

Agenda Item	7.1
Report No	PLN/013/26

## HIGHLAND COUNCIL

**Committee:** North Planning Applications Committee

**Date:** 11 March 2026

**Report Title:** 24/05153/S37: Scottish Hydro Electric Transmission Plc.  
Land Between Strathy North And South Wind Farms, Strathy

**Report By:** Acting Area Planning Manager - South

### Purpose/Executive Summary

**Description:** Strathy Wood Wind Farm Grid Connection - installation and operation of approximately 4.5 km of 132 kV overhead line (OHL) on double circuit steel structure towers and the installation and operation of 2 No. trident wood H poles each with downlead spans of up to 18m from each pole for connection onto an existing trident H wood pole 132 kV OHL.

**Ward:** 01 – North, West and Central Sutherland

**Development category:** National Development (132kV transmission cables)

**Reason referred to Committee:** National Development (Section 37 Application)

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

### Recommendation

Members are asked to agree the recommendation to **RAISE OBJECTION** to the application as set out in Section 11 of the report.

## 1. PROPOSED DEVELOPMENT

- 1.1 The Highland Council has been consulted by the Scottish Government's Energy Consents Unit on an application made under Section 37 of the Electricity Act 1989 (as amended) for the construction and implementation of a new overhead electricity transmission line to connect the Strathy Wood Wind Farm to the national grid. The 132kV voltage of the line means that the development constitutes a 'National Development' as set out in the Fourth National Planning Framework (NPF4).
- 1.2 Members are asked to note that The Council has already Raised Objection to this application however the objection was submitted non-timeously in accordance with The Electricity Act 1989. The late submission of the objection was due to the applicant not agreeing to the Council's request for extension of time for the Council to provide its response, and due to the provisions of the Council's Scheme of Delegation requiring a Committee level decision to the National Development at the time the response was due. The Council did timeously raise objection against the Additional Environmental Information submitted to the application in July 2025 however this information was submitted under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 whereby it is The Electricity Act 1989 that establishes the time frames that timeous responses must be submitted. Consequently, Scottish Ministers are not statutorily obliged to hold a public local inquiry to formally investigate the reasons for the Council's objection. That means that any subsequent procedure following the Committee's decision and the issuing of this report would be at the discretion of Scottish Ministers.
- 1.3 The development comprises:
- 4.5km of double circuit 132kV OHL supported on 19 steel lattice towers (15 suspension, three angle/tension towers, and one terminal tower) measuring between 26m and 36m in height;
  - two trident wood poles (H Poles) of between 13.5m and 15m height, with downlead spans of up to 18m from each pole to connect in to the existing 132kV H Pole OHL;
  - a cable sealing end (CSE) compound;
  - the formation of 2.75km of temporary and 2.46km of permanent access tracks with watercourse culverts;
  - temporary hardstanding working areas around individual towers; and
  - 5.6ha of tree felling.
- 1.4 Although the EIAR advises that borrow pits would likely be required for construction aggregate, these would be dealt with under separate applications for planning permission and are not considered within the EIAR submitted with the scheme which therefore assumes importation of all construction material to site.

- 1.5 The OHL would run from the CSE located close to the Strathy Wood Wind Farm Substation at the site of the now demolished Braerathy Lodge southeast of the River Strathy, with the larger section running east of the river and the recently upgraded forestry track, east of Strathy Forest and which provides the main access to the development. The application OHL then joins the existing OHL just south of Bowside Lodge. The existing OHL connects Strathy North Wind Farm with the Connagill Substation (located off the A897, 7.5km to the east). The average span of OHL between towers would be between 200 and 280m.
- 1.6 The applicant has sought horizontal limits of deviation of 100m, 50m either side, of wood poles and steel lattice towers, and 50m from the edge of the CSE compound, along with a 50m micrositing limit, equating to 25m either side for access tracks. Additionally, operational corridors are required for the safe operation and access through woodland and forestry, with 36m required either side of the OHL and 12.5m either side of linking tracks. These limits of deviation within wooded sites set the requirements for woodland removal, anticipated at 5.6ha, although it should be noted the site boundary allows for some flexibility to extend the limits of deviation where environmental constraints are anticipated. Moreover, the applicant has requested a vertical allowance of 3.2m to increase or decrease the heights of towers where required by ground and topographical conditions.
- 1.7 The submission advises that the number and locations of any temporary construction compounds are yet to be determined and will be subject to separate planning application, while separate consents will also be sought for the modification including diversion of sections of existing underground cabling. Such enabling works applications are considered by the Council to constitute part of 'the project' and should be set out in full within the EIAR. In the absence of this information, and given the environmental sensitivities within and surrounding the OHL, Officers advise that Scottish Ministers as decision makers must satisfy themselves that they have sufficient environmental information to competently determine this application.
- 1.8 The application proposal forms a part of the larger Connagill Cluster Grid Connection project with the purpose of consolidating the grid connections to the existing Connagill 275/132kV Substation for the following generating stations:
- Strathy Wood Wind Farm (under construction);
  - Strathy South Wind Farm (under construction);
  - Melvich Energy Hub (application stage and awaiting public local inquiry);
  - Kirkton Energy Park (refused S36 consent); and
  - Armadale Wind Farm (withdrawn).
- 1.9 The current Strathy North Wind Farm grid connection OHL does not have capacity for Strathy North (68MW), Strathy Wood (63MW), and Strathy South (208MW) Wind Farms and a separate S37 application is currently pending for consent to replace that

infrastructure to double circuit steel lattice towers (THC ref. 25/01055/S37 - Strathy South Wind Farm Grid Connection). As such, the two trident wood poles included with this scheme for connecting the new OHL to the existing are temporary and would be replaced by permanent infrastructure once the upgrades to the OHL are complete. This arrangement would allow the continued transmission of power generated at Strathy Wood and Strathy North Wind Farms during those OHL upgrade works.

- 1.10 The anticipated construction period for the development is 12 months based on works being carried out over seven days a week between 07.00 to 19.00 March to September and 07.30 to 17.00 (i.e., hours of daylight) between October to February.
- 1.11 The applicant did not use the Council's Pre-application Advice for Major Applications Service prior to submitting the application to the ECU however did submit for an EIA Scoping Opinion covering the complete Connagill Cluster project through the ECU on which the Council, amongst other consultees, was consulted.
- 1.12 Although not statutorily required under The Electricity Act 1989, the applicant undertook public consultation on the full Connagill Cluster project at both the route selection and the route alignment stages of design development. The first included an online event in March 2022 and an in person event on 30 November 2023 at Strathy Village Hall to present the findings. The latter alignment stage consultations included a consultation document for the full Connagill Cluster project available online along with an in-person presentation of alignment options at Strathy Village Hall on 20 May 2024. A Public Consultation Report is submitted with the application that highlights how the applicant has responded to public comments EIAR Volume 4, Technical Appendix 4.1 - Public Consultation Report.
- 1.13 The application is also supported by an Environmental Impact Assessment Report (EIAR) with chapters covering: introduction and background; the routeing process and alternatives; [description of] the proposed development; scope [of the EIAR] and consultation; EIA process and methodology; landscape and visual [effects]; ecology; ornithology; soils, geology and water; cultural heritage; traffic and transport; forestry; socio-economic, tourism and recreation; and a schedule of mitigation.
- 1.14 The proposal has not materially changed since the application was submitted to the ECU. The applicant has, however, provided clarification and refinement on the assessment of impacts on the Flow Country World Heritage Site, the Caithness and Sutherlands Special Area of Conservation, and related peat matters, including updating the cumulative assessment with respect to the Strathy South Wind Farm Grid Connection scheme, through the following documents:
  - Addendum to Habitats Regulation Appraisal and World Heritage Site Assessment (June 2025);
  - Peatland Condition Assessment Report (June 2025); and
  - Cumulative Assessment Addendum (June 2025).

The documents were submitted and advertised as Additional Environmental Information under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017.

## **2. SITE DESCRIPTION**

- 2.1 The 3ha application site is located 4km south of Strathy running linearly between Strathy Wood substation and Bowside Lodge over commercial forestry and undulating moorland rough grazing, it crosses the River Strathy at two locations. The aforementioned Strathy Wood, Strathy North, and Strathy South Wind Farms are to the west, south, and southwest of the proposed OHL route.
- 2.2 Braerathy Lodge is now demolished however there are properties at Dallangwell and Bowside including Bowside Lodge, Bowside Cottage (Gamekeepers Cottage), and The Bothy, that are used for site staff accommodation (Dallangwell) and holiday accommodation respectively although Bowside appeared to be awaiting refurbishment on officer site visit. Access to the site would be from the A836 using a forestry track that has been upgraded for use by Strathy Wood and Strathy South Wind Farms. Additionally, Scottish Hill Track 344 Strath Halladale (Trantle Beg) to Strathy follows the route of the main access track and the River Strathy is used for angling.
- 2.3 The site is wholly within the Sweeping Moorland and Flows Landscape Character Type (LCT) but is not covered by any landscape designation or areas of wild land. Where the site is east of the River Strathy, it is within, and at the western edge of, the Flow Country World Heritage Site (FCWHS), the Caithness and Sutherlands Special Area of Conservation, the Caithness and Sutherlands Special Protection Area, the Caithness and Sutherland Ramsar Site, and the West Halladale Site of Special Scientific Interest, which are conterminous at this location.
- 2.4 There are no designated historic assets that would be directly impacted by the proposal however four non-designated assets are within or just outside of the OHL's limits of deviation. Several watercourses flow across the site discharging to the River Strathy including the Allt Rèidhean a' Bhainne and the Uidh nan Con Luatha.

## **3. PLANNING HISTORY**

- |     |                 |   |                 |              |
|-----|-----------------|---|-----------------|--------------|
| 3.1 | 25 June 2012    | 12/02145/SCRE, Construction of new 132kV overhead transmission line connection.   | EIA             | NOT REQUIRED |
| 3.2 | 03 January 2024 | Proposed south circuit 132kV double wood pole ('H) trident lines from Strathy North South Windfarms, Strath Halladale to the new Connagill substation at Dallangwell. | RAISE OBJECTION | NO           |

3.3	26 October 2022	22/04160/PAN, Construction of access track – alternative access for Strathy South Wind Farm	PAN REPORTED TO COMMITTEE
3.4	15 November 2023	23/04988/DEM, Demolition of buildings	PRIOR APPROVAL NOT REQUIRED
3.5	24 May 2024	24/01442/SCOP, Up to 275kV overhead electricity transmission line to serve Strathy South, Armadale, Melvich and Kirkton wind farm proposals, comprising approximately 11km of steel lattice tower double circuit line from the end of the Strathy Wood to Strathy North steel lattice circuit near to Strathy North to Connagill substation, including removal of existing wood pole infrastructure near Strathy North to near Melvich	SCOPING DECISION ISSUED
3.6	09 May 2025	25/01055/S37, Strathy South Wind Farm Grid Connection - installation and operation of 132kV OHL on double circuit steel structure towers, approximately: Option 1, 10.5km with 8.3km installed with a future capacity of 275 kV; or, Option 2, 13.5km with 11km installed with a future capacity of 275kV comprising the removal and temporary diversion of existing OHL to allow temporary underground cabling. Construction of a cable sealing end (CSE) compound, formation of access tracks and associated infrastructure	RAISE OBJECTION
3.6	21 January 2026	25/03497/PNO, Prior Notification under Reg. 62 for Strathy South Wind Farm Grid Connection: Underground Cable (UGC)	PRIOR APPROVAL GRANTED
3.7	23 January 2026	22/05533/S36, (ECU00003244): Kirkton Energy Park - Erection and operation of a wind farm comprising of 11 wind turbines of up to 149.9m blade tip height, battery energy storage system, access tracks, substation, control building, 2 borrow pits, temporary construction compound	APPEAL DISMISSED BY SCOTTISH MINISTERS

and associated development for a period of 30 years

#### **4. PUBLIC PARTICIPATION**

##### **4.1 Advertised: EIA Development**

Date Advertised: 06 December 2024 (1<sup>st</sup> advert) and 13 December 2024 (last advert) in the Edinburgh Gazette, Northern Times, and Hohn O'Groats Journal.

