

Agenda Item	6
Report No	PLN/012/26

HIGHLAND COUNCIL

Committee: North Planning Applications Committee
Date: 11 March 2026
Report Title: 25/02964/PIP: Thistle Wind Partners Joint Venture
Report By: Area Planning Manager - North

Purpose/Executive Summary

Description: Construction of onshore transmission infrastructure comprising cable landfall, substation, cable circuits, temporary construction areas, access, drainage, landscaping and associated infrastructure.

Location: Land 1500M East Of Old Free Church Manse
Bower

Ward: 02- Thurso and Northwest Caithness

Development category: National Development

Reason referred to Committee: 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.

Recommendation

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

1. PROPOSED DEVELOPMENT

- 1.1 The proposal is for onshore infrastructure to allow the export of electricity from the Ayre Offshore Wind Farm. The offshore wind farm is subject to a separate application under Section 36 of the Electricity Act 1989, to be determined by Marine Scotland (THC reference 25/04779/S36). The offshore wind farm is located some 33km off the eastern coast of Orkney. Owing to the proposed array's considerable distance from Highland's coastline, Council Officers have confirmed to Marine Scotland that the Council have no objection or further comment to make on that aspect of the project. The offshore wind farm's export cables would make landfall at Sinclair's Bay, Caithness, and continue on land within a buried cable corridor to connect to the national electricity grid network. To enable this, a new substation is proposed on land between the A882 and A9 1.4km to the south-east of Georgermas Junction Railway Station. From the project's specific substation, a further underground cable connection would be required to the 400 kilovolt (kV) substation and HVDC converter station (Banniskirk Hub), which at the 26 November 2025 North Planning Applications Committee received a minded to grant planning permission decision (reference 24/04898/FUL).
- 1.2 The application to be determined includes the following key components:
- Landfall and Transition Joint Bays (TJBs) – the location at which the offshore export cables come ashore and are jointed to the onshore export cables;
 - Onshore export cables (220-275kV) – up to four onshore cable circuits laid in up to two cable trenches. Each circuit will comprise of three power cables, a fibre optic cable for communication and temperature sensor cables as required. The final cable corridor will measure 50 metres (m) in width, incorporating a temporary haul road, space for the cable trenches and temporary top and subsoil storage areas. The onshore cable corridor will be up to 23.5km in length with a resulting working corridor footprint of up to 117.5 hectares (ha);
 - An onshore substation (400kV) – required to transform the power to comply with the requirements of the receiving Banniskirk Hub Grid Connection Point (GCP) and the national grid network. The substation's permanent site area comprises 42ha, inclusive of landscaping and planting, with the substation's indicative vehicle access connecting to the A882. A maximum of three substation buildings are proposed to house the switchgear, using a Gas Insulated Switchgear (GIS) technology where switchgear is cooled by refrigerated gas rather than air. Up to three buildings are proposed within a 10ha switchyard area. The maximum building footprint would be 82m x 36m, with a maximum roof ridge height of 15m.
 - Onshore 400kV cable corridor – up to two onshore cable circuits laid in up to two cable trenches, providing onward transmission to the grid, which connect the substation to Banniskirk Hub. The final cable corridor will measure 35m in width, incorporating a temporary haul road, space for the cable trenches and

temporary top and subsoil storage areas. The onshore 400kV cable corridor will be up to 2.5km in length;

- Temporary construction compounds and temporary and permanent access tracks for the landfall, onshore export cables and substation; and
- Sustainable drainage systems (SuDS), perimeter security fencing, landscape planting and habitat management.

- 1.3 The proposed development is identified as National Development by National Planning Framework 4 (NPF4). It is classified as 'development contributing to Strategic Renewable Electricity Generation and Transmission' with 'new and/or replacement upgraded on and offshore high voltage electricity transmission lines, cables and interconnectors of 132kV or more; and new and/or upgraded Infrastructure directly supporting on and offshore high voltage electricity lines, cables and interconnectors including converter stations, switching stations and substations'.
- 1.4 Given many of the uncertainties around this type of development related to advances in technology, construction methods and the long lead time for the project to commence on site, the exact layout and design requirements for each element of the development are yet to be determined. As such, this application is for Planning In Principle (PIP), which allows for approval of outline parameters with the impacts of each individual element and the final design to be approved through specific conditions attached to the consent. This means that the application site area is significantly larger than the final area required for the onshore element of project. The proposed development has utilised a Project Design Envelope (PDE) approach which uses a design envelope and maximum parameters within which the final design would sit. The PDE approach allows for a necessary degree of flexibility where certain details of a development are indicative and yet to be finalised at the time of application. This is particularly applicable to the PIP application process.
- 1.5 The applicant has undertaken an Environmental Impact Assessment (EIA), based on this design envelope approach principle known as the 'Rochdale Envelope'; a term derived from established case law; it essentially means that consideration is given to the maximum and minimum extents of the project to establish a 'worst case scenario'. Work would continue refining the project concepts and the final design for approval at condition stage.
- 1.6 A detailed construction programme would be developed as design and procurement activities progress and full details including sequencing and installation methodologies would be confirmed in a Construction Environmental Management Plan (CEMP) which would be produced and agreed post-consent. It is anticipated that construction will take four years, commencing in 2029 at the earliest. The applicant has submitted an outline CEMP with the application. The offshore infrastructure is also anticipated to commence in 2029 and take up to five years which means construction will run concurrently. The substation is likely to have a lifetime of up to 50 years. The operational lifetime of the offshore electricity generation infrastructure is expected to be up to 30 years, becoming fully operational by 2034, however the design life assumptions of the project indicate a longer operational phase would be possible.

- 1.7 The applicant has been in regular contact with the Planning Authority in advance of submission seeking advice on procedural matters and on the details which would accompany the application, following from their use of the major pre application advice service in September 2023. The applicant undertook informal public consultation roadshow events at five locations within Caithness held during November 2023, with further presence at public and business events in Caithness and Orkney during 2024. The applicant has undertaken two rounds of formal Pre Application Consultation (PAC) activities. Formal Pre Application Consultation ran from March 2025 – May 2025 with two consultation events at the Ross Institute Halkirk (March, April) and two at Keiss Village Hall (March, May).
- 1.8 An EIA scoping request was submitted in January 2024 and a scoping opinion was issued in February 2024. The project design envelope was further refined through environmental surveys, technical and engineering studies and discussions with stakeholders and the community, as part of the EIA process. This continues to be refined as further studies and discussions with stakeholder's progress.
- 1.9 The application's accompanying Environmental Impact Assessment Report (EIAR), dated August 2025, contains chapters on planning policy and legislation, project description, EIA methodology, site selection and consideration of reasonable alternatives, biodiversity and terrestrial ecology, terrestrial ornithology, landscape and visual impact assessment, cultural heritage, water quality and flood risk, geology and ground conditions, air quality, noise and vibration, traffic and transport, land use, soils and public access, climate change and socio-economic impact. The application was also supported by a Pre-Application Consultation Report (PAC) and Planning Statement.
- 1.10 No variations have been made to the application since validation. The applicant has however, provided clarification responses to representations received and consultations, dated 16 December 2025, 29 January 2026 and 3 February 2026.

2. SITE DESCRIPTION

- 2.1 The application site red line boundary comprises 1,197 ha. The offshore cables land on the coast at Sinclair's Bay south of Keiss. The onshore cable corridor then heads west from Sinclair's Bay for 24km travelling west to Loch Scarmclate and the B874 before heading south over the Far North Railway line at Claycock and then the A882 to the proposed substation site adjacent to Banniskirk Mains, north of Spittal Hill. The precise onshore export cable alignments are yet to be defined and would be dependent on the results of ongoing site investigations, engineering studies, consultation feedback and the findings of the EIA. Permanent access to the substation would be from the A882. The majority of construction traffic would be routed along main roads including the A9, A882 and A99.
- 2.2 The predominant land use affected is agriculture, comprising both arable and grazing farmland. There are also areas of commercial plantation at Mireland and Bridge of Gravity and native or nearly native woodland. Georgemas lies to the north of the proposed substation at the junction of the A9 and A882 with scattered farms and houses north and south of the cable route. Other prominent features include electrical overhead lines, with a mixture of wooden pole and larger lattice steel

towers; and Bower Quarry and Ruther Quarry which lie to the south of the application boundary. The single-track Far North Railway line runs between Georgemas Junction Station and Scotsclader with a branch line to Wick within the application boundary, just north of Banniskirk. The Subsea 7 Pipeline factory track is located at Mireland with Spittal substation to the south. There are 7 residential properties located within, and 14 adjacent to, the application site's redline boundary.

- 2.3 The site lies within the hydrological catchment of the Wick River, Burn of Garth, Burn of Lyth and River Thurso. Major watercourses crossing the application site include from east to west; the Burn of Aukhome, Blind Burn, Burn of Gravity and Gillock Burn. The Loch of Wester and Quoynee Burn and Loch Scarmclate lie to the south of the site boundary. Recreation and tourism include deer stalking, cycling and hill walking with both serviced and non-serviced tourist accommodation within the area. The site is crossed by the North Coast 500 Tourist Route and the Inverness to John O' Groats route of the National Cycle Network which both follow the A99 west of Keiss Beach. There are core paths in and around Halkirk to the west and Keiss to the east.

Environmental Designations and Habitats

- 2.5 The site is not located within any natural heritage designation. There are thirteen designated sites of importance for terrestrial ecology within 12 km of the site boundary. This includes five Special Areas of Conservation (SAC), seven Sites of Special Scientific Interest (SSSI) and one Ramsar Site. There are also seven areas of Ancient Woodland with 2km of the site boundary. Additionally, the Flow Country World Heritage Site is located approximately 7km south of the onshore export cable corridor, at its closest point.

Designation	Purpose	Distance from site
Loch of Wester SAC	Naturally nutrient rich lakes or lochs: Natural eutrophic lakes with Magnopotamion or Hydrocharition-type vegetation	120m south
Loch of Wester SSSI	Mesotrophic loch	120m south
Loch Scarmclate SSSI	Base-rich loch	130m south
Loch Watten SAC	Natural eutrophic lochs with Magnopotamion or Hydrocharition-type vegetation	1.8km south
Loch Watten SSSI	Base-rich loch; and open water transition fen	1.8km south
Caithness and Sutherland Peatlands SAC	Clear-water lakes or lochs with aquatic vegetation and poor to moderate nutrient levels, acid peat-stained lakes and ponds, blanket bogs, wet heathland, transition mires and quaking	Various locations: 1.2km north at closest point

	bogs, depressions on peat substrates, otter and marsh saxifrage	
Caithness and Sutherland Peatlands Ramsar Site	Ramsar Criterion 1: blanket bog, lochans and pools and wet heath. Ramsar Criterion 2: bog orchid, Lindberg's bog-moss, olive bog-moss, oreodytes alpinus and fresh water pearl mussels; and otter	Various locations: 1.2km north at closest point
Stroupster Peatlands SSSI	Blanket bog and oligotrophic loch	1.2km north
River Thurso SAC	Atlantic salmon	1.5km east
Loch of Durran SSSI	Transition grassland and vascular plant assemblage.	2.3km north
Moss of Killimster SSSI	Blanket bog.	3.6km south
Loch of Winless SSSI	Open water transition fen	4.2km south
East Caithness Cliffs SAC	Vegetated sea cliffs of the Atlantic and Baltic Coasts.	10.7km southeast

2.6 There are nine sites designated for ornithological importance within 12 km of the study area. This includes two SPAs also designated as Ramsar sites of international importance, a further two SPAs and three SSSIs.

Designation	Purpose [all breeding birds unless stated]	Distance from application boundary
Caithness Lochs SPA	Whooper swan (non-breeding) Greylag goose (<i>Anser anser</i>) (non-breeding) Greenland white-fronted goose (non-breeding)	Various locations: 190m south at closest point
Caithness Lochs Ramsar site	Whooper swan (non-breeding) Greylag goose (non-breeding) Greenland white-fronted goose (non-breeding)	Various locations: 190m south at closest point
Caithness and Sutherland Peatlands SPA	Wigeon, Dunlin, Wood sandpiper, Greenshank, Red-throated diver, Black-throated diver, Golden eagle, Golden plover, Hen harrier,	Various locations: 1.67km north at closest point

	Merlin, Short-eared owl, Common scoter	
Caithness and Sutherland Peatlands Ramsar site	Breeding bird assemblage Dunlin, Greylag goose	Various locations: 1.67km north at closest point
North Caithness Cliffs SPA	Fulmar, Guillemot, Kittiwake, Peregrine, Puffin, Razorbill, Seabird assemblage	8.15 km north
East Caithness Cliffs SPA	Cormorant, Fulmar, Great black-backed gull, Guillemot, Herring gull, Kittiwake, Shag, Seabird assemblage	10.28 km southeast
Loch Watten SSSI*	Greylag goose, Non-avian features; Base-rich loch, open water transition fen	850m south
Loch of Wester SSSI*	Whooper swan (non-breeding) Non-avian features; Mesotrophic loch	200 m south
Loch Scarmclate SSSI*	Base-rich loch Greylag goose (non-breeding)	190m south
*A component of the Caithness Lochs SPA		

Landscape Designations, Wild Land and Landscape Character

- 2.7 There are no National Scenic Areas (NSA), Special Landscape Areas (SLA) or Wild Land Areas (WLA) within the site. The landscape assessment has assessed the potential impact of the onshore substation on the surrounding Landscape Character Types (LCTs), being Farmed Lowland Plain (LCT 143), Sweeping Moorland and Flows (LCT 134), Sandy Beaches and Dunes (LCT 140); and Coastal Crofts and Small Farms (LCT 144).

Built Heritage

- 2.8 The site is not located within any built heritage designations. Known cultural heritage assets within 3km are set out in the table below:

Site Name	Listing	Location Within Application Site
Halcro Manse, broch	Scheduled Monument SM556	10 m from the application boundary and 7.2 km from the proposed substation location

Stemster House	Category B listed Building LB589	200 m from the application boundary and 2.6 km from the proposed Substation location.
Dovecote and Memorial, Stemster House	Category C listed Building LB590	360 m from the application boundary and 2.8 km from the proposed substation location
Mill of Knockdee, chambered cairn	Scheduled Monument National SM468	600 m from the PPP Application Boundary and 2 km from the proposed Substation location
Achanarras, hut circle	Scheduled Monument SM2402	1.6 km from the PPP Application Boundary and 3 km from the proposed Substation location.

3. PLANNING HISTORY

Current Application

- | | | | |
|-----|-------------|--|---|
| 3.1 | 11 Feb 2026 | 25/04779/S36: Ayre Offshore Wind Farm - construction and operation of an offshore wind farm comprising up to 67 turbines with a maximum blade tip height of 356m, subsea interconnector and export cabling and associated offshore infrastructure. | Pending consideration by Scottish Ministers (THC raised no objection) |
| 3.2 | 23 Apr 2025 | 25/00496/PAN: Provision of onshore transmission infrastructure for the Ayre Offshore Wind Farm. | Proposal of Application Notice reported to committee |
| 3.3 | 29 Feb 2024 | 24/00243/SCOP: Ayre Offshore Wind Farm - onshore infrastructure including substation, inter-array cables, export cables and associated infrastructure | EIA scoping response issued |
| 3.4 | 31 Oct 2023 | 23/03886/PREMAJ: Ayre Offshore Wind Farm - onshore infrastructure including substation, inter-array cables, export cables and associated infrastructure | Advice Issued |

Application Site and Cable Corridor

3.5		25/02353/FUL Formation of two temporary junctions for construction vehicle access, to enable underground electricity cabling works associated with the Spittal to Peterhead High Voltage Cable project	Pending Consideration
3.6		25/03443/FUL Formation of temporary accesses to A99 Spittal to Peterhead high voltage cable	Pending Consideration
3.7		25/04521/PIP Erection of house	Pending Consideration
3.8		25/04525/PIP Erection of house and formation of access	Pending Consideration
3.9	5 Jan 2026	25/02512/FUL Construction of two temporary access points, to provide access to the cable corridor for construction vehicles associated with the LT360 Spittal to Peterhead High Voltage Cable project	Planning Permission Granted
3.10	23 Oct 2025	25/02504/PIP erection of dwelling (renewal)	Planning Permission in Principle Granted
3.11	23 Oct 2025	25/02504/PIP erection of dwelling (renewal)	Planning Permission in Principle Granted
3.12	22 Aug 2025	25/00536/FUL Demolish existing buildings, erection of dwelling house, installation of new private drainage system and associated works	Planning Permission Granted
3.13	31 Jan 2025	24/04706/FUL Replacement static caravan	Planning Permission Granted
3.14	04 Jul 2023	23/01178/PIP Erection of house	Planning Permission in Principle Granted

Pertinent Planning History for Associated Suite of Transmission Projects and Connecting Renewable Energy Projects Not Part of this Current Application

3.15	27 Feb 2026	24/04898/FUL Banniskirk Substation – Erection and operation of an Air Insulated Switchgear 400kV substation and HVDC converter station with associated buildings, installation of new platforms, drainage infrastructure, temporary construction compound, landscaping, mounding and other ancillary works	Minded to Grant Planning Permission Decision, Subject to Conclusion of S75 Agreement
3.16	30 Oct 2025	25/03311/S37 Spittal to Beaully 400 kV OHL - Install, operate and keep installed 173km of new 400 kV overhead electricity line, supported on steel lattice tower structures, between proposed new substations at Banniskirk (ND 15905 56823) in the area of Spittal, and Fanellan (NH 48534 43208) in the area of Beaully, with a connection via a proposed new substation at Carnaig (NH 65053 97458) near to the existing substation at Loch Buidhe, in the area of Bonar Bridge; associated permanent diversion works to 18km of existing 132 kV and 275 kV overhead electricity lines, including the temporary diversion works, and ancillary development and associated works.	Section 37 Electricity Act: Raise Objection
3.17	18 Jun 2024	23/05353/PIP West of Orkney Wind Farm - construction of onshore transmission infrastructure comprising up to two cable landfalls, an onshore substation and up to five associated export circuits	Planning Permission in Principle Granted

4. PUBLIC PARTICIPATION

4.1 Advertised: Unknown neighbour and EIA development

Date advertised: 27 August 2025 - The Edinburgh Gazette and 29 August 2025 - The John O’Groat Journal.

Timeous representations: 13 objections, 3 support comments

Late representations: 0

4.2 Material considerations raised in objections are summarised as follows:

- Adverse impacts on wildlife and local habitats;
- Landscape and visual impacts;
- Impacts on capacity and condition of the local road network and road safety;
- Potential negative impacts on the local visitor and agricultural economy;
- Loss of agricultural land;
- Construction noise and dust impacts;
- Operational noise impacts;
- Loss of agricultural land;

- Potential land contamination and Unexploded Ordnance (UXO);
- Concerns regarding the detail of the supporting information necessary to determine the application; and;
- Issues with the EIAR process for the associated offshore element of the project and consideration of reasonable alternative options.

4.3 Material considerations raised in support are summarised as follows:

- Environmental benefits of renewable energy;
- Potential socio economic benefits incurred; and
- Project accords with national and local policies.

4.4 The following matters raised in representations are not material planning considerations:

- Lack of need for further renewable energy in Caithness, Highland and Scotland;
- Lack of grid capacity to transmit generated electricity;
- Lack of a coordinated strategy for renewables energy generation and transmission in Scotland and UK;
- Concerns that proposed community benefits will not be realised locally;
- Impact on property values and private views; and
- General perceived impact on lifestyle and mental wellbeing.

4.5 All letters of representation received by the Council are available for inspection via the Council's eplanning portal which can be accessed through the internet www.wam.highland.gov.uk/wam

5. CONSULTATIONS

5.1 **Caithness West Community Council** – did not respond to the consultation.

5.2 **Castletown and Bower Community Council (host)** - did not respond to the consultation.

5.3 **Dunnet and Canisbay Community Council** – did not respond to the consultation

5.4 **Halkirk Community Council (host)** – do not object to the application. The Community Council raised concern regarding the level of development in the Halkirk and Caithness Region, and that the level of assessment is not robust. They state the application needs to address the land use for business and recreation needs and the impact on the lifestyle and wellbeing of the local communities. It has an overarching concern there is no plan for the generation and distribution of power in Scotland and that such development is currently driven by developers which are businesses. An approved plan should be put in place to allow assessment of need for projects.

5.5 **Latheron Lybster and Clyth Community Council** – did not respond to the consultation

5.6 **Sinclair Bay Community Council (host)** – did not respond to the consultation.

5.7 **Tannach and District Community Council** - did not respond to the consultation.

- 5.8 **Watten Community Council** - did not respond to the consultation.
- 5.9 **Wick Community Council** – did not respond to the consultation.
- 5.10 **Access Officer** - does not object to the application. There is a core path, CA15.17, running along the coast at Keiss, which shall be protected throughout the construction and operation of the development. Other, non-formal, access routes may also be affected. The Access Officer requests that an Outdoor Access Management Plan is secured via condition. Any upgraded tracks, or new tracks that will be retained, should be designed to facilitate public recreational access.
- 5.11 **Community Wealth Building Team** – do not object to the application and will contact the applicant separately regarding the Highland Social Values Charter.
- 5.12 **Contaminated Land** - do not object to the application, subject to conditions. There are numerous localised areas within the site boundary, with potential for contaminated land due to historic and current activities. Where contaminated land cannot be avoided additional mitigation would be required, as confirmed in the Environmental Impact Assessment Report. This includes potential contamination in the vicinity of the SHETL Banniskirk Hub and the proposed substation associated with the current application, where part of the site includes former quarries. It requests a condition that no work shall commence until a scheme to deal with potential contamination onsite has been approved by the Planning Authority.
- 5.13 **Ecology Officer** – initially objected to the application based on concerns with the level of detail within the applicant’s protected species surveys and biodiversity enhancement measures. Following the submission of clarification on the extent of the protected species survey areas and an outline Biodiversity Enhancement Plan by the applicant, the Ecology Officer’s objection was removed, subject to conditions to secure species protection plans, pre commencement ecological surveys and a Habitat Management Plan to define the applicant’s biodiversity enhancement measures.
- 5.14 **Environmental Health** - does not object to the application subject to conditions. It requests a construction noise assessment where work audible at any noise sensitive receptor outwith scheduled working hours or where noise levels are likely to exceed 75dB(A) for short term works and 55dB(A) for long term works. It also requests a scheme for dust suppression depending on proximity of works to residential receptors. The applicant has submitted a revised noise impact assessment following previous consultation response advising on the Council’s noise criteria. Environmental Health require operational noise limit of background plus 5db or 30db whichever was lower. The applicant’s revised noise impact assessment has demonstrated that with use of mitigation and the design of the equipment, they would be able to meet the limit imposed. A condition is attached to ensure that this is implemented.
- 5.15 **Flood Risk Management Team** - do not object to the application. It notes that as the cables will be buried there will be no risk of flooding or increased risk to others. It requests a condition that requires a Flood Risk Assessment where any permanent above ground infrastructure is required including the watercourse crossings and the substation. It also requests a condition which requires surface water drainage design including a Drainage Impact Assessment (DIA) is submitted for review.

