

Agenda Item	7.1
Report No	PLN/027/26

HIGHLAND COUNCIL

Committee: North Planning Applications Committee

Date: 10 June 2026

Report Title: 25/01055/S37: Scottish Hydro Electric Transmission Plc.
Land Between Strathy North And South Wind Farms, Strathy

Report By: Area Planning Manager - North

Purpose/Executive Summary

Description: 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.

Ward: 01 – North, West and Central Sutherland

Development category: National Development

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 South Wind Farm to the national grid. The 132kV line constitutes a 'National Development' as set out in the Fourth National Planning Framework (NPF4).
- 1.2 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 in Strath Halladale for the following electricity generating stations:
- Strathy North Wind Farm (existing);
 - Strathy Wood Wind Farm (pre-construction, currently satisfying conditions);
 - Strathy South Wind Farm (pre-construction, currently satisfying conditions);
 - Melvich Wind Energy Hub (application awaiting determination by Scottish Ministers);
 - Kirkton Energy Park (refused consent); and
 - Armadale Wind Farm (withdrawn).
- 1.3 In addition to the above, the applicant has since notified the Council of its intention to submit an application for the National Scale Strathy Switching Station (THC ref. 25/02583/PAN), which would be located north of the OHL on higher ground west of the River Strathy and a wind farm access track. The facility would be used to tie-in the grid connection for the pre-application stage Achrugan Wind Farm and battery energy storage system (100MW+ capacity) (THC ref. 24/05142/PAN) into the Connagill cluster grid connection infrastructure, with that wind farm proposed within the same forestry as, and north of, Strathy North Wind Farm. The above grid connections and respective generating stations are considered as part of this current proposal.
- 1.4 The existing Strathy North Wind Farm is served by a wood pole grid connection Overhead Line (OHL). This line has capacity for Strathy North (68MW) and Strathy Wood (63MW) wind farm connections, but not the addition of the consented Strathy South Wind Farm which could generate an additional 208MW of electricity. This application seeks consent to replace the existing Strathy North grid connection infrastructure to double circuit steel lattice towers to consolidate all three Strathy North, Wood and South grid connections to a single double circuit OHL. The OHL could also potentially provide future proofing should new generating stations be approved nearby thereby avoiding the need for additional wood pole supported OHL into Connagill Substation located on the Dounreay to Beaully 275kV transmission line.

- 1.5 This application is interdependent with the Strathy Wood Wind Farm grid connection (THC ref. 24/05153/S37) which was reported to committee in March 2026. Members will recall that the Council's recent objection to the related proposal for the Strathy Wood grid connection was submitted late, meaning that any subsequent procedure following the Committee's decision to uphold its objection to that proposal will be at the discretion of Scottish Ministers.
- 1.6 For this Strathy South Wind Farm grid connection application, Members are asked to note that the Council has timeously Raised Objection pending this report on handling, in accordance with the Electricity Act. This objection was registered prior to the Planning and Infrastructure Act 2025 coming into effect in February 2026 and therefore, should Members decide to uphold this objection in line with Officers recommendation, Scottish Ministers are statutorily obliged to hold a public local inquiry ahead of determination of the application. There is clear merit in holding a conjoint public local inquiry owing to the Strathy South Wind Farm's designed grid connection being entirely dependent on the development of Strathy Wood's grid connection, which for the purposes of this application, therefore, forms part of 'The Project' for the purposes of the environmental impact assessment (EIA).
- 1.7 There are two development options following different routes that the applicant has requested Scottish Ministers consider however only one route is to be developed. The preferred 'Proposed Alignment' would run northwards from east of Strathy North Wind Farm's substation at Dallangwell and east the River Strathy, loosely following the existing Strathy North Wind Farm wood pole grid connection. It would then cross an upgraded forestry track (for use by Strathy Wood and Strathy South Wind Farms) and north of Cnoc Feàrna to head east-northeast across undulating moorland. At Creagan Reamhar, the OHL turns southeast towards Strath Halladale crossing the Halladale River and the A897 west of the Connagill substation at Ceargaraidh Mhòr where it would then connect to the substation via underground cabling. The Proposed Alignment comprises:

Proposed Alignment

- 10.5km of double circuit 132kV OHL supported on 46 steel lattice towers (Towers 19 – 64, including 30 suspension, 15 angle/tension towers, and one terminal tower at the cable sealing end) measuring between 28m and 59m in height;
- a cable sealing end (CSE) compound and 780m of permanent underground cabling to connect to OHL to the substation;
- the formation of 7.4km of new permanent access track, 13.3km of upgraded existing access track, and 5.8km of new temporary access tracks;
- four new permanent and one new temporary watercourse crossings;
- temporary hardstanding working areas around individual towers; and
- 5.75ha of tree felling.

1.8 The 'Proposed Alignment' would be routed through the proposed Melvich Wind Energy Hub and as such, should that wind farm be developed, the applicant has proposed an 'Alternative Alignment' that would loop the OHL around Melvich Wind Energy Hub to its north, adding an additional 3km to the length of OHL in comparison to the Proposed Alignment. Members will recall that THC has objected to Melvich Wind Energy Hub, with the scheme's status still pending determination by Scottish Ministers. It therefore remains uncertain if the scheme will be consented however, in the event that it is, the Alternative Alignment would comprise:

Alternative Alignment

- 13.5km of double circuit 132kV OHL supported on 58 steel lattice towers (Towers 19 – 31, A1 – A27, and 47 – 64, including 15 suspension, three angle/tension towers, and one terminal tower) measuring between 28m and 55.5m in height;
- 30 temporary trident wood poles (H Poles) of between 13.5m and 15m height, with downlead spans of up to 18m from each pole to connect into the existing 132kV H Pole OHL;
- 480m of temporary underground cabling;
- a cable sealing end (CSE) compound;
- the formation of 7.4km of new permanent access track, 13.3km of upgraded existing access track, and 5.8km of new temporary access tracks;
- six new permanent and one new temporary watercourse crossings;
- temporary hardstanding working areas around individual towers; and
- 5.75ha of tree felling.

1.9 The Alternative Alignment would circumvent the Melvich Wind Energy Hub site and therefore change direction to north-eastward from near Airigh an Leathald at Tower 31 towards Cnoc Eadar Dha Allt where it would head southwest to rejoin the Proposed Alignment north of Achridigill Burn at Tower 47. Temporary 15.5m high H wood pole structures would also be required to facilitate the diversion and allow the continued supply of electricity generated from Strathy North Wind Farm to the grid.

1.10 The proposal, comprising either the proposed or Alternative Alignment, in effect replaces and upgrades the current wood pole grid connection for the operational Strathy North Wind Farm. To that end, a 7.1km section of the OHL is proposed to be dismantled and removed (between Dallangwell (Pole 48) and north of the Achridigill Burn (Pole 128)). However, the remainder east section of the operational OHL is proposed to be retained with Table V1-1.1: Connagill Cluster Grid Connections – Proposed Technology Solutions and Consenting Approach advising that Melvich Wind Energy Hub would connect to this OHL via underground cabling. Additionally, Paragraph 3.13.3, EIAR Volume 1, Chapter 3: The Proposed Development, advises that the retention of the section of OHL would allow for the operational Strathy North

Wind Farm to connect onto the proposed double circuit 132 kV OHL for onward transmission to the Connagill substation.

- 1.11 A short section of temporary wood pole OHL would also be required for the Alternative Alignment for the stated purposes of facilitating the construction of the temporary UGC, itself required for the continued transmission of electricity generated by Strathy North Wind Farm to the grid while the new double circuit steel lattice OHL is installed. EIAR Vol 4, Technical Appendix V1-3.7: Dismantling Plan sets out the works required for dismantling the existing OHL.
- 1.12 The applicant has sought horizontal Limits of Deviation (LoD) of 100m, 50m either side of centre line for steel lattice towers, wooden H poles, and underground cabling, along with 50m from the edge of the CSE compound and a 25m micro-siting limit equating to 25m either side of the centre line of the access tracks. Additionally, operational corridors are required for the safe operation and access through woodland and forestry, with 42.5m required either side of the OHL and 12.5m either side of linking tracks. The LoD within wooded sites set the requirements for woodland removal, anticipated at 5.75ha. The applicant has also requested a vertical LoD allowance of up to 4m to increase or decrease the heights of the steel towers where required by ground and topographical conditions. A vertical LoD for the wood pole is not stated however these would be well below the heights of the steel towers. The average span of OHL between towers would be between 200 and 275m.
- 1.13 The anticipated construction period for the development is 21 months (15 months installation and 6 months dismantling works) 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.
- 1.14 The applicant has acknowledged that borrow pits, temporary construction compounds, and local modifications to the existing distribution network would also likely be required for construction purposes. However, the applicant proposes to deal with these associated works under separate applications, and, where necessary, through obtaining separate planning permission. Associated works are, therefore, not considered within this application nor the EIA.
- 1.15 Similarly, the applicant anticipates that works to install underground cables would be permitted development under Class 40 – Electricity Undertakings of the Town and Country Planning (General Permitted Development) (Scotland) Order 1992 (as amended). However, given that these works are part of an EIA project and are, therefore, EIA development (and considered within the EIA), they would not be permitted development and would require deemed planning permission under section 57(2) of the Town and Country Planning (Scotland) Act 1997 should Scottish Ministers grant this S37 consent.

- 1.16 A review of the Environmental Impact Assessment (EIA), in terms of its completeness, i.e., considering the whole project, for the purposes of Regulation 4 of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017, is provided at Appendix 1.
- 1.17 The applicant used the Council's Pre-application Advice for Major Applications Service for the Connagill Cluster of generating station grid connections (THC ref. 23/03059/PREMAJ), with the response advising that the Council would be unlikely to be in a position to support any proposals that impact on the outstanding universal value of the Flow Country World Heritage Site or its setting. The pre-application response, it should be noted, was issued prior to the property's inscription while it was a candidate for inscription. In addition, the applicant undertook EIA Scoping, also covering the complete Connagill Cluster project, prior to submitting the application to the ECU.
- 1.18 Although not statutorily required under The Electricity Act 1989, the applicant conducted public consultation on the 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 V1-4.1 - Public Consultation Report).
- 1.19 The application is also supported by an Environmental Impact Assessment Report (EIAR) with chapters covering: introduction and background; the routing process and alternatives; description of the proposed development; scope of the EIAR and consultation; EIA process and methodology (which sets out that cumulative effects have been considered in combination with Strathy South and Strathy Wood Wind Farms, Kirkton Energy Park, and Melvich Wind Energy Hub, along with their respective grid connections, as well as the proposed Strathy Switching Station, and more developments over a larger area for the cumulative effects on ornithology); landscape and visual effects; ecology; ornithology; soils, geology and water; cultural heritage; traffic and transport; forestry; and, a schedule of mitigation. Volume 5 of the EIAR considers the effects of the proposed Alternative Alignment under the same chapter headings although the scope and consultation as well as the EIA process and methodology issues of Volume 5 are covered in Volume 1. A Planning Statement and Socio-economic and tourism technical note are also submitted as Supporting Information.
- 1.20 The proposal has not materially changed since the application was submitted, nor has any additional environmental or supporting information been provided.

2. SITE DESCRIPTION

- 2.1 : The preferred and alternative OHL route alignments are located on the inland interior and south side of the A836 (forming a part of the North Coast 500 promoted tourist route) over undulating moorland and rough grazing between the between the respective straths of the River Strathy and the Halladale River, over which the OHL would cross, from Dallangwell in the west to the Connagill substation in the east. The alignments also cross several other watercourses, lochs and lochans, taking in both rivers' catchments (with associated known flood risks from coastal, fluvial, and pluvial sources), and commercial forestry. Other than the existing Strathy North Wind Farm wood pole OHL, rough access tracks from the A836 and the U1733 (which will be used by the development), the disused Melvich Landfill, and Scottish Water distribution infrastructure, there is no modern development within the interior area between the straths.
- 2.2 : The majority of the OHL would be within the Sweeping Moorland and Flows Landscape Character Type (LCT)134 with the eastern section crossing Strath – Caithness and Sutherland LCT142. The area is not covered by any landscape designation or areas of wild land with the nearest scenic designations being to the Farr Bay, Strathy and Portskerra Special Landscape Area (SLA) to the north, while the Kyle of Sutherland National Scenic Area is outwith the development's influence.
- 2.3 : The central section of the OHL including all of the Alternative Alignment is located within the Flow Country World Heritage Site (FCWHS). The OHL alignment also crosses a small section of the Caithness and Sutherlands Special Area of Conservation (SAC), the Caithness and Sutherlands Special Protection Area (SPA), the Caithness and Sutherland Ramsar Site, and the West Halladale Site of Special Scientific Interest (SSSI) at a point east of Bowside Lodge, with the majority of the OHL route located north of these Natura2000 designations.
- 2.4 : There are no designated historic assets that would be directly impacted by the proposal however there are 14 nationally designated heritage assets within the study area including the category A listed Bighouse, garden pavilion and walled garden (LB7160), the category B listed Bighouse Mains Steading (LB7140) and Bighouse Barracks (LB7161). The Bighouse Garden Walls and West Gate Piers (LB7159) are category C listed. These assets are east of the Halladale River northeast of Melvich. The Strathy Former Church of Scotland (LB7143), Strathy Free Church of Scotland (LB7144), Strathy Former Free Church School (LB7146), and Strathy former Free Church Manse (LB7145) are north of the OHL alignments and are also category C listed. The Bailgill Burn Limekilns (SM4290), Bailgill Mill (SM4265), and Halladale Bridge Hut Circles (SM3304) Schedule Monuments are on the coastal side of the

A836, or in the case of the latter, on both sides of the road. There are non-designated historic assets within or just outside of the OHL's limits of deviation.