Additional Environmental Information: 27 June 2025 (1<sup>st</sup> advert) and 07 August 2025 (last advert) in the Edinburgh Gazette, Northern Times, and Hohn O'Groats Journal.

Representation deadline: 07 August 2025 (ECU deadline)

##### **4.2 Representations received by THC: 1 objection submitted on behalf of two 3<sup>rd</sup> parties**

Representations received by the ECU: 1 objection (and one follow up objection) submitted on behalf of two 3<sup>rd</sup> parties (duplicate of the objection received by THC).

##### **4.3 Material considerations raised are summarised as follows:**

- a) Conformity with the Strategic Spatial Plan for Energy Infrastructure
- b) Conformity with the Electricity Act 1989 and the development plan
- c) Landscape and visual impacts
- d) Impacts on the Flow Country World Heritage Site
- e) Impacts on ornithology interests including on the qualifying interests of the Caithness and Sutherland Special Protection Area.

##### **4.4 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](http://www.wam.highland.gov.uk/wam).**

##### **4.5 All letters of representation received by the ECU are available for inspection on the ECU's website at <https://www.energyconsents.scot/> using the ECU's reference ECU00005221.**

#### **5. CONSULTATIONS**

##### **5.1 Strathy and Armadale Community Council (host) did not respond to the consultation request.**

##### **5.2 Historic Environment Team (Archaeology) does not object and considers that archaeological interests are appropriately considered within the EIAR, subject to a condition to secure its approval of a Written Scheme of Investigation prior to works**

commencing on site along with the implementation of the mitigation measures set out in the EIAR during construction works.

- 5.3 **Historic Environment Team (Conservation) objects** on the grounds of impacts on the Flow Country World Heritage Site.
- 5.4 **Ecology Officer** no objection and no specific comments due to NatureScot being the lead authority on ecological and ornithological matters as these relate to the Caithness and Sutherland Special Area of Conservation and Special Protection Area.
- 5.5 **Environmental Health** does not object and agrees with operational noise have been scoped out of the EIAR.
- 5.6 **Flood Risk Management Team** does not object and has no further comment.
- 5.7 **Transport Planning** has not objected to the application and has reviewed the Roads and Transport section of the report with its comments having been integrated into the section (Paragraphs 7.69 – 7.80). The Section sets out that updated roads, traffic and transport related information including HGV routeing, numbers of HGV movements, an assessment of the cumulative impact on the local road infrastructure, and delivery of any necessary mitigation regarding the abnormal load movements, would require to be secured by condition, prior any construction works commencing on site.
- 5.8 **Forestry Officer** does not object to the application subject to conditions to secure a detailed Compensatory Planting Plan for a minimum area of 5.6ha of commercial forestry prior to the commencement of development, and to ensure that no felling is undertaken in relation to the development until it is demonstrated that construction works are imminent.
- 5.9 **British Telecom** does not object and advises that the proposal will not interfere within its current or planned radio network.
- 5.10 **Defence Infrastructure Organisation (MOD)** does not object subject to a condition to secure information on the location and heights of OHL towers, the heights of construction equipment, and the date of commencement of development, for aviation charting and safety management purposes.
- 5.11 **Fisheries Management Scotland** does not object to the application. It advises that the site falls within the catchment of the Northern District Salmon Fishery Board and that its guidance on terrestrial wind farms should be followed throughout the planning, construction, and monitoring stages of the development.
- 5.12 **Highlands and Islands Airports Ltd.** does not object to the proposal and advises that there would be no impact to Wick Airport.

- 5.13 **Historic Environment Scotland** does not object and advises that there would be no significant visibility of the proposal from nearby heritage assets within its remit and therefore impacts on the settings of these assets will not be significant.
- 5.14 **Ironside Farrar (Peat Landslide Hazard Risk Assessment)** does not object. It has reviewed the submission in relation to the risk of peat landslide hazards and, following the submission of further detailed information from the applicant, considers that the risk of peat landslide hazards can be suitably mitigated.
- 5.15 **Joint Radio Company Ltd.** does not object and has no specific comments on the proposal.
- 5.16 **NatureScot objects** to the application on the grounds of impacts to the peatland habitat outstanding universal value of the Flow Country World Heritage Site and peatland habitat qualifying interests of the Caithness and Sutherland Special Area of Conservation. It considers that the impacts on the Caithness and Sutherland Special Protection Area can be mitigated but that there is insufficient information submitted with the application to demonstrate such mitigation. It also advises that impacts on the qualifying interests of the Caithness and Sutherland Ramsar Site and the West Halladay Site of Special Scientific Interest are addressed through the Special Area of Conservation and Special Protection Area.
- 5.17 **Royal Society for the Protection of Birds objects** to the proposal on the grounds of impacts to the peatland habitat outstanding universal value of the Flow Country World Heritage Site and peatland habitat qualifying interests of the Caithness and Sutherland Special Area of Conservation, the Caithness and Sutherland Special Protection Area, the Caithness and Sutherland Ramsar Site, and the West Halladay Site of Special Scientific Interest.
- 5.18 **Scottish Environmental Protection Agency** does not object to the application as the proposal is below the threshold for its project specific advice. It advises the decision maker to therefore refer to its standing advice.

## **6. DEVELOPMENT PLAN POLICY**

- 6.1 Appendix 2 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 Scottish Government Planning Policy and Guidance**

The application has been submitted to the Scottish Government for approval under Section 37 of the Electricity Act 1989 (as amended). Should Ministers approve the

development, it will receive deemed planning permission under Section 57(2) of the Town and Country Planning (Scotland) Act 1997 (as amended). For that reason, the Council processes S37 applications in the same way as a planning application as consent under the Electricity Act will carry with it deemed planning permission.

7.2 Schedule 9 of The Electricity Act 1989 contains considerations in relation to the impact of proposals on amenity and fisheries. These considerations mean the developer requires to:

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

7.3 It should be noted that for applications under the Electricity Act 1989 that the Development Plan is just one of several considerations, and therefore Section 25 of the Town and Country Planning (Scotland) Act 1997 which requires planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise, is not engaged. That said, the application still requires to be assessed against all policies of the Development Plan relevant to the application, all national and local policy guidance, and all other material considerations relevant to the application.

### **Planning Considerations**

7.4 The key considerations in this case are:

- a) Compliance with the Development Plan and other planning policy;
- b) Energy and economic impacts;
- c) Construction impact;
- d) Design, landscape and visual impact;
- e) Natural heritage;
- f) Water environment;
- g) Built and cultural heritage;
- h) Roads and transport; and
- i) Any other material considerations.

### **Compliance with the Development Plan and Other Planning Policy**

7.5 Appendix 3 of this report provides an assessment of compliance with the Development Plan / Other Material Policy Considerations. In summary, the

Development Plan comprises National Planning Framework 4 (NPF4), the Highland-wide Local Development Plan (HwLDP), The Caithness and Sutherland Local Development Plan (CaSPlan) and various supplementary guidance associated with these Local Development Plans. CaSPlan focuses largely on regional and settlement strategies as well as specific site allocations rather than planning policies of relevance for the proposed development.

- 7.6 The principle of 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 will assist in the delivery of the Spatial Strategy and Spatial Priorities for the north of Scotland, and that Highland can continue to make a strong contribution toward meeting Scotland's ambition for net zero via a repowered and expanded electricity grid. Alongside these ambitions, the strategy for Highland aims to protect environmental assets as well as to stimulate investment in natural and engineered solutions to address climate change. This aim is not new and will clearly require a balancing exercise to be undertaken, which is reflected throughout NPF4.
- 7.7 At the regional level, HwLDP also offers support for transmission infrastructure where this is located, sited and designed to avoid unacceptable significant impacts on the environment. Providing that the resultant siting, size and scale of the proposed infrastructure is acceptable, with its impacts on the receiving environment also being suitably mitigated, the proposal would accord with this key determining policy.

### **Energy and Economic Impacts**

- 7.8 Renewable Energy Transmission, Security of Supply, Economic and Community Socio-Economic Benefits, and local supply chain opportunities are outlined in the submitted Planning Statement Section 3. The proposed development will strengthen the robustness of the country's grid network and also result in further job and investment opportunities through the development of associated supply chains. The Planning Statement states that the OHL will transmit 62.2MW of electricity from Strathy Wood Wind Farm and then link Strathy South Wind Farm to the grid to provide a total 208MW (although both schemes combined would equate to 271MW) to the transmission network from renewable sources. As such, the proposal is consistent with core aims of NPF4 to enhance the green energy transmission capacity to achieve a net zero economy and support network resilience in rural areas.
- 7.9 The applicant makes reference to sustainable procurement codes and supplier guidance to oblige suppliers and contractors to maximise local employment and economic gain and social benefits as a result of the investment in new energy infrastructure in their area. Implementing these measures is intended to maximise opportunities for local people and businesses close to the site and in the wider region,

albeit that there is no definition of what maximising means within the context of NPF4 Policy 11.

- 7.10 Highland is experiencing significant construction activity in the transmission network, in that regard the proposal would have a positive economic impact, particularly during the proposed construction period of 12 months. The project could offer investment / opportunities to the local, Highland, and Scottish economy including businesses ranging across construction, haulage, electrical and service sectors. However, there is also likely to be some adverse effects caused by construction disruption and construction traffic, but these will be temporary in nature.
- 7.11 Given the above, NPF4 Policy 11, in particular paragraph c), notes that development proposals 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. Additionally, NPF4 Policy 25 provides support for development that is consistent with local economic priorities and where they contribute to local and / or regional community wealth building strategies. A condition could be included to require the submission of a Local Employment Scheme prior to the start of works to maximise the socio-economic benefits of the proposed development.

### **Construction impacts**

- 7.12 Whilst the route of the proposed OHL is well away from noise sensitive receptors and construction noise from the OHL installation works themselves are unlikely to be a significant issue. Access to the development will be from the A836 using the existing access track which was upgraded for the construction works of Strathy Wood and Strathy South Wind Farms. No further upgrade works for the installation of the OHL are anticipated however, 2.46km of permanent and 2.76km of temporary stone spur tracks would be required to access the individual tower locations from the main track.
- 7.13 Delivery of construction materials and components would be via the A9 between Georgemas Junction and Scrabster, and the A836 from Thurso with construction traffic passing through several settlements including Reay and Melvich, as well as individual properties along the route. The traffic assessment has averaged out the anticipated traffic movements for the purposes of the assessment however the submission notes that peak of construction activities will be during month 4 and short lived.
- 7.14 The applicant has sought working hours of 0700 to 1900 Monday to Sunday between March and September and 0730 to 1700 (or as daylight allows) between October and February. Planning conditions are not routinely used to control the impact of construction noise as similar powers are available to the Local Authority under Section 60 of the Control of Pollution Act 1974. However, our Environmental Health Team notes that, generally, people are tolerant of construction noise during typical working

hours which are taken to be 0800 to 1900 Monday to Friday and 0800 to 1300 on Saturdays. Works for which noise is inaudible at the curtilage of any noise sensitive property could still be progressed outwith these times.

- 7.15 Environmental Health also advises that if the applicant intends to undertake work that is audible at noise sensitive properties outwith standard times, they would be required to submit a detailed construction noise assessment to demonstrate that amenity impacts from construction noise would be within acceptable limits, which could be controlled by condition. For the avoidance of doubt, this would include any proposal to run compound generators overnight for the purposes of lighting or any other requirement.
- 7.16 A scheme detailing mitigation measures to be put in place to suppress dust during the construction phase can also be controlled by condition.
- 7.17 By using best practice construction management, the anticipated impacts on local communities and residential properties in proximity to the development would be kept to a minimum. A Construction Environmental Management Plan (CEMP) is secured by condition.