- 5.16 **Forestry Officer** – does not object to the application. The application boundary generally has sufficient scope to adjust the cable alignment to avoid sensitive woodland areas. However, there are sections of productive woodland where it is apparent that some removal will be unavoidable. A condition is to be secured via the forthcoming detailed applications, to secure a compensatory planting plan in advance of development commencing.
- 5.17 **Landscape Officer** - does not object to the application. Overall, the proposed development has been designed sympathetically with the landscape. It is relatively contained and has limited visibility from the surrounding landscape with significant effects limited to its vicinity.
- 5.18 **Historic Environment Team (Archaeology)** - do not object to the application. Pre - commencement conditions for a Written Scheme of Investigation and programme of archaeological works are requested.
- 5.19 **Transport Planning Team** – do not object to the principle of the proposed development but raised concerns about the application due to the impacts of the increase in traffic during construction and the potential damage and disruption to local roads infrastructure. Discussions with the applicant have secured a further written statement committing to discussions with Transport Planning and the Area Roads Operations Team, to confirm site traffic and abnormal loads routeing, a schedule of mitigation and a phasing plan for construction avoiding the construction periods of other major projects in the area.
- 5.20 **Highlands and Islands Airports Limited** – do not object to the application. The project does not infringe on the safeguarding criteria for the operation of Wick Airport.
- 5.21 **Historic Environment Scotland (HES)** - do not object to the application subject to conditions. The application does not raise historic environment issues of national interest, relating to heritage assets within its remit. The Scheduled Monument Halcro Manse, broch [SM556] is located c10m from the site boundary and contractors should ensure all staff are aware of the monument and its protection. It requires a condition for a site protection plan to be approved by the Planning Authority and HES.
- 5.22 **National Air Traffic Control Services (NATS)** – do not object to the application. The proposals do not conflict with the NATS safeguarding criteria.
- 5.23 **NatureScot** – do not object to the application subject to conditions. The Highland Council, as competent authority, is required to carry out an appropriate assessment in view of the conservation objectives of the Caithness Lochs Special Protection Area (SPA and Ramsar), Caithness and Sutherland Peatlands (SAC and Ramsar), Loch of Wester (SAC), Loch of Watten (SAC) and River Thurso (SAC) with Nature Scot providing further comments to advise the Council Officers in this regard. NatureScot sets out the range of issues that must be considered and mitigation plans that must be included in the consent.
- 5.24 **Network Rail** – do not object to the application subject to conditions to integrate consideration of traffic passing over or under the railway in the CTMP. The design of the proposed cable route must be undertaken in agreement with Network Rail.

- 5.25 **RSPB** – do not object to the application subject to conditions. It raises concern on the impacts on Greenland White-fronted Geese and supports the recommendations of NatureScot on mitigation of potential effects. It raises the impact on waders and recommends the condition that addresses pre-construction surveys and nest checks with appropriate exclusion zones considers not only Schedule 1 and Annex 1 species but is extended to include these important wader species. It also states it is important the proposed Habitat Management Plan and Biodiversity Enhancement clearly set out what elements are proposed as mitigation and/or compensation and what is considered enhancement with a condition securing biodiversity enhancement including benefits for Caithness waders.
- 5.26 **Scottish Environment Protection Agency** - do not object to the application subject to conditions. It requests conditions for flood risk, protection of watercourses, management of peat and micro siting of works. It also requests the applicant considers the possibility of riparian planting as part of any biodiversity net gain and compensatory planting strategy.
- 5.27 **Scottish Forestry** - did not respond to the consultation.
- 5.28 **Scottish and Southern Energy Networks** – did not respond to the consultation.
- 5.29 **Scottish Water** - did not respond to the consultation.
- 5.30 **Transport Scotland** – do not object to the application subject to conditions to regulate vehicle movements on the trunk road network. A Construction Traffic Management Plan (CTMP) is required via condition, alongside further conditions to secure details of a strategy for abnormal load deliveries to the construction site.

6. DEVELOPMENT PLAN POLICY AND OTHER MATERIAL POLICY CONSIDERATIONS

- 6.1 Appendices 2 and 3 of this report provides details of the documents which 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 Section 25 of the Town and Country Planning (Scotland) Act 1997 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

Planning Considerations

- 7.2 The key considerations in this case are:
- a) Compliance with the Development Plan / Other Planning Policy
 - b) Energy and Economic Benefits
 - c) Design and Layout
 - d) Landscape and Visual Impacts

- e) Construction Impact
- f) Noise
- g) Water, Flood Risk, Drainage and Soils
- h) Roads, Transport and Access
- i) Natural Heritage (including ornithology)
- j) Built and Cultural Heritage
- k) Other Material Considerations

Development Plan / Other Planning Policy

- 7.3 The Development Plan comprises National Planning Framework 4 (NPF4), the adopted Highland-wide Local Development Plan 2012 (HwLDP), the Caithness and Sutherland Local Development Plan 2018 (CaSPlan) and all statutory supplementary guidance.
- 7.4 Appendix 3 provides an assessment of compliance with the Development Plan and other planning policies.
- 7.5 In summary, the principle of the development is established in national policy, with the proposed development being of national importance for the delivery of the national Spatial Strategy. NPF4 considers that Strategic Renewable Electricity Generation and Transmission Infrastructure would 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 would clearly require a balancing exercise to be undertaken, which is reflected throughout NPF4. At the regional level, the HwLDP also offers support for renewable development proposals where they are located, sited and designed such as they would not be significantly detrimental overall, individually or cumulatively with other developments.

Energy and Economic Benefit

- 7.6 The UK Government targets an additional 5GW of offshore wind energy capacity by 2030. The draft Scottish Energy Strategy and Just Transition Plan 2023 has also identified a target of 8-11GW of installed offshore wind energy capacity in Scottish Waters by 2030.
- 7.7 The Ayre Offshore Wind Farm's indicative capacity of 1GW would make a substantial contribution to Scottish and UK Government policy targets and international commitments for renewable energy and electricity generation to facilitate net zero by 2050. The proposed development would allow the electricity generated by the wind farm to be exported to the grid. There would be a carbon cost to the construction of the development. The total emissions of the Onshore and Offshore infrastructure over the lifetime of the project, from construction to operation and maintenance and decommissioning, are estimated in the EIAR as 2,090,013 Tonnes of Carbon Dioxide Equivalent emissions (tCO₂E). Of this total, the onshore infrastructure will result in

emissions estimated at 117,829 tCO₂e. This is balanced against an estimated avoidance of emissions from the offshore generation assets of -34,323,902 tCO₂e. The carbon payback period (i.e. the period of time before the project has avoided more CO₂e than has been produced by its construction and operation) for the combined onshore and offshore works is estimated to be two years. The application estimates that the project would produce enough electricity each year to meet the needs of the equivalent of 1.2 million households.

- 7.8 In terms of economic benefits, the applicant estimates the totality of the project would require a capital investment of £2,370 million. The proposed development anticipates a construction period of four years and 50 years of operation prior to decommissioning or repowering. 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 applicant has stated that during construction the project would support 3,660 annual Full-Time Equivalent Jobs (aFTEs) in Highlands and Orkney, 5,520 FTE's in Scotland and 8,610 aFTEs across the UK. These figures are quoted in respect of the on and offshore elements of the project and are inclusive of the wider supply chain impacts and induced spending through expansion of these, but exclusive of the estimates of employment generated by construction of the Banniskirk Hub.
- 7.9 During operation the project is expected to support 170 jobs in Highlands and Orkney, 410 jobs in Scotland; and 540 jobs in the UK. There is a potential for these impacts to be greater as the applicant is working with local supply chains to support the development of Scottish manufacturing capability. The applicant is also engaging with local business and has invested £1million in the University of Highlands and Islands' STEM outreach programme to promote and develop local opportunities. The proposed development has the potential to result in temporary housing pressures during construction and decommissioning of both the onshore and offshore infrastructure. The applicant has committed to drafting an Accommodation Strategy, engaging with the Council's housing services and other accommodation providers.
- 7.10 Localised disruption is predicted during construction on tourism and recreation receptors. This would be conditioned through the Construction Traffic Management Plan (CTMP) and Access Management Plan. Stakeholder liaison can be conditioned as part of the CEMP. The applicant has committed to producing an outline Accommodation Strategy to support the incoming workforce during onshore and offshore works.
- 7.11 The applicant is in the process of considering a community benefit fund and/or shared ownership links to operational performance. However, they state in the application that given current policy uncertainty and the fact that provision of community benefit is not a material consideration, further details on community benefit and ownership would be agreed post consent. An announcement was made by the UK Government on 10 March 2025 that the Planning and Infrastructure Bill will deliver an energy discount scheme for homes close to overhead transmission pylons required to deliver Clean Power 2030, with this scheme to be rolled out across England, Wales and Scotland. The subsequent Planning and Infrastructure Act 2025 received Royal Assent on 18 December 2025. The March 2025 statement explains that communities

could £530,000 worth of funding per substation. It remains unclear if this detail will remain unaltered or what the scheme eligibility / commencement cut-off date will be. The applicant has however confirmed that this project will not be eligible for a contribution.

Design and Layout

- 7.12 As set out in Section 1 of this report there will be several different elements to the development, each having different impacts through their layout and design. The application is for planning permission in principle and due to the complex nature and timescales for the project the final details are yet to be brought forward. As set out in Section 1, the applicant has brought forward the application on a design envelope approach and identified the “worst case” scenario for the proposal.
- 7.13 The majority of the site falls within the Farmed Lowland Plain (LCT 143) as defined by the NatureScot National Landscape Character Assessment (NatureScot, 2019). To the northeast, the cable route passes through an isolated part of the Sweeping Moorland and Flows (LCT 134), with the landfall located within the Sandy Beaches and Dunes (LCT 140). There are no statutory landscape designations within the application site with the nearest such designation being the Dunnet Head Special Landscape Area (SLA), located some 6.2km north of the proposed cable corridor, at its closest point.
- 7.14 This outline layout and design comprises three main elements as set out in Figure 3.1 of Volume 1, Chapter 3 of the applicants EIAR. For ease of reference within this report, these have been assigned zones and numbered 1-3, with the design envelope and potential impacts explained in more detail below.
- 7.15 The layout of the onshore infrastructure has progressed through an iterative selection process. The land fall location was selected by identifying land fall zones and then options within those zones. The options were appraised looking at a range of environmental, engineering and design criteria against BRAG scoring (black, red, amber, green). The onshore cable route considered a search corridor of 5km looking at engineering, cost and environmental constraints. The substation location was necessitated by the onshore grid connection offer, which required to be in the vicinity of the Banniskirk Hub. It was selected owing to its economic and efficient connection location, as close to the connection point to the grid as possible, whilst respecting environmental constraints. Following the confirmation of the Banniskirk Hub as the Grid Connection Point, the search area for the onshore substation site was defined as a 2km radius around this site boundary. The radius was determined by the desire to minimise transmission losses along the 400 kV Cable Corridor between the Substation and the GCP, in the interests of efficiencies and cost, as transmission losses increase with distance over the 400kV cable.

Figure 1-1 – Development Overview



7.16 Development Zone 1 – Cable Landfall

The offshore cables would make landfall at Sinclair’s Bay and be brought under the intertidal area just behind the sand dunes on Keiss Beach using Horizontal Directional Drilling (HDD). Underground concrete Joint Transition Bays (JTB’s) would be used to connect to the onshore cables. The onshore proposals EIAR only considers the offshore export cables between Mean Low Water Spring Tide Level (MLWS) and the JTBs. The JTBs would house the interface joint between the offshore and onshore export cables. Up to four JTBs are required, one JTB per export cable. Each JTB would be set below the existing ground level, flush with the surface, but above Mean High Water Springs (MHWS) and comprise a maximum area of 20m length x 4m width x 4m depth. Final selection of the JTB dimensions depends on ground conditions and cables, transition joints, link box sizes and other technical issues. There would be no significant above ground structures in the landfall zone post completion of the construction works. As a result, it is unlikely to have any landscape or visual impacts, particularly with scope for treatment of the surface of the JTB to be landscaped, which may be conditioned. The JTBs would be located within a temporary construction compound accessed from the A99 with a permanent track access.

7.17 Development Zone 2 - The Cable Export Corridor

The cable export corridor would comprise two trenches routed inland from the JTBs to the substation and located within the proposed application boundary. There would be two circuits in each trench with three cable ducts giving a total of 12 cables. Cable Joint Bays (CJBs) would be required every 500m to 1,500m, up to 208 in total for all 12 export cables. The location, length and number would be confirmed in detailed design. The trenches would be buried at 1.65m in a 35m corridor. The exact location and alignment of the cables would be established following further engineering and site investigations. Routing of the cable corridor considered woodland, mature and protected trees, hedgerows and other ecologically sensitive habitats. It also

considered the impact on peat. Due to the JTBs and the export cables being underground, no significant permanent landscape or visual effects are likely to occur beyond construction.

7.18 **Development Zone 3 - The Onshore Substation and Grid Connection**

The substation provides the electrical equipment required to connect to the national electricity grid and would be located between the A882 and A9 1.4km southeast of Georgmas Junction. It would convert the voltage of the electricity supplied by the onshore export cables allowing connection via 400kV cables to the national grid at the proposed Banniskirk Hub. The substation footprint would be a maximum of 42ha with 10ha footprint for the switchyard with three switchgear/control buildings, with a maximum height of 15m. It would be above ground and secured by perimeter fencing. The substation would use Gas Insulated Switchgear (GIS) which reduces the overall size and footprint of the structure. The buildings would be constructed with insulated cladding to reduce noise breakout with ventilation using a vertical exhaust where required. The design would require some limited cut and fill earthworks to create a level platform. The final design, including the arrangement and massing of the building and external materials would be developed for later approval through conditions post consent. It would be surrounded by landscape and ecological planting, both as a form of screening and biodiversity enhancement, details of which would be agreed post consent via condition.

7.19 The development would be operated continuously throughout the year. The substation is likely to have an operational lifetime of up to 50 years. The TJBs at the landfall would not need to be accessed during operation and maintenance but they would be provided with inspection covers in the event of cable failure requiring replacement or repair and for testing. There would be new permanent operational tracks to access the substation, landfall and TJBs and sections of the onshore export cable corridor. During construction these new access roads would not be available to the public to maintain security of the site. Access to the substation would be restricted during operation.

7.20 Operation and maintenance would include infrequent on-site inspections of the cables and corrective maintenance activities (e.g. repairs due to cable failure). The cables would be continuously monitored remotely. In the event of a cable failure, access to link boxes would be required to identify where along the cable section the fault had occurred. Once detected, a maintenance team would excavate, remove and replace the section of damaged cable. The substation would be unmanned, with staff visits for routine on-site checks, and preventative and corrective works on a regular basis. The assumption has been made that there would be one visit per month. The perimeter would be securely fenced and monitored with security cameras. The security fencing would have a height of up to 3.4m. Operational access would be controlled for site security. There will be a new permanent operational access required as part of the proposed development to access the Substation.

Cumulative Context

7.21 The West or Orkney Offshore Wind Farm, as permitted in principle through application reference 23/05353/PIP will connect to the new Banniskirk Hub at a location to the west of the onshore substation considered as part of this application's proposals. This

infrastructure is 'supergrid' which means it carries significant strategic importance for the whole of the electrical transmission network in the North of Scotland. Based on the scale of the Ayre application site and its Onshore Substation Development Zone and Cable and Access Development Zone, it is considered that there is sufficient space to accommodate all of these elements, with West of Orkney linking to the north coast and Ayre to the east coast, joining a mid-point inland and away from coastal communities. The exact configuration, siting, design and interaction between these projects and the infrastructure proposed as part of this application would be a reserved matter of any Planning Permission in Principle consent. In this respect, the applicant has confirmed that they have ongoing dialogue with applicants and their design teams for surrounding developments, considering the infrastructure requirements and interplay between the projects in the Spittal area.

Landscape and Visual Impact

7.22 The EIAR assesses both the landscape and visual impact of the proposed development. The study area for the onshore Landscape and Visual Impacts Assessment (LVIA) was defined as 5 km from the onshore substation search area and 1 km from the onshore export cable area. The only permanent, significant landscape and visual effects would result from the proposed onshore substation. Photomontages are provided from nine representative viewpoints within the onshore substation study area. The indicative design of this aspect of the development and its relationship with the surrounding landscape and features is best demonstrated by the visuals from:

- North – VP4 (A9 Junction at Banniskirk Road, 1.2km northwest of the site), is taken from the junction of the A9 trunk road with the unclassified Banniskirk Road, looking south towards the onshore substation. There are open views toward the substation site with the rolling landform generally rising beyond and higher terrain providing a focal point to the southeast (left of the view).
- South – VP5 (Northwest of Banniskirk Mains Farm, 600m south of the site), is taken from an elevated position on the Banniskirk Road, north of the Farm Steading. This location presents open views of the onshore substation site, looking downhill to the northeast. Long distance views are available to the northeast from this location towards the wider landscape around Weydale and Hilliclay.
- West – VP8 (B874 Junction with Crescent Street at Halkirk, 3.3km northwest of the site), is taken from the B874 public road on the settlement edge of Halkirk. Views look across open agricultural land and plantation woodland toward the substation site to the southeast, which will be located on slightly elevated ground in the centre of the view. Spittal Hill on the right (southeast) side of the view is a prominent topographical feature. Existing electricity transmission infrastructure in the form of steel lattice towers, runs across the view from right to left (northwest to southeast) between the viewpoint and proposed onshore substation site.
- East – VP3 (A882 to the East of the Railway, 800m north of the site), is taken from the A882 public road near where it crosses over the Far North Railway line, at Clayock, east of Georgemas Junction. Views look across agricultural

land and several isolated rural properties, toward the substation site that will be located directly to the southwest on elevated ground.

- 7.23 A Zone of Theoretical Visibility (ZTV) drawing is also included in the assessment which shows theoretical bare ground visibility. The ZTV identifies that visibility extends beyond the 5km study area, being predominantly concentrated over areas of higher ground to the east and west of the onshore substation site. Owing to the limited height and scale of the proposed above ground infrastructure, Officers are content that there is not potential of likely significant landscape or visual effects from beyond the agreed LVIA 5km study area.
- 7.24 In terms of landscape setting, the surrounding context is relatively flat, with levels varying from 40m Above Ordinance Datum (AOD) at Halkirk to 100m AOD at Mybster and with a high point at Spittal Hill of 176m AOD. Higher ground is predominantly moor with some interspersing arable and pastureland and forestry plantations, some commercial in scale. The onshore substation proposals are not located within any formal landscape designations. The landscape assessment has assessed the potential impact of the development on the surrounding Landscape Character Type (LCT) 143 Farmed Lowland Plain. This LCT is open, vast and dominated by a horizontal emphasis, allowing for extensive views both within the lowland plain and to the landscapes and seascapes beyond. The onshore substation will introduce large scale energy infrastructure into the Farmed Lowland Plain LCT, replacing an existing area of agricultural fields, albeit one enclosed by existing plantation woodland. While the proposed landscaping mounding associated with the substation will physically and visually contain the development, they will nevertheless, alter the character of the landscape within the area of search, although as these landscaping measures mature over time, this effect will become less noticeable. The proposed substation is located in proximity to the existing Spittal substation and overhead lattice tower electrical transmission lines and the surrounding landscape is more widely, influenced by existing large scale infrastructure development, with the Halsary Wind Farm and Mybster Substations located to the south of the site, with further overhead lattice towers connecting in. Smaller wooden pole electrical lines are also a feature in the surrounding landscape, with more distant wind energy development also being particularly evident at Halsary and Bad a Cheo to the south of the application site and large-scale quarrying at Spittal to the south. This part of the landscape is therefore undergoing cumulative development pressure, emphasising the need for careful siting and design and effective mitigation to be integral to all projects.
- 7.25 In respect of visual impacts, significant effects are anticipated for receptors in the immediate vicinity of the onshore substation; this is again due to the scale of infrastructure proposed. These will be most pronounced for properties located on and in the immediate vicinity of Banniskirk Road and along the A882, out to an approximate radius of 1.5km east and west of the substation site. Although the substation infrastructure will be contained behind landscaping bunds, measuring up to 12m in height, some may find the landscaping bunds themselves imposing and unnatural features in the landscape, particularly in the short term whilst vegetation and planting establishes. Officers consider it important to secure planting at the earliest opportunity and those elements providing the greatest visual screening of the substation site from the closest residential properties along Banniskirk Road should be prioritised. Views of the substation from properties in Halkirk, the nearest sizeable

settlement, some 3.3km distant, will be limited to the top sections of the proposed substation buildings, as represented by Viewpoint 8. Aside from a small section of the landscaping bund, these features will not break the skyline, with the impacts further contained by intervening established plantation woodland. A recessive colour scheme may also be agreed via condition.

- 7.26 The visual impacts on local transport routes would generally be mitigated by the intervening topography and vegetation cover. For users of the A9 Trunk Road running north and south past the application site, views of the energy infrastructure within the substation site would be limited by the intervening topography and set back distance of the proposals, some 1.3km from the road edge. For users of the A882 public road to the north and east of the site, impacts will be more noticeable, along an 2.5km long section of the route. The proposed landscape mounding will limit views of the onshore substation infrastructure and would be expected to integrate more closely to the surrounding landscape character as they mature over time. Due to the intervening topography and position of the substation relative to the Far North Railway line, no significant effects on railway users are expected.
- 7.27 The visual impacts on recreational receptors are generally limited to walkers on the Footway B874 Core Path, some 3km northwest of the site, where no significant effects are predicted given the orientation of the path and intervening distance and screening. The Access Officer has not raised any objections or other concern regarding the potential visual impacts on the local path network.
- 7.28 There are no statutory landscape designations within the application site with the nearest such designation being the Dunnet Head Special Landscape Area (SLA), located some 6.2km north of the proposed cable corridor, at its closest point. It is not considered that the proposals would have an impact on the integrity of the SLA due to the scale and location of the proposed development.
- 7.29 The potential for cumulative effects of the project, together with the Banniskirk Hub and West of Orkney Wind Farm proposed onshore substation has been assessed. The project results in an extension of large scale energy infrastructure to the east albeit in an area where other forms of this infrastructure, including electricity transmission and distribution towers and wooden pole lines are evident, together with large scale but more distant onshore wind energy development, especially to the south and east.
- 7.30 Owing to this concentration, following pre-application discussions and engagement throughout the assessment of the application, the applicant has incorporated Officers suggested mitigation measures, including providing landscape planting to filter key views. The use of Gas Insulated Switchgear (GIS) platform also reduces the landscape and visual impacts of the proposals, due to its relatively more compact built footprint, as compared to the alternative Air Insulated Switchgear (AIS) platform. As a result, while acknowledging the scale of the proposed infrastructure, these measures help to ensure that the adverse landscape and visual effects arising from the proposal are suitably contained and are not unacceptable. Whilst the finalised design and layout is proposed to be a reserved matter, the application has demonstrated the ability for

the maximum envelope of the proposed development to be successfully accommodated into the landscape, with limited localised significant adverse effects. NPF4 Policy 11 makes clear that such localised effects are to be expected from large scale renewable energy related projects, and in this case through careful site selection and design, appropriate mitigation has been applied.

Construction Impacts

- 7.31 Construction of the onshore project is estimated to take four years. The main construction works would involve three principal working areas: landfall Horizontal Directional Drilling (HDD); the cable route from the landfall to the substation; and substation including interconnection to the national grid. The export cables would be buried using open cut trenching techniques over unobstructed ground. Crossing methods for linear features, such as watercourses, roads and railways, would use open trenching and trenchless crossings. A detailed construction programme would be developed as design and procurement activities progress and set out in a Construction Environment Management Plan (CEMP).
- 7.32 The offshore cables would be brought under the intertidal area just behind the sand dunes on Keiss Beach using HDD where a channel is drilled underground and the cables pulled through. Using maximum design parameters there would be a 8,000m² (100m x 80m) HDD landfall construction area. The onshore export and 400kV cables would require a 70x50m cable entry and 50x40m exit compounds to allow HDD works and the cables to be pulled through. It is anticipated there would be two temporary construction compounds collectively comprising an area of 10.6ha providing office, welfare facilities, soil and material storage, storage of plant and equipment and parking, requiring temporary utility services.
- 7.33 A 50m construction corridor for construction plant access, soil and materials laydown would be required resulting in temporary visual impacts. This would include access tracks from the highway for delivery of plant and materials and a temporary construction haul road to enable access along the corridor from the construction compounds. In instances where the haul road crosses sections of the existing road network, measures would be implemented through the CTMP to manage the road crossings. HDD would be used at sensitive locations such as below watercourses, road and rail crossings which means the construction areas and permanent easements would be wider because the cables would be installed in ducts inserted separately. Special measure would be employed where the cables cross deep peat. This includes an 8m spacing between the two tranches to preserve the drainage and structural integrity of the peat and a floating road for reduce the amount of excavated peat.
- 7.34 The precise locations of the construction compounds and temporary access tracks have not been identified. This infrastructure would however be sited to avoid sensitive receptors as part of embedded mitigation. The detailed design of construction methodologies would be completed once the final onshore export cable route has been confirmed. Temporary access would be required to access all sections of the Onshore Export Cable Corridor. The substation would require a separate 3ha construction compound which would provide office, welfare facilities, soil and material storage, storage of plant and equipment and parking. A laydown area would also be required to facilitate the construction of the substation access road with a temporary

bell mouth junction onto the A882. Acoustic fencing would be used to minimise construction noise impacts for local residents.