3. PLANNING HISTORY

3.1	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 and associated development for a period of 30 years	APPEAL DISMISSED BY SCOTTISH MINISTERS
3.2	21 January 2026	25/03497/PNO: Prior Notification under Reg. 62 for Strathy South Wind Farm Grid Connection: Underground Cable (UGC)	PRIOR APPROVAL GRANTED
3.3	11 March 2026	24/05153/S37: 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.	S37 RAISE OBJECTION
3.4	24.09.2025	25/02583/PAN: Proposed new switching station and platform with associated buildings, access, laydown/work compound area(s), associated landscaping, site drainage and ancillary works (National Development)	PAN REPORTED TO NPAC
3.5	22 January 2025	24/05142/PAN: Achrugan Wind Farm - Proposal of Application Notice for the erection and operation of a wind farm comprising up to 14 turbines with maximum tip height of 200m, battery energy storage system (BESS), and ancillary infrastructure	PAN REPORTED TO NPAC
3.6	4 September 2024	24/03770/SCOP: 4.25km of Steel Lattice (L7c) double circuit from Strathy Wood substation to a T connection point with the existing Strathy North to Connagill circuit near Strathy North,	SCOPING DECISION ISSUED

One side of this circuit will carry Strathy Wood and the other Strathy South

3.7	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
3.8	13 March 2024	23/01402/FUL: Strathy South Wind Farm alternative access and upgrade works including road widening, water crossing upgrades and replacements, passing places, and drainage	PERMISSION GRANTED
3.9	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 NO OBJECTION
3.10	13 December 2023	23/02320/S36: Melvich Wind Energy Hub - Erection and operation of a wind farm for a period of 40 years, comprising 12 wind turbines with a maximum blade tip height of 149.9m, energy storage facility, access tracks, borrow pits, substation, and ancillary infrastructure	RAISE OBJECTION
3.11	01 February 2023	22/03723/S42: Application for non-compliance with conditions 10 (Aviation Lighting and Information) and Condition 30 (Noise) of deemed planning permission 20/03481/S36 (Strathy South Wind Farm Variation)	APPROVED BY SCOTTISH MINISTERS
3.12	26 October 2022	22/04160/PAN: Construction of access track - alternative access for Strathy South Wind Farm	REPORTED TO COMMITTEE
3.13	12 September 2022	22/02994/SCOP: Melvich Wind Farm - Erection and Operation of a Wind Farm comprising of 15 Wind Turbines with a maximum blade tip height 149.9m, battery energy storage system, access	SCOPING DECISION ISSUED

tracks, borrow pits, substation, control building, met mast and ancillary infrastructure

3.14	08 2021	December	13/04469/S36: Strathy Wood Wind Farm - Erection of up to 13 (amended from 26) wind turbines with a max tip height of 180m and ancillary development	APPROVED BY SCOTTISH MINISTERS
3.15	24 2021	November	20/03481/S36: Strathy South Wind Farm - Application under Section 36 of the Electricity Act 1989 to vary the consented Strathy South Wind Farm to increase the blade tip height from 135 m to up to 200 m and increase maximum consented output from 133 MW to 208 MW	APPROVED BY SCOTTISH MINISTERS
3.16	07 April 2021		21/01847/SCOP: Kirkton Wind Farm - Erection and Operation of a Wind Farm comprising of up to 12 Wind Turbines with a maximum blade tip height of 149.9m, access tracks, anemometry mast, borrow pits, substation, control building, battery storage array and ancillary infrastructure.	SCOPING DECISION ISSUED
3.17	22 July 2020		20/02331/SCOP: Installation of 4 km, 132 kV overhead electricity line between Strathy Wood wind farm sub-station and Strathy North wind farm sub-station	SCOPING DECISION ISSUED
3.18	07 June 2019		19/02068/SCOP: Proposed development to construct and operate wind farm	SCOPING DECISION ISSUED
3.19	27 April 2018		07/00263/S36SU: Wind farm consisting of 47 turbines including access tracks, temporary borrow pits, anemometer masts, control building, switching station and underground cabling.	APPROVED BY SCOTTISH MINISTERS
3.20	3 January 2014		13/03853/OHL: Proposed south circuit 132kV double wood pole ('H) trident lines from Strathy North _ South Windfarms, Strath Halladale to the new Connagill substation at Dallangwell.	S37 RAISE NO OBJECTION

3.21 25 June 2012 12/02145/SCRE: Construction of new 132kV overhead transmission line connection. SCREENING - EIA NOT REQUIRED

4. PUBLIC PARTICIPATION

4.1 Advertised: EIA Development

Date Advertised: 17 and 24 March 2025 and 30 April 2025 in the Edinburgh Gazette, Northern Times, and John O’Groat Journal.

Representation deadline: 30 May 2025 (ECU deadline)

4.2 Representations received by THC: 0

Representations received by the ECU: 2 objections (1 of which is submitted on behalf of two third parties)

4.3 Material considerations raised are summarised as follows:

- a) Concern regarding the EIA process and whether the EIA covers the whole project;
- b) Conformity with the Strategic Spatial Plan for Energy Infrastructure;
- c) Conformity with the Electricity Act 1989 and the development plan;
- d) Impacts on peat;
- e) Landscape and visual impacts including cumulative impacts with Melvich; and
- f) Impacts on ornithology.

4.4 All letters of representation received are available for inspection on the ECU’s website at <https://www.energyconsents.scot/> using the ECU’s reference ECU00005081.

5. CONSULTATIONS

Community Councils

5.1 **Melvich Community Council (host)** did not respond to the consultation request.

5.2 **Bettyhill, Strathnavar and Altnaharra Community Council** did not respond to the consultation request.

5.3 **Caithness West Community Council** did not respond to the consultation request.

5.4 **Strathy and Armadale Community Council** did not respond to the consultation request.

Highland Council Consultees

- 5.5 **Archaeology (Historic Environment Team)** does not object and considers that archaeological interests are appropriately considered within the EIAR including for mitigating impacts on the archaeological interests during construction activities, which should be secured by condition by way of the Construction Environmental Management Plan, along with a condition to secure its approval of a Written Scheme of Investigation prior to works commencing on site, to include provision of Post-Excavation Research Design as may be required.
- 5.6 **Development Plans** does not object to the application but advises that it may be appropriate for the Council to object to Scottish Ministers following an assessment of its impacts on the attributes and integrity of the Flow Country World Heritage Site, taking account of the UK's international obligations for protection and management of the property. Advises on other policy considerations including local place plans, and potential developer contributions.
- 5.7 **Ecology Officer** does not object and has no site specific comments due to NatureScot being the lead authority as the site is within the Flow Country World Heritage Site, which is a natural heritage designation.
- 5.8 **Environmental Health** does not object and agrees that operational noise is unlikely to be a significant issue provided due consideration is given to potential noise sources such as plant. Advises that a construction noise impact assessment may be required if noise generating construction activities that would be audible at noise sensitive properties are carried out outwith standard working hours (Mon – Fri 8am to 7pm, Sat 8am to 1pm), along with a scheme to protect properties from construction dust, and to protect private water supplies that may be impacted by the development.
- 5.9 **Flood Risk Management Team** does not object on flood risk grounds and advises on the design principles that should be implemented to ensure the development is not at risk of flooding or of causing flooding elsewhere.
- 5.10 **Forestry Officer** does not object subject to conditions to secure a compensatory planting plan, including with future maintenance, with an enhanced area of planting to the 5.34ha of native woodland and 0.41ha commercial forestry lost to development. The Forestry Officer also requires a restriction on tree removal until it is satisfactorily demonstrated that construction activities are imminent.
- 5.11 **Landscape Officer** does not object but advises that the proposal would result in significant effects on parts of Sweeping Moorland and Flows, and, Strath – Caithness and Sutherland Landscape Character Types, and that there would be significant visual effects, including cumulative effects, on visual receptors to the north and along Strath Halladale.

5.12 **Transport Planning objects** to the application on the grounds of the unreliable data included with the Traffic Assessment and on the lack of detail regarding current road condition and the scale of upgrade works required for Council maintained roads.

Consultations undertaken by the Energy Consents Unit

5.13 : **British Horse Society** does not object and welcomes that equestrians have been considered within the outline construction traffic management plan. It advises of the importance of off-road riding to equestrians along with the potential for improvements to equestrian access, and of the contribution made by equestrians to the national economy.

5.14 : **British Telecom** does not object and advises that the proposal will not interfere within its current or planned radio network although its response only appears to have considered the proposed and not the Alternative Alignment.

5.15 : **Historic Environment Scotland** does not object. It has considered impacts in relation to the setting of category A listed Bighouse, garden pavilion and walled garden (LB7160) and advises that there would be no significant effect on the asset's setting, including from the proposed alternative OHL alignment.

5.16 : **NATS Safeguarding** does not object and advises that the proposal would not conflict with its safeguarding criteria.

5.17 : **Northern District Salmon Fishery Board** does not object and expresses its trust that the developer will ensure that no water quality issues arise during construction activities, and the works are timed to ensure salmon spawning beds are not disturbed.

5.18 : **NatureScot objects** to the application on the grounds of impacts to the peatland habitat Outstanding Universal Value of the Flow Country World Heritage Site. It has requested a National Vegetation Classification survey of the OHL alignment and tracks, an assessment of habitat losses for blanket bog, wet heath and others, as well as detail of construction methods, and a restoration plan. It advises that offsetting of World Heritage Site Outstanding Universal Values is inappropriate and that the precautionary principle should be applied where insufficient information is provided to predict impacts on the Outstanding Universal Value, which should never be put at risk. It considers that the qualifying wet heath peatland habitat of the Caithness and Sutherland SAC would not be significantly impacted and that appropriate mitigation can be implemented to ensure its other qualifying interest is not significantly impacted and therefore the overall integrity of the designation would remain intact. It considers that impacts on the avian qualifying interests of the Caithness and Sutherland SPA can be mitigated through implementation of a Bird Protection Plan and line markers being installed on the OHL itself. It advises that its appraisal of impacts on both the Caithness and Sutherland Peatlands SAC and SPA qualifying interests has fully addressed the Caithness and Sutherland RAMSAR site interests. It does not consider

the proposal likely to affect the avian qualifying interests of the North Caithness Cliffs SPA.

- 5.19 : **Office of Nuclear Regulation** does not object and advises the proposal does not present a significant external hazard to the safety of the nuclear site.
- 5.20 : **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 on the grounds that it does not believe that impacts on the qualifying red-throated diver, black-throated diver, hen harrier, and merlin interests of the Caithness and Sutherland SPA have been satisfactorily demonstrated to not be significantly adverse.
- 5.21 : **Scottish Environmental Protection Agency** does not object subject to conditions to secure its approval of a finalised peat management plan prior to development commencing on site and its approval of all new and upgraded watercourse crossings.
- 5.22 **Transport Scotland** does not object and advises that impacts on the trunk road network will not be significant and do not require specific mitigation.

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 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 Section 37 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 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 and defines the boundaries of Special Landscape Areas rather than planning policies of relevance for the proposed development. Additionally, the
- 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.
- 7.8 It is noted here that while there are no references to the Flow Country World Heritage Site in the CaSPlan, which was adopted in 2018, its inscription as a World Heritage Site by 2030 is a stated ambition for Caithness and Sutherland in the Highland-wide Local Development Plan, adopted in 2012. With that ambition now achieved, impacts on the actively accumulating peatland habitat Outstanding Universal Value (OUV) of the property are a key deciding factor on the acceptability of all proposals, given that such impacts cannot be mitigated or offset. It is NPF 4 Policy 7 Historic assets and places at Part I) that specifically seeks to protect the OUVs of World Heritage Sites in Scotland, albeit if for cultural designations, with NPF4 Policy 4 Natural Places at Part a) that seeks to protect the natural environment from inappropriately sited and scaled development. In this instance, owing to the siting of the OHL within the newly inscribed World Heritage Site, and its direct and indirect impacts on the OUV, the proposal is found to be not in overall conformity with the development plan, with further assessment of this and all other material considerations set out within the remainder of this report.

Energy and Economic Impacts

- 7.9 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 sets out that the OHL will transmit the 208MW capacity of electricity from Strathy South Wind Farm, while connecting Strathy Wood Wind Farm (63MW) and Strathy North Wind Farm (68MW), and that the double circuit 132kV OHL (with a section proposed to operate at 275kV if required for future connections) will carry a total of 3,250MW to the national grid (Paragraph 3.1.1, Planning Statement). Given that this contribution to the transmission network from renewable sources, 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.
- 7.10 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.

- 7.11 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 21 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.
- 7.12 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

- 7.13 Much of the proposed OHL's route is well away from noise sensitive receptors meaning that construction noise from the OHL installation works themselves are unlikely to be a significant issue.
- 7.14 However, the delivery of construction materials and components would be via the A9 between Georgemas Junction and Scrabster, the A836 from Thurso, the U1733 Kirkton Road west of the Halladale River from its junction with the A836 up to the end of where it is adopted by the Kirkton Cemetery where it becomes the Kirkton – Upper Bighouse Core Path (SU19.03), which would also be used construction traffic following upgrade works, and the A897 from its junction with the A836 to just south of the Connagill Substation (including for aggregate from Ackron Quarry). As such, construction traffic would pass through several settlements including Reay and Melvich, as well as individual properties along these routes with potential for amenity impacts.
- 7.15 The development will require use of several access tracks and junctions. In all, 13.3km of existing track would be upgraded, 7.5km of new permanent and 5.8km of temporary spur and linking tracks would be installed. Three accesses would be taken directly from the A836, two from the U1733 Kirkton Road west of the Halladale River,

and an additional new access from the A897 near the Connagill substation (see Figure 2 Access Junction Locations, Volume 4: Appendix V1-11.1: Traffic Assessment). While the westernmost access at Strathy would be via the existing upgraded wind farm track from the A836, which requires no upgrades for this development, the junctions from the A836 near Melvich and from the Kirkton Road would require upgrading however the A897 junction would be new.

- 7.16 The Traffic Assessment has assumed a construction period of 21 months and that that aggregate would be sourced from quarries off the A897 at Ackron. It 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 months 7 and 8 (Annex B: Traffic Programme of EIA Volume 4: Appendix V1-11.1: Traffic Assessment, and, EIA Volume 5, Chapter 9: Table V5-9.5: Construction Traffic Programme – Alternative Alignment,) and short lived.
- 7.17 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 generally notes that people are more 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.
- 7.18 Should the applicant intend to undertake work that is audible at noise sensitive properties outwith the above standard times, including access and egress of HGV construction traffic, then a detailed construction noise assessment could be secured by condition, which should demonstrate that amenity impacts from construction noise would be within acceptable limits. For the avoidance of doubt, this would include any proposal to run compound generators overnight for the purposes of lighting or any other requirement.
- 7.19 A scheme detailing mitigation measures to be put in place to suppress dust during the construction phase can also be controlled by condition.
- 7.20 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. SSEN's General Environmental Management Plans have been submitted with the application covering matters such as Dust Management Oil Storage and Refuelling, Soil Management, Working in or Near Water, Working with Concrete, Working in Sensitive Habitats, Waste Management, Watercourse Crossings, and Restoration amongst others, have been submitted with the application. These documents would inform a project-specific comprehensive Construction Environmental Management Plan (CEMP) to include an updated

Schedule of Mitigation. The CEMP would also be required to give consideration of concurrent construction on activities on nearby wind farm and OHL schemes to ensure that cumulative impacts from construction noise and dust on residents and other sensitive receptors in the area are appropriately mitigated. The above considerations should be secured by condition.