### **Design**

- 7.18 The applicant has undertaken a routeing process followed by a more detailed alignment process to establish an optimum design of the OHL that would balance the need to connect Strathy Wood Wind Farm to the grid against environmental, technical, and economic constraints. It is noted here that the routeing process was undertaken prior to the inscription of the Flow Country World Heritage Site (see Paragraphs 7.36 – 7.41 below) however due to these constraints, there is little to no scope to seek improvements to the scheme on visual amenity grounds as submitted.
- 7.19 The EIAR states that the route to the east of Strathy North Wind Farm is chosen as it has lower impacts on the qualifying interests of the natural heritage designations, minimises impacts on cultural heritage assets and avoids the River Strathy floodplain. The route also avoids interference with the turbines and cabling of the existing Strathy North Wind farm and permits the infrastructure to carry the required double circuit.
- 7.20 The OHL will also connect Strathy South Wind Farm, which is the rationale for combining both connections using a single OHL on steel lattice towers over two separate OHLs using trident H wood poles, as steel structures are able to transmit a larger capacity and would provide some future proofing to the project. On that basis, it is clear that, as a standalone development, Strathy Wood Wind Farm Grid Connection could be via OHL using wood pole instead of steel lattice towers. Such a proposal would likely reduce environmental effects including effects on the visual amenity of the area. However, for the stated reason that the proposal would link

Strathy South Wind Farm to the grid, a wood pole grid connection is not the proposal that the applicant has submitted and therefore is not considered further in this report.

- 7.21 The applicant has undertaken a Landscape and Visual Impact Assessment (LVIA) as reported within the EIAR. In doing so the impacts of the proposed development on landscape character and receptors within a 2.5km study area have been considered. Beyond this distance there are not anticipated to be any significant landscape and visual effects resulting from the OHL. The chapter is supported by visualisations from a single viewpoint at Bowside.

### **Landscape Effects**

- 7.22 There are no national, regional, or local landscape designations including Wild Land Areas, covering the site. The nearest national designation being the Kyle of Tongue National Scenic area of 12km west of Bowside Lodge, with the regionally designated Farr Bay, Strathy and Portskerra Special Landscape Area being 4km north of Bowside Lodge. Both designations are outside the influence of this new section of OHL and as such, the effects of the proposal are not considered against the Special Qualities of either.
- 7.23 The proposal is located wholly within the Sweeping Moorland and Flows Landscape Character Type (LCT) as identified in the NatureScot's National Landscape Character Assessment (LCA) (2019). The hosting section of this LCT includes the strath of the River Strathy, it also hosts the majority of turbines of the existing Strathy North Wind Farm, and all the turbines of the under construction turbines of Strath Wood and Strathy South Wind Farms. There is a section of Rocky Hills and Moorland LCT to the east of the study area that hosts some Strathy North Wind Farm turbines.
- 7.24 The Sweeping Moorland and Flows LCT is generally considered to have the capacity to accommodate larger infrastructure elements such as turbines and OHL due to its largescale and simple ground cover. The specific hosting section of the LCT is characterised by steeper moorland covered hillside to the east of the access track, including that of Cnoc Coillteil, that change to more gentle slopes moving southwards. These slopes effectively enclose the eastern side of the strath of the River Strathy. There are isolated estate properties along with wood pole supported OHL between the track and the river, while commercial forestry is generally contained to the river's west where the turbines of Strathy North Wind Farm are. The Habitat Management Plan for Strathy North Wind Farm shows that the area surrounding its turbines will remain commercial forestry, with eastern edge of the plan area nearest the OHL, marked for riparian native woodland planting, meaning the western side of strath will likely remain wooded.
- 7.25 The larger section of the OHL would follow the route of the track to its east, being sited between the track and the hillsides. The southern OHL section crosses the track and river over moorland covered strath floor, woodland and improved pasture as well

as commercial forestry. Similarly, the north section of OHL crosses the track joining the existing OHL within the moorland covered strath floor.

- 7.26 Direct impacts are predicted on the Sweeping Moorland and Flows LCT resulting from temporary and permanent new ground infrastructure such as tracks and tower bases with the worst of the effects being during construction, although reducing during the operational phase following the reestablishment of vegetation.
- 7.27 Locally significant effects on landscape character are predicted during the construction phase of development, reducing to not significant effects during the operational phase. The proposal would extend OHL southwards away from more settled areas using larger steel infrastructure, which, as the EIAR sets out, would be locally prominent, and extend the hosting area of the LCT's the association with grid infrastructure and reinforcing the energy generating land use in the wider area. The proposal would result in a perceptual reduction in scenic quality and a degree of change to the intrinsic landscape character during operational phase.
- 7.28 It is anticipated that these changes would be largely contained to within the River Strathy's strath floor and enclosing hillsides/slopes area of the hosting LCT, with the proposal's effect on landscape character considered to be within acceptable limits.
- 7.29 Although there is predicted theoretical visibility of the OHL within the neighbouring Rocky Hills and Moorland LCT to the west, the proposal would be visible as relatively distant slender towers behind the substantially larger turbines of Strathy North Wind Farm, but likely well screened by topography and woodland. Consequently, the towers would have a negligible effect on the character of the neighbouring LCT.

### **Visual Amenity Effects**

- 7.30 The EIAR has identified sensitive visual receptors in the area surrounding the OHL route including residential properties and those providing holiday accommodation (Bowside Lodge, the Bothy (part of the Bowside complex), Bowside Cottage, and Dallangwell), and recreational users (Scottish Hill Track 334 – Strath Halladale (Trantlebeg) to Strathy, which correspond to the main access track, and recreational users of the River Strathy for fly fishing). Given the distance to the A836, road users are scoped out of the assessment.
- 7.31 The assessment is supported by a visualisation taken from the north of Bowside looking south being representative of users of the Scottish Hill Track. The level of effect of the proposal has not been assessed for the visualisation within the EIAR. The visualisation shows the OHL as it cuts from west (right) of the view to the east of the track (left of the track in the receptor's view) where a dense arrangement of towers appear above the property on a shelf in the slope and follow the route of the track southwards. There will be some visual clutter when the towers are experienced as a

dense receding line of towers in forward views, and when experienced with the Strathy Wood Wind Farm turbines further south.

- 7.32 It is clear that the towers will result in an upscaling of grid infrastructure at the location, which will reduce the remote and rural character of views within the strath of the River Strathy, particularly for static views at the properties listed and views experienced by those travelling along the track. The EIAR sets out the OHL will result in significant effects on the visual amenity of Bowside Cottage and recreational users of the track in both directions during the construction phase of the development, and that significant effects would be limited to the latter receptor only once the OHL is installed. No other significant effects on the visual amenity of the receptors identified in the EIAR are predicted. This assessment is not disputed.
- 7.33 As assessed within the EIAR and as set out above, the proposal will contribute to a change in the character of views. However, it is the existing turbines and those currently under construction that are the larger characterising manmade feature within these views, meaning that the OHL's contribution to the cumulative magnitude of change in the area is limited. As such, the proposal's effect on the visual amenity of each of the residential and recreational receptors as described, is considered within acceptable limits.

### **Natural Heritage**

- 7.34 The applicant's assessment in relation to ecology and ornithology are set out in EIAR Chapters 7, Ecology, (including for impacts on peatland habitats and the Flow Country World Heritage Site) and 8 respectively. These chapters are supplemented by figures and appendices reflecting survey work including results and conclusions undertaken in support of the submission.
- 7.35 In terms of Designated Sites, and as set out in Paragraph 2.2 above, the proposal is within the Flow Country World Heritage Site (FCWHS), the Caithness and Sutherlands Special Area of Conservation, the Caithness and Sutherlands Special Protection Area, the Caithness and Sutherland Ramsar Site, and the West Halladale Site of Special Scientific Interest, which are all conterminous at this location. The applicant has provided an FCWHS Impact Assessment, and a Shadow Habitats Regulations Assessment for the Caithness and Sutherland Peatlands SAC / Ramsar, which were updated in July 2025 as informed by a Peatland Condition Assessment, and as Additional Environmental Information under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017. The status of the SAC, SPA, and Ramsar sites mean that the requirements of the Conservation (Natural Habitats, et cetera) Regulations 1994 as amended (the 'Habitats Regulations') apply.
- 7.36 **Flow Country World Heritage Site (FCWHS):** the FCWHS is protected for its globally important blanket bog ecosystem with the Outstanding Universal Value

(OUV) encompassing several attributes relating to the blanket bog habitat and its ecosystem processes. In its initial response, NatureScot advised that the proposal is predicted to result in the loss of 2.49ha of blanket bog habitat within the WHS along with the permanent loss of Sphagnum moss. These losses would negatively affect the extent and function of the blanket bog in this part of the WHS, with impacts being long-term and irreversible, and therefore significant. Given the whole site concept of OUVs, any impacts on an WHS' OUVs cannot be mitigated or offset, and as such NatureScot has objected in principle to the proposal.

- 7.37 NatureScot also considers that construction works could also affect watercourses within the WHS, which could impact Attribute f) 'water filtration and the impact on the water quality of associated riverine habitats', which contributes to the OUV, but advises that this could be mitigated through appropriate onsite environmental management practices during construction works.
- 7.38 The policy implications of the above are considered in Appendix 3 of this report and in particular in the light of the recent refusal of Kirkton Wind Farm by Scottish Ministers (23 January 2026). In short, the Reporter for that scheme considered that while NPF4 Policy 7 Historic Assets and Places considers World Heritage Sites at part I), it does not directly apply to Natural Heritage, which is covered under NPF4 Policy 4 for Natural Places. However, the Reporter did consider that the policy test NPF4 Policy 7 part I) contains, that 'development proposals affecting a World Heritage Site or its setting will only be supported where their Outstanding Universal Value is protected and preserved', does apply to World Heritage Sites inscribed for natural heritage. Moreover, the Reporter considered that Kirkton Wind Farm would not conflict with NPF Policy 4 Natural Places because there is no specific reference to World Heritage Sites in that policy. However, Scottish Minister's took the view that Part a) 'development proposals which by virtue of type, location or scale will have an unacceptable impact on the natural environment, will not be supported' was relevant to the assessment and gave significant weight to that provision.
- 7.39 Members are advised that since its inscription, the statutory duty to 'protect, conserve, and present the site for people now and in the future' is held at the national level. It is therefore the remit of NatureScot to advise the Scottish and UK governments on impacts from development on the FCWHS as a natural heritage designation.
- 7.40 Nevertheless, the Highland Council, along with NatureScot, is a lead partner to the management of the property and as the Planning Authority, it is reasonable that the Council supports NatureScot's position that the proposal will have an unacceptable and unsupportable impact on the OUV. On that basis, the impact on the OUV is recommended under reason 1 for objecting to the application at Section 11 of this report. This position is entirely consistent with the Council's updated Flow Country Planning Position Statement 2, published in July 2025, which states that:

'World Heritage inscription for The Flow Country does not present a ban or moratorium on development. Each planning proposal that comes forward will be assessed and considered on its merits. In seeking to fulfil the international obligations for protection and management of the Site, which it can be anticipated will carry significant weight in decisions, the focus will be on seeking to protect the Site's Outstanding Universal Value. This will include taking into account Site integrity, including its wholeness, and setting. Positive and negative, individual and cumulative effects will be taken into account, together with appropriate mitigation proposals in a World Heritage context.'

- 7.41 Members are asked to note however, that while THC has already submitted its objection to the Section 37 application, the objection was submitted non-timeously in accordance with The Electricity Act 1989 due to the applicant not agreeing to an extension of time for the Council to provide its response. The Council has timeously raised objection against to the Additional Environmental Information however as this is submitted under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017, which is separate legislation, Scottish Ministers are not statutorily obliged to hold a public local inquiry to formally investigate the impacts on the OUV in light of the Council's objection. That means that any subsequent procedure following the issuing of this report and the Committee's decision would be at the discretion of Scottish Ministers.
- 7.42 **Caithness and Sutherland Special Area of Conservation (SAC):** The SAC is protected for its peatland and freshwater habitats, otter, and the perennial herb marsh saxifrage.
- 7.43 In its initial response, NatureScot advised that the proposal would likely have a significant effect on blanket bog, wet heathland with cross-leaved heath, and otter qualifying interests of the SAC. These effects would be a result of the direct permanent loss and indirect permanent loss, due to habitat change, of National Vegetation Classification (NVC) communities M15 and M17 and the mosaics containing these habitats. Due to the likely significant effects, NatureScot also advised that Scottish Ministers, as competent authority, is required to undertake an Appropriate Assessment in view of the SAC's conservation objectives for its qualifying interests.
- 7.43 NatureScot has reviewed the applicant's peatland condition assessment, which informs its Shadow Habitat Regulations Assessment in relation the SAC, but advises that such assessments are designed to consider the potential for restoration or the amount of emissions from a peatland, rather than understand the habitat value. It therefore does not consider the assessment appropriate or informative for understanding the development's impacts on the integrity of the site and advises that, based on the information submitted by the applicant, Scottish Ministers would unlikely be able to conclude that there will be no adverse effect on the integrity of the SAC.