Noise

- 7.35 The applicant submitted a construction noise assessment and has stated that core working hours for construction will be 7am – 8pm weekdays and 7am – 1pm Saturdays. This would also apply to Heavy Goods Vehicle (HGV) movements. Developers must comply with reasonable practices for construction noise to avoid nuisance. Section 60 of the Control of Pollution Act 1974 sets restrictions in terms of hours of operation, plant and equipment used and noise levels, amongst other factors, which is enforceable via Environmental Health. It is also expected that the developer and contractors would employ the best practicable means to reduce the impact of noise from construction activities at all times. Environmental Health have indicated they do not object to the core working hours proposed, provided that the applicant's mitigation measures are implemented at all times, including the use of enclosures around noisy equipment, noise reduction equipment on plant and vehicles and the provision of localised acoustic screening.
- 7.36 Potential noise impacts were identified within the applicant's EIAR where HDD works may require periods of evening and night activity, particularly for the onshore export and 400kV cable routes. Works outside the normal working hours (such as HDD operations) would be agreed in advance with Environmental Health. A finalised construction noise assessment would be required where work is audible at the curtilage of any noise sensitive receptor, outside Mon-Fri 8am to 7pm and Sat 8am to 1pm or where noise levels during the above periods are likely to exceed 75dB(A) for short term works or 55dB(A) for long term works. Construction noise and vibration (including HDD work at night) would be managed through the CEMP and a conditioned Noise and Vibration Management Plan. Construction traffic noise would be controlled through scheduling of deliveries and traffic to site in liaison with other nearby developments, with scope for any concurrent work to be considered further once development programmes are known for other proposed substations and related grid network upgrades in the vicinity should these be consented.
- 7.37 Beyond the construction phase, the onshore substation would be the only operational noise source. At this stage, the design of the substation is indicative and not finalised. The final specification of the acoustic measures to meet the thresholds will be set out in a Noise and Vibration Management Plan, secured via condition. During the detailed design phase, mitigation measures will be considered and adopted to aid in the reduction of noise from the substation plant at nearby receptors to meet the required noise limits. The plant layout will be designed to reduce noise impacts as much as is reasonably practicable with additional mitigation measures such as acoustic enclosures, attenuators, and acoustic barriers. The exact measures will be determined as the design progresses. The applicant's noise assessment includes nine potential impacted properties, Noise Sensitive Receptors (NSRs), in the vicinity of the substation site as shown in the table below. As they are residential, they are of high sensitivity both during the daytime and night-time. The EIAR states that operational noise from the substation noise would not exceed 30dB [LAeq, 15 min] or background plus 5dB which can be conditioned. Operational noise would therefore be unlikely to constitute a nuisance, with adherence to the specified limits that comply with current

guidance and standards. The EIAR therefore concludes the magnitude of impact at all receptors would be negligible and not significant.

Table 1 – Noise Sensitive Receptors

Receptor	Property Name	Distance to Substation Switchyard (m)
NSR-015	Rowanlea	490 northwest
NSR-017	An Luachair	313 northwest
NSR-018	Criffel	290 northwest
NSR-020	Woodview	200 west
NSR-021	Smiddy Cottage	382 west
NSR-025	Monygairn	478 north
NSR-027	Millers Cottage	486 northeast
NSR-028	Caisteil An Tulach	438 northeast
NSR-029	Marischal House	398 northeast

7.38 The applicant’s cumulative assessment considered the Banniskirk Hub, the West of Orkney Wind Farm Onshore Substation and the existing Spittal Substation. The assessment concluded the potential cumulative impacts during both construction and operation were predicted to be of local spatial extent, short term duration, and thus, not significant in EIA terms.

7.39 Should the development be granted consent, a condition would require that the provision of a Community Liaison Group to help ensure that the community council and other stakeholders are kept up to date and consulted before, during and after the construction period.

Roads, Transport and Access

7.40 The traffic and transport impacts of the proposals will relate mainly to the construction phase, with some traffic movements for operation and maintenance of the substation. Proposed construction routes, an indicative construction programme and anticipated flows of construction traffic have been submitted as part of the outline Construction Traffic Management Plan (CEMP). The site is linear spanning over 24 km. The majority of construction traffic would be routed along main roads including the A9, A882 and A99. Allowing for materials to be delivered from Scrabster Harbour, Wick Harbour and from the south via the A9 and A99 would maximises the number of daily HGV movements on all parts of the road network. Access to the construction corridor

for the onshore export cables would be via 25 potential access points along the application boundary to the substation, onshore export cable corridor, 400kv cable corridor and landfall. No new junctions for construction access would be required from the A9 between Scrabster Harbour and the A99, however, the substation access road from the A882 would require a new bell mouth junction.

- 7.41 During construction, internal access tracks (haul roads) would be provided as embedded mitigation to allow for the movement of construction vehicles within the Onshore Export Cable Corridor and 400kV Cable Corridor and to minimise the number of construction vehicles on the road network.
- 7.42 The baseline identified baseline traffic flows across the local and trunk network as low, with some existing Heavy Goods Vehicle (HGV) movements on local routes including the A9 (trunk road). This means that although the application would result in small absolute increases in traffic, there would be a large percentage increase on some local roads, the most significant being a 203%, or 134 vehicle increase in HGV traffic on the A9 between the A882 and B870 and a 106% or 134 vehicle increase in HGV traffic on the A882 between the B870 and A99. The peak impacts of construction on the road network overall are expected to occur during months 10-12 of Year 1 of construction, which is projected to be 2031, when the onshore substation site platform is being constructed and parts of the cable route and/or temporary construction compounds are being laid out, requiring importation of stone. The assessment concluded that overall construction traffic would have a marginal and insignificant impact on driver delay, pedestrian delay and amenity and severance due to the low baseline flows. The assessment considered embedded mitigation measures, including a new scheme of passing places on single-track roads on construction routes. This would reduce traffic delays for a small number of local road users, and for construction vehicles. In addition, measures set out in the CEMP would ensure that dust and dirt effects on the public road network are minimised.
- 7.43 HDD would be used to install the cable below the railway line to ensure there is no impact on railway operations.
- 7.44 The cumulative impact on vehicle flows of other developments was also assessed. The assessment identified roads where a cumulative impact on traffic flows might occur and concluded that cumulative traffic impacts on the local road network would not be significant. The substation would require abnormal load deliveries, involving 270 cable drums and a further 4 movements for transformers. While a port of entry has not been finalised, Scrabster Harbour may be used for some loads via the A9. It is also possible that Wick Harbour, and the A99 and A9 might also be used. An assessment of the routes for abnormal load would be conditioned.
- 7.45 Operational traffic flows would be minimal and no significant effects from operational traffic were predicted by the EIA.
- 7.46 As noted in the consultation responses received from the Transport Planning Team and Transport Scotland, a finalised Construction Traffic Management Plan (CTMP) would be required that would address both project and cumulative impacts during construction. While the representation concerns are noted, this document would ensure that appropriate mitigation is in place on the surrounding road network for any localised impacts including pre- and post-construction road condition surveys

undertaken along construction routes. These will identify any damage caused by construction vehicles and ensure that the developer is responsible for repairs. There will also be a requirement for a Section 96 wear and tear agreement under the Roads (Scotland) Act. An additional condition will also ensure the eventual infrastructure decommissioning measures are informed through consultation with the Local Roads Authority and Transport Scotland.

Public Access

- 7.47 Keiss Beach is a key recreational resource used by the local population and tourists visiting the area. HDD will be used to pull the cables through, ensuring that the beach will remain open. Additional measures to limit amenity and noise impacts to Keiss Beach will be set out in the detailed CEMP. There are no National Cycle Network routes located within the site. The John O'Groats to Inverness cycle route passes along the A99 through the application red line boundary. There are several core paths and Public Rights of Way (PRoW) within and surrounding the proposed site. The Keiss/Reiss shore core path and the John O'Groats long distance footpath cross the site boundary. Use of HDD will avoid temporary or permanent stopping up or diversion of these rights of way.

Water, Flood Risk, Drainage and Soils

- 7.48 EIAR Chapter 10 looks at the impact on water quality and flood risk. The application site lies within the watercourse catchments of the River of Wester; Burn of Garth; River Thurso, and Wick River. The onshore cable corridor crosses all four catchments. The application site is located within a groundwater Drinking Water Protected Area (DWPA) and two Private Water Supplies have been identified within a 5km buffer of the site.
- 7.49 The EIA concluded that there would be no significant effects on geology or hydrology receptors during construction or operation or cumulatively with other developments. It states that all flood-sensitive infrastructure would be located outside the flood risk area. Construction activities would be managed through the CEMP which would control potentially polluting activities to prevent adverse impact on downstream sensitive receptors and the environment. Additional site management measures would also be conditioned including: a Drainage and Flood Risk Plan to protect water quality; detailed drainage design which follows Sustainable Urban Drainage Systems (SUDS) principles; a Water Quality Monitoring Programme and the appointment of a qualified Environmental Clerk of Works to supervise operations during the construction period. At detailed design, runoff attenuation and treatment proposals would be designed to prevent any detrimental effects to the water quality or quantity of existing waterbodies. The applicant will apply for the necessary authorisations under the Environmental Authorisation (Scotland) Regulations 2018 (EASR), where required.
- 7.50 SEPA state that locating the substantial soil/peat bunds along the cable route and any land raising (for example for haul roads) will potentially create a barrier to flood flows, with the potential for floodplain capacity loss and increased risk of flooding elsewhere. It requests a range of conditions to protect against flooding. It also states the applicant should be mindful of the coastal flood risk at the proposed landfall location and recommends the proposed HDD working area emerges beyond the Future Coastal

flood risk extent. SEPA request that the finalised CEMP states no large machinery, storage of materials or construction works will take place within 20m of any watercourse apart from those associated with a water crossing. This can be secured by condition.

- 7.51 Isolated areas of peatland are located across the application site, concentrated in the eastern parts of the cable route corridor. Areas of priority Class 1 peatland interspersed with Class 5 were surveyed around Mireland and Moss of Kirk, with further areas of Class 1 and Class 3 present around Hastigrow. Pockets of Class 3 (not priority peatland habitat) are located further west around Bower Lower and an isolated area of Class 5 (no peatland habitat recorded) is present on the onshore substation site. An isolated area of Class 4 (unlikely to include carbon-rich soils) is present around Corsback Hill. The EIAR explains that it is not possible to accurately predict peat loss until the design is further refined. An outline Peat Management Plan (PMP) was submitted with the application and may be finalised post consent via condition. The finalised design of the export cable corridor and ancillary access tracks and construction compounds will be designed, planned and phased to avoid areas of deep peat and where it is not possible to microsite infrastructure or works away from areas of deep peat, the footprint of activities will be minimised as much as practicable. While SEPA raised concerns regarding the lack of a 'worst case' peat excavation scenario in the outline PMP, a finalised PMP, providing detail on predicted peat volumes for excavation and how it would be stored reused and managed may be secured via condition. SEPA also request that no micro siting of the final infrastructure and earthworks encroaches further onto deeper peat or wetlands and is not located closer to any watercourses than agreed with the planning authority and statutory consultees. This can be conditioned.
- 7.52 A number of areas of possible GWDTEs were identified with high potential in areas of rush pasture and moderate potential in areas of wet dwarf-shrub heath, mire and mesotrophic grassland. Taking account of the underlying geology, the EIAR concludes that the areas of GWDTE potential are more likely to be surface water/rainwater fed. However, SEPA states that whilst it is prepared to accept this conclusion, HDD would be the most appropriate method to cross these sensitive areas if groundwater is not the primary source of water. It also requests that mitigation measures to reduce impact on these wetlands are included in the Habitat Management Plan (HMP).
- 7.53 The application site comprises predominantly Land Capability for Agriculture (LCfA) grade 4.1 and 4.2. None of the land is grade 1,2 or 3.1 classified as prime agricultural land. There are 50 land holdings and several registered crofts within and bordering the application site which are mainly used for livestock or forage cropping related to livestock-based holdings. The substation and proposed landscaping and construction area form part of a single land holding. Implementation of the finalised PMP and CEMP, via condition, would ensure the soils and agricultural land are restored post construction.
- 7.54 Scottish Water have no objection to the application provided any conflicts with their assets are identified and managed with their Assets Team.
- 7.55 The Contaminated Land Service do not object to the application. However, potential sources of contamination may be present in the vicinity of the Banniskirk Hub, as

identified by surveys undertaken in support of the associated planning application 24/04898/FUL, that identified deep made ground and hydrocarbon odours. Layers of deep peat within the red line boundary may also be an issue in terms of ground gas generation and the construction of enclosed structures. These matters will be considered within a scheme to deal with potential contamination that will be secured from the applicant via condition.

Natural Heritage (including Ornithology)

- 7.56 The application site does not form part of any natural heritage designation. The EIA assessed the impact on freshwater ecology, terrestrial ornithology and terrestrial non-avian ecology. This included protected species surveys that identified the presence of otter and the potential presence of water vole and pine marten. There was no direct evidence of badger activity within the site envelope, but the creation of future setts and foraging badger activity cannot be ruled out. Ornithological surveys identified whooper swan and greylag goose, which are qualifying features of the Caithness Lochs Special Protection Area (SPA), in addition to pink footed goose, and Greenland white-fronted goose. The assessment scoped out Great Crested Newts (GCN) due to lack of suitable water bodies and red squirrel, due to lack of evidence. Four Special Areas of Conservation (SAC), one Ramsar site and six Sites of Special Scientific Interest (SSSI) were identified within 5km of the site boundary with one SAC 10.7km from the boundary. Direct effects on the Loch of Durran SSSI were also scoped out due to distance from the site, in addition to impacts on the East Caithness Cliffs SAC.

Caithness Lochs Special Protection Area (SPA) and Ramsar

- 7.57 The proposed onshore cable corridor is located within 200m of the SPA and Ramsar in the vicinity of the Loch of Wester and Loch Scarmclate. The lochs are designated as an SAC and Ramsar for their wintering Greenland white-fronted and greylag goose and whooper swan. NatureScot advises that the application is unlikely to have a significant effect on the integrity of the site provided that, via condition, a Caithness Lochs Species Protection Plan (SPP) is produced, based on the mitigation measures tabled for terrestrial ornithology within the EIAR. Monitoring for Greenland white-fronted and greylag goose and whooper swan must also take place, by a suitably experienced and qualified Environmental Clerk of Works (ECoW) within 600m of any active works, with the authority to halt works should signs of disturbance become evident. More generally, the applicant proposes that a detailed Breeding Bird Protection Plan (BBPP) will be implemented to avoid the disturbance of any nest site, as a supporting document to the finalised CEMP. Further specific protection measures will be implemented for geese and swan species and osprey.

Caithness and Sutherland Peatlands Special Area of Conservation (SAC) and Ramsar

- 7.58 The proposed cable corridor passes within 1.7km of the SAC and Ramsar in the vicinity of Mireland. The SAC is protected for peatland habitats, otter and marsh saxifrage. The Ramsar site is protected for its peatland habitats, breeding birds, otter, freshwater pearl mussel, rare plants and water beetle. NatureScot advises that the application is unlikely to have a significant effect on the integrity of the site provided that an SPP for otter is produced and that preconstruction surveys of all suitable habitat within 200m of the proposal are timetabled into project plans, no more than 3

months prior to the commencement of works. These measures may be secured via planning condition.

Loch of Wester, Loch Watten and River Thurso Special Areas of Conservation (SAC)

- 7.59 The proposed cable corridor passes 350m to the north, upstream of the Loch of Wester SAC, and 2km to the north of the Loch Watten SAC, both of which are protected for their loch habitat. The western end of the corridor and the substation site are also located within 1.8km east, upstream of the River Thurso SAC, protected for its Atlantic Salmon. NatureScot advises that the application is unlikely to have a significant effect on the integrity of these site provided the applicant provides a Frac-out Response Plan, providing a strategy for monitoring for any unintended release of drilling fluid from the HDD works into the surrounding environment and a set of related mitigation and control measures.

Caithness and Sutherland Peatlands SPA

- 7.60 NatureScot advises that, although the onshore cable corridor passes within 1.7km south of the Caithness and Sutherland Peatlands SPA at Mireland, protected for its breeding upland and peatland birds, the proposals are unlikely to have any effect on the qualifying interests of the site.

Appropriate Assessment

- 7.61 As competent authority, the Highland Council is required to carry out an appropriate assessment in terms of the conservation objectives of the Caithness Lochs Special Protection Area (SPA) and Ramsar, Caithness and Sutherland Peatlands Special Area of Conservation (SAC) and Ramsar and the Loch of Wester, Loch Watten and River Thurso SACs. Overall, NatureScot have not raised an objection to the proposals, providing that the applicant's mitigation measures are adhered to. The applicant has submitted a Report to Inform Appropriate Assessment (RIAA) alongside the EIAR.
- 7.62 It is recognised that there will be limited adverse overall impacts on natural heritage caused by the proposed development through construction and operation. A limited range of potential residual significant effects have however been identified by NatureScot and have been addressed through the Appropriate Assessment included within this report. With the application of mitigation measures and the conditions outlined above, it is considered that the extent of adverse impacts may be suitably managed and contained for a development of this scale.

Forestry

- 7.63 Most of the land within the site boundary is not forested. There are, however, areas of commercial forest comprising mainly conifers, some area assumed to be woodland and areas of young trees. There is no Ancient Woodland identified within the site red line boundary. The site boundary has been designed to avoid areas allocated for forestry, where possible, however some removal of productive commercial woodland will be required, most notably between Hastigrow and Loch of Wester. In the worst case, it is estimated, based on a construction corridor up to 50m wide, that up to 47.54ha of forestry which is 12.08% of the application site, will be lost temporarily and

1.7ha (0.43% of the application site) will be lost permanently, although the actual area is likely to be substantially less than this. The applicant has proposed that compensation planting or replanting will be agreed post consent. The applicant will be required to show via condition, in line with the Forestry Officer's comments, how any permanent loss of woodland meets the acceptability criteria within the Scottish Government's Control of Woodland Removal Policy and will require to provide a compensatory planting plan to secure a greater area of planting of the same woodland type than that removed.

Biodiversity Enhancement

- 7.64 The applicant proposes that the final layout of the proposed development, at the Matters Specified in Conditions (MSC) stage, will be accompanied and informed by a Biodiversity Enhancement Plan. The plan will utilise the Department for Environment Food and Rural Affairs Biodiversity Metric to provide a quantitative assessment of biodiversity gain from recommended enhancements and habitat creation. A detailed Biodiversity Net Gain assessment will be undertaken at the MSC stage when detailed design is known. The Applicant's UK Habitat Classification and National Vegetation Classification Survey Report, as an appendix to the EIAR, highlights sensitive habitats within the study area and suggests that biodiversity enhancement may take place mainly through the restoration of degraded peatland. Following discussions with the Council's Ecology Officer, the applicant has provided an according outline Biodiversity Enhancement Plan, based on peatland restoration and enhancement via a Habitat Management Plan, which will be secured via condition at the reserved matters stage. It is anticipated that these measures will be delivered as either restoration of afforested peat or degraded drained bog habitats within the application red line boundary.
- 7.65 Overall, the applicant's EIAR proposes a range of mitigation measures including production of Species Protection Plans and Breeding Bird Protection Plans and the use of HDD to install the cables below ground to avoid impacts on water courses. The application includes an outline a Habitat Regulations Appraisal (HRA) to inform Appropriate Assessment and proposes a Habitat Management Plan (HMP), Biodiversity Enhancement Plan and appointment of an ECoW post consent, as can be secured via condition. The Ecology Officer considers the applicant's supporting information is robust and is confident that the applicant will be able to deliver suitable habitat enhancements at the matters specified stage.

Built and Cultural Heritage

- 7.66 There are several scheduled monuments and listed buildings in proximity to the application site. Historic Environment Scotland (HES) and the Highland Council Historic Environment Team do not object to the application. HES notes the proximity of Scheduled Monument, Halcro Manse, broch 640m S of (Scheduled Monument SM556), which is located circa 10m from the site boundary. While no permanent impacts on the setting of the monument are foreseen, HES requests a site protection plan for the monument be approved by the Planning Authority. A Written Scheme of Investigation and programme of works may also be secured via planning condition, as recommended by the Historic Environment Team (Archaeology).

Other Material Considerations

- 7.67 The representations raised concerns over the identification of reasonable alternative options and accurately determining the cumulative impacts of the project. The applicant has provided a site selection process methodology within the EIAR, which is considered robust given the nature and scale of the proposals. The EIAR methodology notes that the planning process is a continuous one and thus a cut off point must be identified to enable production of the EIAR. The cumulative assessments in the EIAR may be considered as up to date, as up to 27 March 2025, as agreed with the applicant relatively shortly in advance of the application's submission.
- 7.68 The objection comments raised concerns relating to the level of supporting information submitted in respect of the associated offshore project, currently being assessed under Section 36 of the Electricity Act 1989 by Marine Scotland and the Council. It is considered there is currently sufficient information to determine the principle of development of the onshore works under this current application under the Town and Country Planning Act.
- 7.69 The applicant has sought permission to operate the proposed development for 50 years. At the end of its operational life, it is proposed that the supporting infrastructure (this development application) is decommissioned. No decommissioning plan has been included with the EIAR, however, a decommissioning plan and a financial guarantee to secure decommissioning and site restoration can be secured by condition.
- 7.70 Due to the scale of the project and the potential technical challenges with development of the offshore proposals, it is considered reasonable to prescribe an eight-year timescale for submission of the matters specified in conditions associated with the onshore works.

8.0 MATTERS TO BE SECURED BY LEGAL AGREEMENT / UPFRONT PAYMENT

- 8.1 A legal agreement in respect of the development would be required, relating to Section 96 of the Roads (Scotland) Act and should include the provision of a Road Bond or similar security. The agreement shall take account of any neighbouring developments that might progress concurrent with the works proposed and would provide, if necessary, a mechanism for apportionment of costs between respective developers.

9. CONCLUSION

- 9.1 The Scottish Government and the Council each have policies in support of projects which increase the capacity of the grid network to serve the community and in particular the significant level of investment in renewable energy. The proposed development falls under the category of National Development, where there is support in principle for such proposals.
- 9.2 The proposed infrastructure is fundamental to the ability to deliver a substantial amount of renewable energy to serve the needs of residents and businesses across Scotland and the wider UK. The wider project would also improve national energy security and is a critical step forward on the path to achieving net zero. In turn, the

wider project presents significant employment opportunities at the Caithness, Highland wide and national level, for over a sustained period of time, with there being prospect that the skills and experience of the local workforce in the north of Highland which currently serves the nuclear industry, being in time re-directed to serve electricity infrastructure projects such as this. This transition is a key tenant supporting the employment outcomes embedded in the Caithness and Sutherland Local Development Plan (CaSPlan).