Design, Landscape and Visual Impact

- 7.21 Members will recall that the rationale for the use of steel lattice towers is to combine the grid connections of the Connagill Cluster generating stations using a single OHL rather than two separate wood pole OHLs, as steel structures are able to transmit a larger capacity and would provide future proofing to the project.
- 7.22 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 South, Strathy Wood, Strathy North, and potentially the proposed Achrugan Wind Farms to the grid against environmental, technical, and economic constraints following the industry standard 'Holford Rules'. Broadly stated, the rules advocate 'avoiding areas of high amenity value, minimising changes in direction, taking advantage of topography, and minimising visual interaction with other transmission infrastructure' (Section 2.5, EIAR Volume 1, Chapter 2: The Routeing Process and Alternatives). It is noted here that the routeing process was undertaken prior to the inscription of the Flow Country World Heritage Site (see Paragraphs 7.63 – 7.69 below).
- 7.23 Based on the above principles, the applicant advises that the corridor of the existing Strathy North Wind Farm grid connection was found to be suitable for the change from OHL supported on wood pole to steel lattice tower, taking account of additional landscape and visual effects. For example, the EIAR advises that the route has sought to avoid skylining as well as to target ridges, open valleys, and woods by keeping close to landscape type edges and transitions in order to reduce effects of the tower scales and prominence. The applicant has also considered effects produced by proximity to other lines such as confusing and domineering wirescape effects, which provides additional rationale for the Connagill Cluster taking advantage of shared infrastructure. Although, it is also noted that the section of existing wood pole OHL between the Melvich Wind Energy Hub onsite substation and the Connagill Substation would be retained for its grid connection.
- 7.24 Taking the alternative route through Melvich Wind Energy Hub would require underground cabling through third party land and deep peat to avoid cable interference with turbines and associated cable connections. The EIAR also cites the lack of existing access opportunities as well as engineering and economic difficulties with adding future connections to, and maintenance of, existing UGC as major constraints to the practicality of such a routeing (Section 2.5, EIAR Volume 5, Chapter 2: The Routeing Process and Alternatives – Alternative Alignment). As proposed, the

Alternative Alignment avoids most natural heritage designations with minimised impacts on their qualifying interests but has not avoided the now inscribed Flow Country World Heritage Site.

- 7.25 The applicant has also concluded that a deviation from the current Strathy North Wind Farm grid connection corridor so that the new OHL approaches Connagill Substation more from the south means that it would result in a reduction of landscape and visual effects. For example, the OHL 'would cross Strath Halladale away from the more open valley area and would make better use of the local landform, helping the OHL to appear less prominent from the strath and nearby sensitive properties'.
- 7.26 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.
- 7.27 However, since the FCWHS' inscription, Kirkan Wind Farm has been refused by Scottish Minister while substantial amendments have been tabled for Melvich Wind Energy Hub as it awaits public local inquiry, both of which would be sited within the property. With the FCWHS in mind, officers had advised the applicant at the pre-application stage to reconsider the OHL's form and routing, including of the potential to route the east-west elements of the connection further to the north alongside the A836 / North Coast 500 (NC500). Given the tourism significance of this route and proximity to the Farr Bay, Strathy and Portskerra Special Landscape Area and the vicinity of settlements, the applicant was also advised that undergrounding the route at this point would be establish a more environmentally acceptable means of connecting the consented wind farms to the grid. It is unclear then why the applicant has not sought to explore this further with Officers and continued to pursue the design as submitted. Nevertheless, the Council is obliged to appraise the landscape and visual effects of the proposal as submitted, which is provided below.

Landscape Effects

- 7.28 The proposal is located almost entirely within the Sweeping Moorland and Flows Landscape Character Type (LCT) LCT134 as identified in the NatureScot's National Landscape Character Assessment (LCA) (2019) although where its eastern section crosses Strath Halladale it cuts through LCT142: Strath – Caithness and Sutherland.
- 7.29 There is a section of LCT136: Rocky Hills and Moorland to the east of the study area that hosts some Strathy North Wind Farm turbines, and pockets of LCT144: Coastal Crofts and Small Farms, LCT141: High Cliffs and Sheltered Bays along the north coast and an area of LCT140: Sandy Beaches and Dunes at the mouth of the

Halladale River at Melvich Bay. The applicant has undertaken an assessment of impacts on each of these LCTs for both the proposed and Alternative Alignments.

- 7.30 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. Thus the LCT hosts the majority of the nearby turbines of the existing Strathy North Wind Farm, as well as all the under construction turbines of Strathy Wood and Strathy South Wind Farms.
- 7.31 The specific hosting section of the LCT includes the strath of the River Strathy and is characterised by a low-lying smooth moorland covered plateau between the steeper moorland covered hills and strath sides of the River Strathy and Halladale River to the west and east, and slopes facing the north coast. The plateau is punctuated by low summits such as Cnoc Eipteil, lochs and lochans such as Loch Baligill, and several watercourses including the Baligill Burn and Allt na Cléite. There are isolated estate properties along the Strathy River strath and residential properties at Kirkton to the east, along with other isolated manmade structures and rough tracks. Commercial forestry is generally contained to the west of both rivers, with the larger part to west of the River Strathy.
- 7.32 The western section of the OHL would follow the route of the wind farm access track northwards before moving into the remote moorland interior while the Alternative Alignment would bring the OHL closer to the LCT's northern slopes. The eastern section of OHL would run close to, and above, the edges Coastal Crofts and Small Farms, and, Strath- Caithness and Sutherland LCTs.
- 7.33 Direct and indirect landscape effects on LCT134: Sweeping Moorland and Flows would result from the towers introducing scale indicators that perceptibly reduce the scale of the low hills, in particular where they are skylined, while also reducing the sense of remoteness afforded by the LCT. The proposal would make OHL grid connection and energy development a starker feature of the moorland by using larger steel infrastructure, which, as the EIAR sets out, would be locally prominent, increase the LCT's association with grid infrastructure thus 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.
- 7.34 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 along with the presence of the OHL and Towers. The worst of the effects are anticipated during the construction period, although reducing during the operational phase following the reestablishment of vegetation. Given the overall scale of the LCT, the EIAR assesses the same minor-moderate and not significant level of direct landscape effects for the Proposed Alignment but a moderate and significant level of

direct landscape effects during both the construction and operational phases of the Alternative Alignments.

- 7.35 Significant indirect effects on the character of the Sweeping Moorland and Flows are not predicted for the Proposed Alignment, either during the construction phase or while in operation. However, moderate and significant indirect landscape effects are predicted within the study area for the Alternative Alignment both during the operational phase and while operational.
- 7.36 Similarly, on ground infrastructure and the presence of the OHL and towers will introduce new direct effects on LCT142: Strath – Caithness and Sutherland including a cable sealing end (CSE) compound. As with LCT134, the towers would introduce scale indicators that perceptibly reduce the scale of the low enclosing hills, particularly where they break the skyline. The OHL will cut across the strath disrupting channelled views and contrasting the linear settlement pattern. The proposal would result in a perceptual reduction in scenic quality and intensify the strath's association with energy development in combination with existing OHL and other energy development.
- 7.37 The EIAR assesses the same medium magnitude of change, and moderate and significant level of direct landscape effects, for both the proposed and Alternative Alignments during construction. However, the level of direct landscape effects on LCT142 is predicted to reduce to not significant once the OHL is operational for the Proposed Alignment, while remaining at a significant level of direct landscape effect for the Alternative Alignment during its operational lifetime.
- 7.38 As for indirect landscape effects on LCT142, the EIAR assesses the same medium magnitude of change, and moderate and significant level of indirect landscape effects during construction, reducing to not significant once operational for the Proposed Alignment, but remaining significant if the Alternative Alignment is built out.
- 7.39 Although there is predicted theoretical visibility of the OHL within the neighbouring LCTs, the proposal would be visible from a relatively greater distance as slender towers behind or in combination with substantially larger existing, under construction or proposed turbines, where they are more likely to be screened by physical features such as topography and woodland, or backdropped from higher ground. Consequently, the towers would have a minor level of effect on the overall character of the neighbouring areas of LCT136: Rocky Hills and Moorland, LCT144: Coastal Crofts and Small Farms, LCT141: High Cliffs and Sheltered Bays, LCT140: Sandy Beaches and Dunes.
- 7.40 In terms of the future baseline, cumulative landscape effects have been assessed in combination with the now refused Kirkton Energy Park, its grid connection, and the Strathy Switching Station. For the Proposed Alignment, Melvich Wind Energy Hub is not considered given that the Alternative Alignment is proposed in the event that it is

consented and built out. For the same reasons, Melvich Wind Energy Hub is considered as part of the baseline for the in solus effects of the Alternative Alignment.

- 7.41 The EIAR judges the cumulative effects on the LCTs resulting from both the addition of the Proposed Alignment to be no greater than the effects assessed for the in solus developments, which takes account of the existing and approved energy developments in the area (and Melvich Wind Energy Hub for the Alternative Alignment). Nor does the EIAR judge the additional cumulative effects on the LCTs to be greater than the effects that would arise from Kirkton Energy Park, its grid connection, and the Strathy Switching Station, although the full landscape effects of the pre-application proposed switching station are yet to be assessed.
- 7.42 In summary, significant direct and indirect cumulative landscape effects are predicted for LCT134: Sweeping Moorland and Flows for the proposed and Alternative Alignments. For LCT142: Strath – Caithness and Sutherland, the EIAR predicts not significant direct cumulative landscape effects but significant indirect cumulative effects on the character of the LCT.
- 7.43 The Council's landscape officer agrees that the introduction of both the proposed and Alternative Alignments will introduce significant effects on the character of both the Sweeping Moorland and Flows, and the Strath – Caithness and Sutherland LCTs, including that there would be a marked reduction in their scenic qualities, and advises that the level of effect would be higher than that assessed within the EIAR. However, the landscape officer has not objected on the grounds of unacceptable landscape effects.
- 7.44 In terms of designated landscapes, there are no national, regional, or local landscape designations including Wild Land Areas, covering the site. The nearest national designation is the Kyle of Tongue National Scenic area of 12km west of Bowside Lodge, and outside the influence of both the proposed and Alternative Alignments. As such, the effects of the proposal are not considered against the NSA's Special Qualities.
- 7.45 The regionally designated Farr Bay, Strathy and Portskerra Special Landscape Area is less than 2km north of the Proposed Alignment and less than 500m north of the Alternative Alignment. The SLA is, in part, characterised by 'deeply indented coastline of rocky headlands and sheltered bays, backed by a colourful and diverse mosaic of moorland and crofting landscapes'. Its Special Qualities are cited as Dramatically Intricate Coastline and Forceful Sea, Moorland and Crofting Mosaic, Big Skies and Extensive Views, and, Historical Dimension. Tall vertical structures are cited as a sensitivity to change where they are 'visible in views along the coast and could be inappropriate in scale in relation to the domestic scale of existing buildings and settlements'.

- 7.46 Some direct physical effects would occur within the SLA boundary where access junctions are upgraded however these upgrades would have negligible impact on any of the SQs (although kerbed engineered accesses may be out of character for the rural location and should be removed after construction where possible). The larger part of the effect would be on the Moorland Crofting Mosaic as well as the Big Skies and Extensive Views Special Qualities, given that these describe, or relate more to, interior areas that provide backdrop and context to the coastal SLA. The EIAR anticipates the Proposed Alignment to result in a minor and not significant level of effect on the Moorland and Crofting Mosaic Special Quality and a negligible not significant level of effect on the Big Skies and Extensive Views Special Quality. Similarly, the EIAR anticipates minor and not significant levels of effect on both the Moorland Crofting Mosaic, and the Big Skies and Extensive Views Special Qualities stemming from the Alternative Alignment.
- 7.47 As with the LCTs above, the applicant judges the cumulative effects on the Special Qualities resulting from both the addition of the proposed and Alternative Alignments to be no greater than the effects stemming from the addition of Kirkton Energy Park in isolation. The Council's landscape officer also agrees with the assessment of significance on the in the EIAR however considers that the level of effects on the Special Qualities would be greater than as assessed by the applicant however has not objected on the grounds of unacceptable impacts on the SLA's Special Qualities.

Visual Amenity Effects

- 7.48 The EIAR has identified several sensitive place-based visual receptors in the area surrounding the OHL route including building-based receptors (largely residential properties and those providing holiday accommodation that have been assessed as a single group), recreational and route receptors including paths as well as road, and other outdoor based receptors such as locations where users are not moving through the landscape such as car parks and cemeteries. The receptors are located to the west including along the wind farm access track and the River Strathy, to the north along the A836, the north coast. and settlements at Strathy, Portskerra, and Melvich, and to the east, including receptors within Strath Halladay such as the Halladale River and the A897.
- 7.49 The Visual Impact Assessment is supported by visualisations from the following Visualisation Locations (VLs):
- Visualisation Location 1: Strathy Cemetery
 - Visualisation Location 2: A836 near Bighouse
 - Visualisation Location 3: A897 near Golval
 - Visualisation Location 4: A897 at Loch Earacha
 - Visualisation Location 5: Totegan near Strathy Point
 - Visualisation Location 6: Melvich War Memorial (Alternative Alignment only).

- 7.50 The applicant has not undertaken an assessment of visual effects for each of the Visualisation Locations (VLs) so no judgement on the level of effects including its significance is provided, which is generally preferred as it helps to understand the assessor's logic in establishing the extent of significant visual effects, which can then be extrapolated to different receptors. However, in this instance, the lack of VL analyses is less problematic as the VLs generally conform with the locations of receptors where the applicant anticipates significant visual effects.
- 7.51 Table V1-6.14: Summary of Visual Effects on building based visual receptors, Table V1-6.15: Summary of Visual Effects on route based visual receptors, and Table V1-6.16: Summary of Visual Effects on outdoor based visual receptors, all set out the applicant's judgement on the significance of visual effects on place-based receptors resulting from the Proposed Alignment.
- 7.52 Table V5-4.4: Summary of Visual Effects on building based visual receptors, Table V5-4.5: Summary of Visual Effects on route based visual receptors, Table V5-4.6: Summary of Visual Effects on outdoor based visual receptors each set out the applicant's judgement on the significance of visual effects on place-based receptors resulting from the Alternative Alignment.
- 7.53 The full assessments are set out in EIAR Volume 4 Technical Appendix V1-6.5: Visual Assessment Tables and V5-4.3: Visual Assessment Tables – Alternative Alignment. As for cumulative landscape effects, the future baseline cumulative visual effects have been assessed in combination with the now refused Kirkton Energy Park, its grid connection, and the Strathy Switching Station. Melvich Wind Energy Hub is not considered in the cumulative visual assessment of the Proposed Alignment but is included in the baseline for the in solus effects of the Alternative Alignment given that that the Alternative Alignment is only proposed in the event that Melvich Wind Energy Hub is consented.
- 7.54 For the Proposed Alignment, the EIAR has assessed that significant effects will occur within the 5km study area:
- West of the OHL (no corresponding VLs, however the VL provided for Strathy Wood Wind Farm Grid Connection demonstrates indicative effects) –
 - Property receptors - Bowside Cottage;
 - Route receptors – Scottish Hillside Track 344 (corresponding with the wind farm access track);
 - Outdoor receptors – none.