- 7.45 It is considered appropriate and prudent to support NatureScot's conclusion and include the impact on the SAC as a reason to object to the application.
- 7.46 **Caithness and Sutherland Special Protection Area (SPA):** the SPA is protected for its upland breeding waders, waterfowl, and raptors. The proposal would result in 2.57h of habitat loss within the SPA and there is likely to be disturbance and displacement of breeding and foraging birds during construction activities. The EIAR advises that breeding golden plover, greenshank, red-throated diver, black-throated diver, hen harrier, and merlin were recorded during field surveys, and/or identified during the desk study, within the relevant study areas.
- 7.47 NatureScot has advised the applicant that the information submitted with the application is insufficient and does not adequately demonstrate that the proposal will not result in significant effects on the integrity of the site or the conservation objectives for its qualifying interests. This is because without the submission of an updated breeding bird survey report, Scottish Ministers would unlikely be in a position to conclude that there will be no adverse effect on the integrity of the SPA for its appropriate assessment. NatureScot also advises that fitting line markers along the length of the OHL, which is suggested within EIAR chapter 8, would mitigate impacts through collision risk to SPA species.
- 7.48 As with the SAC, it is considered appropriate and prudent to support NatureScot's conclusion and include the impact on the SPA as a reason to object to the application.
- 7.49 **Caithness and Sutherland Peatlands Ramsar Site:** following the Scottish Government's updated position that the Habitats Regulations should apply to Ramsar sites, NatureScot has advised that the interests of this designation are fully addressed as part of its appraisal on the Caithness and Sutherland Peatlands SAC and SPA as outlined above.
- 7.50 **Other Ornithology Impacts and Protected Species:** in terms of general ornithological issues, the submission advises that mitigation will be implemented during the construction period including preconstruction surveys for protected birds, as well as, nesting and breeding birds and protective measures included in a breeding bird protection plan and targeted species specific protected plans, particularly for hen harrier. The overall impact on several bird species during construction activities is not predicted to be significant save for hen harrier. Pre-construction surveys and targeted species protection plans should be secured by condition.
- 7.51 Protected species surveys have identified the likely presence of badger, otter, and pine martin within the study area, but no evidence of water vole even though it is known to be present in the wider area and there is suitable habitat on site. There are known common pipistrelle bat roosts at Dallangwell Cottage, Bowside Lodge and Stock Shed, which are just outside of the ecological impact assessment study area

but are included. Scottish wild cat, adder, and common lizard are also considered in the assessment and forwarded for appropriate mitigation.

- 7.52 The submission includes SSEN's standard General Environmental Management Plans, which include mitigation measures to reduce effects on protected species, as well as specific Species Protection Plans for badger, otter, bats, and reptiles. The EIAR sets out that there is embedded mitigation and mitigation by design for the protection of species, including minimising habitat loss and fragmentation and ensuring that an Ecological Clerk of Works would be employed to oversee the implementation of these plans along with a Construction Environmental Management Plan during the construction phase of development. On that basis, it is considered that wider impacts on protected species would be within acceptable limits subject to conditions to secure that works are carried out in accordance with the approved environmental plans under the appropriate oversight.
- 7.53 **Habitat Loss and Biodiversity Enhancement:** in addition to the 2.57ha of peatland habitat loss identified within the conterminous designated sites set out above (2.49ha being blanket bog and wet heath), the EIAR has identified an additional permanent loss of 1.77ha of habitat (blanket bog, wet heath, acid grassland, coniferous woodland, and purple moor-gras and rush pasture) as a result of the development. A further temporary loss of 2.79ha of non-designated habitat would be reversible following reinstatement after construction works.
- 7.54 A high level landscape scale outline Habitat Management Plan that spans the whole Connagill Cluster grid connection projects is submitted with the application, which outlines a strategy to compensate for peatland habitat losses at a 1:10 ratio and undertake riparian woodland creation, which should be a minimum of 5.24ha as advised by THC's Forestry Officer, as well as to provide diver rafts in relation to the SPA qualifying interest. The strategy for the plan also advises of the applicant's commitment to achieving a biodiversity net gain of 10% through enhancement measures in line with the requirements of NPF4 Policy 3.
- 7.55 The EIAR advises that the plan is currently under development in consultation with NatureScot and is therefore a working document. In general terms however, the principles of compensating for unavoidable habitat loss and biodiversity enhancement are supported. In this instance, while the submission does not include more detail on the location of the proposed Habitat Management Plan area, Members are reminded that there is now in place a Memorandum of Understanding (MoU) between the applicant and the Council, which sets out the Council's agreement to the applicant delivering on its compensatory and enhancement obligations at a later date in order to not hold up delivery of nationally important infrastructure. Although this application was lodged ahead of the MoU being signed, applying this established approach remains appropriate and consistent with the Ministerial and Chief Planner letter of

April 2025, which gave a clear indication that the use of suspensive conditions to secure such matters can be appropriate.

- 7.56 In terms of peat disturbance, the EIAR advises that the layout is designed to avoid areas of deep peat and minimise impacts where this is not avoidable. The outline Peat Management Plan (EIAR Volume 4, Technical Appendix 9.2) sets out that a total of 48,814m<sup>3</sup> of peat is anticipated to be excavated overall, with the development having potential to reuse a larger volume, 48,853m<sup>3</sup>, for reinstatement works, indicating that none of the excavated soils on site will become waste.
- 7.57 The outline plan sets out the best practice measures for excavation, re-use, storage, transport and handling of excavated peat onsite to reduce the likelihood of it releasing embodied carbon and becoming waste. A finalised peat management plan could be secured by condition.

### **Built and Cultural Heritage**

- 7.58 EIAR Chapter 10 presents the applicant's assessment of the proposal's likely direct and indirect and directs impacts on built and cultural heritage assets within the defined study area, which generally corresponds with the limits of deviation for the OHL and tracks.
- 7.59 There are no designated heritage assets within the study area or wider area that would be directly impacted by the development, nor are the settings of any designated heritage assets considered likely to be significantly affected due to limited visibility of the towers and OHL as confirmed by Historic Environment Scotland.
- 7.60 There are several undesignated heritage assets within the study area including two sites associated with the early modern Braerathy Township, a farmstead and a large hut circle associated with the Bronze Age Reidhean a Bhainne, and the Neolithic Bowside Hut Circles at Dallangwell.
- 7.61 The submission sets out embedded mitigation includes avoiding direct impacts on these assets through layout design and micrositing, with construction exclusion zones being marked out onsite around the assets by the developer to protect them from construction works, which should be secured through the CEMP.
- 7.62 However, Paragraph 10.10.1 of the EIAR advises that an unavoidable direct impact is predicted for the undesignated Bowside Hut Circles at Dallangwell in relation to a specific site (Site 4c to the south of Uidh nan Con Luatha identified on Figure 10.1 – Cultural Heritage Assets). The EIAR recommends avoiding laying or dragging conductors across the feature where practical, or, where not, laying matting or temporary earth banking over the structure while ensuring that plant, vehicles and other machinery are excluded from crossing the feature.

7.63 The Council's archaeologist has advised that this mitigation, along with implementing watching briefs in sensitive areas, is considered proportionate and appropriate and has not objected on the grounds of the specific direct impact subject. The no objection is subject to a condition to secure an archaeological Written Scheme of Investigation to detail the recording and recovery of archaeological resources found within the application site and to include a Post-Excavation Research Design element in the event that post excavation analyses are required.

### **Water Environment**

7.64 Chapter 9 of the EIAR includes an assessment of the likely hydrological and hydrogeological effects, i.e., effects on the water environment, of the development. Scottish Water has confirmed that there are no Scottish Water drinking water catchments or water abstraction sources, which are designated as Drinking Water Protected Areas under the Water Framework Directive, that would be affected by the development. Similarly, the two identified private water supplies within the study area are for Dallangwell Farmhouse and Braerathy Lodge, which the EIAR advises are no longer in use / demolished.

7.65 There are areas of known flood risk from fluvial sources where the application site is closest to the River Strathy, i.e., the north and south extents of the development. Tower 4 of the proposal would be on the edge of the river's floodplain, located due to engineering constraints of the OHL. The EIAR advises that the bases of the proposed steel lattice towers are considered water compatible and therefore not considered to be at risk of fluvial flooding nor increase flood risk in the river itself. Moreover, the proposal is 'essential infrastructure' as defined under NPF4, meaning the development can be allowed in a flood risk area where it is demonstrated to be required for operational purposes. As such, the proposal is acceptable in terms of flood risk.

7.66 Due to the proposal using an already upgraded forestry track, no new permanent water crossings are proposed, although temporary measures such as fording where appropriate, use of bog mats, scaffolding or temporary bridges may be required to cross water courses.

7.67 The applicant also undertook a NVC habitat mapping exercise, which has identified areas of moderate to high potential of ground water dependent terrestrial ecosystems (GWDTE), which are generally located in areas hydrologically connected to the River Strathy, although the EIAR advises that these are likely to be sustained by rainfall and surface water runoff rather than groundwater and that implementing appropriate SUDS to sustain existing surface water flow paths during the construction and operational phases of the development will ensure that these habitat communities are protected.

7.68 Any works that may impact watercourses would also be subject to authorisation from SEPA under the Environmental Authorisations (Scotland) Regulations 2018 (EASR). However, best practice mitigation measures to safeguard the water environment, including pollution prevention measures, can be prior agreed through a condition to secure the CEMP condition in order to reduce the likelihood of the pollution of watercourses or groundwater.

### **Roads and Transport**

7.69 Chapter 11 of the EIAR: Traffic and Transport provides a review of the roads issues associated with the development and is supported by a Transport Assessment (EIAR Volume 4 Technical Appendix 11.1). The assessment assumes all aggregate will be sourced offsite and transported to site using the public road network, although the EIA advises that aggregate could be sourced from nearby borrow pits to mitigate road impacts. As mentioned however, any new borrow pit would require separate planning permission with the applicant advising that this will be for the contractor to manage.

7.70 All HGV movements and plant and component delivery, including abnormal loads (AIL) are assumed to travel west to the site using the A9(T) between Georgemas Junction and Scrabster, and the A836 from Thurso to the site access 1km east of Strathy. No other Council maintained roads are identified within the Transport Assessment with the assessment advising that the use of the A836 between Lairg and Tongue, and the A897 between Helmsdale and Melvich are not supported by the Council due to road condition. Additionally, the assessment assumes that both Strathy South and Strathy Wood Wind Farms will be constructed ahead of works commencing on the grid connection works, however the finalised Construction Traffic Management Plan would be required to consider any developments that may be taking place at the same time. Table 5 of the Transport Assessment advises that peak construction traffic flows will occur in month 4 of the 12 month programme.

7.71 The assessment predicts that over the course of the construction phase, there will be an increase of all traffic (car, LGV, and HGV) of 1.4% at the A9 north Georgemas Junction, 2.5% on the A9(T) at Thurso, 3.2% on the A836 near Forss, and 10.6% on the A836 near Strathy. Specifically for HGV movements, the predicted increases are 8% at the A9(T) north Georgemas Junction, 22.5% on the A9(T) at Thurso, 60.5% on the A836 near Forss, and 73.6% on the A836 near Strathy.

7.72 For the A836 near Strathy, the EIAR advises that the increase works out at an average of 38 HGV movements per day / 3 HGV movements per hour, which corresponds with the peak number of HGV movements across the study area for month 4 as predicted in Table 5 of the Transport Assessment. The Council's Transport Planning Team advises that these increases in HGV movements are significant, in opposition to the applicant's assessment, for all locations except north of Georgemas Junction.