- 9.3 Highland has been successful in attracting inward investment in renewables, enabled in part by a significant level of investment in the improvement of the electricity transmission network. This success has led to the Highlands having a good understanding of this type of project and this Council having appropriate policies and guidance to assist in its assessment, and to effectively manage their implementation on the ground. For example, the use of Construction and Environmental Management Documents “CEMD”, a particular approach to assist with the implementation / management of such large-scale projects with a focus on environmental protection.
- 9.4 Subject to conditions, there are no statutory consultee objects to the application. There are clear impacts that might be expected from this development, particularly during its construction. These can be managed through best practice construction management techniques to ensure surrounding interests, particularly road access and the amenity of local housing is safeguarded from the key impacts of the development; by planning conditions. Such details would be brought forward and assessed in future matters specified in conditions applications. The proposal would also be overseen by an appointed Ecological Clerk of Works, with any permission requiring regular compliance monitoring and ongoing engagement by means of a Community Liaison Group.
- 9.5 Under the provisions of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017, the Council is required to reach a reasoned conclusion on the environmental impacts of the proposed development. The Council is satisfied that environmental effects of this development can be addressed by way of mitigation. The Council has incorporated the requirement for a schedule of mitigation within the conditions of this permission.
- 9.6 The application can be supported in the context of the Council’s Development Plan and in particular it’s HwLDP Policy 69 on Electricity Transmission Infrastructure and the underlying support for renewable energy development which is consented in this area. 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.
- 9.7 In relation to landscape and visual impacts, significant effects are anticipated, but these are mainly localised and the mitigation proposed will help to mitigate these to an acceptable level. Key to the suitability of the proposed substation location is this element of the proposal being screened from views from the settlement of Halkirk and A9 Trunk Road by intervening terrain. The landscaping provisions within the application have been carefully assessed, with the long-term planting and earthwork creation being secured by condition.

9.8 This application does not pre-determine the outcome of the associated application for the offshore generating element of the proposals. This is rightly, the subject of a separate application under Section 36 of the Electricity Act to Marine Scotland.

10. IMPLICATIONS

10.1 Resource: Not applicable

10.2 Legal: If an objection is raised to the proposal, the application may be subject to a an Appeal under the Town and Country Planning Act and a Public Local Inquiry.

10.3 Community (Equality, Poverty and Rural): The proposal has the ability to result in meaningful socio economic benefits to the local community and Highland more widely.

10.4 Climate Change/Carbon Clever: The proposal has the ability to make a meaningful contribution toward the production of renewable energy.

10.5 Risk: Not applicable

10.6 Gaelic: Not applicable

11. RECOMMENDATION

Action required before decision issued: N

Notification to Scottish Ministers N

Conclusion of Section 75 Obligation N

Revocation of previous permission N

It is recommended to **GRANT** the application subject to the following conditions and reasons:

A. Members grant delegated authority to the Area Planning Manager – North to agree the finished condition wording, with any substantive amendments to be subject to prior consultation with the Chair of the North Planning Applications Committee; and

B. The following conditions and reasons.

Conditions and Reasons

1. The development to which this planning permission in principle relates must commence no later than EIGHT YEARS from the date of this decision notice. If development has not commenced within this period, then this planning permission in principle shall lapse.

Reason: In accordance with Section 59 of the Town and Country Planning (Scotland) Act 1997 (as amended).

2. No development shall commence in a Development Zone until a phasing plan setting out the phases of works for that Development Zone has been submitted to and approved in writing by the Planning Authority.

Thereafter the development shall be undertaken in accordance with the agreed Phasing Plan or as may be approved in writing by the Planning Authority.

For the avoidance of doubt, a phase means any part of the development the subject of an Approval of Matters Specified in Conditions issued by the Council following an application on that behalf, or otherwise subject of any equivalent planning approval following an application on that behalf.

Reason: To ensure that the development proceeds in an appropriate manner and that the necessary elements of the development are provided at the appropriate stages.

3. No phase of the development shall commence within a Development Zone, until for that phase, an application, or applications, has been submitted to and approved by the Planning Authority in respect of the following matters, insofar as they relate to the details relevant to the phase, taking full account of the Environmental Impact Assessment Report (EIAR), received August 2025 and relevant national and local policy and guidance and the matters set out below:

- a) the siting, design and external appearance of all buildings and other structures
- b) the precise routing of underground cabling and location of any ancillary structures above or below ground;
- c) the means of access to the site including connections to the A882, A9 and A99 for all modes of transport inclusive of type and form of routes; junction layout and design with projected traffic figures supported by traffic modelling; junction and forward visibility requirements; vehicle tracking at junctions and standard radii;
- d) the provision of car parking inclusive of disabled parking and electric vehicle charging infrastructure;
- e) the provision of covered staff cycle parking;
- f) the details of and timetable for delivery of any and all landscaping associated with the phase, including any post construction site restoration;
- g) details of all boundary treatments within the development including hard and soft landscaping;
- h) the provision for service vehicles following occupation of the development;
- i) details of the provision of surface water drainage systems, including access for maintenance, across the phase, how it relates to the surface water drainage strategy for the site as a whole and management and maintenance arrangements of said infrastructure;
- j) details of the water and waste water connections;
- k) means of dealing with waste in accordance with the Highland Council's 'Managing Waste in New Developments' Supplementary Guidance' (or any superseding guidance prevailing at the time of submission);
- l) details of existing and proposed site levels with fall arrows;
- m) details of finished floor levels; and
- n) details of all external lighting ensuring that safety and security are addressed with no lighting directed skyward.

Reason: Planning permission is granted in principle only and these specified matters must be approved prior to development commencing within each phase.

4. The development shall be constructed and operated in accordance with the provisions of the Application, and the Environmental Impact Assessment Report (EIAR), received August 2025, except in so far as amended by the terms of this consent or any future matters specified in conditions approval.

Reason: To identify the extent and terms of the development consent.

5. Any details pursuant to Condition 3 above, as far as they relate to the Substation Development Zone, shall include full details of the substation building, substation compound, and associated infrastructure hereby permitted. These details shall include:

- a) the scale and design of the substation (the area of the substation platform switchyard not exceeding 10ha and the height of the substation buildings not exceeding 15 m above finished ground level, external materials, colours and finishes of all buildings, external plant or equipment and site fencing, with a non-reflective, semi-matte finish to be specified throughout;
- b) details of the layout of the substation compound, inclusive of location of welfare facilities, parking and offices;
- c) the routing, width, surfacing (to be of a dark non-reflective material) and construction of any and all permanent and temporary access tracks;
- d) details of any temporary construction compounds; and
- e) no element of the development shall have any text, sign or logo displayed on any external surface of the facility, save those required by the applicant's safety systems and those required by law; and

Thereafter, the facility shall be installed in accordance with these approved details and the facility shall be maintained in the approved colour, free from rust, staining or discolouration until such time as the development is decommissioned.

Reason: Planning permission is granted in principle only and these specified matters must be approved prior to development commencing on the onshore substation, onshore substation compound and associated infrastructure.

6. Any details pursuant to Condition 3 above, as far as they relate to the cabling Cable Development Zone, shall include full details of the cable and access track routing. These details shall include:

- a) the routing, width, surfacing (to be of a dark non-reflective material) and construction of any and all permanent and temporary access tracks;
- b) the routing and installation methodology of any and all cabling and ducting;
- c) the location and design for any cable joint bays; and
- d) details of any temporary construction compound.
- e) restoration details for any temporary access tracks.

Thereafter, the development shall be installed in accordance with these approved details and the development shall be maintained in an appropriate condition until such time as the development is decommissioned.

Reason: Planning permission is granted in principle only and these specified matters must be approved prior to development commencing on the cable circuits and access tracks.

7. Any details pursuant to Condition 3 above, as far as they relate to the Landfall Development Zone, shall include full details of the Transition Joint Bay and any cable routing and access track routing. These details shall include:
- a) the routing and installation methodology of any and all cabling and associated ducting;
 - b) the location and design for the Transition Joint Bay;
 - c) the routing, width, surfacing (to be of a dark non-reflective material) and construction of any and all permanent and temporary access tracks; and
 - d) details of any temporary construction compounds and restoration thereof.

Thereafter, the development shall be installed in accordance with these approved details and the development shall be maintained in an appropriate condition until such time as the development is decommissioned.

Reason: Planning permission is granted in principle only and these specified matters must be approved prior to development commencing on the cable circuits and access tracks.

8. Any details pursuant to Condition 3 above for any Development Zone shall be informed by and include an access management plan (including details of footpaths and cycle ways and lighting (existing, during construction and upon completion and information on temporary or permanent diversion or closure)) which shall be submitted for the written approval of the planning authority for each phase of the development. In respect of the relevant phase, the plan shall show:-

- a) all existing paths, tracks and rights of way and any areas currently outwith or excluded from statutory access rights;
- b) any areas proposed for exclusion from statutory access rights, for reasons of privacy, disturbance or curtilage in relation to proposed buildings or structures;
- c) all paths and tracks proposed to be constructed for use by walkers, riders, cyclists, all-abilities users etc and how these would integrate with existing or proposed networks; and
- d) any diversion of paths, temporary or permanent proposed for the purposes of the development.

The Access Management Plan shall be implemented as approved and in accordance with the timetables outlined therein, unless otherwise approved in writing by the Planning Authority.

Reason: To ensure accordance with the Land Reform (Scotland) Act 2003.

9. No phase of the development shall commence unless and until, a scheme to deal with potential contamination in respect of that phase has been submitted to, and approved in writing by, the Planning Authority. Each scheme shall include:
- i) the nature, extent and type of contamination on site, identification of pollutant linkages and assessment of risk (i.e. Contaminated Land Risk Assessment and Remediation Plan). The scope and method of this assessment to be agreed in advance with the planning authority, and undertaken in accordance with PAN 33 (2000) and BS10175:2011+A1:2013 Investigation of Potentially

Contaminated Sites – Code of Practice;

- ii) the measures required to treat/remove contamination (remedial strategy) including a method statement, programme of works and proposed verification plan to ensure that the site is fit for the uses proposed;
- iii) measures to deal with contamination during construction works;
- iv) in the event that remedial action be required, a validation report that validates and verifies the completion of the approved decontamination measures; and
- v) in the event that monitoring is required, monitoring statements submitted at agreed intervals for such time period as is considered appropriate in writing by the Planning Authority. Thereafter, no development shall commence within any phase until written confirmation that the approved scheme has been implemented, completed and, if required, on-going monitoring is in place, has been issued by the Planning Authority.

Reason: In order to ensure that the site is suitable for redevelopment, given the nature of previous uses/processes on the site.

10. No phase of the development shall commence unless and until a Construction Environment Management Plan (CEMP) for the works and development related to that phase has been submitted to and approved in writing by the Planning Authority in consultation with NatureScot. The development shall then proceed in accordance with the approved CEMP unless otherwise agreed in writing by the Planning Authority. The CEMP shall include details of:
- a) An updated Schedule of Mitigation (SM) as it relates to construction highlighting mitigation set out within each chapter of the Environmental Impact Assessment Report (EIAR), received August 2025, and the conditions of this consent;
 - b) Pre-commencement protected species survey with a focus on, but not limited to, the qualifying interests of the Caithness and Sutherland Peatlands Special Area of Conservation (SAC), the River Thurso SAC, the Caithness Lochs Special Protection Area (SPA) and the North Caithness Cliffs SPA.
 - c) Processes to control / action changes from the agreed SM;
 - d) Management Plans for the construction phase, covering:
 - i) Habitat and Species Protection plans, including, Otter, Atlantic Salmon, Greenland white-fronted geese, greylag geese and whooper swan Species Protection Plans;
 - ii) Pollution Prevention and Control Plans to include details of any emergency spill procedures;
 - iii) Dust Management, covering demolition and construction activity, including vehicle movements and details of a dust mitigation scheme designed to protect neighbouring properties from dust;
 - iv) Horizontal Direct Drilling (HDD) construction method statement;
 - v) Construction Noise and Vibration;
 - vi) Temporary Site Lighting;
 - vii) Site Waste Management;

- viii) Surface and Ground Water Management, including drainage and sediment management measures from all construction areas including access tracks; mechanisms to ensure that construction would not take place during periods of high flow or high rainfall; and a programme of water quality monitoring. For the avoidance of doubt, no large scale machinery, storage of materials or construction works will take place within 20m of any watercourse apart from those associated with the water crossing;
 - ix) Soil Management, with details of soil placement and measures to utilise the soils' existing seed base in the finalised landscaping plan;
 - x) Public and Private Water Supply Protection Measures;
 - xi) Emergency Response Plans;
 - xii) A Frac-out Response Plan to ensure no impacts to habitat and water quality in the event of a frac-out to include detailed mitigation and control measures, including frac out monitoring and clean-up operation procedures, and must be adhered to during construction [NatureScot];
 - xiii) Timetable for post construction restoration / reinstatement of the temporary working areas and construction compound; and
 - xiv) Other relevant environmental management as may be relevant to the development.
- e) A statement of responsibility to 'stop the job/activity' if a breach or potential breach of mitigation or legislation occurs; and
- f) Methods for monitoring, auditing, reporting and the communication of environmental management on site and with client, Planning Authority and other relevant parties.

Reason: to ensure the environment is appropriately managed to avoid impacts on the natural environment as a result of construction of the development.

11. Any details pursuant to Condition 3 above for each phase of the development shall include full details of surface water drainage provision within the relevant phase and how that relates to the surface water drainage approach for the site as a whole (which should accord with the principles of Sustainable Urban Drainage Systems (SUDS) and be designed to the standards outlined in the CIRIA Manual and Sewers for Scotland Fourth Edition, or any superseding guidance prevailing at the time). This shall also detail updated greenfield run-off rates to reflect the details of the proposed development. Thereafter, only the approved details shall be implemented and all surface water drainage provision for the relevant phase shall be completed prior to the completion of construction of the relevant phase. All surface water drainage designs must be submitted for review and will include a Drainage Impact Assessment.

Reason: In the interests of amenity, to protect and enhance the natural environment, protect the water environment and prevent pollution.

12. Any details pursuant to Condition 3 above for each phase of the development shall be supported by a Flood Risk Assessment where any permanent above ground infrastructure is to be located in, or close to, the potential floodplain. This includes

any above ground water crossings and the substation. This shall include full details of how the development within that phase would remain operational in a 1 in 200-year return period storm event. This shall also include details of any modelling work and finished floor levels to reflect the details of the proposed development.

To protect against flood risk:

- i) No long-term (more than 24 hours) land raising or storage of materials or bunding will be located within SEPA Future Flood Extents;
- ii) Within SEPA Future Flood Extents operations (sequenced to excavate, duct and backfill) shall start and finish within a single day;
- iii) A flood warning process will be put in place for works taking place within the SEPA Future Flood Extent;
- iv) Any new or upgraded watercourse crossings, temporary or permanent, shall be designed to convey the 0.5% annual probability flood plus an appropriate allowance for climate change and freeboard, should have a minimal afflux (backwater effect) and a clear span structure where possible. For very small watercourses in remote locations, the crossings shall be designed in line with SEPA's Good Practice Guidance on watercourse crossings; and
- v) The submission of detailed watercourse crossing schedule which includes the methodology for each cable route crossing e.g. whether HDD or otherwise, and for any associated watercourse crossings for access tracks and haulage roads.

Reason: In the interests of amenity, to protect and enhance the natural environment, protect the water environment and prevent pollution.

13. 1) No development shall commence on any phase of the development until maps have been submitted in respect of that phase at least 12 months prior to start on site showing:

- a) all proposed infrastructure, including temporary works;
- b) overlain with details of the extent and depths of all proposed excavations (excavations should also include all insertions and foundations) c) overlain with groundwater abstractions and GWDTE; and
- c) showing the relevant specified buffer zones (100m and 250m).

All groundwater abstractions within the following distances of development need to be identified, in order to assess potential risk:

- a) within 100m radius of all excavations less than 1m in depth;
- b) within 250m of all excavations deeper than 1m. This covers both public and private water supply groundwater abstractions, both within and outwith the site boundary.

2) The following information for each identified PWS source must be submitted:

- a) Source location (including National Grid co-ordinates);
- b) Source type e.g., spring, borehole etc;
- c) Use e.g., domestic water supply for house, water troughs for livestock, supply to industrial/commercial premises;
- d) Abstraction rate (this could be estimated from, for example, the number of people/animals using the supply).

e) nature and integrity of the construction.

3) The design, construction and maintenance of all infrastructure must ensure that the quality and quantity of the groundwater that feeds sensitive receptors (groundwater abstractions and Groundwater Dependant Terrestrial Ecosystems (GWDTE)) downstream from any infrastructure does not significantly change, and the development does not act as a preferential pathway to groundwater flow.

The requirement for monitoring would be confirmed by SEPA once the information requested in 1) and 2) above, has been submitted for review. Should SEPA confirm monitoring of groundwater is required, it shall be carried out as set out in SEPA Technical Guidance Note 1: The Monitoring of Infrastructure with Excavations less than 1m Deep within 100m of Sensitive Receptors (Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystem) (Appendix 5 to SEPA Planning Guidance LUPS-31 Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystem). Monitoring shall commence at least 6 months prior to start on site. The monitoring results demonstrating whether the quality of groundwater and/or hydrological connectivity is being maintained must be presented to the Planning Authority in consultation with SEPA annually from the commencement of development in the required format. If monitoring identifies that the requirements are not being met, remedial action must be taken within 6 months in agreement with the Planning Authority in consultation with SEPA. No excavations greater than 1m deep within 100m of sensitive receptors should take place unless agreed in writing with the Planning Authority in consultation with SEPA.

Reason: In order to prevent potential unacceptable environmental impacts to sensitive receptors including groundwater abstractions and groundwater dependent terrestrial ecosystems.

14. No development shall commence until the Planning Authority has approved in writing the terms of appointment by the applicant of a suitably qualified independent Ecological Clerk of Works (ECoW). The terms of appointment shall:
- a) Impose a duty to monitor compliance with the ecological and hydrological commitments provided in the Environmental Impact Assessment Report, Supplementary Environmental Information and CEMP and other plans approved. This shall include, but is not limited to undertaking a further pre-construction breeding bird and protected species site walkover survey; overseeing site construction tree protection and site lighting requirements to ensure lighting is directed away from trees to reduce disturbance to any foraging bats; and to monitor compliance with all pollution prevention measures including water quality monitoring (“the ECoW Works”);
 - b) Require the ECoW to report to the applicant’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 report every three months to the Planning Authority and Planning Monitoring Officer, or monthly at the further written request of the Planning Authority, summarising progress with the development and environmental works undertaken on site;
 - d) Have power to stop 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 applicant’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 pre-construction survey work ahead of the commencement of development, throughout any period of construction activity, ground reinstatement and landscaping and for one year post construction to monitor the environmental effects of the development.

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

15. No phase of the development shall commence until a Construction Traffic Management Plan (CTMP) to manage all construction traffic and abnormal indivisible loads, associated with that phase, has been submitted at least 4 months prior to start on site and approved in writing by the Planning Authority, in consultation with the Local Roads Authority, Transport Scotland and any affected local Community Councils. The CTMP shall be carried out as approved in accordance with the timetable specified within the approved CTMP. The CTMP shall include, but is not limited to:
- a) A detailed construction programme.
 - b) Confirmation of bulk material sources to be used during the construction period
 - c) Identification of the routes to and from site for general construction traffic and confirmation of the number and type of vehicle movements anticipated on

these routes during the construction period, including any routes that will pass over the railway.

- d) Proposed measures to mitigate the impact of abnormal load movements and general construction traffic on the local road network following detailed assessment of the relevant routes. Measures such as the following should be considered, with such works to be funded / delivered by the applicant in a timely manner:
 - e) carriageway strengthening;
 - f) strengthening of bridges and culverts;
 - g) carriageway widening and/or edge strengthening;
 - h) provision of passing places;
 - i) road safety measures; and
 - j) traffic management, including measures such as temporary speed limits, suitable temporary signage, road markings and the use of speed activated signs as required.
- k) A risk assessment for the movement of abnormal loads during daylight hours and hours of darkness.
- l) Proposals for an abnormal loads delivery trial-run to be undertaken with the involvement of Police Scotland and prior to the commencement of abnormal loads deliveries.
- m) A detailed protocol for the delivery of abnormal loads/vehicles, prepared in consultation with interested parties, including the Council, the Police, Transport Scotland and, as required, community representatives. The protocol shall identify any requirement for convoy working and/or escorting of vehicles and include arrangements to provide advance notice of abnormal load movements in the local media. Temporary signage, in the form of demountable signs or similar approved, shall be established, when required, to alert road users and local residents of expected abnormal load movements. All such movements on Council maintained roads shall take place outwith peak times on the network, including school travel times, and shall avoid local community events. Prior to the movement of any abnormal load, any accommodation measures required, including the removal of street furniture, junction widening and traffic management must be approved and implemented to the satisfaction of the Planning Authority, in consultation with Transport Scotland. 4 Prior to the movement of any components and/or construction materials, any additional signing or temporary traffic control measures deemed necessary due to the size or length of any loads being transported must be undertaken by a recognised QA traffic management consultant, to be approved by Transport Scotland.
- n) A detailed delivery programme for abnormal load movements, which shall be made available to the Council and as required, community representatives. Prior to commencement of deliveries to site, the proposed route for any abnormal loads on the trunk road network must be submitted to and approved by the Planning Authority, in consultation with Transport Scotland.
- o) A contingency plan prepared by the abnormal load haulier. The plan shall be adopted only after consultation and agreement with the Police and the respective roads authorities. It shall include measures to deal with any haulage incidents that may result in public roads becoming temporarily closed or restricted.

- p) A procedure for the regular monitoring of road conditions and the implementation of any remedial works required during the construction period.
- q) 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 public road network that can reasonably be attributed to construction related traffic. 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 Authorities.
- r) Details of upgrading works required at access points connecting to any Council maintained roads.
- s) Measures to ensure that all affected public roads are kept free of mud and debris arising from the development.
- t) Identification of a named point of contact responsible for the CTMP;
- u) The establishment of a Community Liaison Group (CLG) the purpose of which shall be to monitor progress and agree suitable measures to address any issues of concern arising from the works; and
- v) Details on the steps that will be taken to manage potential conflicts with other major developments' activities in the local area. Where information is reasonably available regarding the predicted construction traffic movements of other major developments, and where the construction phases and access routes of these developments are likely to overlap with that of the Development, an evaluation of the cumulative construction traffic movements will be undertaken. The findings will be used to inform the need for any further mitigation to be detailed in the CTMP.
- w) Details of the measures that will be taken to manage points of conflict between construction traffic routes where they interact with local public roads and users of them. This will include the submission of a Code of Practice to be implemented by drivers of construction and delivery vehicles.
- x) A timetable for the implementation of the measures detailed in the CTMP.

Reason: In the interests of road safety and to ensure adequate road safety measures are in place including measures to minimise conflict with routes to schools, cyclists and local events.

16. No phase of the development shall commence until the appointment of a Traffic Management Coordinator is established for the duration of that phase to manage all construction traffic, and the implementation of the CTMP associated with that phase. Prior to commencement of construction, a Scope of Work for the role of Traffic Management Coordinator shall be submitted to include:

- Details of how the Traffic Management Coordinator will manage construction traffic and manage and monitor compliance with the CTMP.
- Details of how the Traffic Management Coordinator intends to liaise with other major developments in the area.

Reason: In the interests of road safety and to ensure adequate road safety measures are in.

17. No phase of the development shall commence until, for that phase, a plan detailing the extent of any proposed improvements to the local road network on the route between the port of entry and the site accesses within that phase, is submitted to

and approved in writing by the Planning Authority, in consultation with the local Roads Authority. The Plan shall be based on an assessment of the route and the likely level of traffic using the route for the construction of the relevant phase of the development. Thereafter, the improvement works shall be implemented either prior to the main construction works commencing on the substation, or within 4 months of the commencement of the relevant phase of development, whichever is the sooner.

Reason: To ensure the road is enhanced and thereafter maintained to safely accommodate the increased traffic arising from the construction traffic associated with this development and existing road users.