These effects will generally occur along the strath of the River Strathy close to the OHL, and correspond to similar effects described for the Strathy Wood Wind Farm Grid Connection (THC ref. 24/05153/S37). Namely, that the OHL will result in a dense arrangement of receding towers for receptors experiencing them in views along the track northwards, and southwards in

combination with the Strathy Wood Wind Farm Grid Connection. There would, therefore, be some visual clutter, particularly when experienced with the turbines of approved wind farms visible from the strath. The sweep of the OHL would be apparent to receptors. Significant effects at Bowside Cottage are predicted to extend beyond the construction phase of development with the addition of the Proposed Alignment into the OHL's operational lifetime as opposed to the assessed significant visual effects at the receptor during construction only as assessed for the Strathy Wood Wind Farm Grid Connection;

7.55

- North of the OHL –
 - Property receptors – properties on minor road to Strathy Point (no corresponding VL, nearest VL5: Totegan near Strathy Point), properties at Baligill (no corresponding VL, nearest VL1: Strathy Cemetery), properties east of Bighouse Lodge (VL2: A836 near Bighouse, 3km to nearest tower);
 - Route receptors – A836 east- and west- bound (VL2: A836 near Bighouse);
 - Outdoor receptors – none.

For property receptors, the EIAR advises that the significant effects occur beyond 3km, particularly for elevated properties, where multiple towers are visible including towers that breach the skyline. towers. For westbound travellers on the A836, effects increase from 5km to around 2.5km from the OHL with the larger part of the visual effects occurring from the descent to Strath Halladale to Melvich where buildings would obscure views, although where visible the effects would be significant. Similarly for eastbound travellers on the A836,

7.56

- East of the OHL –
 - Property receptors – properties at Strath Halladale North (nearest VL3: A897 near Golval), properties at Kirkton (nearest VL3: A897 near Golval), and Tigh na Breac, Strath Halladale (nearest VL3: A897 near Golval);
 - Route receptors – A897 north- and south- bound, U1733 Kirkton Road southbound only, and Core Path SU19.03 (unadopted track south of Kirkton Road);
 - Outdoor receptors – Kirkton Cemetery.

Visual effects will increase for affected properties moving south from around 2.5km at Strath Halladale North through properties at Kirkton between 2.5km and 1km, to Tigh na Breac within 1km of the nearest tower. The towers will be new tall manmade structures in sections of the view or they add comparatively much taller manmade structures in those sections where they overlap and cross with the existing wood pole OHL, thus creating some visual clutter. Other significant effects stem from medium to high numbers of towers visible with several breaching the skyline.

For the A897, the U1733, and Core Path SU19.03, significant effects increase on approach to where the OHL descends Strath Halladale's western slopes and crosses the strath floor, particularly when in forward facing views, and as the CSE comes into clear view.

For Kirkton Cemetery, several towers would be visible from around 600m and beyond where their scale is apparent, with several breaching the skyline

7.57 The Alternative Alignment would bring the OHL closer to receptors further north and extend the influence of towers and wire along the western extent of Strath Halladale thus increasing the level of effect for those receptors already described. The EIAR has assessed that additional significant effects will occur at:

- North of the OHL –
 - Property receptors – properties on A836 west of Portskerra (VL6: Melvich War Memorial), Melvich Park Cottage and Coastline Café, properties south of the Coastline Café (VL6: Melvich War Memorial);
 - Route receptors – as above; and
 - Outdoor receptors – Melvich and Portskerra War Memorial (VL6: Melvich War Memorial).

For property based receptors and Melvich War Memorial, the Alternative Alignment would be seen from around 785m away, ahead of the Melvich Wind Energy Hub and even partially looping the wind farm, where the scale of the towers would be apparent, and the scale difference between towers and turbines would create visual dissonance and the interaction between the features would create visual clutter. Further visual clutter would occur where the OHL and towers interact with the wood pole supported OHL. Other significant effects stem from several towers breaching the skyline.

The EIAR states that, for property based receptors, ' the Alternative Alignment would be seen as a partially encircling loop around the wind farm development and would result in a noticeable further deterioration in the quality of [...] view[s]'.

Landscape and Visual Summary

7.58 It is clear that the OHL wire and towers will result in an upscaling of grid infrastructure for locations near its route and as assessed within the EIAR and set out above, the proposal would contribute to a change in landscape character and the character of views. Officers are in agreement that there would be significant effects on the Sweeping Moorland and Flows as well as the Strath Halladale area of the Strath – Caithness and Sutherland LCTs, and that there would not be significant effects on the Special Qualities of the Farr Bay, Strathy and Portskerra SLA, as well as for resident, recreational, and road user visual receptors.

- 7.59 However, while Strathy South, Strathy Wood, and Strathy North Wind Farms, and indeed Melvich Wind Energy Hub if eventually approved, would be the larger characterising manmade features within the landscape and views, officers consider that there would be a greater level of effect from the OHL than that set out in the EIAR. The main concern is the scale of the development, which officers consider would result in greater and additional significant visual effects from a number of receptors, particularly when experienced from the north and along Strath Halladale.
- 7.60 On the above basis, officers advise that the design of the proposal is inappropriate for its location and maintain that the most appropriate design would see the east-west elements of the connection brought further north to the A836 where they should be undergrounded to the Connagill Substation. Given the tourism significance of the A836 route, forming part of the NC500, and the proximity of the Farr Bay, Strathy and Portskerra Special Landscape Area, as well as the vicinity of settlements, officers consider such a design to be a more environmentally acceptable means of connecting the wind farms in the area to the grid. Subsequently, it is considered that the significant visual effects are not appropriately mitigated to reduce the prominence of the OHL in views from several resident, recreational, and road user receptors and are unacceptable. Reason X, therefore, sets out the officer recommendation that the proposal should also be objected to on visual impact grounds.

Natural Heritage

- 7.61 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 (for the Alternative Alignment the corresponding chapters are Chapter 5 and Chapter 6 in EIAR Volume 5). These chapters are supplemented by figures and appendices reflecting survey work including results and conclusions undertaken in support of the submission.
- 7.62 In terms of Designated Sites, and as set out in Paragraph 2.3 above, the central sections of proposal are within the Flow Country World Heritage Site (FCWHS). Only a small portion near Bowside Cottage is within 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. The applicant has provided an FCWHS Impact Assessment, and a Shadow Habitats Regulations Assessment for the Caithness and Sutherland Peatlands SAC / Ramsar. 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.
- 7.63 **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. The EIAR advises that the proposal is predicted to result in the direct and indirect loss of 25.8ha of blanket bog habitat within the WHS, although NatureScot advises that it is not clear whether this calculation includes true wet heath or wet heath vegetation as the data is not presented in the format of a National Vegetation Classification survey (NVC) as required for EIA. This format is important because it provides a higher level of detail on plant communities to inform soil properties, hydrology, and the conservation status of the surveyed habitats. Moreover, the full extent of habitat loss is not evidenced as the construction methodology to install on-ground infrastructure is not provided. This information would provide a higher level of certainty of direct and indirect habitat loss.

- 7.64 NatureScot has not explicitly objected on the grounds that these losses will affect the OUV of the FCWHS but rather that insufficient detail is included with the submission to determine whether they would. However, the applicant has not provided the information requested by NatureScot and has confirmed that at this stage they do not intend to do so. While the EIAR includes a commitment to offset losses and an additional 10% enhancement, any negative affect on the extent and function of the blanket bog would be long-term and irreversible, and therefore significant.
- 7.65 Given the whole site concept of OUVs, any impacts on an WHS' OUVs cannot be mitigated or offset, and as such, Members are recommended that the precautionary principle is engaged and are therefore recommend to object to the proposal on the grounds laid bare above. It is noted here that should the application move to public local inquiry if Members agree to uphold the recommendation, then the information requested by NatureScot would likely be provided by the applicant.
- 7.66 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.
- 7.67 Members are also 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.

- 7.68 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 insufficient detail is provided to demonstrate that the proposal will not have an unacceptable and unsupportable impact on the OUV. On that basis, the unknown impact on the OUV is recommended as reason 1 for objecting to the application at Section 11 of this report.
- 7.69 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.'
- 7.70 **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. Tower 21 and a short section of access track are within the SAC boundary.
- 7.71 In its response, NatureScot advised that the proposal would likely have a significant effect on the wet heath habitat and otter qualifying interests of the SAC and as such, NatureScot advises that Scottish Ministers, as competent authority, are required to undertake an Appropriate Assessment in view of the SAC's conservation objectives for its qualifying interests. However, NatureScot has advised that the proposal would not affect the integrity of the designation because the 0.162ha of permanent and temporary wet heath habitat loss would equate to a 'de minimus' area of the designation, around 0.0001% of the designation area. Furthermore, all towers are positioned a minimum of 20m away from watercourses which is sufficient to allow a 10m development free buffer zone from watercourses to allow for otter movement without disturbance. Additionally, no natal holts (breeding dens) were identified within the survey area and no nighttime construction works are proposed, which, along with works being carried out under the supervision of an Environmental Clerk of Works, is sufficient mitigation to ensure that otter will not be disturbed during the construction phase of development. All mitigation measures would require to be secured by condition.

- 7.72 **Caithness and Sutherland Special Protection Area (SPA):** the SPA is protected for its upland breeding waders, waterfowl, and raptors. The proposal would likely have a significant effect on the common scoter, red-throated diver, black-throated diver, hen harrier, merlin, golden plover, and golden eagle qualifying interests of the SPA. The EIA advises that no common scoter were recorded during surveys, including for breeding birds, but that no records of breeding golden plover, 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.
- 7.73 In its response, NatureScot has advised that the proposal is unlikely to result in significant effects on the integrity of the site or the conservation objectives for its qualifying interests provided that the proposed mitigation set out in the Schedule of Mitigation chapters (EIA Volume 1, Chapter 13 for the Proposed Alignment, and Volume 5, Chapter 11 for the Alternative Alignment) are implemented for the listed species. These measures include implementing Breeding Bird Protection Plans (except for golden eagles) throughout the construction phase of development as well as installing line markers / bird diverters on the OHL for the operational phase. NatureScot has also considered that displaced birds can be accommodated in surround areas during construction, and that predicted mortality rates due to golden eagle collisions are low and not significant. All mitigation measures would require to be secured by condition.
- 7.74 **Caithness and Sutherland Peatlands Ramsar Site:** 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.
- 7.75 **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. The overall impact on several bird species during construction activities is not predicted to be significant. Pre-construction surveys and targeted species protection plans should be secured by condition.
- 7.76 Protected species surveys have identified the likely presence of adder, badger, otter, pine martin, and water vole within the study area, but no evidence of red squirrel or wild cat although there is suitable habitat for wild cat within the study area. Bat roosts were surveyed at Braerathy Lodge and the Croft House and 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.
- 7.77 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, bats, otter and water vole. 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 Environmental 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.

- 7.78 **Habitat Loss and Biodiversity Enhancement:** site surveys have identified bog, fen marsh and swamp, acid and neutral grasslands, dwarf shrub heath, dense scrub, and broadleaved/mixed and coniferous woodland habitats across the study area. The EIAR has identified that the Proposed Alignment (including OHL, temporary OHL diversion, underground cabling, cable sealing end, permanent and temporary tracks) would result in 46.7ha of temporary and permanent habitat losses, with the Alternative Alignment resulting in 78.76ha temporary and permanent habitat losses, with 5.31ha and 17ha being reversible following reinstatement after construction works.
- 7.79 Of these losses, 31.44ha (Proposed Alignment) and 29.71ha (Alternative Alignment) would be permanent losses of blanket bog, and, 0.45ha (Proposed Alignment) and 0.33ha (Alternative Alignment) would be permanent losses of dwarf shrub heath, both Annex 1 Habitats. These figures are the sum of losses predicted in Tables V1-7.7/8/9 (EIAR Volume 1, Chapter 7: Ecology) and Tables V5-5.1/2/3 (EIAR Volume 5, Chapter 5: Ecology – Alternative Alignment), which calculate habitat losses for the Caithness and Sutherland Peatlands SAC, the FCWHS, and non-designated habitats respectively. These figures do not precisely match those provided for Strathy South Wind Farm Grid Connection in Table 3: Predicted Habitat Loss of the Connagill Cluster Grid Connections, as set out in the Connagill Cluster Outline Habitat Management Plan (EIAR Volume 4, Appendix V1-7.8), which states that the calculations use the Alternative Alignment.
- 7.80 As mentioned, the Outline Habitat Management Plan spans the whole Connagill Cluster grid connection project and is high level but three aims to undertake 550ha of peatland restoration, 2-3ha of woodland planting (envisaged to be largely riparian planting), and provide additional nesting habitats for fivers and common scoters through the provision of diver rafts. The strategy advises of the applicant's commitment to achieving a biodiversity net gain of 10% although proposes 10% peatland restoration for both offsetting and enhancement, however it is noted that the plan should aim to include an additional 10% peatland restoration for enhancement (ratio 1:11).
- 7.81 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. Members will also remember 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.

- 7.82 Notwithstanding 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, the HMP must cover a substantial area to mitigate habitat losses and provide the requisite habitat enhancement measures. It should, therefore, be expected that more detail on this matter is provided as part of inquiry proceedings with a finalised plan to be submitted for further consideration at the earliest possible opportunity should the HMP be a conditional element of any forthcoming consent. Whilst the MoU is in place, it operates as a landbank to be drawn down from and at present, there are no schemes that have been concluded through the MoU for SSENT BNG projects in the region.
- 7.83 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 V1-9.2) sets out that a total of 156,615m³ of peat is anticipated to be excavated overall, increasing to 187,785 m³ for the Alternative Alignment, with the development having potential to reuse a larger volume, 160,678m³ or 192,187m³ (proposed and Alternative Alignments respectively) for reinstatement works, indicating that none of the excavated soils on site will become waste.
- 7.84 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.

Forestry

- 7.85 Woodland losses are anticipated at 5.34ha of planted native woodland and 0.41ha of conifer plantation. The applicant proposes to deliver offsite compensatory planting of an equivalent area as mitigation to ensure no net loss of woodland.
- 7.86 The Council's Forestry Officer advises that an equivalent area of compensatory planting for recently planted woodland (not yet established), or productive woodland approaching commercial harvesting age may be acceptable, but that the removal of established native woodland or mid rotation productive woodland would require an enhanced area of compensatory planting. An enhanced area would be sought to compensate for the net public benefit embodied in the woodland to be removed in line with the Scottish Government's policy on the Control of Woodland Removal.