- 7.73 The issue for the Council is that many of its roads have evolved to support the low levels of traffic volume they have experienced. They are not designed roads with modern foundations and they depend on the strength of the natural substrate. The lane widths are often substandard; some routes are single track with limited passing opportunities. A significant increase in the number of heavy axle-loads per day (from the increased volume of HGV construction vehicles) may lead to significant over-run damage to the road drainage and the edge of the road construction and in the worst case to failure of the carriageway structure and its foundation. This would impact both the communities relying on the local road network as well as Council resources.
- 7.74 However, the only local road that has been assessed by the applicant is the A836 between Thurso and Strathy, while the full road network that will be impacted by construction traffic remains unknown as the source of the bulk materials required for construction (such as sand and aggregate) has not been identified at this stage. If materials are sourced from offsite borrow pits or local quarries then it is likely that construction HGVs will use other local roads including C and U class routes to access these materials. These routes cannot be identified or assessed at this stage.
- 7.75 As such, an accurate assessment of cumulative impact cannot be made at this time. The risk of concurrent large-scale development is high due to the large number of major energy related developments approved and proposed in the lead up to 2030. Additionally, accurate construction periods are also unknown along with the material supply routes. For these reasons, it is not possible to accurately identify the HGV traffic volumes or the routes that will be used by this scheme or other major developments that could be under construction at the same time in this area.
- 7.76 Although the proposal would not be as intensive on the road network as the construction of a wind farm for example, the impact cumulatively may be significant and require mitigation especially on the routes to borrow pits or quarries. Transport Planning advises that it would object to the proposal unless a condition is applied to any permission to secure firstly an updated and cumulative traffic assessment and secondly an engineering assessment (in addition to any updated environmental assessment) of Council maintained roads and structures used for the development where the traffic and/or HGV traffic increase is significant. This assessment should inform any road improvements and mitigation measures that may be required prior to the commencement of development.
- 7.77 The Transport Assessment also advises that the delivery of abnormal load components is not anticipated as towers generally arrive to site as individual steel components or in prefabricated panels. Mobile crane movements (which will be abnormal) are required for the erection of the towers. The Transport Assessment concludes that the crane can access the site with no obstacles but no indication of the vehicle type, number of movements or routeing is given. A condition to secure information on the routeing, numbers of movements, assessment of the cumulative

impact on the local road infrastructure and delivery of any necessary mitigation regarding the abnormal load movements required is requested.

- 7.78 THC and Transport Planning's prior approval of a finalised Construction Traffic Management Plan should also be secured by condition. The Plan should include risk assessments for the transport of construction materials, both during daylight hours and hours of darkness, along with proposed traffic management and mitigation measures along access routes as required such as temporary speed limits, suitable temporary signage, and road markings, and any accommodation measures. The plan should also be adaptable to adapt to the event that other consented developments are using the same public road network at the same time.
- 7.79 The applicant will be required to finalise a legal Section 96 Agreement under the Roads (Scotland) Act 1984 (as amended) to adequately compensate the public purse in the event of additional damage to Council maintained roads that can be attributable to the associated construction traffic.
- 7.80 In terms of wider public access, a recreational access taken at the proposal site but that a Recreational Access Management Plan should be conditioned to secure favourable and safe public access for users of Scottish Hill Track 344 and more general track users during construction and once the development is operational.

#### **Decommissioning and Aftercare**

- 7.81 The applicant is seeking planning permission in perpetuity for the development, however, in the event of decommissioning, this would be carried out in line with the best practice processes and methods at that time and managed through a Decommissioning Environmental Management Plan. Given that grid infrastructure decommissioning and restoration is an established requirement under the network operator's licence, this is not required to be secured by condition.

#### **Other material considerations**

- 7.82 There are no concerns that the proposal would result in a statutory nuisance due to noise emissions once the OHL is operational. Additionally, light pollution can significantly affect the character of the countryside from disturbing the way animals and plants perceive daytime and nighttime to making developments visible across wide areas. The infrastructure would not be illuminated at night for normal operation however construction lighting should be controlled by condition. There are no other amenity issues that would be cause for concern.

#### **Non-material considerations**

- 7.83 None raised.

#### **8.0 Matters to be secured by Legal Agreement / Upfront Payment**

- 8.1 On other applications, legal agreements have previously been used to secure off-site compensatory / enhancement measures. However, based on the latest advice from the Chief Planner and Ministers (April 2025), there is a clear indication that the use of suspensive conditions to secure such matters can be appropriate. Given this advice, and the applicant's MoU with the Council, Officers are content that additional off-site compensatory planting / biodiversity enhance can be delivered through a planning condition, rather than through legal agreement.
- 8.2 A wear and tear legal agreement will also be required under Section 96 of the Roads (Scotland) Act. This would include the provision of a Road Bond or similar security. The agreement would take account of any neighbouring developments that might progress concurrently with the works proposed and would make provision for a mechanism for apportionment of costs between respective developers. This can be secured concurrently with the finalisation of the CTMP.

## **9. CONCLUSION**

- 9.1 The Scottish Government and the Council each have policies offering support to projects which increase the capacity of the grid network to serve renewable energy projects. NPF4 offers strong support for such development highlighting upgraded infrastructure supporting onshore high voltage electricity lines, cables and interconnectors as being of development of national importance.
- 9.2 The 132 kV OHL is designed to connect Strathy Wood Wind Farm, and Strathy South Wind Farm thereafter, via steel lattice towers to the national grid and thereby have a transmission capacity of 271MW from renewable sources, of which 63MW would be attributable to Strathy Wood's connection. In that way, the OHL would form part of the delivery of a fit for purpose transmission network that facilitates the move towards net zero. In addition, the development has potential to bring economic benefits to the area and support the creation of new jobs.
- 9.3 However, as with all such proposals, the benefits of the scheme must be weighed against potential drawbacks and then considered in the round, taking account of the relevant policies of the Development Plan and the provisions of Schedule 9 of The Electricity Act 1989. In this instance, officers would highlight that the issues with the grid connection proposal as assessed in this report may have been averted had the grid connection been considered within the EIA in the original application for Strathy Wood Wind Farm.
- 9.4 As it stands however, the proposal is predicted to result in the loss of 2.49ha of blanket bog habitat within the Flow Country World Heritage, which is the Outstanding Universal Value that the World Heritage Site is inscribed for, along with the permanent loss of Sphagnum moss. These losses would negatively affect the extent and function

of the blanket bog in this part of the World Heritage, with impacts being long-term and irreversible, and therefore significant.

- 9.5 Given the whole site concept of Outstanding Universal Value of a World Heritage Site, any impacts on an Outstanding Universal Value cannot be mitigated or offset, and as such NatureScot has objected in principle to the proposal. Although it is recognised that NatureScot is the technical advisor to the Government on the World Heritage Site, the Council still has a pivotal role in the protection of the property and it is, therefore, the recommendation of this report that the Council objects to the proposal on the same grounds.
- 9.6 In addition to effects on the World Heritage Site, NatureScot's response also highlights that, in its opinion, Scottish Ministers would be unlikely to be in a position to conclude that the proposal will not result in adverse effects on the integrity of the Caithness and Sutherland Special Area of Conservation / Special Protection Area / and Ramsar Site or on the conservation objectives for their qualifying interests as required under the Conservation (Natural Habitats, et cetera) Regulations 1994 (as amended). This is due to the submission not adequately covering the impacts on blanket bog habitats for the Special Area of Conservation, outstanding issues with the Breeding Bird Survey Report for the Special Protection Area, with both issues covering the qualifying interests of the Ramsar Site. It is therefore recommended that the Council supports NatureScot's position and objects to the Scottish Ministers on the same grounds. However, in the event that the applicant provides adequate information to address these matters to the satisfaction of NatureScot, the Council would maintain its right to withdraw these reasons for refusal.
- 9.7 As an application submitted under Section 37 of the Electricity Act 1989 however, it will be for the Scottish Ministers to decide whether the applicant has had sufficient regard to the preservation of amenity and the desirability of preserving the natural beauty, of conserving flora, fauna and geographic or physiographical features of special interest to the extent that any such impacts are reasonably mitigated as required under Schedule 9 of the Act.
- 9.8 The report has set out that the impacts and effects of the proposal as they relate to construction, design, landscape effects, visual amenity, built and cultural heritage, the water environment, roads, traffic, transport, access, and amenity, as well as decommissioning and aftercare, would be within acceptable limits subject to the developer's compliance with conditions as requested by consultees and as would be requested by the Council.
- 9.9 This application has been assessed principally against the policies set out in NPF4 and the Local Development Plan, including NPF4 Policy 1 for Tackling the climate and nature crises, NPF4 Policies 3 and 4 as they relate to Biodiversity and Natural Places, and the policy test set out in BPF4 Policy 7 for World Heritage Sites. NPF4 Policy 11 for Energy with its 13 considerations for project design and mitigation has

been given due consideration, along with the equivalent parallel HwLDP Policy 69 for Electricity Transmission Infrastructure. This HwLDP policy also reflects policy tests set out in other HwLDP policies, for example Policy 28 Sustainable Design. Moreover, significant weight has been given to the global climate and nature crises in this assessment.

- 9.10 The Council is not satisfied that the environmental effects of this development can be addressed by way of mitigation in relation to the World Heritage Site, nor is the Council satisfied that the EIA submission has adequately demonstrated that the proposal will not have unacceptable impacts on the integrity and conservation objectives for the qualifying interests of the Caithness and Sutherland Special Area of Conservation / Special Protection Area / Ramsar Site. On that basis and having considered all relevant matters when appraising this application. It is considered that the proposal does not accord with the principles and policies contained within the Development Plan and is unacceptable in terms of applicable material considerations.

## 10. IMPLICATIONS

- 10.1 Resource: Not applicable
- 10.2 Legal: Not applicable
- 10.3 Community (Equality, Poverty and Rural): Not applicable
- 10.4 Climate Change/Carbon Clever: if permitted, the development would support the transmission of energy from renewable sources.
- 10.5 Risk: Not applicable
- 10.6 Gaelic: Not applicable

## 11. RECOMMENDATION

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

It is recommended that the Council **Raise Objection** to the application subject to A. and for the following reasons set out in B. below:

- A. Members granting delegated authority to the Area Planning Manager – North to respond to the Scottish Government’s Energy Consents Unit / Scottish Ministers, regarding any future Further / Supplementary Environmental Information, where that information does not materially change the scale of the proposed development, including to amend the reasons for objection.
- B. **Reasons for Objection:**

1. The application does not accord with the provisions of Section 37 of the Electricity Act 1989 by virtue of not demonstrating sufficient regard to the desirability of, and failing to reasonably mitigate effects detrimental to preserving natural beauty and conserving physiographical features of special interest because the proposal would result in significantly detrimental effects on the blanket bog peatland habitat Outstanding Universal Value of the Flow Country World Heritage Site by virtue of the removal of 2.49ha of blanket bog habitat and Sphagnum moss, which cannot be mitigated or offset. In that way, the proposal does not accord with: 1) the policy intent or policy outcomes of NPF4 Policy 4 Natural places including Policy 4 part a) because the type, location and scale of the development proposal will have an unacceptable impact on the natural environment; 2) the policy test set out in NPF4 Policy 7 Historic assets and places part I); 3) NPF4 Policy 11 Energy part e) viii. by virtue of the development proposal significantly impacting the hydrology and water environment of the Flow Country World Heritage Site; and 4) Highland-wide Local Development Plan Policies 28 Sustainable Design, 57 Natural, Built and Cultural Heritage, 60 Other Important Habitats, 63 Water Environment, and 69 Electricity Transmission Infrastructure.
  
2. The application does not accord with the provisions of Section 37 of the Electricity Act 1989 by virtue of not demonstrating sufficient regard to the desirability of, and failing to reasonably mitigate effects detrimental to preserving natural beauty and conserving physiographical features of special interest because it has not been adequately demonstrated that the proposal would not result in significantly detrimental effects on the blanket bog, wet heathland with cross-leaved heath, and other qualifying interests of the Caithness and Sutherland Special Area of Conservation and therefore on the integrity of the designation and the conservation objectives for its qualifying interests as required under the Conservation (Natural Habitats, et cetera) Regulations 1994 (as amended). These impacts would be a result of the direct permanent loss and indirect permanent loss of NVC communities M15 and M17 and the mosaics containing these habitats due to habitat change. Consequently, the proposal does not accord with: 1) the policy intent or policy outcomes of NPF4 Policy 4 Natural places and specifically Policy 4 part a) because the type, location and scale of the development proposal will have an unacceptable impact on the natural environment, part b) because an appropriate assessment cannot conclude that the integrity of the designation and the conservation objectives for its qualifying interests will not be significantly adversely effected, and therefore; 2) NPF4 Policy 11 Energy part d); 3) NPF4 Policy 11 part e) viii. by virtue of the development proposal significantly impacting the hydrology and water environment of the designation; and 4) Highland-wide Local Development Plan Policies 28 Sustainable Design, 57 Natural, Built and Cultural Heritage, 60 Other

Important Habitats, 63 Water Environment, and 69 Electricity Transmission Infrastructure.