18. No delivery of abnormal indivisible load (AIL) shall be made to any phase until an Abnormal Indivisible Load Assessment and Construction Traffic Management Plan (AIL-CTMP) has been submitted to, and approved in writing by, the Planning Authority, in consultation with the Local Roads Authority, Transport Scotland, the Police and all affected Community Councils. The AIL-CTMP shall provide a detailed protocol for the delivery of AILs, including details of their proposed routing on the local and trunk road network, with any accommodation measures required, including the removal and replacement of street furniture, junction widening, and traffic management with these measures to be undertaken by a recognised Quality Assured traffic management consultant. The AIL-CTMP shall be prepared in consultation with all interested parties and thereafter be carried out as approved. The details shall include, but is not limited to:
- a) A review of maximum axle loading on structures along the access route;
 - b) A review of overhead services along the access route;
 - c) A review in summer conditions of roadside vegetation along the access route and clearance of any vegetation that may interfere with construction traffic;
 - d) A review of road works or road closures that could affect the movement of construction traffic;
 - e) Full details of all road improvements and mitigation measures needed to facilitate abnormal load movements shall be agreed with Transport Scotland and the Local Roads Authority and thereafter implemented in full to the satisfaction of Transport Scotland and the Local Roads Authority. Such measures may, but not be limited to include: the removal of street furniture, modifications to bridges and culverts, junction and carriageway widening and/or edge strengthening, road safety improvements and traffic management. These measures shall be undertaken by a recognised Quality Assured traffic management consultant;
 - f) A detailed protocol for the delivery of abnormal loads prepared in consultation and agreement with interested parties. The protocol shall identify any requirement for convoy working/and or escorting of vehicles and include arrangement to provide advance notice of demountable signs or similar approved, when required to alert road users and local residents of expected abnormal load movements. All such movements on Council maintained roads shall take place outwith peak times on the network including school travel times and shall avoid community events;
 - g) A detailed assessment of structures along the routes of any Highland Council Road shall be carried out in consultation with and the satisfaction of the Council's Structures Section;

- h) A contingency plan prepared by the abnormal load haulier. The plan shall be adopted only after consultation and agreement with the Police and the respective Roads Authorities and shall include measures to deal with any haulage incidents that may result in public roads becoming temporarily closed or restricted; and
- i) A detailed delivery programme for abnormal load movements which shall be made available to Highland Council and community representatives.

The AIL-CTMP shall be prepared in consultation with all interested parties and thereafter be carried out as approved.

Reason: In the interests of road safety and to ensure that abnormal loads access the site in a safe manner.

19. No development shall commence until a Biodiversity Net Gain Planting Plan (BNGPP) is submitted to and approved in writing by the Planning Authority. The BNGPP must include: a commitment to ensure the development results in at least 10% biodiversity net gain; the design of planting; timing of delivery; and ongoing management and maintenance arrangements. The approved BNGPP shall be implemented in full and in accordance with the approved timing, unless otherwise agreed in writing by the Planning Authority.

Reason: To ensure that the development delivers biodiversity net gain.

20. (1) No phase of the development shall commence unless and until a Habitat Management Plan (HMP), in respect of that phase has been submitted to and approved in writing by the Planning Authority. This shall be based upon and informed by the Outline Biodiversity Enhancement Plan, dated February 2026.
- (2) The HMP shall include provision for regular monitoring and review to be undertaken against the HMP objectives and measures for securing amendments or additions to the HMP in the event that the HMP objectives are not being met.
- (3) Unless and until otherwise agreed in advance in writing with the Planning Authority, the approved HMP (as amended from time to time with written approval of the Planning Authority) shall be implemented in full.

Reason: In the interests of good land management and the protection of habitats.

21. No phase of the development or site enabling works shall commence until a works specific finalised Peat Management Plan (PMP) has been submitted to and approved in writing by the Planning Authority in consultation SEPA. This shall be based upon and informed by the EIAR, received August 2025.

(1) The PMP shall:

- (a) Include a specification that all access tracks and haulage roads located on peat deeper than 1m will be floating;
- (b) Take account of site and ground investigations to minimise the loss of peatlands and reduce carbon loss;
- (c) Include details of vegetated turf stripping and storage;

- (d) Include actions (including micro siting) to minimise excavated peat volumes and reuse peat in an appropriate manner, with the inclusion of a specific section outlining measures such as micrositing, limiting the footprint, and use of floating track to reduce disturbance;
- (e) Ensure no micrositing of the finalised infrastructure and associated earthworks shall encroach further onto deeper peat or wetlands and must not be located closer to any watercourses than agreed with the Planning Authority and statutory consultees;
- (f) Include detail on the predicted volumes of peat that will be excavated during construction, the characteristics of the peat that would be excavated, and the details of how and where this excavated peat would be stored, reused and managed;
- (g) Include detailed assessment of the peatland condition which demonstrates the development has minimised impact on the best quality peatland (appliance to refer to NatureScot's Peatland Condition Assessment guidelines); and,
- (h) Follow SEPA's good practice for handling, storing and reinstating peat materials.

(2) The PMP shall thereafter be implemented as approved.

Reason: To ensure that a plan is in place to deal with the storage and reuse of peat within the application site, including peat stability and slide risk.

22. Any detailed application must, where relevant, demonstrate whether any permanent loss of woodland associated with the proposed development, meets the acceptability criteria given in Annex C of the Control of Woodland Removal policy. Where considered acceptable, the area(s) of woodland removal must be clearly identified on a site plan and calculated by woodland type.

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

23. (1) No phase of the development or Site Enabling Works shall commence until an Outline Scheme of Woodland Management and Compensatory Planting has been submitted and approved in writing by the Planning Authority.

(2) No phase of the development or Site Enabling Works shall commence until a detailed scheme of Woodland Management and a Compensatory Planting Plan (including future maintenance) in respect of that phase, has been submitted and approved in writing by the Planning Authority.

The area of planting shall be greater than the area of woodland to be removed, consisting of the same woodland type and located within the Highlands. The area identified for compensatory planting may also need to be considered under The Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017, where this exceeds the current thresholds. The Compensatory Planting Plan must follow the same process as required for preparing a woodland creation proposal, as set out in the Scottish Forestry publication: Woodland Creation Application Guidance. The Compensatory Planting Plan must be prepared by and then implemented under the supervision of a suitably qualified forestry consultant, approved by the planning

authority. The appointed forestry consultant must provide a detailed timescale for delivery and schedule of supervision, with compliance monitoring reports to be issued at agreed stages. The approved Compensatory Planting Plan must be implemented in full, prior to first commissioning of the development. The compensatory planting shall be maintained thereafter in accordance with the approved scheme, until established to the full satisfaction of the planning authority and then shall remain as woodland in perpetuity. To comply with the Felling Permission exemptions, woodland removal must not begin until the applicant can demonstrate that construction work is imminent. In the event that development fails to commence within 3 years of the initial felling, then the land use shall revert back to woodland and the area must be replanted within 12 months, to a specification approved by the planning authority. Where compensatory planting takes place on land located outside the planning application boundary and/or is not under the ownership of the applicant, a Section 75 legal agreement must first be secured between the applicant, the landowner and the planning authority. The applicant must provide the planning authority with a GIS shapefile clearly identifying the approved area(s) of woodland removal and the associated area(s) of compensatory planting

Reason: In the interest of visual amenity to aid screening of the Development as well as to protect Scotland's woodland resource, in accordance with the Scottish Government's policy on the Control of Woodland Removal.

24. Any details pursuant to Condition 3 above for the construction of the substation within the Substation Development Zone shall be supported by an operational noise impact assessment.

This shall demonstrate that the Rating Level of noise arising from the development, shall be determined in accordance with BS4142:2014+A1:2019 Methods for Rating and Assessing Industrial and Commercial Sound shall not exceed background level + 5dB or 30dB whichever is lowest at the curtilage of any noise sensitive receptor.

Prior to first operation, a revised Noise Impact Assessment (NIA) shall be submitted to the LPA for approval. The NIA report shall include details of the specified plant to be installed and any required noise control measures to Flare 226609/PDT01209 ensure that operational noise levels from the Development will not exceed background level + 5dB or 30dB whichever is lowest at the curtilage of any noise sensitive receptor

Within 4 weeks of the energisation of the development, the applicant shall carry out compliance monitoring which shall be undertaken by a suitably qualified and competent acoustic consultant.

Within 4 weeks of the monitoring being completed, a noise assessment report shall be submitted for the written approval of the Planning Authority. In so doing the report shall demonstrate the noise emitted from the substation has not exceeded the noise levels set out in this condition.

If the noise level exceeds the levels set out in this condition, the noise assessment shall include a scheme of mitigation including timescales for the implementation of the mitigation. Thereafter any mitigation measures shall be implemented in accordance with the approved scheme and timescales.

Prior to undertaking any compliance monitoring, details of the proposed compliance monitoring shall be submitted to and agreed in writing by the Council's Environmental Health Service.

Within 21 days from receipt of a written request of the Planning Authority, following a justified complaint to it alleging noise disturbance at a noise sensitive location, the site operator shall, at its expense, employ an independent consultant to assess the level of noise in terms of compliance with the noise levels set out in this condition. The site operator shall submit the report of the independent consultant's assessment for the approval of the Planning Authority within 2 months of receiving the written request (unless otherwise agreed in writing).

Reason: In the interest of safeguarding residential amenity.

25. Prior to the commencement of any construction works, a Construction Noise and Vibration Management Plan (CNVMP) shall be submitted to and approved in writing by the Planning Authority. The CNVMP shall be prepared in accordance with BS5228-1:2009+A1:2014 and shall include:

- Details of the mitigation measures to be implemented to minimise noise and vibration from construction activities.
- Proposals for monitoring noise and vibration throughout the construction period.
- Details of the community liaison for engaging with affected residents, including communication of potential impacts and complaint procedures

Thereafter, the development shall proceed in accordance with the approved CNVMP, and all mitigation measures shall be in place prior to the commencement of construction, unless otherwise agreed in writing by the Planning Authority.

Reason: In the interest of safeguarding residential amenity.

26. 1. Subject to Paragraph 2, construction activities, including vehicle movements on site, associated with this development, for which noise is audible at the curtilage of any noise sensitive property, shall, unless otherwise agreed in writing with the Planning Authority, only be permitted between:

- i) 0800 hours and 1900 hours Monday to Friday; and
- ii) 0800 hours and 1300 hours on Saturdays.
- iii) There shall be no audible activity from the site at noise sensitive properties on Sundays or Public Holidays.

2. Limited 24-hours per day / 7 days a week working shall be permitted in relation to construction utilising horizontal directional drilling where this has been agreed in advance with the Planning Authority.

Reason: In the interest of safeguarding residential amenity.

27. Prior to the development commencing the applicant shall submit, for the written approval of the planning authority, a method statement prepared by a suitably qualified and competent person in accordance with PAN 50 Annex D: The Control

of Blasting at Surface Mineral Workings.. The method statement should include but is not limited to the following: -

- The best practicable measures to be taken to reduce the impact of air overpressure and vibration at sensitive properties.
- A scheme for the monitoring of vibration from blasting including the location of monitoring points and equipment to be used.
- The proposed methods for providing the public with advance warning of any blasting.

Thereafter the development shall progress in accordance with the approved method statement and all approved mitigation measures shall be in place prior to any blasting taking place or as otherwise may be agreed in writing by the Planning Authority.

No blasting operations shall take place out with the hours of 10.00am to 5.00pm Monday to Friday and not at all on Saturdays, Sundays or Public holidays.

Ground vibrations as a result of the blasting operations shall not exceed a peak particle velocity of 6mms-1 in 95% of all blasts within any 6 month period. No individual blast shall exceed a peak particle velocity of 12mms-1 as measured at noise sensitive properties. The measurement shall be the maximum of three mutually perpendicular directions taken at ground surface at any vibration sensitive building.

Reason: In the interest of safeguarding residential amenity.

28. No works in connection with any phase of the development hereby approved shall commence unless an Archaeological Management Plan and Written Scheme of Investigation (WSI), in respect of that phase, has been submitted to and approved in writing by the planning authority and a programme of archaeological works has been carried out in accordance with the approved WSI. The WSI shall include details of how the recording and recovery of archaeological resources found within the application site shall be undertaken, and how any updates, if required, to the written scheme of investigation would be provided throughout the implementation of the programme of archaeological works. Should the archaeological works reveal the need for post excavation analysis the development hereby approved shall not be occupied or brought into use unless a Post-Excavation Research Design (PERD) for the analysis, publication and dissemination of results and archive deposition has been submitted to and approved in writing by the planning authority. The PERD shall be carried out in complete accordance with the approved details.

Reason: In order to protect the archaeological and historic interests of the site

29. No works in connection with the development hereby approved shall commence unless a site protection plan has been submitted to and approved in writing by the Planning Authority and Historic Environment Scotland, in respect of Halcro Manse, broch 640m S of (SM556). Site protection measures shall be shown on a layout plan accompanied by descriptive text and shall include:

- a) The location of the scheduled monument to be protected during construction works; and
- b) The position and details of the warning signs and/or protective fencing to be erected.

No works in connection with the development hereby approved shall commence unless the site protection measures have been implemented in full in accordance with the approved details. Any warning signs and/or protective fencing shall be retained during the construction period in accordance with the approved details and no works shall take place at any time within the protected areas.

Reason: To ensure the scheduled monument is adequately protected during construction works.

30. No development shall commence until a community liaison group is established by the applicant, in collaboration with the Planning Authority and affected local Community Councils.

The group shall act as a forum for the community to be kept informed of project progress and, in particular, should allow advanced dialogue on the provision of all transport related mitigation measures and to keep under review the timing of the delivery of abnormal loads and performance of the Construction Traffic Management Plan.

This should also ensure that local events and tourist seasons are considered and appropriate measures to co-ordinate deliveries and work with these and any other major projects in the area to mitigate any conflict between construction traffic and the increased traffic generated by such events / seasons / developments.

The liaison group, or element of any combined liaison group relating to this development, shall be maintained until the construction of the development, during operations thereafter and during the decommissioning phase.

Reason: To assist project implementation, ensuring community dialogue and the delivery of appropriate mitigation measures for example to minimise potential hazards to road users, including pedestrians, travelling on the road networks.

31. Any details pursuant to Condition 3 above for any Development Zone shall be informed by and include an Outdoor Access Plan of public access across the site (as existing, during construction and following completion). The plan shall include details showing:

- i) All existing access points, paths, core paths, tracks, rights of way and other routes (whether on land or inland water), and any areas currently outwith or excluded from statutory access rights under Part One of the Land Reform (Scotland) Act 2003, within and adjacent to the application site;
- ii) Any areas proposed for exclusion from statutory access rights, for reasons of privacy, disturbance or effect on curtilage related to proposed buildings or structures;
- iii) All proposed paths, tracks and other routes for use by walkers, riders, cyclists, canoeists, all abilities users, etc. and any other relevant outdoor access enhancement (including construction specifications, signage, information leaflets, proposals for on-going maintenance etc.);
- iv) Any diversion of paths, tracks or other routes (whether on land or inland water), temporary or permanent, proposed as part of the development (including details of mitigation measures, diversion works, duration and signage).

Reason: In order to safeguard public access during the construction phase of the development.

32. No development shall commence until the Planning Authority has approved in writing the terms of appointment by the applicant of a suitably qualified environmental specialist to assist the Planning Authority in monitoring compliance with the planning permission and conditions attached to this consent. The terms of Planning Monitoring Officer (PMO) appointment shall:
- a) Impose a duty to monitor compliance with the planning permission and conditions attached to this consent;
 - b) Require the PMO to submit a report at least every three months to the Planning Authority, or monthly at the further written request of the Planning Authority, summarising works undertaken on site; and
 - c) Require the PMO to report to the Planning Authority any incidences of non-compliance with the planning permission and conditions attached to this consent at the earliest practical opportunity.

The PMO shall be appointed on the approved terms throughout the period from the commencement of development to completion of post construction restoration works.

Reason: To enable the development to be suitably monitored to ensure compliance with the consent issued.

33. (1) The Development shall cease to be operational no later than the date falling 50 years from the Date of Final Commissioning of the Ayre Offshore Wind Farm.
- (2) No later than one year prior to the date of final transmission of electricity from the associated wind farm or the expiry of the planning permission (whichever is earlier) a detailed decommissioning, restoration and aftercare plan, shall be submitted for the written approval of the Planning Authority in consultation with the Local Roads Authority and Transport Scotland. The detailed decommissioning, restoration and aftercare plan shall provide updated and detailed proposals, in accordance with relevant guidance at that time, for the removal of the Development, the treatment of ground surfaces, the management and timing of the works and environment management provisions which shall include (but is not limited to):
- a) a site waste management plan (dealing with all aspects of waste produced during the decommissioning, restoration and aftercare phases and, including details of measures to be taken to minimise waste associated with the Development and promote the recycling of materials and infrastructure components);
 - b) details of the formation of the construction compound, welfare facilities, any areas of hardstanding, turning areas, internal access tracks, car parking, material stockpiles, oil storage, lighting columns, and any construction compound boundary fencing;
 - c) a dust management plan;
 - d) details of measures to be taken to prevent loose or deleterious material being deposited on the local road network, including wheel cleaning and lorry sheeting facilities, and measures to clean the site entrances and the adjacent local road network;
 - e) a pollution prevention and control method statement, including arrangements for the storage and management of oil and fuel on the site;

- f) details of measures for soil storage and management;
- g) a surface water and groundwater management and treatment plan, including details of the separation of clean and dirty water drains, and location of settlement lagoons for silt laden water;
- h) details of measures for sewage disposal and treatment;
- i) temporary site illumination;
- j) the construction of any temporary access into the site and the creation and maintenance of associated visibility splays; and
- k) details of watercourse crossings.

The Development shall be decommissioned, the site restored, and aftercare undertaken prior to the date falling three years after the date of final transmission of electricity from the associated windfarm, and in accordance with the approved detailed decommissioning, restoration and aftercare plan.

Reason: To ensure the decommissioning and removal of the Development in an appropriate and environmentally acceptable manner and the restoration and aftercare of the site, in the interests of safety, amenity and environmental protection.

34. (1) There shall be no Commencement of Development unless and until a bond or other form of financial guarantee in terms reasonably acceptable to the Planning Authority which secures the cost of performance of all decommissioning, restoration and aftercare obligations referred to in Condition (32 - preceding condition on cessation) is submitted to the Planning Authority.

(2) The value of the financial guarantee shall be agreed between the Company and the Planning Authority or, failing agreement, determined (on application by either party) by a suitably qualified independent professional as being sufficient to meet the costs of all decommissioning, restoration and aftercare obligations referred to in Condition 32.

(3) The financial guarantee shall be maintained in favour of the Planning Authority until the completion of all decommissioning, restoration and aftercare obligations referred to in Condition 32.

The value of the financial guarantee shall be reviewed by agreement between the Company and the Planning Authority or, failing agreement, determined (on application by either party) by a suitably qualified independent professional not less than every five years, and at the time of the approval of the detailed decommissioning, restoration and aftercare plan approved under Condition 32. The value of the financial guarantee shall be increased or decreased to take account of any variation in costs of compliance with decommissioning, restoration and aftercare obligations referred to in Condition 32 and best practice prevailing at the time of each review.

Reason: to ensure that there are sufficient funds to secure performance of the decommissioning, restoration and aftercare conditions attached to this planning permission in the event of default by the applicant.

35. Prior to the Commencement of Development, a Local Employment Scheme for the construction and operation of the development shall be submitted to and agreed in

writing by The Highland Council. The submitted Scheme shall make reference to the EIAR, received August 2025. The Scheme shall include the following:

- a) details of how the staff/employment opportunities at the development will be advertised and how liaison with the Council and other local bodies will take place in relation to maximising the access of the local workforce to information about employment opportunities;
- b) details of how sustainable training opportunities will be provided for those recruited to fulfil staff/employment requirements including the provision of apprenticeships or an agreed alternative;
- c) a procedure setting out criteria for employment, and for matching of candidates to the vacancies;
- d) measures to be taken to offer and provide college and/or work placement opportunities at the development to students within the locality;
- e) details of the promotion of the Local Employment Scheme and liaison with contractors engaged in the construction of the development to ensure that they also apply the Local Employment Scheme so far as practicable having due regard to the need and availability for specialist skills and trades and the programme for constructing the development;
- f) a procedure for monitoring the Local Employment Scheme and reporting the results of such monitoring to The Highland Council; and
- g) a timetable for the implementation of the Local Employment Scheme.

Thereafter, the development shall be implemented in accordance with the approved scheme.

Reason: In order to ensure compliance with NPF4 Policy 11c) and to maximise the local socio-economic benefits of the development to the wider community. To make provision for publicity and details relating to any local employment opportunities.

REASON FOR DECISION

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.

REASONED CONCLUSION

The Council is in agreement with the findings of the Environmental Impact Assessment Report for the proposed construction of the onshore transmission infrastructure comprising a cable landfall, up to four onshore cable circuits an onshore substation, a 400kV cable corridor and ancillary works for the Ayre Offshore Windfarm. Whilst the finalised design and layout is proposed to be a reserved matter, the application has demonstrated the ability for the maximum envelope of the proposed development to be successfully accommodated into the landscape, with limited localised significant adverse effects. It is recognised that there would be limited adverse impacts on natural heritage as a result of the proposed development

through construction and operation. With the exception of the residual significant effects identified by NatureScot and addressed through the Appropriate Assessment included within this report, no other significant environmental impacts have been identified in EIA terms. With the application of mitigation measures and the conditions outlined above, it is considered that the extent of adverse impacts may be suitably managed and contained for a development of this scale. The Council is satisfied that all environmental effects of this development can be addressed by way of mitigation. The Council has incorporated the requirement for a schedule of mitigation within the conditions of this permission. Monitoring of construction and operational compliance has been secured through the conditions of this permission.

Signature: Dafydd Jones

Designation: Area Planning Manager – North

Author: Michael Kordas

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

Relevant Plans:

Plan 1 Location Plan

Plan 2 The Proposed Development: Indicative Layout – Figure 3.1

Plan 3 Substation Indicative Site Layout Plan – Figure 3.3

Appendix 2 – Development Plan and Other Material Policy Considerations

DEVELOPMENT PLAN

A2.1 National Planning Framework (NPF) 4 (2023)

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
- 5 – Soils
- 7 – Historic assets and places
- 10 – Coastal development
- 11 – Energy
- 13 – Sustainable transport
- 22 – Flood risk and water management
- 23 – Health and safety
- 25 – Community wealth benefits
- 33 – Minerals

A2.2 Highland Wide Local Development Plan (HwLDP) (2012)

- 28 - Sustainable Design
- 29 - Design Quality and Place-making
- 30 - Physical Constraints
- 31 - Developer Contributions
- 49 – Coastal Development
- 53 - Minerals
- 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
- 64 - Flood Risk
- 66 - Surface Water Drainage
- 67 - Renewable Energy Developments
- 68 - Community Renewable Energy Developments
- 69 - Electricity Transmission Infrastructure
- 72 - Pollution
- 73 - Air Quality
- 74 - Green Networks
- 77 - Public Access
- 78 - Long Distance Routes

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

No policies or allocations relevant to the proposals are included. It does,

however, confirm the boundaries of Special Landscape Areas within the plan's boundary. As discussed in more detail in the planning assessment and conclusions, the proposed development could also potentially assist with the plan aim of diversifying the local employment base in further directions than the nuclear industry, considering the decommissioning of Dounreay

Other Highland Council Supplementary Guidance

- A2.4 Developer Contributions (Mar 2018)
- Flood Risk and Drainage Impact Assessment (Jan 2013)
- Green Networks (Jan 2013)
- Highland Historic Environment Strategy (Jan 2013)
- Highland's Statutorily Protected Species (Mar 2013)
- Highland Renewable Energy Strategy and Planning Guidelines (May 2006)
- Physical Constraints (Mar 2013)
- Roads and Transport Guidelines for New Developments (May 2013)
- Special Landscape Area Citations (Jun 2011)
- Sustainable Design Guide (Jan 2013)

OTHER MATERIAL CONSIDERATIONS

Emerging Highland Council Development Plan Documents and Planning Guidance

- A2.5 The Highland-wide Local Development Plan is currently under review and is at the evidence report stage. It is anticipated the Proposed Plan would be published during 2027.
- A2.6 The Highland Council also has further advice on the delivery of major developments in a number of documents, which include the Construction Environmental Management Process for Large Scale Projects; and The Highland Council Visualisation Standards for Wind Energy Developments.