- 7.87 Members are advised that officers are currently looking at a formula/metric to calculate appropriate levels of enhanced compensatory planting. In the meantime however, without the metric in place, or further details of compensatory planting, a compensatory planting plan should be secured by condition for the approval of the Forestry Officer prior to the removal of any woodland, to ensure that a site for compensatory planting is agreed for a minimum area of 5.75ha.
- 7.88 The Forestry Officer has also advised that if any areas of woodland controlled by a Long Term Forest Plan are impacted by the development, then the associated plan would also require to be updated with the agreement of Scottish Forestry, and that woodland removal proposals should not contradict the Habitat Management Plan or any other proposals for biodiversity enhancement. These matters could be controlled by condition.

Water Environment

- 7.89 Volume 1 Chapter 9, and Volume 5 Chapter 7 of the EIAR includes assessment of the likely hydrological and hydrogeological effects, i.e., effects on the water environment, of the development for the proposed and Alternative Alignments respectively.
- 7.90 The EIAR advises that Scottish Water has confirmed to the applicant that there are no Scottish Water drinking water catchments or water abstraction sources, which are designated as Drinking Water Protected Areas (DWPA) under the Water Framework Directive, that would be affected by the Proposed Alignment. However, elements of the Alternative Alignment (Tower 21 along with a 54m section of new permanent access track, and a 60m section of an existing track to be upgraded, as well as one pole associated with the existing 132 kV OHL to be dismantled) are within the catchment of the Bowside Burn, which is a designated DWPA.
- 7.91 Similarly, the identified private water supplies within the study area are for Bowside Cottage, The Bothy and Bowside Lodge as per the Bowside Burn DWPA, and Kirkton Farm. The EIAR advises that only the OHL would be within 50m of the Bowside Burn catchment once operational and that, therefore, safeguarding would only be required during the construction phase of development, which should be captured through the CEMP. Kirkton Farm's abstraction location is unknown at this stage but thought to be upstream of the development.
- 7.92 Consequently Environmental Health has advised that further investigations are required, prior to the commencement of development, to identify the source of the water supply, along with surveys for any unknown supplies. The surveys should include searches for the locations of any pipework with the applicant required to provide proposals for monitoring and contingency measures in the event of an incident during both construction and operational phases of the development.

- 7.93 There are areas of known coastal flood risk along the Halladale River and the downstream reach of the Allt na n Eaglaise to the east of the Study Area, as well as fluvial flood risk from the same sources as well as the River Strathy and Allt na Clèite that may affect upgraded tracks but not the permanent infrastructure. Some works would also be required closer to watercourses however, these and access management matters during flood events can be managed through the CEMP and through the proposed detailed construction method statement, which should be secured by condition.
- 7.94 In terms of permanent infrastructure, the EIAR advises that the bases of all proposed steel lattice towers are outwith a 20m buffer zone, which the applicant advises has been agreed with both SEPA and NatureScot. Furthermore, such infrastructure is considered water compatible and therefore not considered to be at risk of fluvial flooding nor of increasing flood risk elsewhere. 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.
- 7.95 Four new permanent and one new temporary watercourse crossings would be required for the Proposed Alignment and six new permanent and one new temporary crossings for the Proposed Alignment. SEPA requires its approval of the final design of each crossing prior to their installation, and specifies that a traditional style bridge is required for the proposed new crossing over the Allt na n Eaglaise (WX16) and that it would not accept fording.
- 7.96 The applicant also undertook a NVC habitat mapping exercise, which has identified areas of moderate to high potential for ground water dependent terrestrial ecosystems (GWDTE), which are generally located in areas hydrologically connected to watercourses. As such, the EIAR advises that these are likely to be sustained by rainfall, surface water runoff and water logging rather than groundwater and that implementing appropriate SUDS to sustain existing surface water flow paths that maintain these habitat communities during the construction and operational phases of the development will ensure they are protected and not impacted by the development.
- 7.97 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.

Built and Cultural Heritage

- 7.98 Chapter 10 of EIA Volume 1 and Chapter 8 of Volume 5 present the applicant's assessment of the proposed and Alternative Alignments' likely direct and indirect impacts on built and cultural heritage assets within the defined 3km study area.
- 7.99 There are 14 nationally designated heritage assets within the study area including the category A listed Bighouse, garden pavilion and walled garden (LB7160), the category B listed Bighouse Barracks (LB7161) and C listed Bighouse Mains Steading (LB7140) and. The Bighouse Garden Walls and West Gate Piers (LB7159) are category C listed. These assets are east of the Halladale River northeast of Melvich. The Strathy Former Church of Scotland (LB7143), Strathy Free Church of Scotland (LB7144), Strathy Former Free Church School (LB7146), and Strathy former Free Church Manse (LB7145) are north of the OHL alignments and are also category C listed. The Bailgill Burn Limekilns (SM4290), Bailgill Mill (SM4265), and Halladale Bridge Hut Circles (SM3304) Schedule Monuments are also within the study area on the coastal side of the A836, or in the case of the latter, on both sides of the road.
- 7.100 Historic Environment Scotland has focussed its response on potential impacts to the setting of Bighouse, garden pavilion and walled garden for the Alternative Alignment only and has advised that it agrees with the conclusions of the EIA that the impact on the asset's setting would not be significant. The assessment is supported by Visualisation Location 7: Bighouse Garden Pavillion. Impacts on the settings of scheduled monuments would also not be significant given distances and intervening topography.
- 7.101 The proposal would not have an effect on the appreciation of the architectural quality or historic significance of any part of the Bighouse cluster but it would have a detrimental visual effect on its outlook as the OHL would be visible on the slopes that provide the backdrop to channelled interior views above the Halladale River and firth. However, given the distance to the OHL, the presence of intervening wood pole supported OHL and other physical manmade features including the industrial appearing agricultural structures at Kirkton Farm, the change to the outlook would not be of such a magnitude nor a significant level of effect to warrant objection. For the same reasons, impacts on the settings of the remainder category B and C listed buildings were scoped out of the assessment as agreed by the Council in its Scoping Opinion.
- 7.102 There are seven undesignated heritage assets within the limits of deviation dating from pre-historic period to the 19th Century, with the EIA advising of the potential for direct impacts on prehistoric cairnfields at Bowside Lodge and Allt na h'Eaglais (and its associated field system). Section 10.8 of EIA Chapter 10 proposes embedded mitigation that includes avoiding direct impacts on these assets through layout design and micro-siting, with construction exclusion zones being marked out onsite around the assets by the developer under the supervision of an Archaeological Clerk of Works in

order to protect assets and archaeological interests from construction works, which should be secured through the CEMP.

- 7.103 The Council's archaeologist has advised that this mitigation, along with implementing watching briefs in sensitive areas, is considered proportionate and appropriate for limiting direct impacts on non-designated historic assets and has not objected to the proposal. 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.

Roads and Transport

- 7.104 Chapter 11 of Volume 1, and Chapter 9 of Volume 5 of the EIAR: Traffic and Transport provides a review of the roads issues associated with the Proposed Alignment and Alternative Alignment respectively. These chapters are supported by the same Transport Assessment (TA) (EIAR Volume 4, Technical Appendix 11.1). The assessment assumes all aggregate will be sourced offsite from Ackron Quarry off the located off A897 at Ackron and transported to site using the public road network. However, the TA advises that aggregate could be sourced from nearby / onsite borrow pits to mitigate road impacts. As mentioned previously however, any new borrow pit would require separate planning permission with the applicant advising that this will be for the contractor to manage.
- 7.105 On the understanding that aggregate could be sourced offsite, the proposal could proceed without new borrow pits and therefore borrow pits would not be integral for the proposal to go ahead. This element of the development has not been included within the EIAR and should be confirmed prior to determination by Scottish Ministers to ensure the completeness of the EIAR. Otherwise, if borrow pits are applied for at a later date, they would be expected to be subject to an EIA Addendum to include full assessments of the cumulative impacts with the whole project and any other relevant developments.
- 7.106 All HGV movements and plant and component delivery, including cranes which may be 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 accesses, as well as the A897 north of Connagill for aggregate only. 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, although the use of the A897 road would be unavoidable given the location of Connagill Substation just off it.
- 7.107 Additionally, the assessment assumes that both Strathy South and Strathy Wood Wind Farms, along with the grid connection works for Strathy Wood Wind Farm grid

connection (THC ref. 24/05153/S37) will be constructed at the same time as these grid connection works. The future baseline traffic flows data includes construction traffic from both wind farms while construction traffic from works to install the grid connection for Strathy Wood Wind Farm is included in the committed traffic data set. These data sets are combined to predict the peak traffic flows during the construction periods taking account of development in the area. It is also noted that other energy construction projects that may use the same Council maintained roads are in the pipeline that are not included in the assessment such as Bettyhill Phase 2 Wind Farm.

- 7.108 Transport Planning has highlighted significant concerns with the data used in the Transport Assessment assumptions. These concerns include that the baseline figure for average daily HGV movements on the A897 show that the road, which has agreed restrictions for forestry timber haulage traffic, being used by more HGVs per 24 hour period than the A9(T) at Thurso. A higher level of HGV movements on the A897 is highly unlikely unless the count was taken during construction activity for a larger scale project, which would be extraordinary traffic (see Table 1: 24-hour Average Daily Traffic Data (2024), Volume 4, Appendix V1-11.1: Transport Assessment). Additionally, Transport Planning also highlight that construction traffic from both Strathy South and Strathy Wood Wind Farms is extraordinary traffic on the Council maintained road and should not, therefore, be used in the baseline data to predict impacts from the in solus proposal (Section 5.7 of the Transport Assessment). Moreover, construction traffic across different projects using Council maintained roads concurrently, should be managed in order to coordinate movements to minimise damage to the infrastructure along with other environmental effects.
- 7.109 The assessment predicts that over the course of the construction phase, there will be an increase of all traffic (car, LGV, and HGV) of 1.8% (2.2% - Alternative Alignment) at the A9 north Georgemas Junction, 3.9% (4.5 % - Alternative Alignment) on the A9(T) at Thurso, 5% (5.9% - Alternative Alignment) on the A836 near Forss, 20.1% (28.3% - Alternative Alignment) on the A836 near Strathy, and 3.6% (3.6% - Alternative Alignment) on the A897 north of Connagill.
- 7.110 Specifically for HGV movements, the predicted increases are 7.5% (10.9% - Alternative Alignment) at the A9(T) north Georgemas Junction, 18.6% (34.9% - Alternative Alignment) on the A9(T) at Thurso, 38.2% (151.8% - Alternative Alignment) on the A836 near Forss, 85.1% (413% - Alternative Alignment), and on the A836 near Strathy, and 15% (15% - Alternative Alignment) on the A897 north of Connagill.
- 7.111 Based on the Council's Transport Planning Team's appraisal set out above however, the increase in construction traffic on the Council maintained roads is likely to be higher than the predicted figures, with increases in HGV movements anticipated to be significant.

- 7.112 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 occurrence would impact both the communities relying on the local road network as well as Council resources.
- 7.113 Moreover, the full road network that will be impacted by construction traffic remains unknown, although it is acknowledged that at least one source of offsite bulk material has been identified, the contractor may require the use of other sources that have not been identified at this stage. If materials are sourced from additional offsite borrow pits / local quarries then construction HGVs would likely use other local roads including C and U class routes to access these materials. These routes cannot be identified or assessed at this stage.
- 7.114 Given the limitations of the in solus assessment, it follows that an accurate assessment of cumulative impacts 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.
- 7.115 Although the applicant has proposed the adoption of a maximum 30mph speed limit for all construction vehicles travelling on the A897 and U1733 Kirkton Road as mitigation, some upgrades would be required to the A897, particularly south of the Connagill Substation, and significant upgrades would be required to the U1733 Kirkton Road to allow construction of the OHL. Such works are proposed as mitigation rather than being integral to the project and are not included in the description of the development, nor are they assessed for environmental impacts within the EIAR. Subsequently, Transport Planning objects to the application on the grounds of the unreliable data included with the Traffic Assessment and on the lack of detail regarding current road condition and the scale of upgrade works required for Council maintained roads. Given that these matters will result in environmental effects that require to be known prior to the determination of the proposal, these matters are included in Reason 3 for objecting to the application.
- 7.116 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. Owing to the lack of this detail, 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 should also be requested.

- 7.117 THC and Transport Planning's prior approval of a finalised Construction Traffic Management Plan would 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.
- 7.118 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.
- 7.119 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.

Other Material Considerations

- 7.120 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.
- 7.121 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

7.122 None raised.

8. 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 132kV (with a section of 275kV) OHL is designed to transmit the 208MW capacity of Strathy South Wind Farm, the 63MW of Strathy Wood Wind Farm, and the 68MW of Strathy North Wind Farm (68MW), and is designed with additional capacity to connect potential future generating stations. 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.

9.4 As the report has set out, NatureScot has advised Scottish Ministers that the information submitted with the application is insufficient to demonstrate that the development will not have an unacceptable and unsupportable impact on the actively

accruing peatland habitat Outstanding Universal Value of the Flow Country World Heritage Site. This is because the accuracy of the predicted 25.8ha loss of peatland habitat is unclear as the survey data has not been provided in the correct and more detailed National Vegetation Classification(NVC) format as required for EIA. Secondly, no details of the methodology that will be used for the construction of on the ground infrastructure such as tracks and areas of hardstanding, for example, are provided, meaning the full extent of direct and indirect habitat losses cannot be predicted. Nevertheless, while insufficient detail is provided with the submission to calculate the extent of peatland habitat losses, it is clear that there will be peatland losses, which would negatively affect the extent and function of the blanket bog in this part of the World Heritage. These impacts would be 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. 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, the officer appraisal has concluded that the design of the OHL, both the proposed and the alternative alignments, is inappropriate for its location in terms of the scale of the towers and its routing. Officers consider that the proposal would result in greater and additional significant landscape and visual effects than those assessed in the EIAR. These effects include the proposal's contribution, in solus and in combination with wider energy development in the area, to the continued deterioration of the scenic quality and character of the landscape and views.
- 9.7 While the proposal's effect on landscape character is appraised to be within acceptable limits, detrimental impacts on visual amenity would most acutely be experienced from the more accessible areas north of the development and along Strath Halladale where they would be experienced by residents in nearby settlements and individual properties, recreational receptors and users of the outdoors, as well as road users, including tourists travelling the North Coast 500 promoted route. Given the potential for undergrounding the grid connection route along the A836 and A897 to Connagill Substation, it is considered that significant visual effects are not sufficiently mitigated and Members are therefore recommended to maintain their objection to the proposal on the grounds of unacceptable significant visual impacts.
- 9.8 As an application submitted under Section 37 of the Electricity Act 1989, it will be for the Scottish Ministers as decision makers to have 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. However, 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 South Wind Farm.