3. The application does not accord with the provisions of Section 37 of the Electricity Act 1989 by virtue of not demonstrating sufficient regard to the desirability of, and failing to reasonably mitigate effects detrimental to preserving natural beauty and conserving physiographical features of special interest because it has not been adequately demonstrated that the proposal would not result in significantly detrimental effects on the breeding bird qualifying interests of the Caithness and Sutherland Special Protection Area and therefore on the integrity of the designation and the conservation objectives for its qualifying interests as required under the Conservation (Natural Habitats, et cetera) Regulations 1994 (as amended). These impacts would be a result of the direct permanent loss and indirect permanent loss of breeding and foraging habitats due to habitat change and disturbance during construction works. Consequently, the proposal does not accord with: 1) the policy intent or policy outcomes of NPF4 Policy 4 Natural places and specifically Policy 4 part a) because the type, location and scale of the development proposal will have an unacceptable impact on the natural environment, part b) because an appropriate assessment cannot conclude that the integrity of the designation and the conservation objectives for its qualifying interests will not be significantly adversely effected, and therefore; 2) NPF4 Policy 11 Energy part d); and 3) Highland-wide Local Development Plan Policies 28 Sustainable Design, 57 Natural, Built and Cultural Heritage, and 69 Electricity Transmission Infrastructure.

Signature: Dafydd Jones

Designation: Area Planning Manager - North

Author: Mark Fitzpatrick

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

Relevant Plans: Plan 1 - Figure 1.1 Location Plan

Plan 2 - Figure 3.1.1 The Proposed Development

Plan 3 - Figure 3.1.2 The Proposed Development

Plan 4 - Figure 3.2: Schematic of Tower 19 arrangement with new trident 'H' wood poles

Plan 5 - Strathy South Wind Farm Grid Connection Figure V1-1.1 Overview of the Proposed Development (for context of the Connagill Cluster Grid Connections project)

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

### **National Planning Framework 4**

- A2.1 National Development 3 - 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
  - 6 - Forestry, Woodland and Trees
  - 7 - Historic Assets and Places
  - 11 - Energy
  - 14 - Design, Quality and Place
  - 18 – Infrastructure First
  - 25 - Community Wealth Building
  - 29 - Rural Development

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

- A2.2
  - 28 - Sustainable Design
  - 29 - Design Quality and Place-making
  - 30 - Physical Constraints
  - 31 - Developer Contributions
  - 36 - Development in the Wider Countryside
  - 47 - Safeguarding Inbye/Appportioned Croftland
  - 51 - Trees and Development
  - 52 - Principle of Development in Woodland
  - 55 - Peat and Soils
  - 56 - Travel
  - 57 - Natural, Built and Cultural Heritage
  - 58 - Protected Species
  - 59 - Other Important Species
  - 60 - Other Important Habitats
  - 61 - Landscape
  - 63 - Water Environment
  - 66 - Surface Water Drainage

69 - Electricity Transmission Infrastructure

72 - Pollution

73 - Air Quality

77 - Public Access

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

A2.3 No sites specific policies

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

- A2.4
- Biodiversity Enhancement Planning Guidance (May 2024)
  - Construction Environmental Management Process for Large Scale Projects (August 2010)
  - Developer Contributions (Mar 2018)
  - Flood Risk and Drainage Impact Assessment (Jan 2013)
  - The Flow Country Planning Position Statement 2 (June 2025)
  - 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)
  - Trees, woodland and development (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 Main Issues Report Stage. It is anticipated the Proposed Plan will be published following publication of secondary legislation post NPF4.
- A2.6 In addition, the Council has further advice on delivery of major developments in a number of documents. This includes Construction Environmental Management Process for Large Scale Projects (Aug 2010) and The Highland Council Visualisation Standards for Wind Energy Developments (Jul 2016).
- A2.7
- The Flow Country World Heritage Site Draft Management Plan (December 2022)
  - Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 – interim and annual targets replaced by Climate Change (Emissions Reduction Targets) (Scotland) Bill in November 2024

- Climate Change Committee Report to UK Parliament (July 2024)
- UK Government Clean Power Action Plan (Dec 2024)
- Draft Energy Strategy and Just Transition Plan (2023)
- Onshore Wind Energy Policy Statement (2022)
- Planning Guidance: Biodiversity (2025)
- Scottish Energy Strategy (2017)
- 2020 Routemap for Renewable Energy (2011)
- Energy Efficient Scotland Route Map, Scottish Government (2018)
- Siting and Designing Wind Farms in the Landscape, SNH (2017)
- Historic Environment Policy for Scotland, HES (2019)
- PAN 1/2011 - Planning and Noise (2011)
- Circular 4/1998 – The use of Conditions in Planning Permissions – this states that planning conditions should only be imposed when they meet all of the following six tests: 1) Necessary, 2) Relevant to planning, 3) Relevant to the development to be permitted, 4) Enforceable, 5) Precise; and Reasonable in all other respects.
- Circular 1/2017: Environmental Impact Assessment Regulations (2017)
- Managing Natural World Heritage (2012)
- Operational Guidelines for the Implementation of the World Heritage Convention (2025)
- UNESCO Guidance and Toolkit for Impact Assessments in a World Heritage Context (2022)
- Scottish Forestry Woodland Creation Application Guidance (November 2017)
- Scottish Energy Strategy (2017)

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

### National Policy

- A3.1 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 will implement the strategies and policies contained in the document.
- A3.2 NPF4 outlines 18 national developments that support the plan's spatial strategy. National developments will be a focus for delivery, as well as exemplars of the Place Principle, placemaking and a Community Wealth Building (CWB) approach to economic development. Six of the national developments support the delivery of sustainable places. Among these is national development number 3 - Strategic Renewable Electricity Generation and Transmission Infrastructure, which "supports electricity generation and associated grid infrastructure throughout Scotland, providing employment and opportunities for community benefit, helping to reduce emissions and improve security of supply." National development 3 accords national development status to electricity transmission that includes b) New and/or replacement upgraded on and offshore high voltage electricity transmission lines, cables and interconnectors of 132kV or more, and/or c) New and/or upgraded Infrastructure directly supporting on and offshore high voltage electricity lines, cables and interconnectors including converter stations, switching stations and substations. This proposal aligns with parts of both b) and c) and therefore, is classed as a national development, and as such received in principle support.
- A3.3 The spatial strategy reflects existing legislation by setting out that decision making requires to reflect the long-term public interest. However, in doing so, it is clear that the decision maker must make the right choices about where development should

be located, ensuring clarity is provided over the types of infrastructure that need to be provided and the assets that should be protected to ensure they continue to benefit future generations. To that end, the Spatial Priorities support the planning and delivery of sustainable places, which will reduce emissions, restore and better connect biodiversity; create liveable places, where residents can live better, healthier lives; and create productive places, with a greener, fairer, and more inclusive wellbeing economy.

- A3.4 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 are to 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.
- A3.5 Policy 3 - Biodiversity aims to protect biodiversity, reverse biodiversity loss, deliver positive effects and strengthen nature networks. Every development proposal has to maintain or improve biodiversity. As detailed in the Natural Heritage section of this report above, the proposed Habitat Management Plan is not considered to be sufficient to mitigate or provide sufficient habitat enhancement however the applicant and the Council have entered in to a Memorandum of Understanding with the aim to ensure that the applicant will timeously deliver on its compensatory requirements for habitat removal and biodiversity enhancement at a suitable location without hindering the progression of nationally important infrastructure.
- A3.6 Policy 4 - Natural Places aims to protect, restore and enhance natural assets making best use of nature-based solutions. It sets out that development proposals, by virtue of type, location, or scale that have an unacceptable impact on the natural environment, will not be supported. The report has set out that due to significantly detrimental impact on the blanket bog peatland habitat Outstanding Universal Value of the Flow Country World Heritage Site, the proposal does not accord with the policy intent or outcome of NPF4 Policy 4 or part a). With the exception of World Heritage Sites designated for Natural Heritage, which is not explicitly mentioned in Policy 4, the policy goes on to clarify what part a) means for different designations. At part b) the policy sets out that proposals with likely significant effects on European sites (SACs, SPAs, and Ramsar Sites) require an appropriate assessment. The report has set out that the submission has not adequately demonstrated that Scottish Ministers will be able to conclude that the proposal will not have significantly detrimental effects on the integrity and conservation objectives of the qualifying interests of the Caithness and Sutherland SAC/SPA/Ramsar site.
- A3.7 Development proposals that will affect a National Park, National Scenic Area or

SSSI shall only be supported where: i) the objectives of designation and the overall integrity of the areas will not be compromised; or ii) any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance. The site is not located within a National Park or NSA.

- A3.8 Policy 5 – Soils, aims to protect carbon rich soils including peatlands. Development proposals on such locations, will only be supported where they relate to essential infrastructure or renewable energy development. With regards to peat, the Outline Habitat Management Plan advises that there would be opportunity to re-use a higher volume of disturbed peat in reinstatement than will be excavated meaning the proposal would be unlikely to produce peat waste. Although, it is acknowledged that these calculations do not consider borrow pits. The applicant is obliged to ensure habitat and biodiversity enhancements through the aforementioned Memorandum of Understanding.
- A2.9 Policy 7 - Historic Assets and Places is intended to protect and enhance historic environment assets, enabling positive change. Policy outcomes include ensuring the historic environment is valued, whilst supporting the transition to net zero, as well as recognising the social, environmental and economic value of the historic environment to our economy and cultural identity. Policy 7 part a) requires proposals with potential significant impacts to be appropriately assessed; with part h) ii) setting out that development proposals will only be supported where significant adverse impacts on the integrity or setting of a scheduled monument are avoided. Part h) iii) of this policy also enables 'exceptional circumstances' to be demonstrated to justify the impact on a scheduled monument and its setting, and where impacts on the monument or its setting have been minimised. The EIAR has concluded that there will a significant direct impact on one non-designated historic asset within the site boundary but that the mitigation included in the document will ensure the impact is within acceptable limits. There will be no significant indirect impacts upon the setting of any listed buildings or scheduled monuments.
- A3.10 Following the recommendation by the Reporter for Kirkton Wind Farm, it is considered that the policy test of Policy 7 part I) for World Heritage Sites applies to the current application even though the policy does not reference properties designated for Natural Heritage. In this instance the proposal does not protect or preserve the blanket bog peatland habitat Outstanding Universal Value of the Flow Country World Heritage Site.
- A3.11 Policy 11 - Energy aims to encourage, promote and facilitate all forms of renewable energy development onshore and offshore. This includes energy generation, storage, new and replacement transmission and distribution infrastructure. Section a) notes development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported, including (ii.) enabling works, such as

grid transmission and distribution infrastructure. Section c) confirms development proposals will 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. Section d) requires development proposals that impact on international or national designations to be assessed in relation to Policy 4. In considering these impacts, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets. With the exception of Policy 11 d), which does not support the proposal, there is strong policy support for the proposal in the remaining matters.

- A3.12 Policy 11 section e) also requires project design and mitigation to demonstrate how the following various impacts on communities and individual dwellings, including, residential amenity, visual impact, and noise, landscape, visual and cumulative impacts, public access, aviation and defence interests, telecommunications and broadcasting installations, traffic and roads, historic environment, hydrology, water environment and flood risk, trees, biodiversity, decommissioning and site restoration are all addressed. As detailed in the Natural Heritage section of this report above, impacts on the hydrology and water environment that contribute to the Outstanding Universal Value of the Flow Country World Heritage Site are not within acceptable limits.
- A3.13 Policy 25 - Community wealth building aims to encourage, promote and facilitate a new strategic approach to economic development that also provides a practical model for building a wellbeing economy at local, regional and national levels. While NPF4 considers national developments as a focus for delivery, they should also be exemplars of the community wealth building approach to economic development. This is considered further within the Economic Impact section of this report.
- A3.14 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) 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.