Other National Guidance

- A2.7 Onshore Wind Energy Policy Statement (2022)
- Onshore Wind Sector Deal for Scotland (2023)
- Draft Energy Strategy and Just Transition Plan (2023)
- Scottish Energy Strategy (2017)
- 2020 Routemap for Renewable Energy (2011)
- Energy Efficient Scotland Route Map, Scottish Government (2018)
- Assessing Impacts on Wild Land Areas, Technical Guidance, NatureScot (2020)
- Wind Farm Developments on Peat Lands, Scottish Government (2011)
- 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)

Appendix 3 - Compliance with the Development Plan / Other Planning Policy

Development Plan / Other Planning Policy

- A3.1 The Development Plan comprises National Planning Framework 4 (NPF4), the adopted Highland-wide Local Development Plan (HwLDP), the adopted Caithness and Sutherland Local Development Plan (CaSPlan) and all statutorily adopted supplementary guidance.

National Policy

- A3.2 National Planning Framework 4 (NPF4) forms part of the Development Plan and was adopted in February 2023. It comprises three parts:
- Part 1 – sets out an overarching spatial strategy for Scotland in the future and includes six spatial principles (just transition / conserving and recycling assets / local living / compact urban growth / rebalanced development / rural revitalisation. Part 1 sets out that there are eighteen national developments to support the spatial strategy and regional spatial priorities, which includes single large scale projects and networks of smaller proposals that are collectively nationally significant.
 - Part 2 – sets out policies for the development and use of land that are to be applied in the preparation of local development plans; local place plans; masterplans and briefs; and for determining the range of planning consents. This part of the document should be taken as a whole in that all relevant policies should be applied to each application.
 - Part 3 – provides a series of annexes that provide the rationale for the strategies and policies of NPF4. The annexes outline how the document should be used and set out how the Scottish Government would implement the strategies and policies contained in the document.
- A3.3 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 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 would 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.
- A3.4 The proposed development is of national importance for the delivery of the national Spatial Strategy, whereby in principle support for the development is

established. As the proposed development would be capable of generating over 50 MW, it is of a type and scale that constitutes NPF4 National Development 3 - Strategic Renewable Electricity Generation and Transmission Infrastructure.

- A3.5 At the high level, NPF4 considers that Strategic Renewable Electricity Generation and Transmission Infrastructure would 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 would clearly require a balancing exercise to be undertaken, which is reflected throughout the document.
- A3.6 NPF4 Policies 1, 2, and 3 now 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.
- A3.7 Specific to this proposal, as well as the support in Policy 1 (significant weight would 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. However, any project identified as a national development 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.
- A3.8 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 would 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 would affect a National Park, NSA or SSSI would only be supported where: i) the objectives of designation and the overall integrity of the areas would 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. In this case, as discussed in more detail in the planning assessment, it is considered that the integrity of the natural heritage designations otherwise affected by the proposals would not be compromised.
- A3.9 Similarly, sites designated in Development Plans for local nature conservation or Special Landscape Areas (SLAs) are protected in NPF4 Policy 4 unless the development would 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.

- A3.10 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 National Scenic Areas. Policy 11 Part c) qualifies this position by stating that wind farms should only be supported where they maximise net economic impact, including local and community socio-economic benefits such as employment, associated business, and supply chain opportunities. The policy goes on to state that while significant weight would 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 and post the adoption of NPF4.
- A3.11 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 would generally be considered acceptable. Members would be aware that the concept of renewable energy developments that have only localised impacts as being more likely to be acceptable is not new and is also reflected in previous Highland Council planning decisions. While the adopted NPF4 reflects a stronger presumption in favour of all national scale energy developments, judgment still requires to be applied at the project level to ensure proposals do not have unacceptable landscape and visual impacts even if the contribution to national renewable energy targets is considerable.
- A3.12 On that point it is noted that both legislation and planning law indicate that where there may be incompatibility between NPF4 and the Local Development Plan (LDP) (HwLDP, CaSPlan, and Highland Council Supplementary Guidance) published prior to NPF4, then the more recent document shall prevail. Notwithstanding however, in instances of incompatibility, this requirement may not eliminate the provisions of the LDP in their entirety whilst these documents remain an extant part of the adopted Development Plan. That means that the Council may wish to give more weight to the provisions of its LDP over national policies where there is strong justification for doing so, such as where it feels that LDP policy is better equipped to respond to local conditions for example. However, this matter is yet to be tested through the planning system.

Highland-wide Local Development Plan

- A3.13 The principal HwLDP policy on which the application needs to be determined is Policy 67 - Renewable Energy. HwLDP Policy 67 sets out that renewable energy development should be well related to the source of the primary renewable resource needed for operation, the contribution of the proposed development in meeting renewable energy targets and positive/negative

effects on the local and national economy as well as all other relevant policies of the Development Plan and other relevant guidance. In that context the Council would support proposals where it is satisfied they are located, sited and designed such as they would not be significantly detrimental overall, individually or cumulatively with other developments having regard to 11 specified criteria (as listed in HwLDP Policy 67). Such an approach is consistent with the concept of Sustainable Design (HwLDP Policy 28) and the concept of supporting the right development in the right place at the right time.

- A3.14 Although HwLDP Policy 67 and NPG4 Policy 11 are compatible, NPF4 expresses greater support for renewable energy projects outwith National Parks and NSAs and requires greater weight to be attributed to the twin climate and biodiversity crises in the decision making process, whilst still recognising that a balancing exercise must still be carried out.

Area Local Development Plans

- A3.15 The Caithness and Sutherland Local Development Plan (CaSPlan) does not contain land allocations related to the proposed development. It confirms the boundaries of Special Landscape Areas within these plan areas. NPF4 Policy 4 and HwLDP Policies 28, 57, 61 and 67 seek to safeguard these regionally important landscapes. The impact of this development on landscape is primarily assessed in the Design, Landscape and Visual Impact section of this report.

Appendix 4 - Habitats Regulations Appraisal

Construction of onshore transmission infrastructure comprising up to two cable landfalls, an onshore substation and up to five associated export circuits.

25/02964/PIP

CONSIDERATION OF PROPOSALS AFFECTING EUROPEAN SITES

Caithness Lochs Special Protection Area (SPA) and Ramsar

Caithness and Sutherland Peatlands Special Area of Conservation (SAC) and Ramsar

Loch of Wester SAC

Loch Watten SAC

River Thurso SAC

The status of the Caithness Lochs SPA and Ramsar, Caithness and Sutherland Peatlands SAC and Ramsar, Loch of Wester SAC, Loch Watten SAC and River Thurso SAC means that the requirements of the Conservation (Natural Habitats, and c.) Regulations 1994 as amended (the 'Habitats Regulations') or, for reserved matters the Conservation of Habitats and Species Regulations 2017 as amended apply.

This means that where the conclusion reached by the Council on a development proposal unconnected with the nature conservation management of a Natura 2000 site is that it is likely to have a significant effect on those sites, it must undertake an Appropriate Assessment of the implications for the conservation interests for which the areas have been designated. The need for Appropriate Assessment extends to plans or projects out with the boundary of the site in order to determine their implications for the interest protected within the site.

This means that the Council, as competent authority, has a duty to:

- Determine whether the proposal is directly connected with or necessary to site management for conservation; and, if not,
- Determine whether the proposal is likely to have a significant effect on the site either individually or in combination with other plans or projects; and, if so, then
- Make an Appropriate Assessment of the implications (of the proposal) for the site in view of that site's conservation objectives.

The competent authority can only agree to the proposal after having ascertained that it will not have an adverse effect on the integrity of the sites. If this is not the case and there are not alternative solutions, the proposal can only be allowed to proceed if there are imperative reasons of overriding public interest, which in this case can include those of a social or economic nature.

Screening of Likely Significant Effects

It is evident that the proposal is not connected with or necessary to site management for conservation, hence further consideration is required. The proposed works has the potential to have a likely significant effect on the qualifying interests of the SPA due to impacts arising from construction, operation and decommissioning of the Proposed Development. The Council is therefore required to undertake an appropriate assessment of the implications of the proposal on the above named European designated sites.

Caithness Lochs Special Protection Area (SPA) and Ramsar

NatureScot have advised that the proposal is likely to have a significant effect on the qualifying interests of Greenland white-fronted geese, greylag geese and whooper swan.

Consequently, The Highland Council, as competent authority, is ***required*** to carry out an appropriate assessment in view of the site's conservation objectives for its qualifying interests.

Caithness and Sutherland Peatlands Special Area of Conservation (SAC) and Ramsar

NatureScot have advised that the proposal is likely to have a significant effect on the qualifying interests of otter.

As a result of the likely significant effects, as competent authority, The Highland Council is ***required*** to carry out an appropriate assessment in view of the site's conservation objectives for its qualifying interests.

Loch of Wester Special Area of Conservation (SAC)

NatureScot have advised that the proposal is likely to have a significant effect on the qualifying interest of loch habitat.

Consequently, The Highland Council, as competent authority, is ***required*** to carry out an appropriate assessment in view of the site's conservation objectives for its qualifying interests.

Loch Watten Special Area of Conservation (SAC)

NatureScot have advised that the proposal is likely to have a significant effect on the qualifying interest of loch habitat.

Consequently, The Highland Council, as competent authority, is ***required*** to carry out an appropriate assessment in view of the site's conservation objectives for its qualifying interests.

River Thurso Special Area of Conservation (SAC)

Nature Scot have advised that the proposal is likely to have a significant effect on the qualifying interest of Atlantic salmon.

As a result of the likely significant effects, as competent authority, The Highland Council is ***required*** to carry out an appropriate assessment in view of the site's conservation objectives for its qualifying interests.

APPROPRIATE ASSESSMENT

While the responsibility to carry out the Appropriate Assessment rests with the Council, advice contained within Circular 6/1995 is that the assessment can be based on the information submitted from other agencies. In this case, the Appropriate Assessment is informed by information supplied by NatureScot, the applicant and various published information.

Caithness Lochs Special Protection Area (SPA) and Ramsar

In its response to the Council of 17 October 2025, NatureScot advised that the proposal is likely to have a significant effect on Greenland white-fronted geese, greylag geese and whooper swan as a qualifying interest of the SPA. Their advice is set out below:

Our advice is that this proposal is likely to have a significant effect on Greenland white-fronted geese, greylag geese and whooper swan. Consequently, The Highland Council, as competent authority, is required to carry out an appropriate assessment in view of the site's conservation objectives for its qualifying interests. To help you do this, we advise that on the basis of the information provided, if the proposal is carried out strictly in accordance with the following mitigation, our conclusion is that the proposal will not adversely affect the integrity of the site.

- *A Caithness Lochs Species Protection Plan (SPP) is produced. The mitigation measures within Chapter 7: Terrestrial Ornithology titled; ORN2 – Controlled construction works, should be adhered to throughout works. The embedded mitigation measures will also be applied for Greenland white-fronted geese, as confirmed in email correspondence by the Applicant.*
- *Monitoring will be undertaken by a suitably experienced and qualified ECoW searching for Greenland white-fronted geese, greylag geese, or whooper swans within 600 m of active construction activities. If these species are found, they will be observed for signs of disturbance. Should signs of disturbance be identified works should halt or be reduced until the group has either moved or behaviours have relaxed.*
- *The CEMP and Pollution Prevention Plan must include a Frac-out Response Plan. This plan should detail mitigation and control measures, including frac-out monitoring and clean-up operation procedures, and must be adhered to during construction.*

NatureScot highlight that with the application of the above mitigation measures the proposals would not adversely affect the integrity of the site. It is considered appropriate to condition the requirement for Species Protection Plans, monitoring and a frac-out response plan as part of the Construction Environmental Management Plan (CEMP) and Pollution Prevention Plan.

Caithness and Sutherland Peatlands Special Area of Conservation (SAC) and Ramsar

In its response to the Council of 17 October 2025, NatureScot advised that the proposal is likely to have a significant effect on otter as a qualifying interest of the SAC. Their advice is set out below:

Our advice is that this proposal is likely to have a significant effect on otter. Consequently, The Highland Council, as competent authority, is required to carry out an appropriate assessment in view of the site's conservation objectives for its qualifying interests. To help you do this, we advise that on the basis of the information provided, if the proposal is carried out strictly in accordance with the following mitigation, our conclusion is that the proposal will not adversely affect the integrity of the site.

- A Species Protection Plan for otter is produced, which includes measures to prevent impacts to otter. The SPP should adhere to NatureScot guidance. This should include the implementation of exclusion zones of 200m around maternal holts and 30m around non-breeding holts and shelters.*
- Pre-construction surveys of all suitable habitat within 200m of the proposals should be timetabled into project plans. These should be completed as close to the project as possible and no more than 3 months prior to start of works.*
- The CEMP and Pollution Prevention Plan must include a Frac-out Response Plan. This plan should detail mitigation and control measures, including frac-out monitoring and clean-up operation procedures, and must be adhered to during construction.*

NatureScot highlight that with the application of the above mitigation measures the proposals would not adversely affect the integrity of the site. It is considered appropriate to condition the requirement for Species Protection Plans, pre construction surveys and a frac-out response plan as part of the Construction Environmental Management Plan (CEMP) and Pollution Prevention Plan.

Loch of Wester SAC

In its response to the Council of 17 October 2025, NatureScot advised that the proposal is likely to have a significant effect on loch habitat as a qualifying interest of the SAC. Their advice is set out below:

Our advice is that this proposal is likely to have a significant effect on the loch habitat. Consequently, The Highland Council, as competent authority, is required to carry out an appropriate assessment in view of the site's conservation objectives for its qualifying interests. To help you do this, we advise that on the basis of the information provided, if the proposal is carried out strictly in accordance with the following mitigation, our conclusion is that the proposal will not adversely affect the integrity of the site.

- The CEMP and Pollution Prevention Plan must include a Frac-out Response Plan. This plan should detail mitigation and control measures, including fracout monitoring and clean-up operation procedures, and must be adhered to during construction.*

NatureScot highlight that with the application of the above mitigation measures the proposals would not adversely affect the integrity of the site. It is considered appropriate to condition the requirement for a frac-out response plan as part of the Construction Environmental Management Plan (CEMP) and Pollution Prevention Plan.

Loch Watten SAC

In its response to the Council of 17 October 2025, NatureScot advised that the proposal is likely to have a significant effect on loch habitat as a qualifying interest of the SAC. Their advice is set out below:

Our advice is that this proposal is likely to have a significant effect on the loch habitat. Consequently, The Highland Council, as competent authority, is required to carry out an appropriate assessment in view of the site's conservation objectives for its qualifying interests. To help you do this, we advise that on the basis of the information provided, if the proposal is carried out strictly in accordance with the following mitigation, our conclusion is that the proposal will not adversely affect the integrity of the site.

- *The CEMP and Pollution Prevention Plan must include a Frac-out Response Plan. This plan should detail mitigation and control measures, including fracout monitoring and clean-up operation procedures, and must be adhered to during construction.*

NatureScot highlight that with the application of the above mitigation measures the proposals would not adversely affect the integrity of the site. It is considered appropriate to condition the requirement for a frac-out response plan as part of the Construction Environmental Management Plan (CEMP) and Pollution Prevention Plan.

River Thurso SAC

In its response to the Council of 17 October 2025, NatureScot advised that the proposal is likely to have a significant effect on salmon as a qualifying interest of the SAC. Their advice is set out below:

Our advice is that this proposal is likely to have a significant effect on salmon. Consequently, The Highland Council, as competent authority, is required to carry out an appropriate assessment in view of the site's conservation objectives for its qualifying interests. To help you do this, we advise that on the basis of the information provided, if the proposal is carried out strictly in accordance with the following mitigation, our conclusion is that the proposal will not adversely affect the integrity of the site.

- *The CEMP and Pollution Prevention Plan must include a Frac-out Response Plan. This plan should detail mitigation and control measures, including fracout monitoring and clean-up operation procedures, and must be adhered to during construction.*

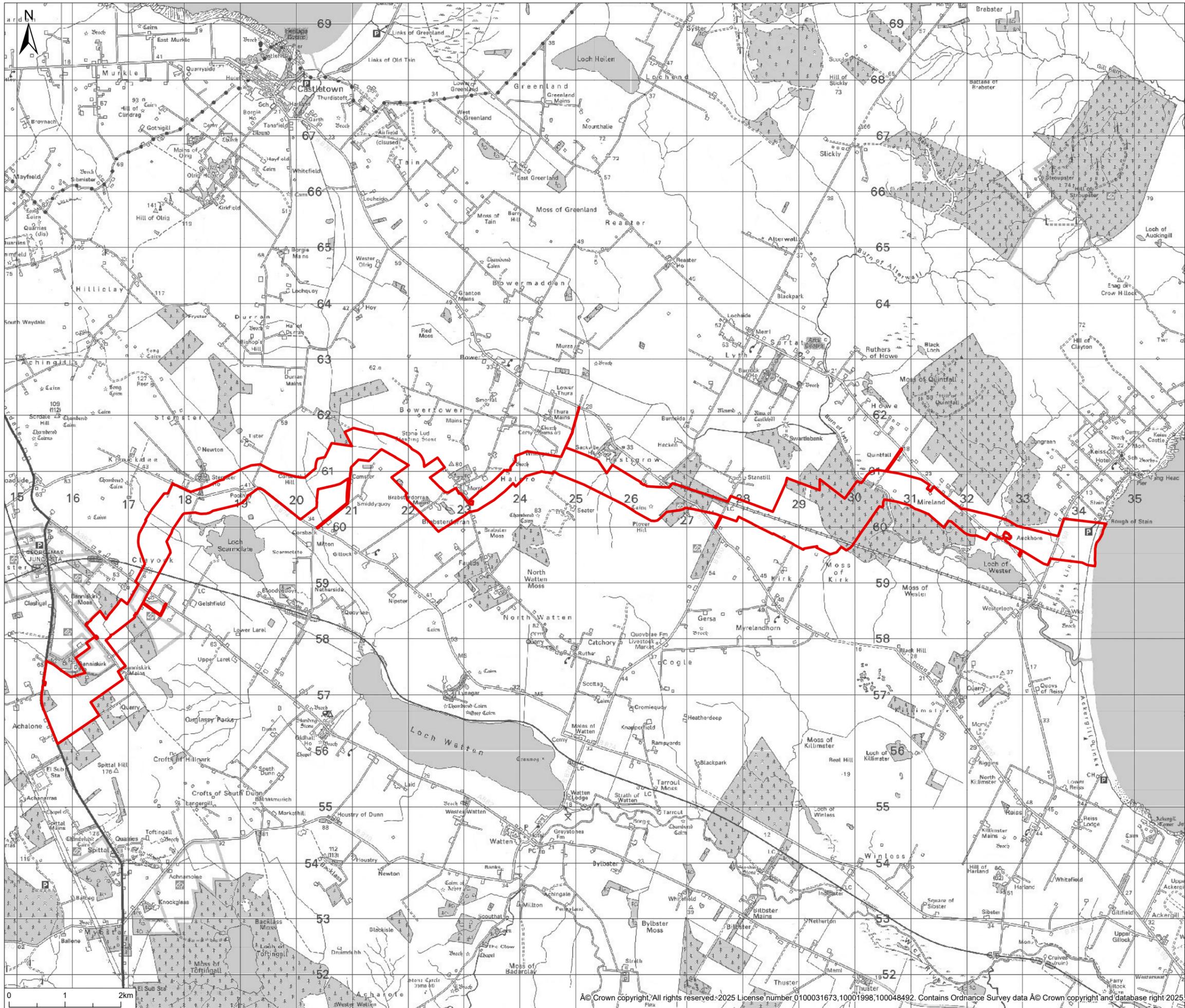
NatureScot highlight that with the application of the above mitigation measures the proposals would not adversely affect the integrity of the site. It is considered appropriate to condition the requirement for a frac-out response plan as part of the Construction Environmental Management Plan (CEMP) and Pollution Prevention Plan.

HIGHLAND COUNCIL APPRAISAL OF THE PROPOSAL

- The proposal is not directly connected with or necessary to site management for conservation;
- The proposal is likely to have a significant effect on the site either individually or in combination with other plans or projects; therefore;
- An Appropriate Assessment of the implications (of the proposal) for the site in view of that site's conservation objectives is provided below.

The impacts on the Caithness Lochs Special Protection Area (SPA) and Ramsar, Caithness and Sutherland Peatlands Special Area of Conservation (SAC) and Ramsar and the Loch of Wester, Loch Watten and River Thurso SACs have been considered. The mitigation proposed by the applicant in their Environmental Impact Assessment Report (EIAR) in addition to conditions to secure the submission and implementation of species protection plans for qualifying features of the designated sites and a pollution prevention plan will be sufficient to address any significant risk and avoid an impact on the integrity of the designated sites and their qualifying features.

Overall, it can be therefore concluded that while likely significant effects have been identified during both the construction and operational phases of the development, there will not be an adverse effect on site integrity of the Caithness Lochs Special Protection Area (SPA) and Ramsar, Caithness and Sutherland Peatlands Special Area of Conservation (SAC) and Ramsar and the Loch of Wester, Loch Watten and River Thurso SACs.



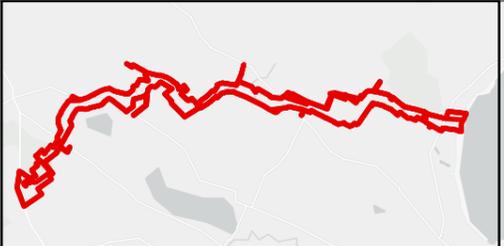
© 2025 RPS Group

Notes
 1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
 2. If received electronically it is the recipient's responsibility to print to correct scale. Only written dimensions should be used.



