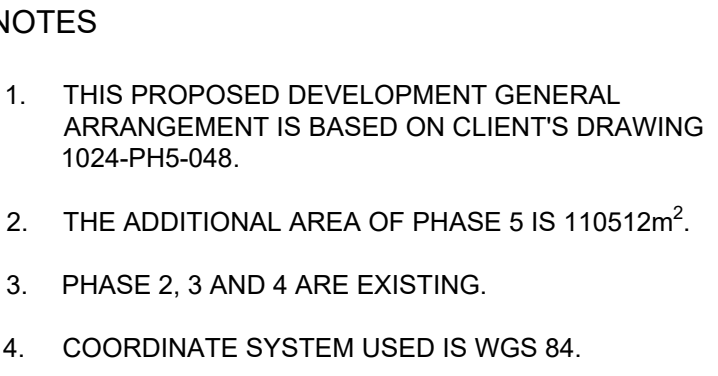
- A2.10 The Highland-wide Local Development Plan is currently under review and is at Main Issues Report Stage. It is anticipated the Proposed Plan will be published in 2026 following undertaking evidence gathering and Gate Check.
- A2.11 In addition, the Council has further advice on delivery of major developments in a number of documents. This includes Construction Environmental Management Process for Large Scale Projects (Aug 2010) and The Highland Council Visualisation Standards for Wind Energy Developments (Jul 2016).

#### **Other National Legislation, Policy and Guidance**

- A2.12
  - Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 – interim and annual targets replaced by Climate Change (Emissions Reduction Targets) (Scotland) Bill in November 2024
  - Climate Change Committee Report to UK Parliament (July 2024)
  - UK Government Clean Power Action Plan (Dec 2024)
  - Draft Energy Strategy and Just Transition Plan (2023)
  - Offshore Wind Investment Roadmap Policy (2023)
  - British Energy Security Strategy (2022)
  - Sectoral Marine Plan for Offshore Wind Energy in Scotland (2020)
  - Offshore Wind Sector Deal (2020)
  - Offshore Wind Policy Statement (2020)
  - Scottish Energy Strategy (2017)
  - Scotland's National Marine Plan (NMP) (2015, reviewed in 2018 and 2021)
  - 2020 Routemap for Renewable Energy (2011)
  - Draft Scottish Biodiversity strategy to 2045: tackling the nature emergency (2023)
  - Historic Environment Policy for Scotland, HES (2019)
  - PAN 1/2011 - Planning and Noise (2011)
  - PAN 60 – Planning for Natural Heritage (2008)
  - Circular 1/2017: Environmental Impact Assessment Regulations (2017)
  - NatureScot: Guidance on Aviation Lighting Impact Assessment (2024)







Phase	Color
PHASE 2	Blue
PHASE 3	Purple
PHASE 3E	Green
PHASE 4	Pink
PHASE 5	Grey

CONSENTING RED LINE  
BOUNDARY

POINT	LATITUDE	LONGITUDE
A	57° 41.182' N	4° 11.728' W
B	57° 40.930' N	4° 11.690' W
C	57° 40.958' N	4° 11.062' W
D	57° 41.027' N	4° 11.073' W
E	57° 41.049' N	4° 10.580' W
F	57° 41.220' N	4° 10.590' W
G	57° 41.236' N	4° 10.793' W
H	57° 41.220' N	4° 10.850' W
I	57° 41.178' N	4° 11.144' W
J	57° 41.047' N	4° 11.126' W
K	57° 41.063' N	4° 10.753' W
L	57° 41.216' N	4° 10.752' W
M	57° 41.194' N	4° 10.790' W

07	10/10/2024	ADDITIONAL POINTS ADDED	SJ	TH	AM
06	10/10/2024	UPDATED BASED ON COMMENTS	SJ	TH	AM
25	12/10/2024	LONGLAT ADDED	SJ	TH	AM
04	21/10/2024	COORDINATES ADDED	SJ	TH	AM
03	18/10/2024	UPDATED BASED ON COMMENTS	SJ	TH	AM
02	15/10/2024	UPDATED BASED ON COMMENTS	SJ	TH	AM
01	14/10/2024	FIRST ISSUE	SJ	TH	AM
EV	DATE	DESCRIPTION	BY	CHK	APP

## REVISIONS

IENT



PROJECT

PoCF - PHASE 5L

TLE

CONSENTING RED LINE  
BOUNDARY - PHASE 5



AWN		CHECKED	APPROVED
SJ		[R]	[R]
TE		SCALE	REF.
OCT24		AT A1 1:2000	PC4461-RHD-SD-XX-DR-C-1006-1009.dwg
DRAWING No.			SUITABILITY
PC4461-RHD-ZZ-XX-DR-C-1009			REVISION
			S5
			P07