### **Highland wide Local Development Plan (HwLDP)**

- A3.15 The principal HwLDP policy against which the application requires to be determined is the Policy 69 - Electricity Transmission Infrastructure. This policy offers support for electricity transmission infrastructure, having regard to their level of strategic significance in transmitting electricity from areas of generation to areas of consumption. Such support is subject to the proposals not having an unacceptable significant impact on the environment.

- A3.16 As the development would provide upgraded infrastructure for the transmission network and would help to facilitate an increasing proportion of electricity generation from renewable sources, the principle of the development receives support under HwLDP Policy 69 - Electricity Transmission Infrastructure, subject to site selection, design and overcoming any unacceptable significant environmental effects.
- A3.17 HwLDP Policy 69 specifically highlights that the “Council will have regard to their level of strategic significance in transmitting electricity from areas of generation to areas of consumption.” Additionally, it notes “It will support proposals which are assessed as not having unacceptable impact on the environment including natural, built and cultural heritage features.” Where development is assessed as not having unacceptable significant impacts on the environment, then the proposal would accord with the Development Plan.
- A3.18 The impact of this development on landscape is primarily assessed in the Landscape and Visual Impact section of this report. HwLDP Policy 36 Development in the Wider Countryside applies and sets out that all development in the countryside will be determined on the basis of a number of criteria. Pertinent matters to this proposal include siting and design, being compatible with the existing pattern of development, landscape character and capacity, as well as drainage and servicing implications. Policies 28 and 57 for Sustainable Design and, Natural, Built and Cultural Heritage support the aims of the aforementioned policies.
- A3.19 The generality of the HwLDP’s topic policies are superseded by those in NPF4. However, those that offer greater detail than NPF4 or that are tailored to Highland circumstance (and are not wholly incompatible with NPF4) are still relevant and may be applicable. For example, the Council’s Policy 31 on Developer Contributions links to greater detail in Supplementary Guidance and therefore both are still relevant.
- A3.20 Work on a new-style local development plan (Highland Local Development Plan) to ultimately repeal and replace the two relevant existing local development plans is progressing with a revised timetable of Evidence Report approval and submission to DPEA for Gate Check in late 2025 and publication of the Proposed Plan in late 2026.

### **Developer Contributions**

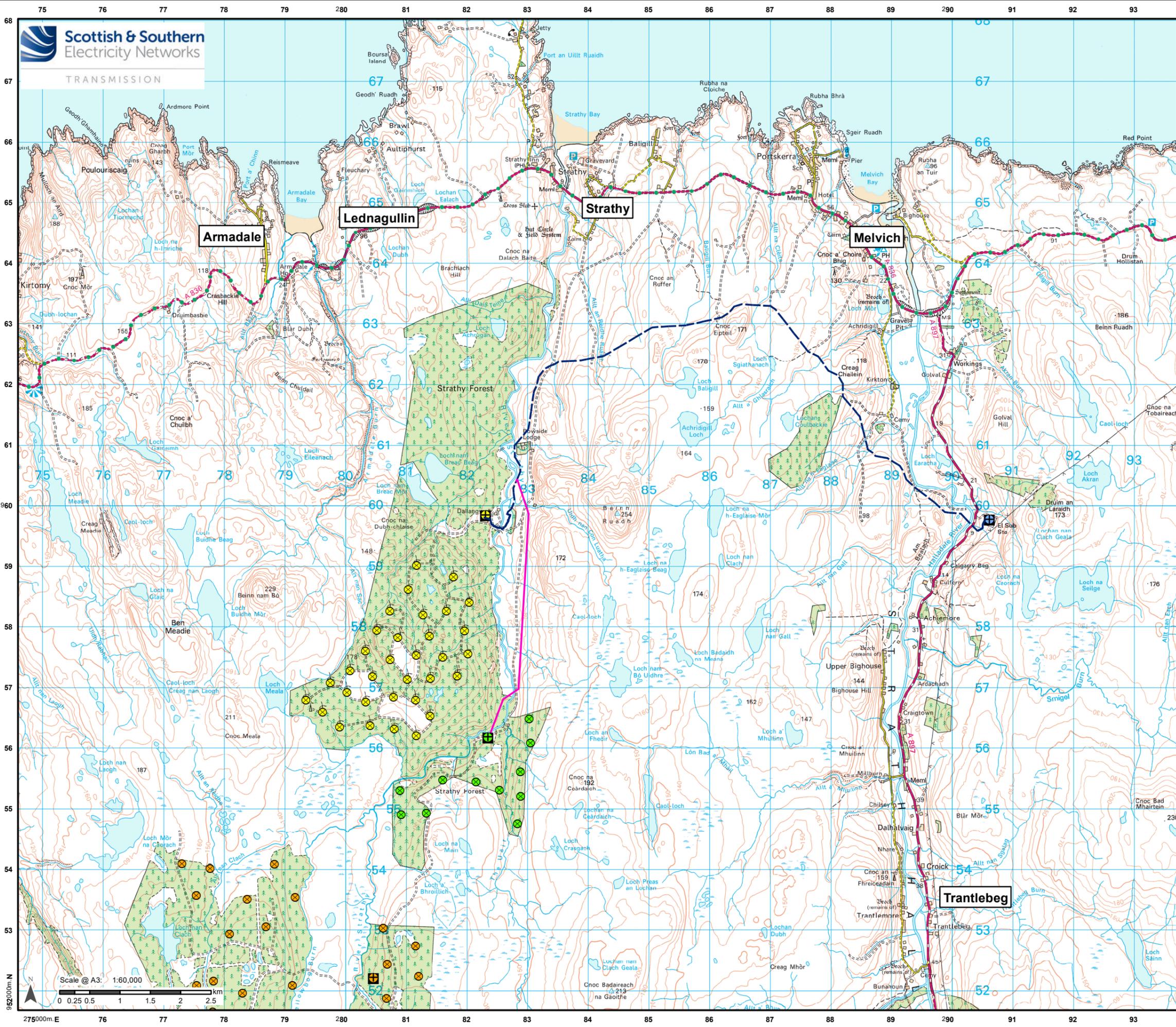
- A3.21 Under the terms of HwLDP Policy 31 Developer Contributions and the Council’s Developer Contributions Supplementary Guidance (2018), industrial (including energy) developments may be required to make contributions towards transport, green infrastructure, water and waste, and public art. In addition, Policy 11c) of NPF4 now provides an explicit national planning policy requirement for community

benefits from energy proposals.

- A3.22 Highland Council's approved and published Social Value Charter for Renewables Investment from June 2024 which sets out the community benefit expectations from developers wishing to invest in energy proposals in Highland.

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

- A3.23 The application site lies outwith any allocated site, delineated settlement boundary and safeguarding notation. The Inner Moray Firth Local Development Plan 2 (IMFLDP2) was adopted on 27 June 2024 and now postdates NPF4. Although the IMFLDP2 does not contain any site-specific policies relevant to this proposal its general policies provide more detail than the equivalent ones in NPF4. In particular, Policy 2 Nature Protection, Restoration and Enhancement which provides the hook for the Council's Biodiversity Enhancement Planning Guidance and Policy 9 Delivering Development and Infrastructure set out more detail.



**Legend**

**Overhead Line (OHL) Works**

Proposed OHL Alignment

**Existing Infrastructure**

- Connagill Substation
- Strathy North 132 kV Grid Connection
- Strathy North Substation
- Strathy North Wind Turbines

**Consented Infrastructure**

- Strathy South Wind Turbines
- Strathy Wood Wind Turbines
- Strathy South Substation
- Strathy Wood Substation



Reproduced by permission of Ordnance Survey on behalf of HMSO.  
© Crown copyright and database rights 2024  
OS AC0000848283. Supplied by: ukmapcentre.com

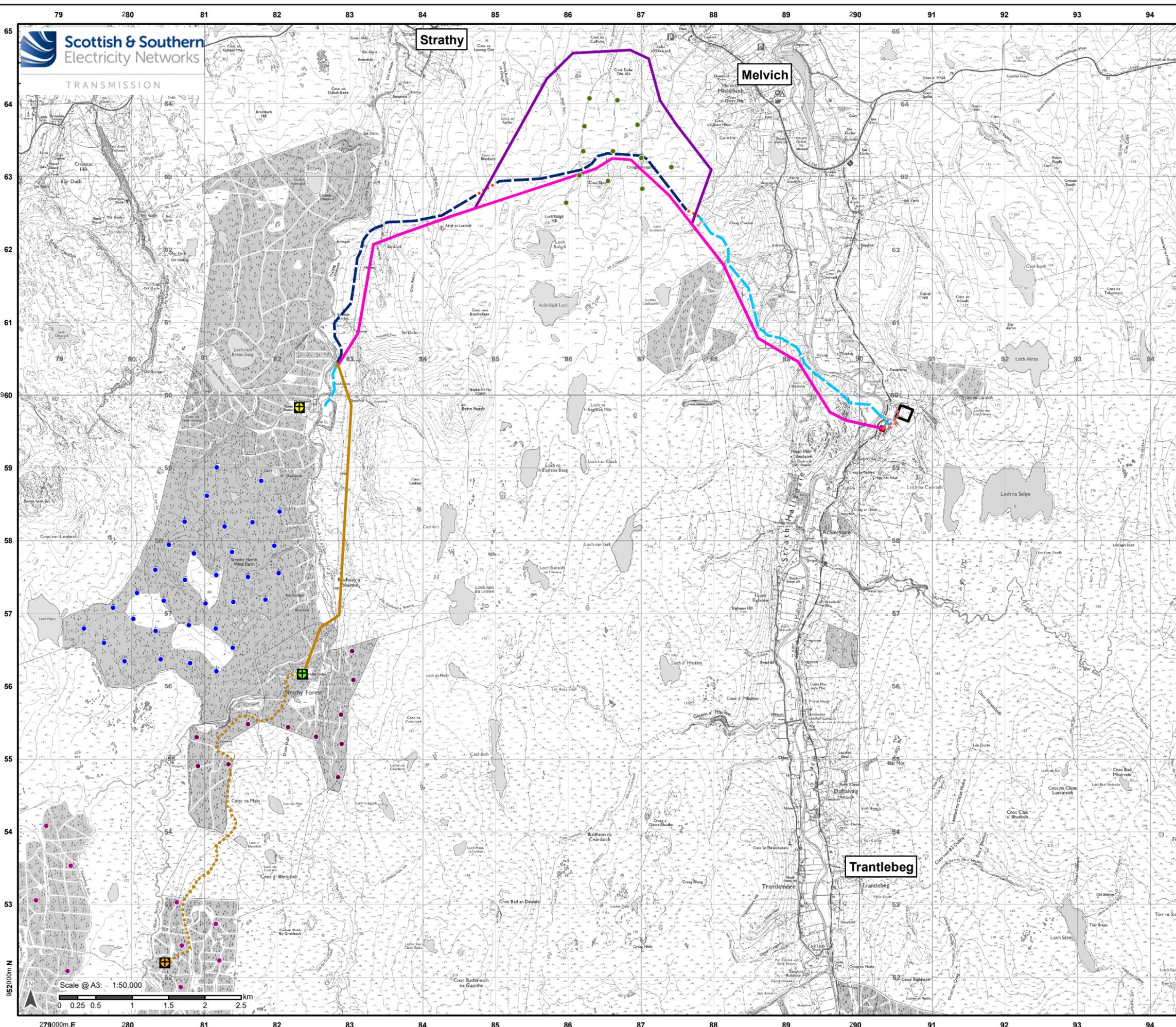
Project No: LT559  
Project: Strathy Wood Wind Farm Grid Connection - EIA Report

Title: Figure 1.1: Location Plan

Drawn by: FL/ MT Date: 28/10/2024

Drawing: 122023-EIA-D1.1-1.0.0





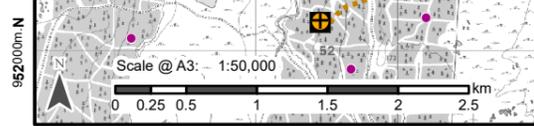
**Scottish & Southern  
Electricity Networks**