Legend

PPP Application Boundary



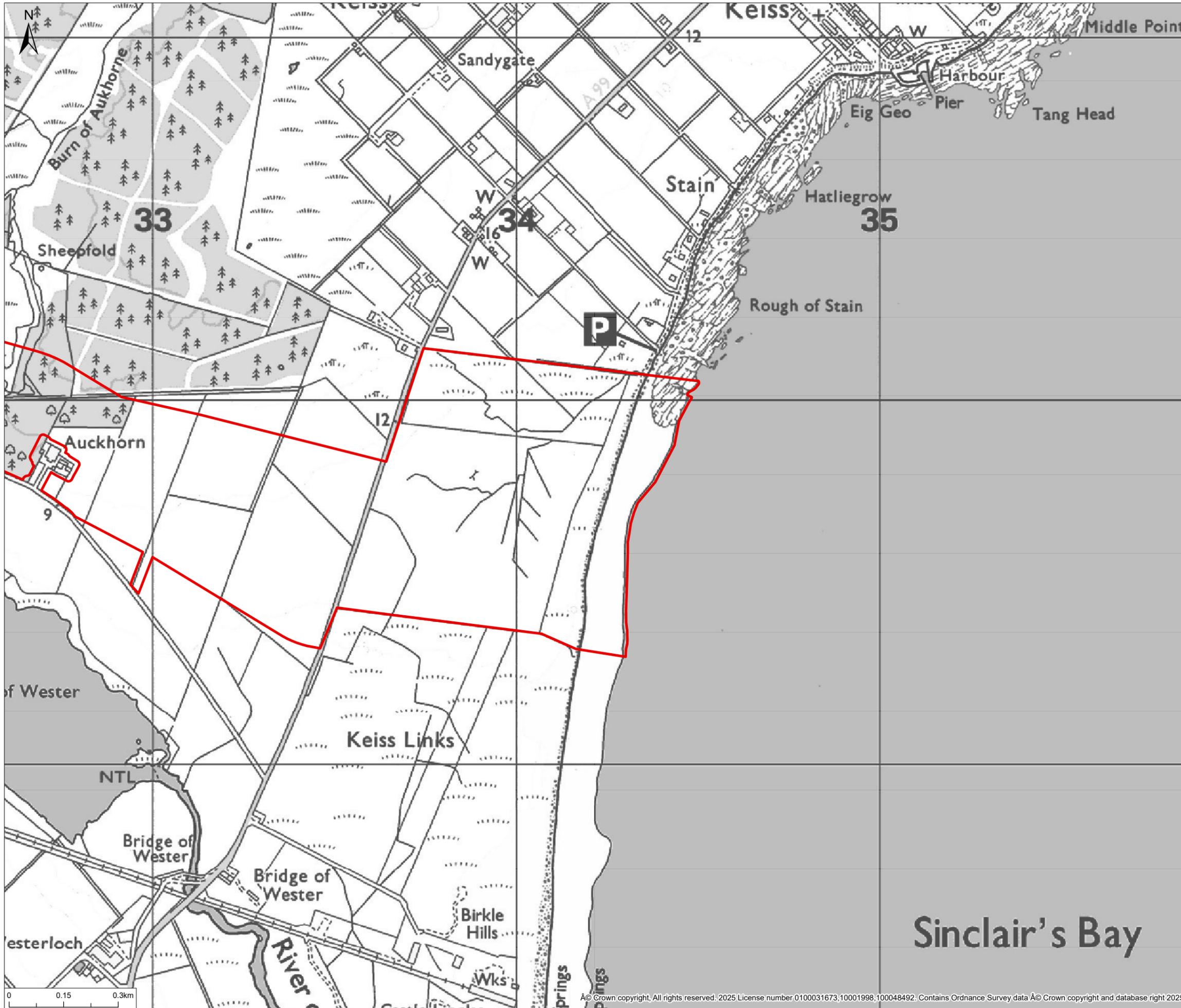
A TETRA TECH COMPANY
 101 Park Drive,
 Milton Park,
 Abingdon, Oxfordshire,
 OX14 4RY
 T: +44(0)1235 821 888
 E: RPS.ox@rps.tetrattech.com

Client **Thistle Wind Partners**
 Project **Ayre Offshore Wind Farm**
 Title **Location Plan - Overview**

Status	Drawn By	PM/Checked By
FINAL	SHB	OW
Project Number	Scale @ A3	Date Created
12705	1:65,000	MAY 2025
Figure Number		Rev
-		01

rpsgroup.com

P:\eur-mps-02_eur_rpsgroup.com\Projects\12705 Thistle Wind Partners ScotWind E3 and NE2\TechDrawings\12705-0289-01.aprx - 12705-0289-01



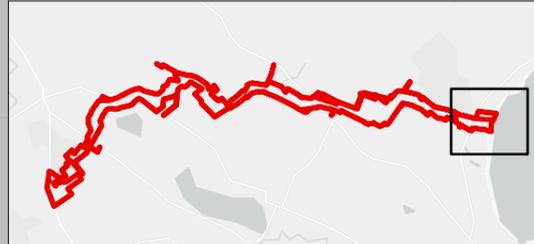
© 2025 RPS Group

Notes
 1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
 2. If received electronically it is the recipient's responsibility to print to correct scale. Only written dimensions should be used.



Legend

PPP Application Boundary



A TETRA TECH COMPANY
 101 Park Drive,
 Milton Park,
 Abingdon, Oxfordshire,
 OX14 4RY
 T: +44(0)1235 821 888
 E: RPS.ox@rps.tetrattech.com

Client: Thistle Wind Partners
 Project: Ayre Offshore Wind Farm
 Title: Location Plan - Sheet 1

Status	Drawn By	PM/Checked By
FINAL	SHB	OW
Project Number	Scale @ A3	Date Created
12705	1:10,000	MAY 2025
Figure Number		Rev
-		01

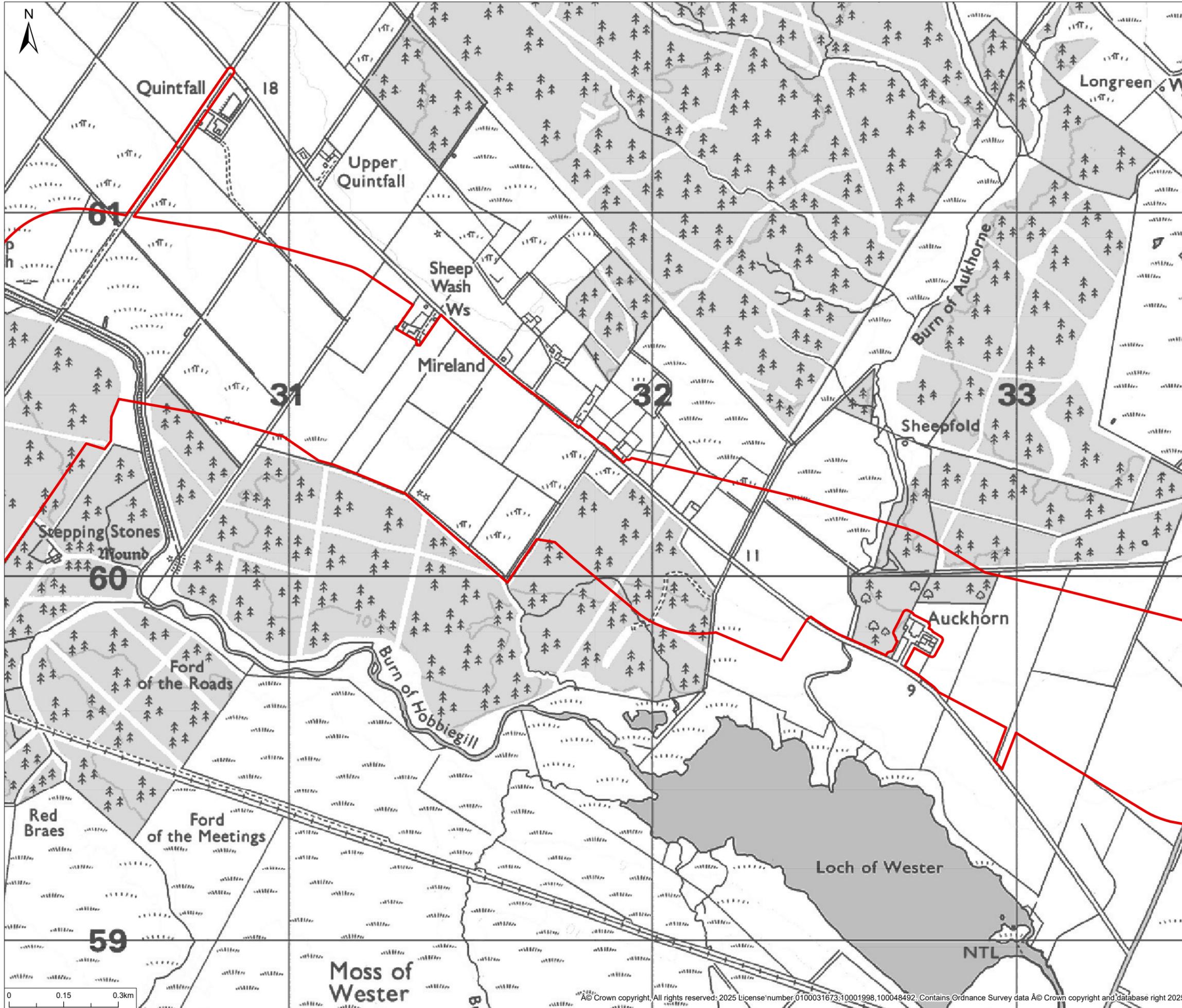
Sinclair's Bay

P:\eur-mps-02_eur.rpsgroup.com\Projects\12705 Thistle Wind Partners ScotWind E3 and NE2\Tech\Drawings\12705-0289-01.aprx - 12705-0289-01

0 0.15 0.3km

© Crown copyright. All rights reserved. 2025 License number 0100031673,10001998,100048492. Contains Ordnance Survey data © Crown copyright and database right 2025.

rpsgroup.com



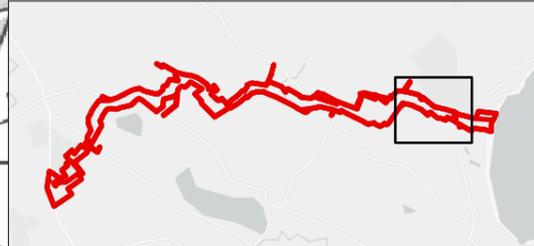
© 2025 RPS Group

Notes
 1. This drawing has been prepared in accordance with the scope of RPS&E™'s appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
 2. If received electronically it is the recipient's responsibility to print to correct scale. Only written dimensions should be used.



Legend

PPP Application Boundary



RPS TWP THISTLE WIND PARTNERS
 A TETRA TECH COMPANY

101 Park Drive,
 Milton Park,
 Abingdon, Oxfordshire,
 OX14 4RY
 T: +44(0)1235 821 888
 E: RPS.ox@rps.tetrattech.com

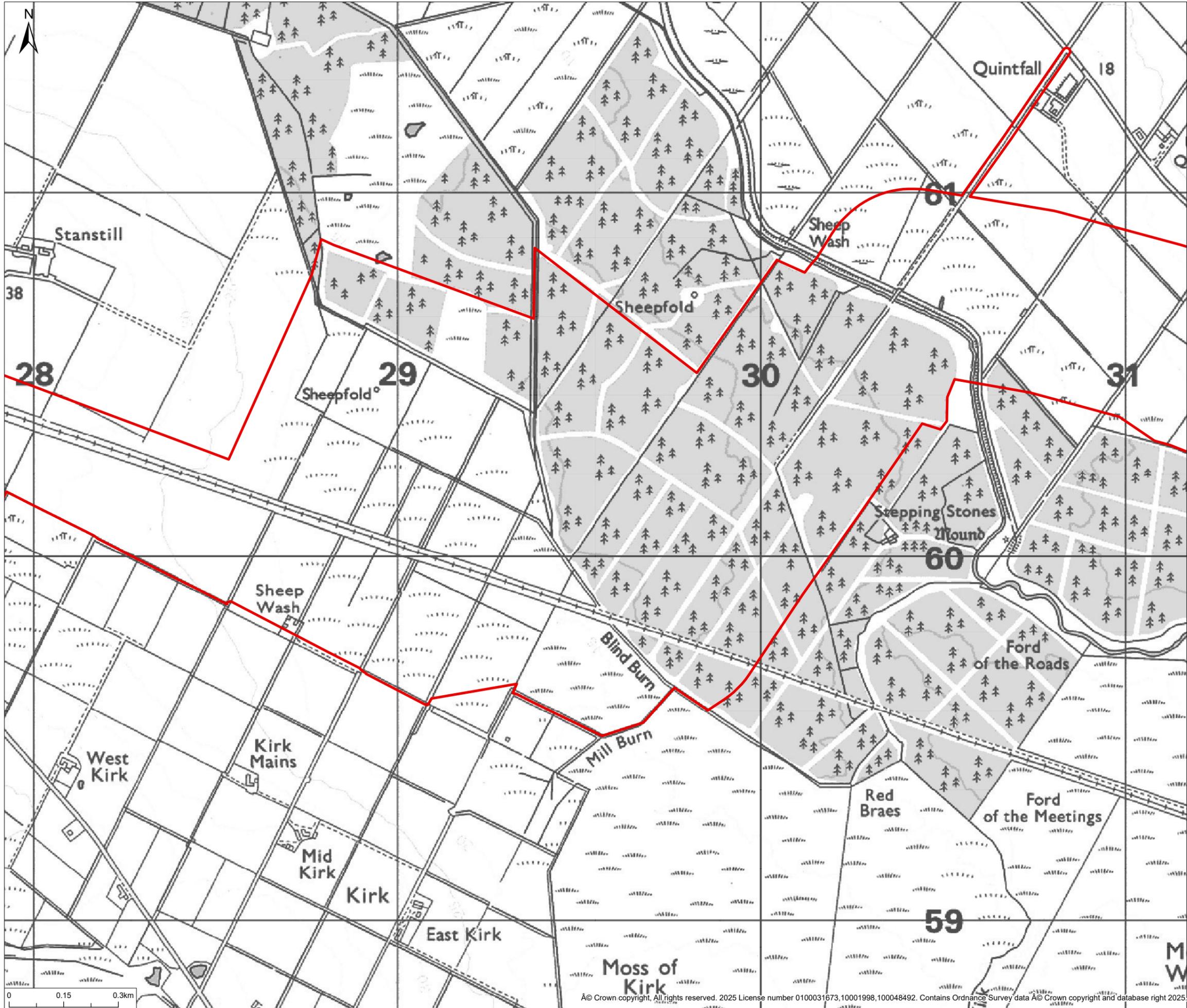
Client Thistle Wind Partners
 Project Ayre Offshore Wind Farm
 Title Location Plan - Sheet 2

Status	Drawn By	PM/Checked By
FINAL	SHB	OW
Project Number	Scale @ A3	Date Created
12705	1:10,000	MAY 2025
Figure Number		Rev
-		01

rpsgroup.com

P:\eur-mps-02_eur_rpsgroup.com\Projects\12705 Thistle Wind Partners ScotWind E3 and NE2\TechDrawings\12705-0289-01.aprx - 12705-0289-01

© Crown copyright. All rights reserved. 2025 license number 0100031673; 10001998, 100048492. Contains Ordnance Survey data © Crown copyright and database right 2025.



© 2025 RPS Group

Notes
 1. This drawing has been prepared in accordance with the scope of RPS&E™'s appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
 2. If received electronically it is the recipient's responsibility to print to correct scale. Only written dimensions should be used.



Legend

PPP Application Boundary



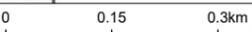
RPS TWP THISTLE WIND PARTNERS
 A TETRA TECH COMPANY

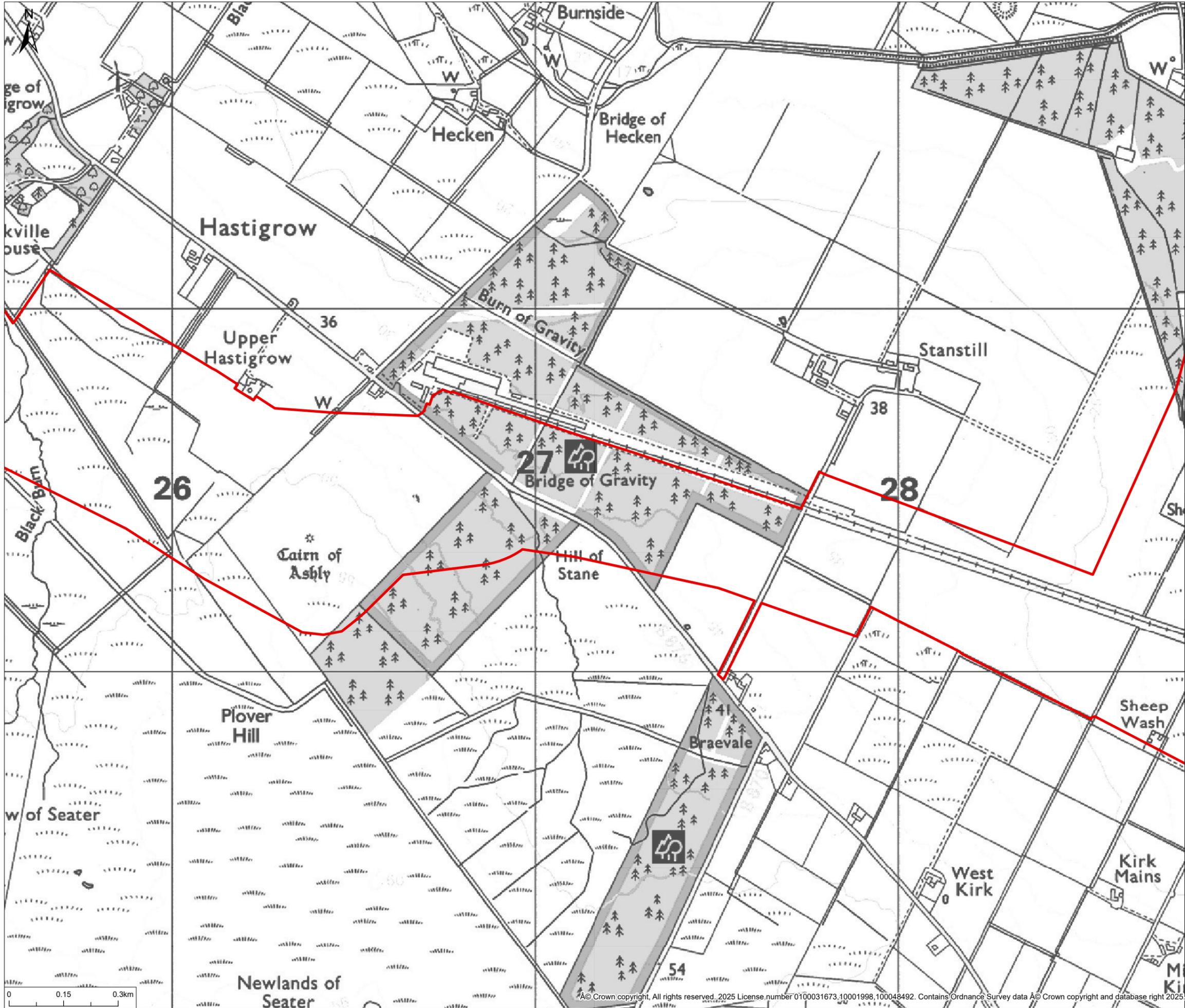
101 Park Drive,
 Milton Park,
 Abingdon, Oxfordshire,
 OX14 4RY
 T: +44(0)1235 821 888
 E: RPS.ox@rps.tetrattech.com

Client Thistle Wind Partners
 Project Ayre Offshore Wind Farm
 Title Location Plan - Sheet 3

Status	Drawn By	PM/Checked By
FINAL	SHB	OW
Project Number	Scale @ A3	Date Created
12705	1:10,000	MAY 2025
Figure Number		Rev
-		01

P:\eur-mps-02_eur_rpsgroup.com\Projects\12705 Thistle Wind Partners ScotWind E3 and NE2\TechDrawings\12705-0289-01.aprx - 12705-0289-01





© 2025 RPS Group

Notes
 1. This drawing has been prepared in accordance with the scope of RPS&E's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
 2. If received electronically it is the recipient's responsibility to print to correct scale. Only written dimensions should be used.



Legend

PPP Application Boundary



RPS TWP THISTLE WIND PARTNERS
 A TETRA TECH COMPANY

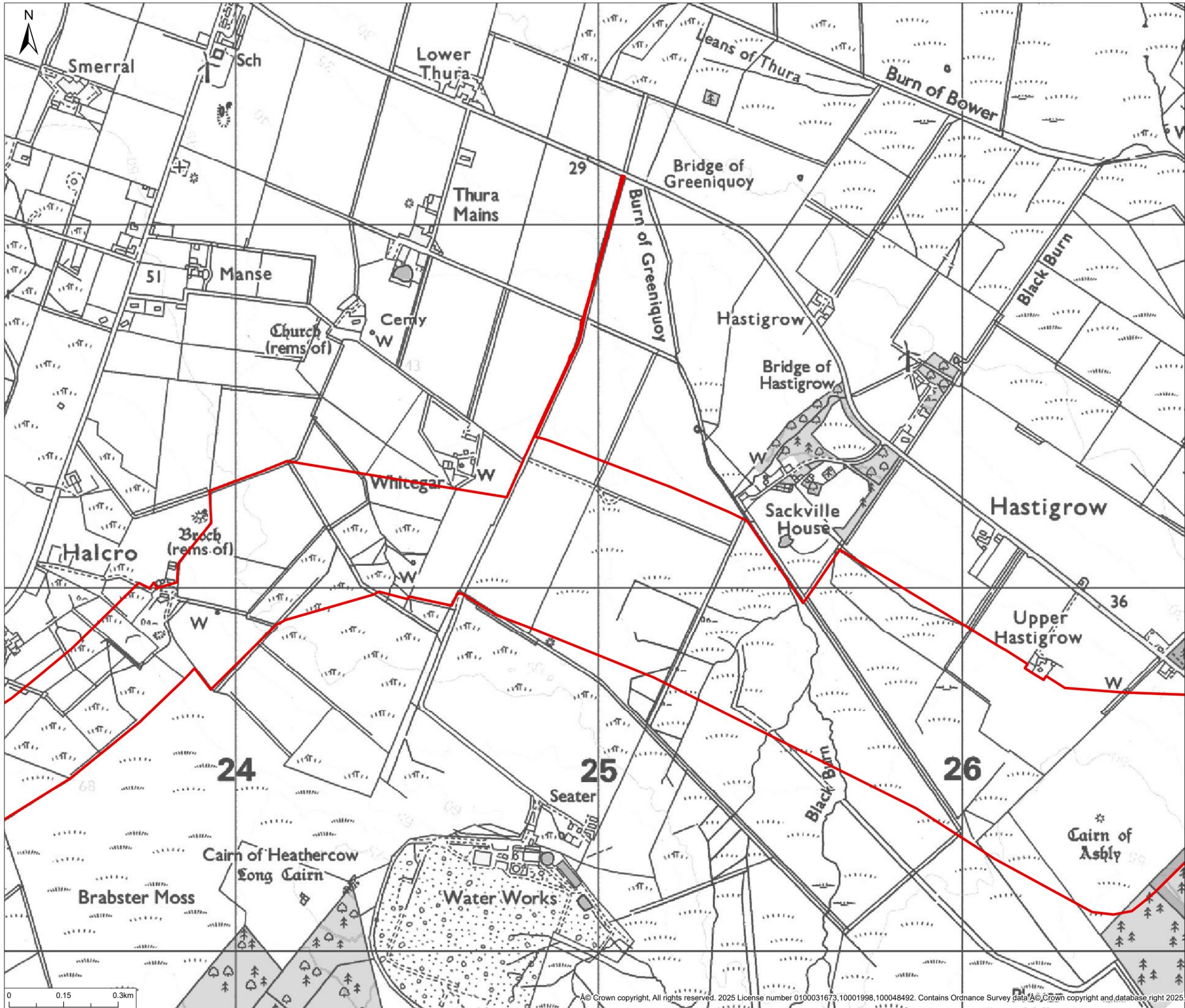
101 Park Drive,
 Milton Park,
 Abingdon, Oxfordshire,
 OX14 4RY
 T: +44(0)1235 821 888
 E: RPS.ox@rps.tetrattech.com

Client Thistle Wind Partners
 Project Ayre Offshore Wind Farm
 Title Location Plan - Sheet 4

Status	Drawn By	PM/Checked By
FINAL	SHB	OW
Project Number	Scale @ A3	Date Created
12705	1:10,000	MAY 2025
Figure Number		Rev
-		01

rpsgroup.com

P:\eur-mps-02_eur_rpsgroup.com\Projects\12705 Thistle Wind Partners ScotWind E3 and NE2\TechDrawings\12705-0289-01.aprx - 12705-0289-01



© 2025 RPS Group

Notes
 1. This drawing has been prepared in accordance with the scope of RPS&E™'s appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
 2. If received electronically it is the recipient's responsibility to print to correct scale. Only written dimensions should be used.