- 9.9 Notwithstanding the Schedule 9 grounds for objecting to the application, Appendix A - Review of the EIA and the Consenting Process of this report sets out an appraisal of whether the EIA has adequately identified, described, and assessed the entirety of the proposal's environmental impacts, including its likely direct and indirect significant effects, as a 'whole project'. In short, the Council considers that the listed 'associated works', such as borrow pits and construction compounds, and any other enabling and ancillary development, would constitute parts of the 'whole project' and that they should be set out in full within the EIAR's description of development and be subject to environmental assessment. Moreover, the applicant anticipates undertaking some of the associated works, namely underground cabling, under Class 40 – Electricity Undertakings of the Town and Country Planning (General Permitted Development) (Scotland) Order 1992 (as amended). However, as EIA development, no such permitted development rights exist for the associated works listed in the submission. Nevertheless, officers recommend that the absence of environmental information on the associated development the insufficiency of the EIAR should provide the third reason for refusal and given the environmental sensitivities within and surrounding the OHL. However, it will be for Scottish Ministers, as decision makers, to satisfy themselves that they have sufficient environmental information to competently determine this application on the understanding that any decision made on that matter would be open for legal challenge.
- 9.10 The report has set out that the impacts and effects of the proposal as they relate to construction, design, landscape effects, natural heritage matters not related to the Outstanding Universal Value of the World Heritage Site (although officers' concerns with the lack of detail on habitat compensation and enhancement measures are laid bare in the main body of the report), the water environment, built and cultural heritage, and roads and transport matters, 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.
- 9.11 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.

- 9.12 The Council is not satisfied that the full extent of the direct and indirect environmental effects of this development have been adequately identified, described, and assessed within the EIAR taking account of interrelatedness of associated works as forming part of the whole project for connecting several wind farms to the national grid. Nor is the Council satisfied that the project's environmental effects can be addressed by way of mitigation in relation to the Flow Country World Heritage Site. Similarly, the Council is not satisfied that the EIA submission has adequately demonstrated that the proposal's detrimental significant effects on the visual amenity of residents, visitors, and road users alike have been adequately mitigated. 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 but would contribute to the loss of peat resources including the carbon storage that peat provides, as well as peatland habitats. It has not been demonstrated that the proposal would not result in the loss of the actively accruing peatland habitat Outstanding Universal Value of the Flow Country World Heritage Site.
- 10.5 Risk: Not applicable
- 10.6 Gaelic: Not applicable

11. RECOMMENDATION

Action required before decision issued - None

- 11.1 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 it has not been adequately demonstrated that the proposal would not have an unacceptable significant impact on the blanket bog peatland habitat Outstanding Universal Value of the Flow Country World Heritage Site. While the submission predicts that the proposal would result in the direct and indirect loss of 25.8ha of blanket bog habitat within the World Heritage Site, the accuracy of the calculated peatland habitat losses is unclear because the submission does not include the results of a National Vegetation survey as required for EIA development in near-natural habitats, and because details of the construction methodology to be used for the construction of the OHL, including for areas of track and hardstanding, are not provided, meaning the full extent of direct and indirect habitat losses cannot be predicted. Impacts on the Outstanding Universal Value of the Flow Country World Heritage Site cannot be mitigated or offset and as such, the precautionary principle is engaged pursuant to NPF4 Policy 4 Natural Places Part e) and Highland-wide Local Development Plan Policy 28 Sustainable Design, which states that '[i]n the relatively rare situation of assessing development proposals where the potential impacts are uncertain, but where there are scientific grounds for believing that severe damage could occur either to the environment or the wellbeing of communities, the Council will apply the precautionary principle'. Subsequently, it has not been demonstrated that: 1) the type, location or scale of the proposal would not have an unacceptable impact on the natural environment as required under NPF Policy 4a); 2) the proposal complies with the policy test for protecting Outstanding Universal Values of World Heritage Sites set out in NPF4 Policy 7 Historic assets and places part I); and 3) the proposal complies with the provisions of Highland-wide Local Development Plan Policies 28 Sustainable Design including that it promotes and enhances the social, economic, and environmental wellbeing of the people of Highland, 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 preserving natural beauty, conserving physiographical features of special interest, and of protecting sites, because the design of the proposal

is inappropriate for the location in terms of the scale of the towers and the OHL routing, which will result in significant detrimental impacts on the visual amenity of residents in nearby settlements and individual properties, recreational receptors and users of the outdoors, as well as road users, including tourists travelling the North Coast 500 promoted route to the north of the proposal and from within Strath Halladale. Given the potential for undergrounding the grid connection route along the A836 and A897 public roads to Connagill Substation, it is considered that the detrimental significant visual effects are not reasonably mitigated. Because appropriate design mitigation has not been applied, the proposal does not accord with NPF4 Policy 11 Energy Part e) ii., or Highland-wide Local Development Plan Policies 69 Electricity Transmission Infrastructure, and 28 Sustainable Design.

3. The application does not accord with Regulation 4 Paragraph (2) of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 because the EIA has not adequately identified, described, and assessed the entirety of the proposal's environmental impacts, including its likely direct and indirect significant effects, by virtue of omitting a consideration of the environmental impacts of associated works including, but not limited to, the upgrading works required to Council maintained roads and construction compounds. Such works would constitute parts of 'the whole project' for the purposes of EIA Development, and should therefore be set out in full within the EIAR's description of development and be subject to environmental assessment.

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 V1-1.1 Overview of the Proposed Development
Plan 2 - Figure V1-3.1: The Proposed Development – Proposed Alignment
Plan 3 - Figure V5-3.1: The Proposed Development - Alternative Alignment
Plan 4 - Appendix V1-3.2: Further Engineering Design Information

Appendix 1 – Review of the EIA and the Consenting Process

Appendix 2 – Development Plan and Other Material Policy Considerations

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

Appendix 1 – Review of the EIA and the Consenting Process

- A.1.1 Regulation 4 of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 directs that the Environmental Impact Assessment must identify, describe and assess in an appropriate manner, in light of the circumstances relating to the proposed development, the direct and indirect significant effects of the proposed development in order to ensure the completeness and quality of the Environmental Impact Assessment report (“EIA report”). The recent Raeshaw Farms V Scottish Ministers and Energiekontor Judicial Review decision has clarified the requirement for decision makers to consider the ‘whole project’ within the EIA based on such matters as common ownership, simultaneous determinations, functional interdependence, and stand-alone projects, amongst other factors that may be relevant.
- A.1.2 EIAR Volume 1, Chapter 5: EIA Process and Methodology, sets out the cumulative development that are considered alongside the specific assessment for the application OHL. These developments include the consented, application stage, and proposed energy developments associated with the Connagill Cluster and are set out at Table VI-5.2: Cumulative Developments of the chapter and are not repeated here. Additionally, the permanent underground cabling at both ends of the new OHL and temporary underground cabling required for the ‘Alternative Alignment are considered within the EIAR, see the respective Soils, Geology and Water Chapters for example (Volume 1, Chapter 9 and Volume 5 Chapter 7).
- A.1.3 However, as the report states, borrow pits, temporary construction compounds, and local modifications to the existing distribution network that would likely be required for construction purposes are considered ‘associated works’ would be dealt with under separate applications for planning permission. These aspects of the development are not considered within the EIAR submitted with the scheme, nor are they considered in the associated Strathy Wood Wind Farm Grid Connection application (THC ref. 24/05153/S37).
- A.1.4 Nevertheless, the Council considers that the ‘associated works’ and any other enabling and ancillary development constitute parts of ‘the whole project’ and that, consequently, they should be set out in full within the EIAR’s description of development and be subject of environmental assessment. 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.
- A.1.5 Addendums to the EIA for Strathy Wood Wind Farm Grid Connection (THC ref. 24/05153/S37) were also supplied to that application as Additional Environmental Information prior to the Council issuing its consultation response to the Scottish Ministers. The Cumulative Assessment Addendum (June 2025) in particular was

submitted to address issues with that EIA not considering the whole project of the combined wind farm grid connections (Strathy North, Strathy Wood, and Strathy South) given that the OHL upgrade proposed for Strathy Wood Wind Farm's grid connection was in fact designed to accommodate the energy produced by Strathy South Wind Farm.

A.1.6 The Cumulative Assessment Addendum for Strathy Wood Wind Farm Grid Connection (below referred to as 'the Addendum') and the EIAR submitted with the current application (referred to below as 'the current EIAR') have considered the cumulative effects of both proposal OHLs in the following manner.

A.1.7 **LVIA**

- The Addendum considers that the EIA's assessment of future baseline in combination landscape and visual effects from within the LVIA study area is sufficient, and therefore does not update the EIA with a judgement of the total effects of both applications within a combined study area;
- The current EIAR assumes that the proposed Strathy Wood Wind Farm Grid Connection forms part of the baseline and therefore considers the in combination effects from within its study area and therefore does not provide a judgement of the total effects of both applications within a combined study area;
- There are slight differences, therefore, between the level of effects on:
 - the special qualities of the Farr Bay, Strathy and Portskerra SLA during operational phase of the OHLs, which is justifiable given the Strathy South Wind Farm Grid Connection development will be closer to the designation;
 - LCT134: Sweeping Moorland and Flows;
 - LCT 136: Rocky Hills and Moorland;
 - visual effects on Bowside Lodge, The Bothy, Bowside Cottage (Gamekeepers Cottage, and Dallangwell);
 - the judgements of level of effects on the Scottish Hill Track 334 – Halladale (Trantlebeg) to Strathy, and the forestry/wind farm access track, are the same.

A.1.8 **Ecology**

- The Addendum updates Strathy Wood Wind Farm's Grid Connection EIAR with the conclusions of total combined effects from the current EIAR on habitat losses within the Caithness and Sutherland Peatlands Special Area of Protection/Ramsar/and West Halladale Site of Special Scientific Interest and the Flow Country World Heritage Site, as well as the total combined effects on protected species.

A.1.9 **Ornithology**

- The Addendum updates Strathy Wood Wind Farm's Grid Connection EIA with the conclusions of total combined effects from the current EIA on qualifying avian interests.

A.1.10 Soils, Geology and Water

- The Addendum considers that the EIA's assessment of future baseline in combination effects is sufficient, and therefore does not update the EIA with a judgement of the total effects of both applications within a combined study area.
- The current EIA assumes Strathy Wood WF Grid Connection is part of the baseline for the cumulative assessment and provides details pertinent to the application such as of peat excavation volumes for the current proposal(s) only. It predicts effects on peat and carbon rich soils, surface water and ground water quality, surface and groundwater flow, flood risk, and designated sites, and predicts negligible cumulative effects in combination with baseline developments.

A.1.11 Cultural Heritage

- Both the Addendum and the current EIA advise that 'Cumulative effects would only be considered in relation to significant visual impacts and impacts on the setting of designated assets and heritage assets. However, as no designated site or heritage asset would be impacted either directly or indirectly, a cumulative assessment has been scoped out of this assessment.'
- Impacts on non-designated assets would be mitigated in the same manner across both developments.

A.1.12 Traffic and Transport

- The Addendum assumes that both developments would not be constructed concurrently as Strathy Wood WF GC would be completed first. It also considers that a finalised Construction Traffic Management Plan should consider the cumulative effect in the event construction activities are concurrent.
- The current EIA assumes both grid connections would be concurrent.

The above shows a lack of consistency in the applicant's approach to the two S37 application's EIAs.

A.1.13 Forestry

- Neither the Addendum nor the current EIA consider the in-combination effects of either applications with an assumption the mitigation against woodland loss will be in compliance with the Scottish Government's Control of Woodland Removal Policy.

A.1.14 Socio-economic and Tourism

- The Addendum reinforces the EIAR's assumption that beneficial socio-economic effects will not be significant.
- For that reason, socio-economic and tourism impacts are not considered within the current EIAR.

It is noted that the socio-economic benefits for each submission are provided for each development in its own right.

- A.1.15 It will be for the Scottish Ministers to ultimately decide whether they consider that the information submitted with the application is sufficient to reach a reasoned conclusion on the significant effects of the development on the environment having regard in particular to current knowledge and methods of assessment. It is noted that the EIAR has assumed offsite sources for the aggregate that would be required for development so in that regard, it may be reasoned that the development could proceed without onsite borrow pits, and therefore they are not required to be assessed within the EIAR even if the EIAR does advise they would be required (Paragraph 3.6.1 of EIAR Volume 1, Chapter 3: The Proposed Development). Conversely, the development would be highly unlikely to be able to proceed without other associated works such as construction compounds and modifications to the existing distribution network to accommodate the new OHL. Members are therefore recommended to **raise objection** on the grounds that the EIA is insufficient to reach a reasoned conclusion on the grounds that associated works are not assessed within the EIA.
- A.1.16 In addition to the above, Members are also asked to note that the applicant intends to install the underground cabling component of the application project using permitted development rights granted under Class 40 – Electricity Undertakings of the Town and Country Planning (General Permitted Development) (Scotland) Order 1992 (as amended) (GPDO) for Licensed Electricity Undertakers. Moreover, a section of underground transmission cabling connecting Strathy South Wind Farm substation to Strathy North Wind Farm substation is being progressed under the same class of the GPDO, as stated at Paragraph 2.5.1 of EIAR Volume 2 Chapter 2: Description of Development) of the 2021 variation consent (ECU ref. ECU00002133, THC ref. 20/03481/S36).
- A.1.17 As such, there is no deemed planning permission for this (southern) section of Strathy South Wind Farm's grid connection as it was not included within the description of the development applied for under any of the Section 36 or variation consents (THC refs. 22/03723/S42, 20/03481/S36, and 07/00263/S36SU – see Section 3 Planning History of this report). However, the logical extension of the aforementioned Raeshaw Farms V Scottish Ministers and Energiekontor Judicial Review decision is that, associated works are part of an EIA project, they are themselves EIA development, which includes grid connections and associated works.
- A.1.18 Article 3 at Part 2 of the GPDO directs that development shall not be permitted by the GPDO if the development is EIA development and in this instance, no separate

planning application has been submitted in respect of the underground grid connection even if the environmental effects of the underground grid connection have been assessed within the EIARs submitted with the respective applications for the Section 36 consents. However, on the above basis, it would appear that the Class 40 permitted development rights are being misapplied and planning permission is required.