TRANSMISSION

**Strathy**

**Melvich**

**Trantlebeg**



### Legend

**Overhead Line (OHL) Works for which consent under Section 37 of the Electricity Act is sought**

- Proposed OHL Alignment
- Alternative OHL Alignment

**Ancillary Development for which Deemed Planning Consent (Town and Country Planning (Scotland) Act 1997 is sought)**

- Proposed Cable Sealing End (CSE) Compound
- Existing Wood Pole 132 kV OHL (to be dismantled)

**Development which falls under the Town and Country Planning (General Permitted Development) (Scotland) Order 1992**

- Proposed Underground Cable (UGC)
- Proposed Temporary UGC (Alternative Alignment only)

**Other Infrastructure**

- Strathy North Substation (Existing)
- Strathy Wood Substation (Consented)
- Strathy South Substation (Consented)
- Strathy South Wind Turbines (Consented)
- Strathy North Wind Turbines (Operational)
- Melvich Wind Turbines (Proposed)
- Strathy Wood Wind Turbines (Consented)
- Connagill 275/132 kV Substation
- Existing 132kV OHL (to be retained)

**Other Associated Works**

- Strathy South Wind Farm UGC
- Strathy Wood Wind Farm Grid Connection



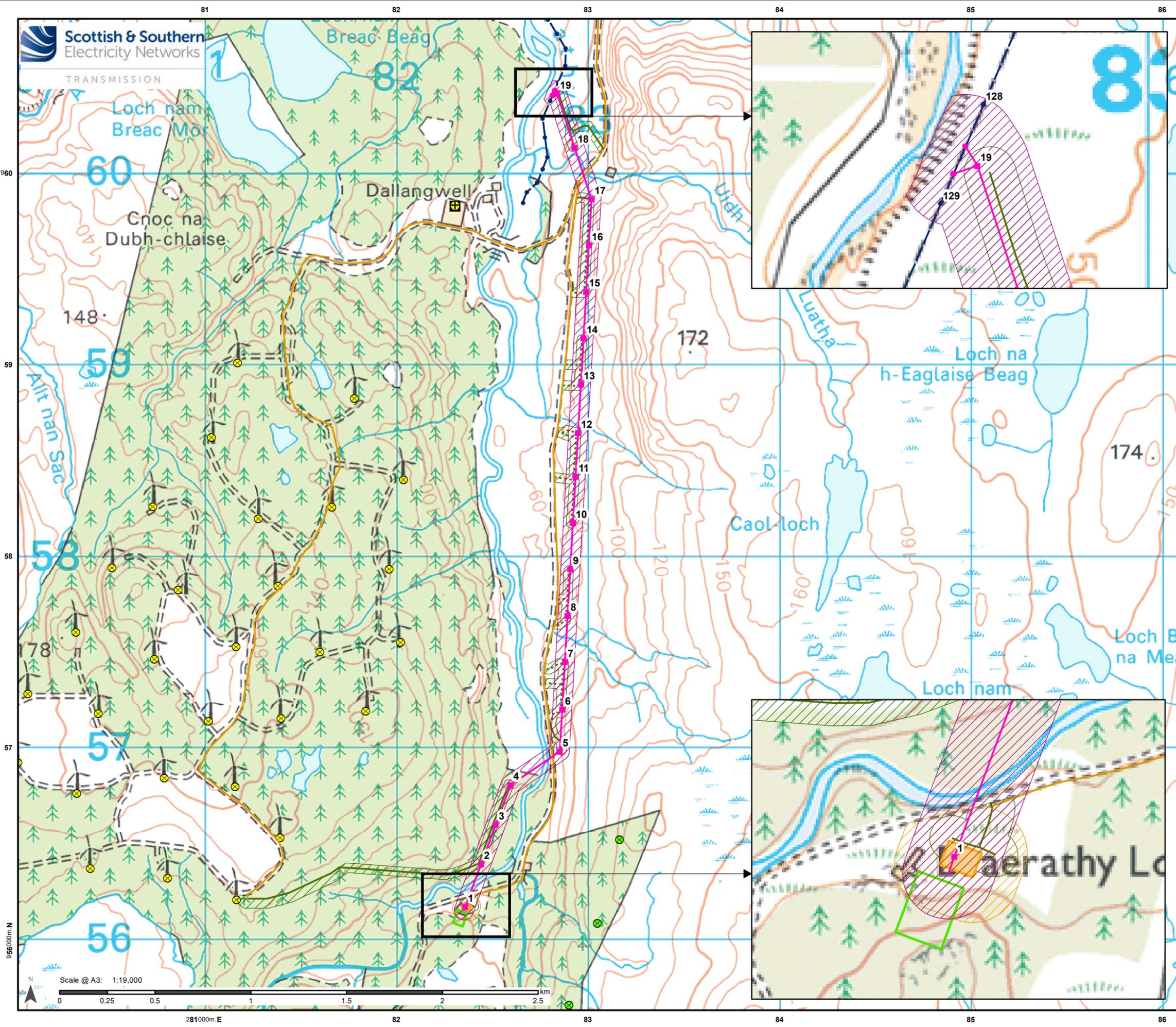
Reproduced by permission of Ordnance Survey on behalf of HMSO.  
© Crown copyright and database rights 2024  
OS AC0000848283. Supplied by: ukmapcentre.com

Project No: LT560  
Project: Strathy South Wind Farm Grid Connection - EIA Report

Title: Figure V1-1.1: Overview of the Proposed Development

Drawn by: MT/SK Date: 07/02/2025

Drawing: 121008-EIA-D-V1-1.1-1.0.0



- ### Legend
- Overhead Line (OHL) Works for which consent under Section 37 of the Electricity Act is sought**
- Proposed Steel Lattice Tower
  - Proposed Wood Pole (H pole)
  - Proposed OHL Alignment
  - ▨ Limit of Deviation (OHL)
- Ancillary Development for which Deemed Planning Consent (Town and Country Planning (Scotland) Act 1997 is sought)**
- Proposed Sealing End Compound
  - ▨ Limit of Deviation (CSE Compound)
  - New Permanent Access
  - ⋯ New Temporary Access
  - ▨ Limit of Deviation (Access Track)
- Existing Infrastructure**
- Existing Wood Pole (H pole)
  - Existing 132 kV OHL (Wood Pole)
  - Existing Access Track
  - ⊗ Strathy North Wind Turbines
  - ⊕ Strathy North Substation
- Consented Infrastructure**
- ⊗ Strathy Wood Wind Turbines
  - ▭ Strathy Wood Substation



Reproduced by permission of Ordnance Survey on behalf of HMSO.  
© Crown copyright and database rights 2024  
OS AC0000848283. Supplied by: ukmapcentre.com

Project No: LT559  
Strathy Wood Wind Farm Grid Connection -  
EIA Report

Title: Figure 3.1.1 - The Proposed Development

Drawn by: FL/ MT Date: 25/10/2024

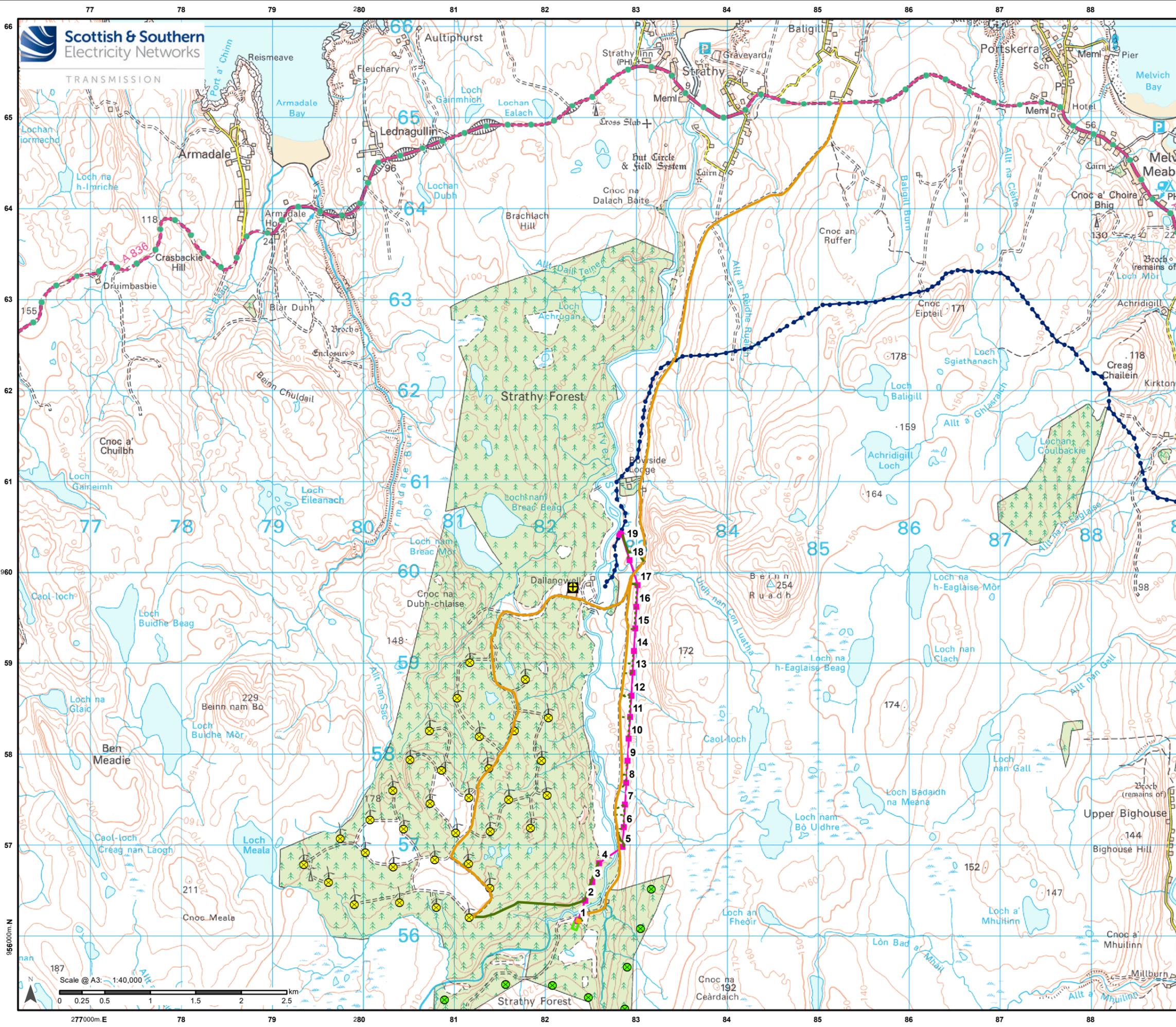
Drawing: 122023-EIA-D3.1.1-1.0.0

Scale @ A3: 1:19,000

0 0.25 0.5 1 1.5 2 2.5 km

956000m N

281000m E 81 82 83 84 85 86



### Legend

**Overhead Line (OHL) Works for which consent under Section 37 of the Electricity Act is sought**

- Proposed Steel Lattice Tower
- Proposed Wood Pole (H pole)
- Proposed OHL Alignment

**Ancillary Development for which Deemed Planning Consent (Town and Country Planning (Scotland) Act 1997 is sought)**

- Proposed Sealing End Compound
- Limit of Deviation (CSE Compound)
- New Permanent Access
- New Temporary Access
- Limit of Deviation (Access Track)

**Existing Infrastructure**

- Existing Wood Pole (H pole)
- Existing 132 kV OHL (Wood Pole)
- Existing Access Track
- ⊗ Strathy North Wind Turbines
- ⊞ Strathy North Substation

**Consented Infrastructure**

- Strathy Wood Wind Turbines
- Strathy Wood Substation



Reproduced by permission of Ordnance Survey on behalf of HMSO.  
© Crown copyright and database rights 2024  
OS AC0000848283. Supplied by: ukmapcentre.com

Project No: LT559  
Strathy Wood Wind Farm Grid Connection -  
EIA Report

Title: Figure 3.1.2 - The Proposed Development

Drawn by: FL/ MT Date: 25/10/2024

Drawing: 122023-EIA-D3.1.2-1.0.0