Legend

PPP Application Boundary



RPS TWP THISTLE WIND PARTNERS
 A TETRA TECH COMPANY

101 Park Drive,
 Milton Park,
 Abingdon, Oxfordshire,
 OX14 4RY
 T: +44(0)1235 821 888
 E: RPS.ox@rps.tetrattech.com

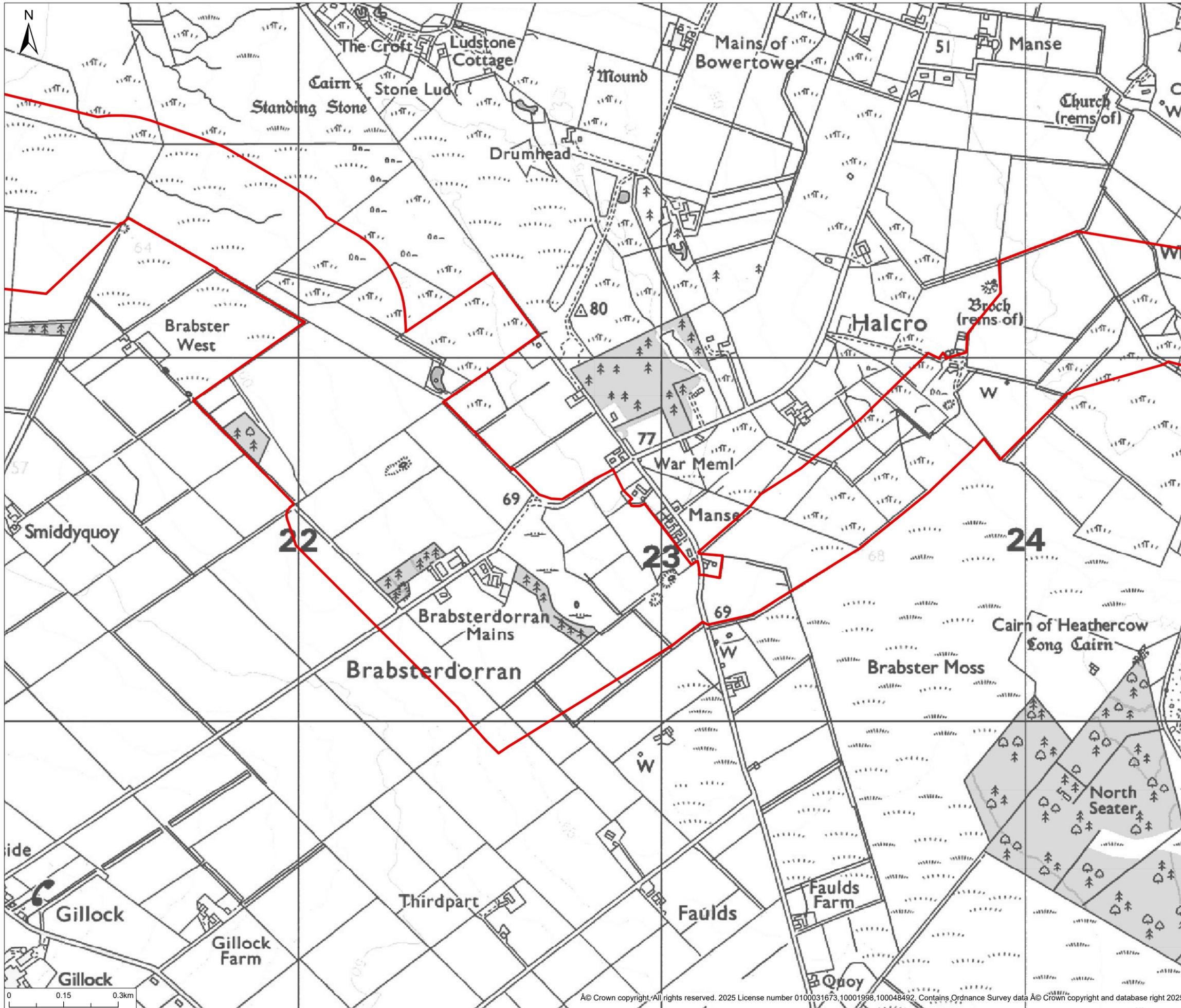
Client Thistle Wind Partners
 Project Ayre Offshore Wind Farm
 Title Location Plan - Sheet 5

Status	Drawn By	PM/Checked By
FINAL	SHB	OW
Project Number	Scale @ A3	Date Created
12705	1:10,000	MAY 2025
Figure Number		Rev
-		01

rpsgroup.com

P:\eur-mps-02_aur.rpsgroup.com\Projects\12705 Thistle Wind Partners ScotWind E3 and NE2\TechDrawings\12705-0289-01.aprx - 12705-0289-01

P:\eur-mps-02_eur.rpsgroup.com\Projects\12705 Thistle Wind Partners ScotWind E3 and NE2\TechDrawings\12705-0289-01.aprx - 12705-0289-01



© 2025 RPS Group

Notes
1. This drawing has been prepared in accordance with the scope of RPS&E's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipient's responsibility to print to correct scale. Only written dimensions should be used.



Legend

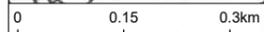
 PPP Application Boundary

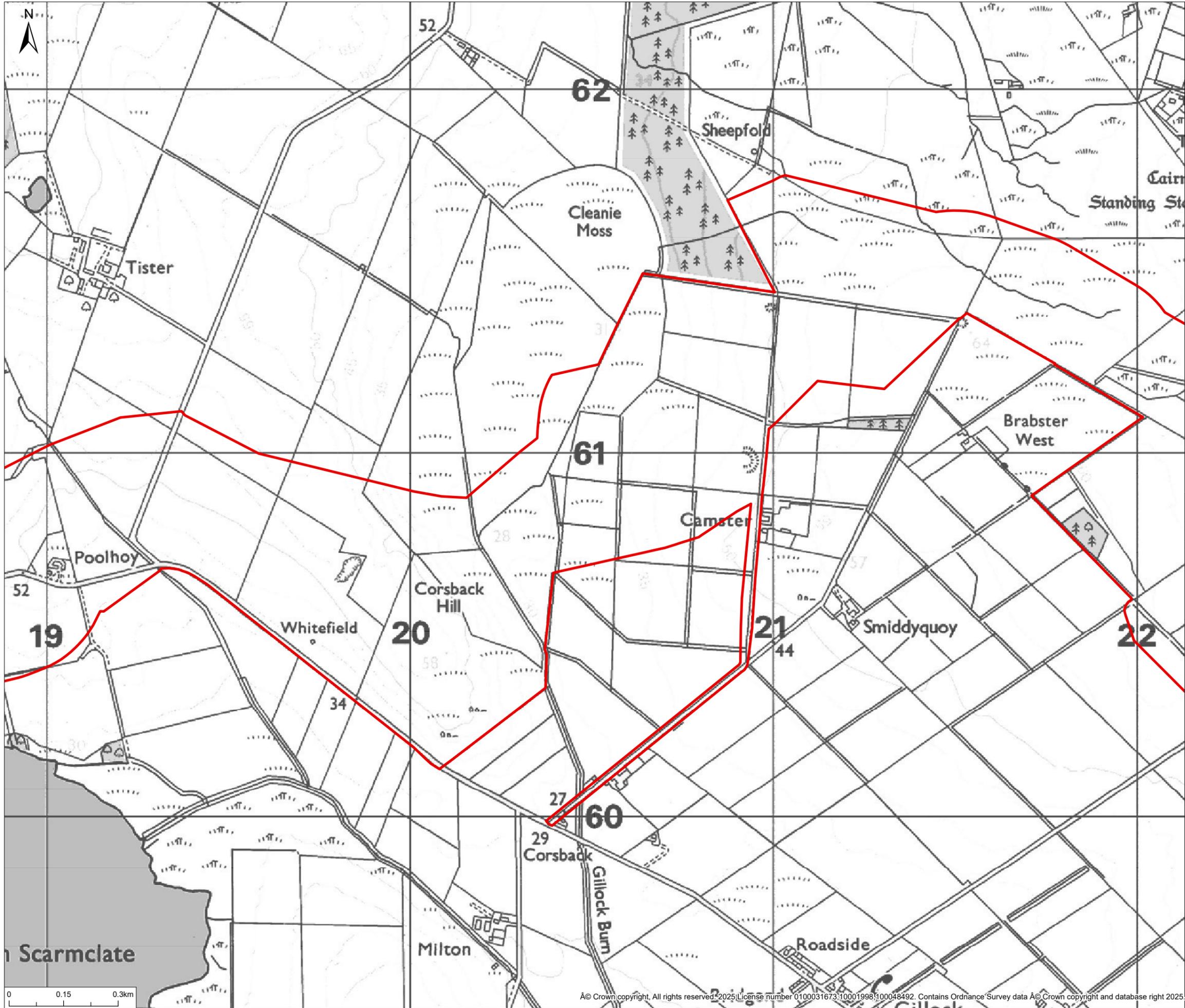


A TETRA TECH COMPANY
101 Park Drive,
Milton Park,
Abingdon, Oxfordshire,
OX14 4RY
T: +44(0)1235 821 888
E: RPS.ox@rps.tetrattech.com

Client Thistle Wind Partners
Project Ayre Offshore Wind Farm
Title Location Plan - Sheet 6

Status	Drawn By	PM/Checked By
FINAL	SHB	OW
Project Number	Scale @ A3	Date Created
12705	1:10,000	MAY 2025
Figure Number		Rev
-		01





© 2025 RPS Group

Notes
 1. This drawing has been prepared in accordance with the scope of RPS&E™'s appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
 2. If received electronically it is the recipient's responsibility to print to correct scale. Only written dimensions should be used.



Legend

PPP Application Boundary



A TETRA TECH COMPANY
 101 Park Drive,
 Milton Park,
 Abingdon, Oxfordshire,
 OX14 4RY
 T: +44(0)1235 821 888
 E: RPS.ox@rps.tetrattech.com

Client Thistle Wind Partners
 Project Ayre Offshore Wind Farm
 Title Location Plan - Sheet 7

Status	Drawn By	PM/Checked By
FINAL	SHB	OW
Project Number	Scale @ A3	Date Created
12705	1:10,000	MAY 2025
Figure Number		Rev
-		01

P:\eur-mps-02_eur_rpsgroup.com\Projects\12705 Thistle Wind Partners ScotWind E3 and NE2\TechDrawings\12705-0289-01.aprx - 12705-0289-01

0 0.15 0.3km

© Crown copyright. All rights reserved. 2025 License number 0100031673;10001998;100048492. Contains Ordnance Survey data © Crown copyright and database right 2025.

rpsgroup.com



© 2025 RPS Group
 Notes
 1. This drawing has been prepared in accordance with the scope of RPS&E™'s appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
 2. If received electronically it is the recipient's responsibility to print to correct scale. Only written dimensions should be used.



Legend
 PPP Application Boundary

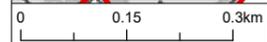


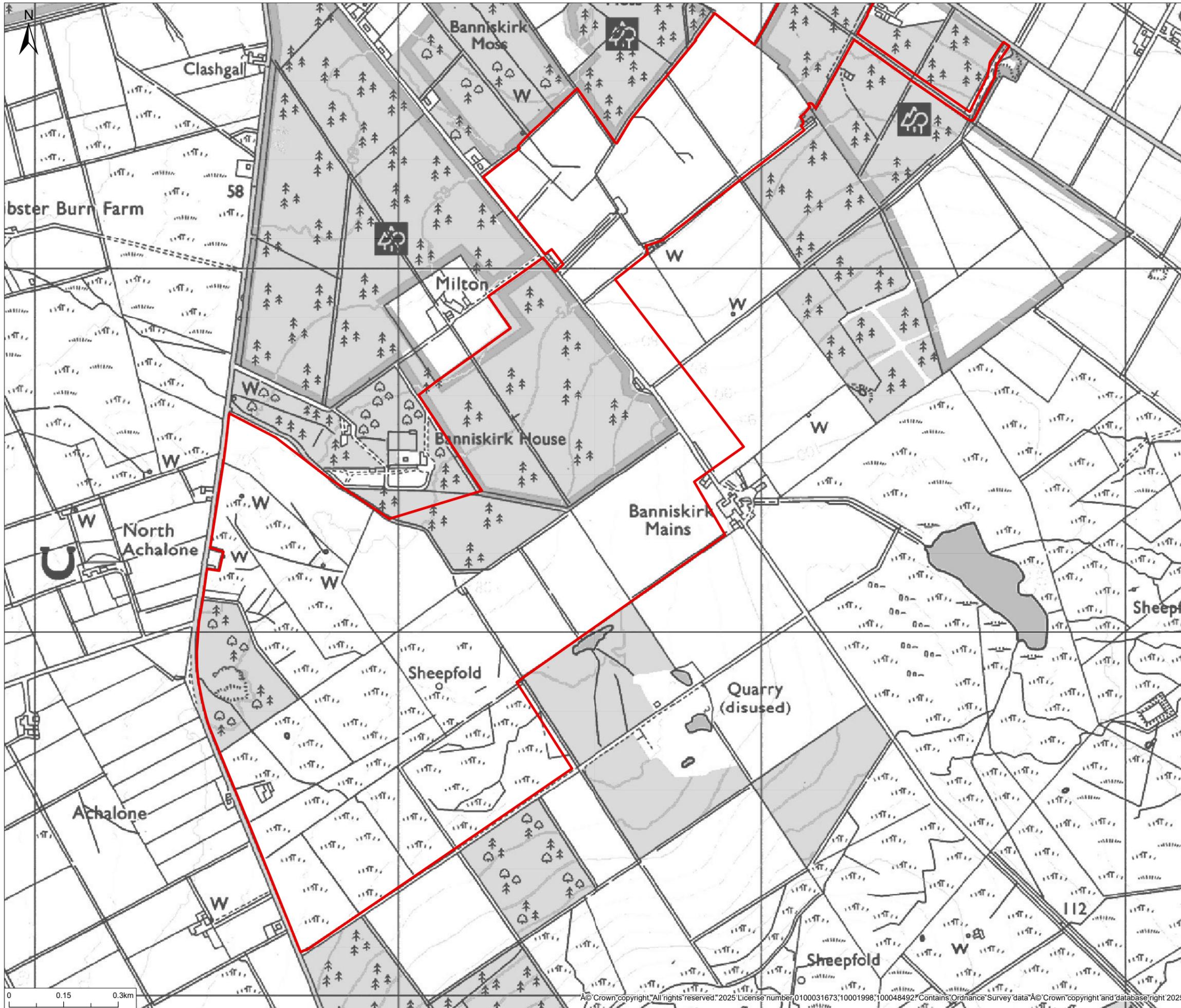
RPS TWP THISTLE WIND PARTNERS
 A TETRA TECH COMPANY
 101 Park Drive,
 Milton Park,
 Abingdon, Oxfordshire,
 OX14 4RY
 T: +44(0)1235 821 888
 E: RPS.ox@rps.tetrattech.com

Client Thistle Wind Partners
 Project Ayre Offshore Wind Farm
 Title Location Plan - Sheet 8

Status	Drawn By	PM/Checked By
FINAL	SHB	OW
Project Number	Scale @ A3	Date Created
12705	1:10,000	MAY 2025
Figure Number		Rev
-		01

P:\eur-mps-02_eur_rpsgroup.com\Projects\12705 Thistle Wind Partners ScotWind E3 and NE2\TechDrawings\12705-0289-01.aprx - 12705-0289-01





© 2025 RPS Group

Notes
 1. This drawing has been prepared in accordance with the scope of RPS&E™'s appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
 2. If received electronically it is the recipient's responsibility to print to correct scale. Only written dimensions should be used.



Legend

PPP Application Boundary



RPS TWP THISTLE WIND PARTNERS
 A TETRA TECH COMPANY

101 Park Drive,
 Milton Park,
 Abingdon, Oxfordshire,
 OX14 4RY
 T: +44(0)1235 821 888
 E: RPS.ox@rps.tetrattech.com

Client Thistle Wind Partners
 Project Ayre Offshore Wind Farm
 Title Location Plan - Sheet 9

Status	Drawn By	PM/Checked By
FINAL	SHB	OW
Project Number	Scale @ A3	Date Created
12705	1:10,000	MAY 2025
Figure Number		Rev
-		01

rpsgroup.com

P:\eur-mps-02_eur_rpsgroup.com\Projects\12705 Thistle Wind Partners ScotWind E3 and NE2\TechDrawings\12705-0289-01.aprx - 12705-0289-01

© Crown copyright. All rights reserved. 2025 License number: 0100031673;10001998;100048492. Contains Ordnance Survey data © Crown copyright and database right 2025.

\\t.local\RPS\Europe\PI_GIS\794\PL\NESHMP\12705\Drawings\12705-0203-03.aprx - 12705-0203-01



© 2025 RPS Group

Notes
1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipient's responsibility to print to correct scale. Only written dimensions should be used.



Legend

- PPP Application Boundary
- Substation Site
- Substation Switchyard
- Onshore Export Cable Corridor
- 400 KV Cable Corridor
- Landfall
- Banniskirk Hub (Grid Connection)



A TETRA TECH COMPANY
101 Park Drive,
Milton Park,
Abingdon, Oxfordshire,
OX14 4RY
T: +44(0)1235 821 888
E: RPS.ox@rps.tetra.tech.com

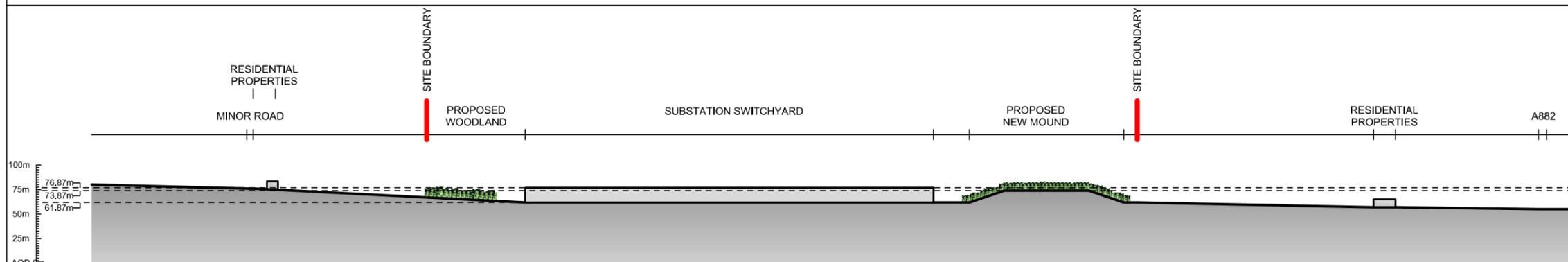
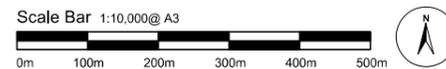
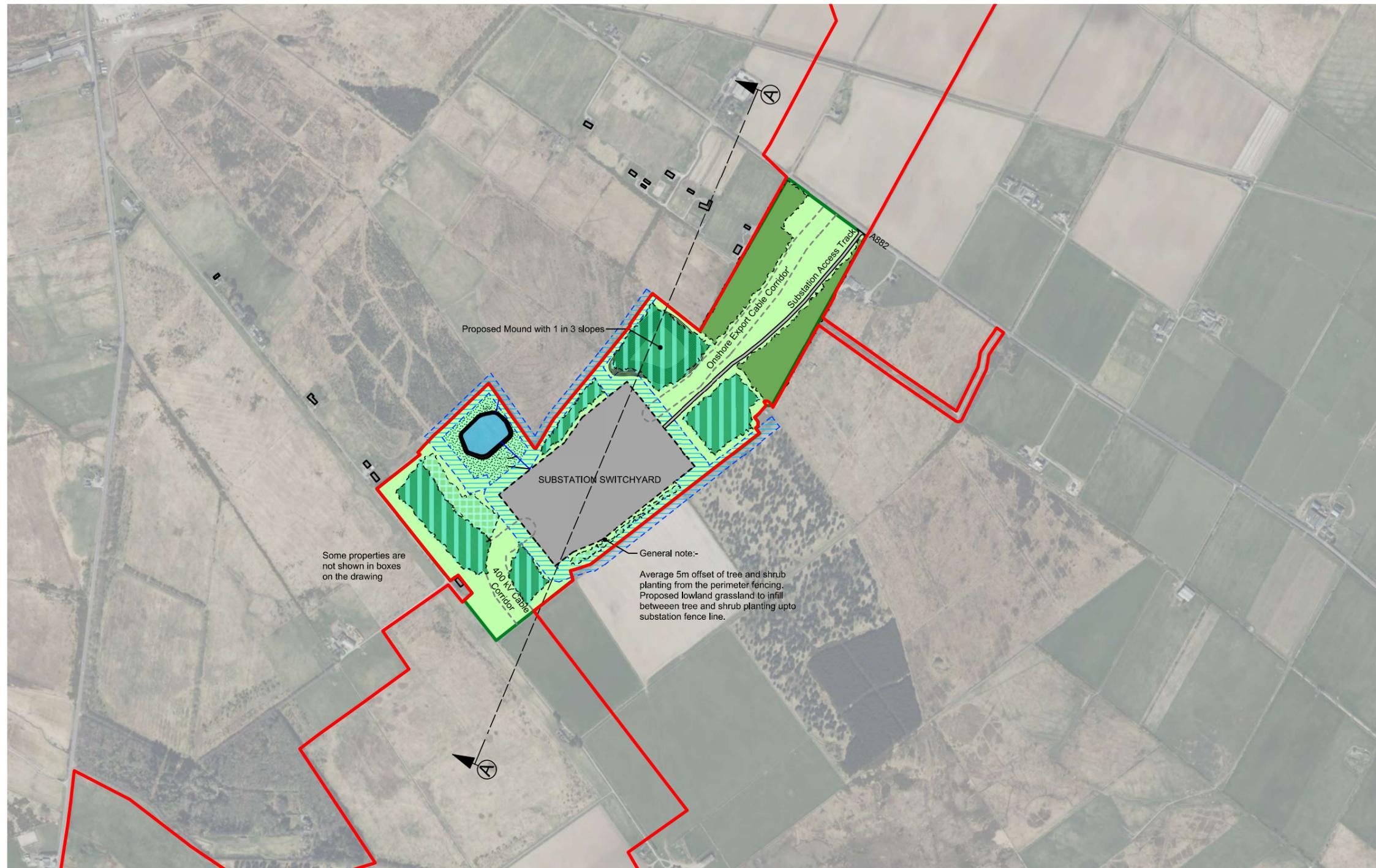
Client **Thistle Wind Partners**

Project **Ayre Offshore Wind Farm**

Title **The Proposed Development - Planning Permission in Principle Application Boundary**

Status	Drawn By	PM/Checked By
FINAL	SHB	OW
Project Number	Scale @ A3	Date Created
12705	1:65,000	JUL 2025
Figure Number		Rev
3.1		03

rpsgroup.com



SECTION A-A

© 2025 RPS Group

Notes
1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipient's responsibility to print to correct scale. Only written dimensions should be used.



Legend

- PPP Application Boundary
- Onshore Substation Landscape Mitigation
- Onshore Substation Switchyard
- Proposed attenuation feature
- Watercourse Easement
- Onshore Export and 400 kV Cable Corridor
- Access track
- Example locations of surrounding residential properties

Landscape

- Retained Forestry Planting
- Proposed native woodland
- Proposed native shrubs
- Proposed Holcus-Juncus neutral grassland
- Proposed lowland acid grassland



101 Park Drive,
Milton Park,
Abingdon, Oxfordshire,
OX14 4RY
T: +44(0)1235 821 888
E: RPS.ox@rps.tetrattech.com

Client Thistle Wind Partners

Project Thistle Wind Partners ScotWind Ayre

Title Indicative Onshore Substation Landscape Mitigation Plan & Substation Illustrative Section A-A (Landscape Screening Purposes)

Status	Drawn By	PM/Checked by
Final	AJC	MB/KO
Job Ref	Scale @ A3	Date Created
794-PLN-NPI-NP12705	As Noted	July 2025

RPS Drawing/Figure Number Rev

Figure 3.3 -

rpsgroup.com