- A.1.19 For Members information, the cabling trench for this underground connection will be dug into a long-existing access track following the track's route (meaning that it uses existing infrastructure and previously disturbed ground) through the Caithness and Sutherland Peatlands Special Area of Conservation and the Caithness and Sutherland Peatlands Special Protection Area, as well as the Flow Country World Heritage Site.
- A.1.20 The works to dig out the trench and install the cable have, however, been subject to a Regulation 62 Consent under the Conservation (Natural Habitats, et cetera) Regulations 1994 (THC ref. 25/03497/PNO). This consent means that the works have been assessed as not having a significant impact on the integrity and conservation objectives of the peatland habitats of the Caithness and Sutherland Peatlands Special Area of Conservation, and the avian interests of the Caithness and Sutherland Peatlands Special Protection Area.
- A.1.21 However, the impacts on the actively accruing peatland habitats Outstanding Universal Value of the Flow Country World Heritage Site have not been assessed. Given that the criteria for assessing significant effects on the integrity and conservation objectives of a Natura 2000 site are different to assessing impacts on an Outstanding Universal Value of a World Heritage Site, the results of a Habitat Regulations Appraisal cannot be relied on to inform the impacts on the latter designation. Subsequently, a Flow Country World Heritage Site Impact Assessment using the Toolkit available from the Council's website should be submitted for assessment.

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
 - 20 - Blue and Green Infrastructure
 - 22 - Flood Risk and Water Management
 - 23 - Health and Safety
 - 25 - Community Wealth Building
 - 29 - Rural Development
 - 33 - Minerals

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 The site is not covered by any specific development allocation or safeguarding notion. The CaSPlan does confirm the boundaries (including any refinements) of Special Landscape Areas (SLAs) within the plan area but does not consider the Flow Country World Heritage Site.

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)
 - Environment - Guiding Principles: Statutory Guidance (2023)
 - 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 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 high level outline Habitat Management Plan sets out the applicant's intention to undertake 550ha of peatland restoration, 2-3ha of woodland planting (envisaged to be largely riparian planting) as compensation and enhancement measures for the entirety of the Connagill Cluster scheme, along with other measures that can be tailored to undertaken on or near the alignment routes. However the detail of the habitat management plan including the location(s) for habitat management are not included with the EIA submission, with the applicant proposing that the detail can be provided later and secured by condition.
- A3. As mentioned in the report, 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. This approach is 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 to ensure that the requirement does not hinder the progression of nationally important infrastructure. The agreement of the Memorandum of Understanding is that sites should be in place to operate as a landbank that can be drawn down from project by project. At present though, there are no agreed such sites that have been agreed through the Memorandum of Understanding with the developer.
- A3. The HMP for the Connagill cluster must cover a substantial area to mitigate habitat

losses and provide the requisite habitat enhancement measures. It should, therefore, be expected that more detail on this matter would be provided as part of inquiry proceedings with a more detailed plan to be submitted for further consideration at the earliest possible opportunity should the HMP be a conditional element of any forthcoming consent.

- 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 impacts of application element of the upgraded OHL and ancillary works will not be significantly detrimental to the qualifying interests or conservation objections of the Caithness and Sutherland Peatlands -SAC, -SPA, and Ramsar Site, or any Natura 2000 designation in the wider area.
- 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 or near to a National Park or NSA.
- A3. Part e) of NPF Policy 4 sets out that the Precautionary Principle will be applied in accordance with relevant legislation and Scottish Government guidance (Environment - Guiding Principles: Statutory Guidance). In short, the decision maker must weigh up the severity and likelihood of any impacts of the proposal, as well as potential for negative longer term effects, taking account of mitigating factors.
- 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 Peat 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.

- A3.9 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 no significant direct impacts on assets within the limit of deviation while Historic Environment Scotland is satisfied that indirect impacts on the setting of the Category A Listed Bighouse, garden pavilion and walled garden for the Alternative Alignment would not be significant. There will be no significant indirect impacts upon the setting of any other 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 l) 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 actively accruing 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. Policy 11 d) does not support the proposal.
- A3.12 Policy 11 section e) also requires project design and mitigation to demonstrate how

the 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.

- A3. As detailed in the Natural Heritage section of this report above, impacts on the Outstanding Universal Value of the Flow Country World Heritage Site are not sufficiently demonstrated to be within acceptable limits and as such, the Precautionary Principle is engaged pursuant to NPF4 Policy 4 e). It is the recommendation of this report to include the matter as a reason to raise objection, takes into account the fact that impacts on the OUV cannot be mitigated or offset.
- A3. The report also sets out that due to the design not sufficiently mitigating significant visual effects on residential, recreational and other users of the outdoors, and road user receptors to the north of the OHL and along Strath Halladale, the proposal does not comply with NPF4 Policy 11 e) part ii.
- 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 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, appropriate 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.

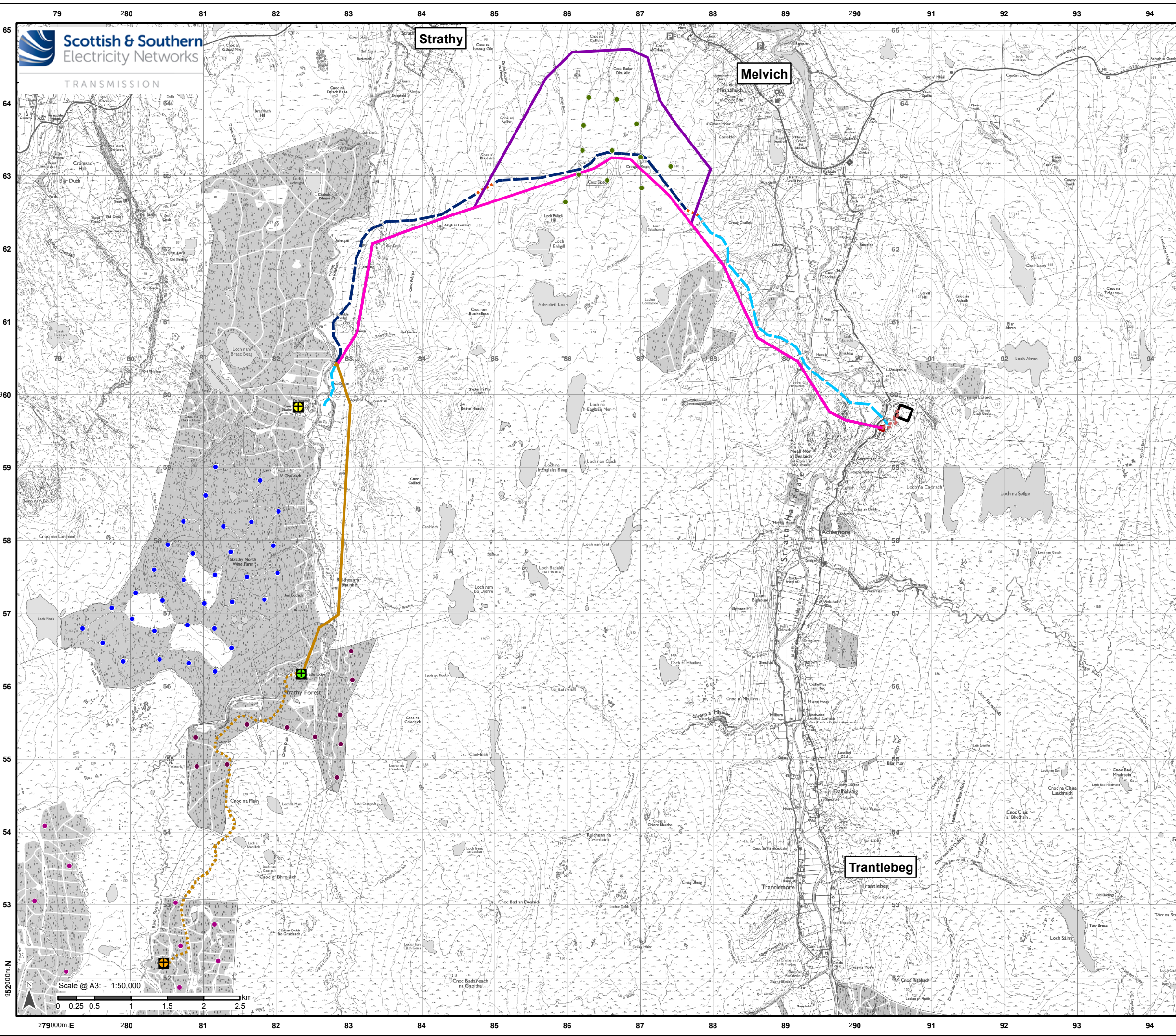
Developer Contributions

- 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. Members are advised that the Council's Community Wealth Building Team are aware of the applicant's

Caithness and Sutherland Local Development Plan

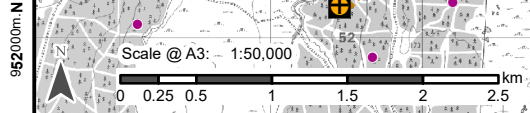
A3.23 The **CaSPlan** was adopted in 2018 and therefore predates NPF4. The application site lies outwith any allocated site, delineated settlement boundary, and safeguarding notation including Special Landscape Areas. While the plan does not specifically refer to the Flow Country World Heritage Site, it does seek to protect natural and historic environments, stating at Paragraph 72 that '[t]he natural and historic environment is rich, containing: internationally and nationally recognised sites, species and habitats; locally valued sites and landscapes; dramatic landforms, and a diverse cultural heritage. HwLDP policies provide safeguards for these features', while simultaneously offering strong in principle support for renewable energy as an employment industry.



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

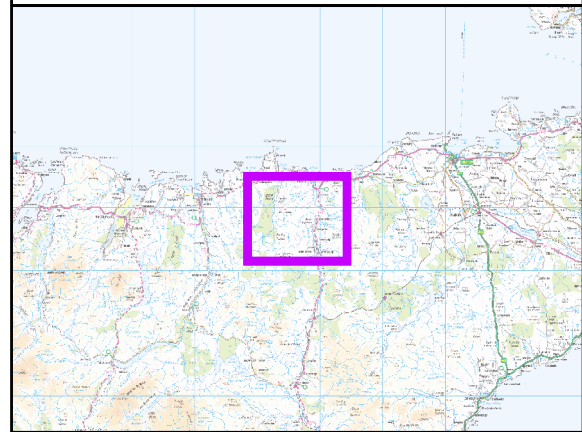
- - - Proposed Underground Cable (UGC)
- - - Proposed Temporary UGC (Alternative Alignment only)

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



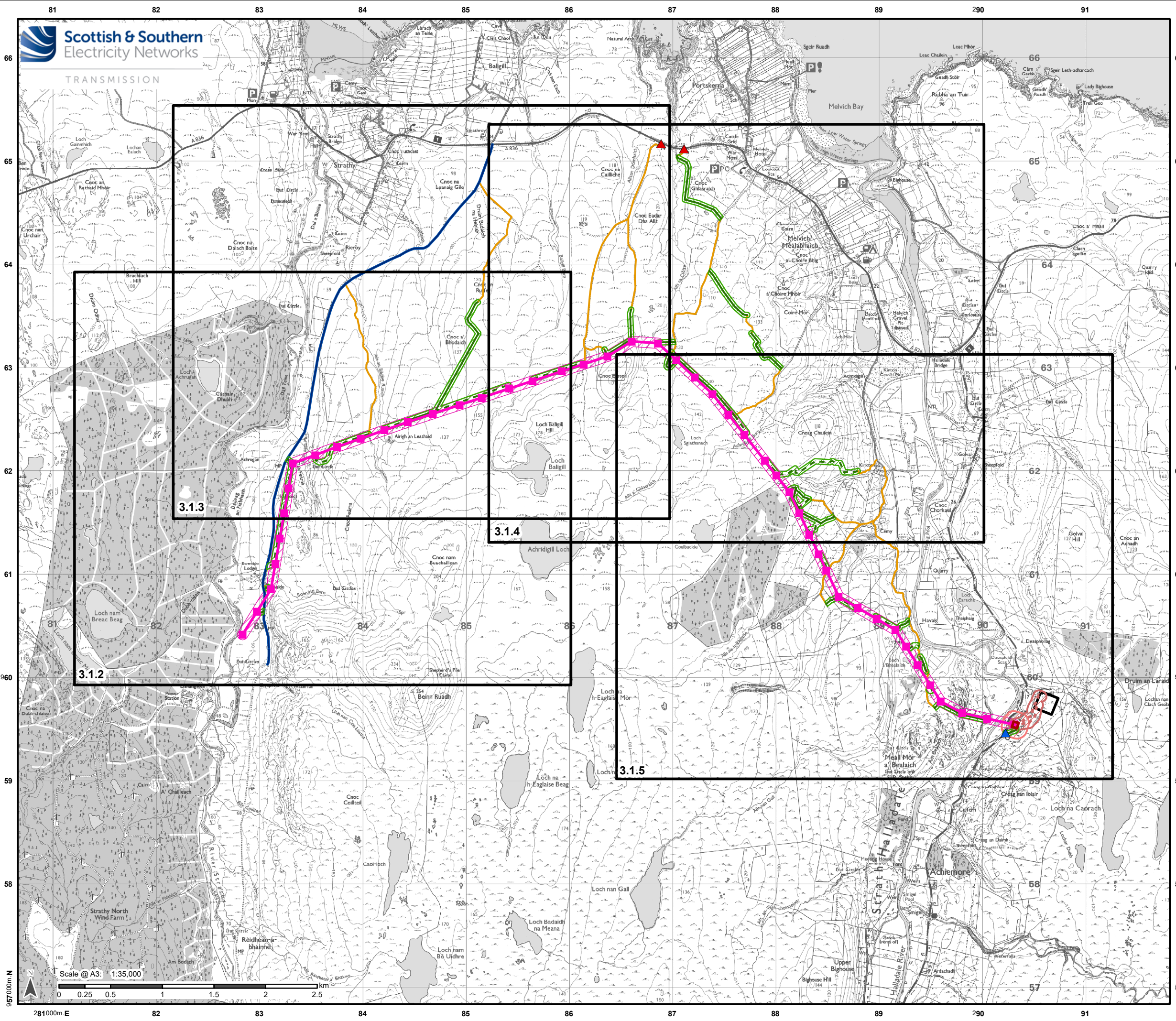
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Project No: LT560
Project: Strathy South Wind Farm Grid Connection - EIA Report

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 OHL Alignment
- Limit of Deviation (OHL)

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

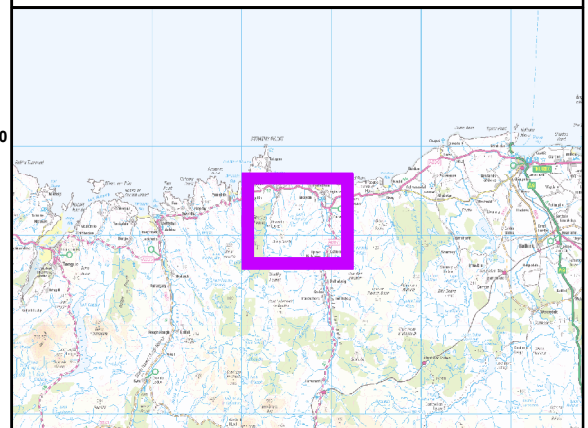
- Proposed Cable Sealing End (CSE) Compound
- Limit of Deviation (CSE Compound)
- ▲ Existing Bellmouth (to be upgraded)
- ▲ New Bellmouth
- Existing Access Track (to be upgraded)
- Proposed Permanent Access Track
- Proposed Temporary Access
- Limit of Deviation (Access Tracks)

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

- Proposed Underground Cable (UGC)
- Limit of Deviation (UGC)

Existing Infrastructure

- Existing Access Track
- Connagill 275/132 kV Substation



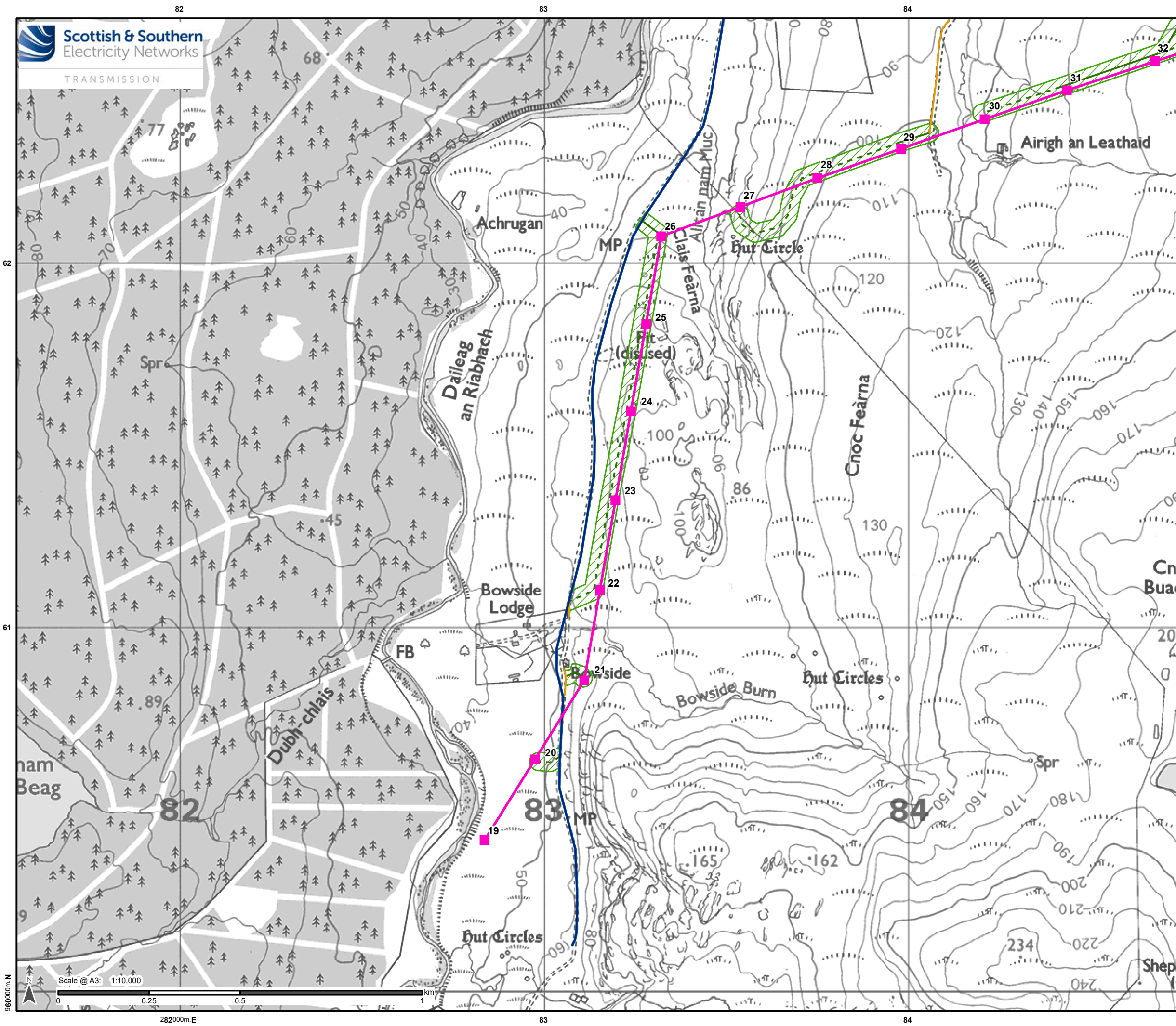
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Project No: LT560
Project: Strathlyon South Wind Farm Grid Connection - EIA Report

Title: Figure V1-3.1.1: The Proposed Development - Proposed Alignment

Drawn by: MT/SK Date: 06/02/2025

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

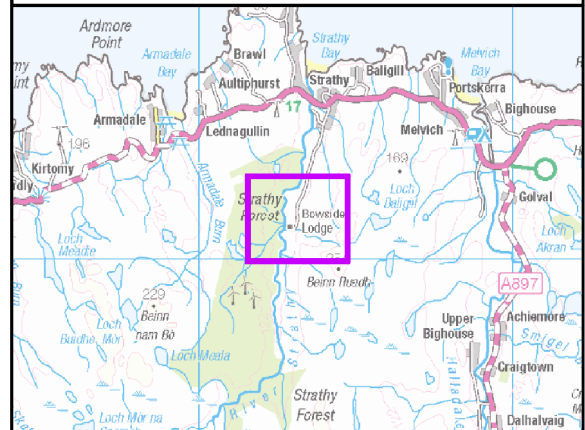
- Proposed Steel Lattice Tower
- Proposed OHL Alignment

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

- Existing Access Track (to be upgraded)
- Proposed Permanent Access Track
- - - Proposed Temporary Access Track
- Limit of Deviation (Access Tracks)

Existing Infrastructure

- Existing Access Track



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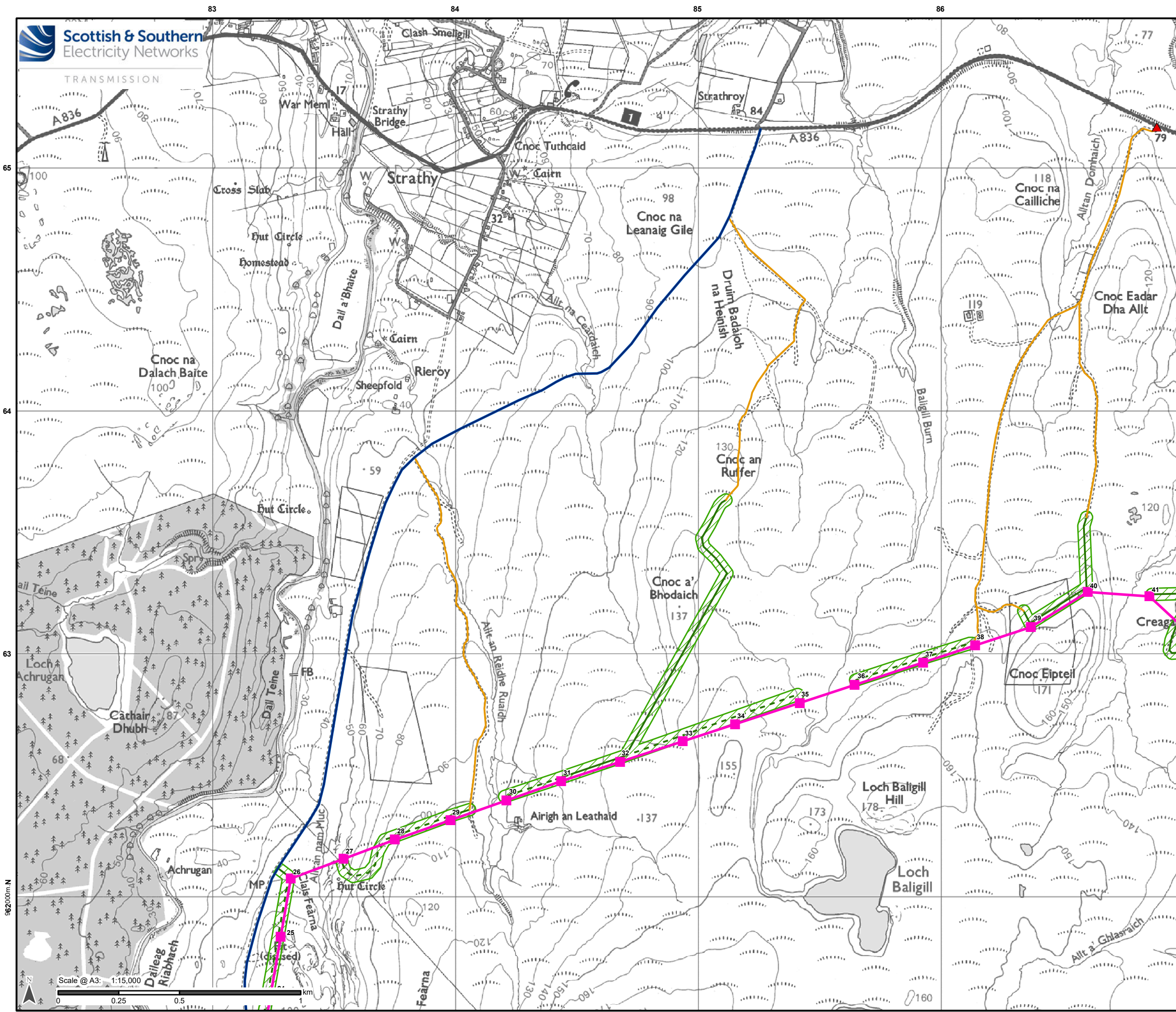
Project: Strathay South Wind Farm Grid Connection - EIA Report

Title: Figure V1-3.1.2: The Proposed Development – Proposed Alignment

Drawn by: MT/SK

Date: 30/01/2025

Drawing: 121008-EIAR-D-V1-3.1.2-1.0.0



Legend

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

- Proposed Steel Lattice Tower
- Proposed OHL Alignment

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

- ▲ Existing Bellmouth (to be upgraded)
- Existing Access Track (to be upgraded)
- Proposed Permanent Access Track
- - - Proposed Temporary Access Track
- Limit of Deviation (Access Tracks)

Existing Infrastructure

- Existing Access Track



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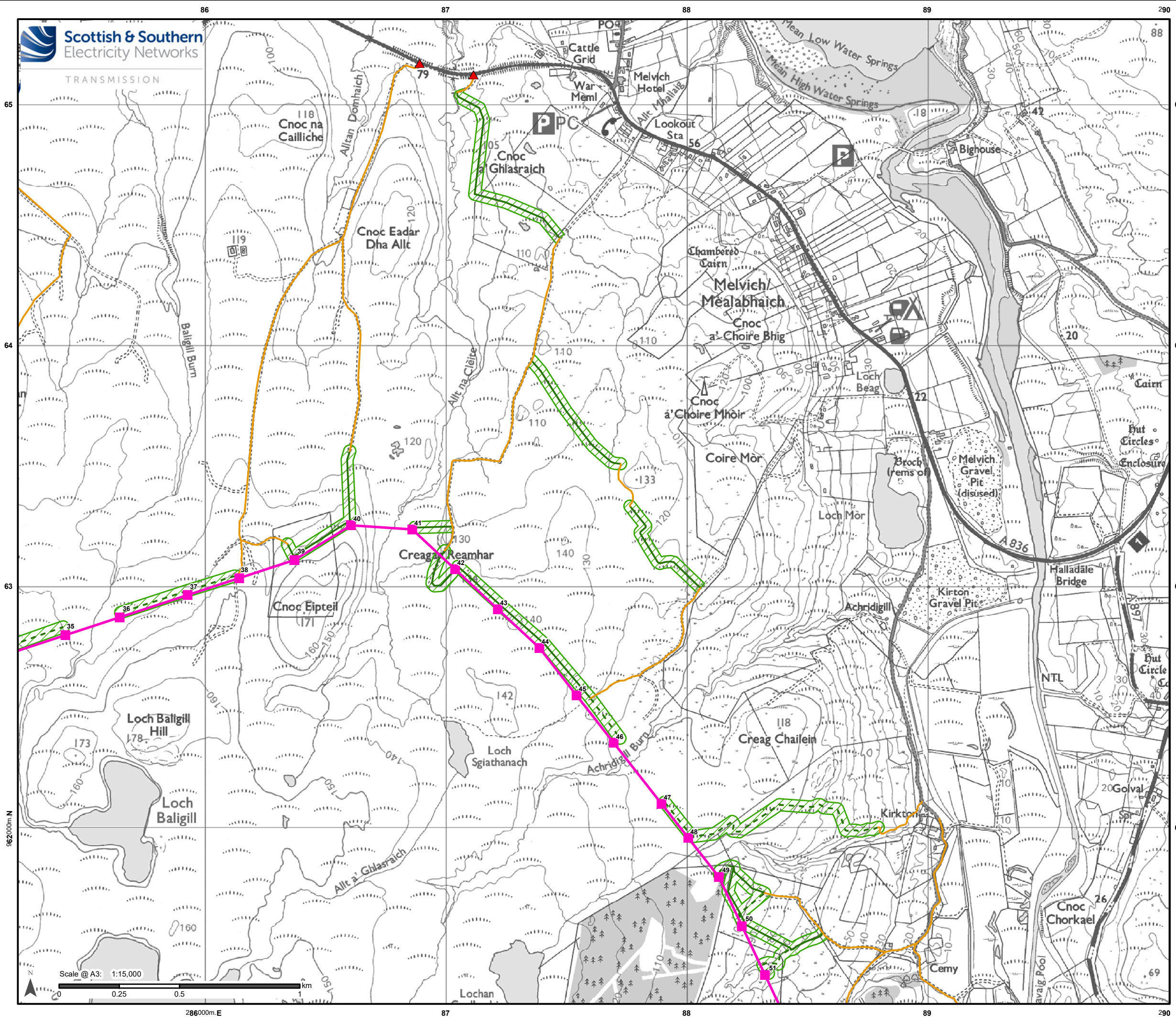
Project: Strathy South Wind Farm Grid Connection - EIA Report

Title: Figure V1-3.1.3: The Proposed Development – Proposed Alignment

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Date: 30/01/2025

Drawing: 121008-EIAR-D-V1-3.1.3-1.0.0



Legend

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

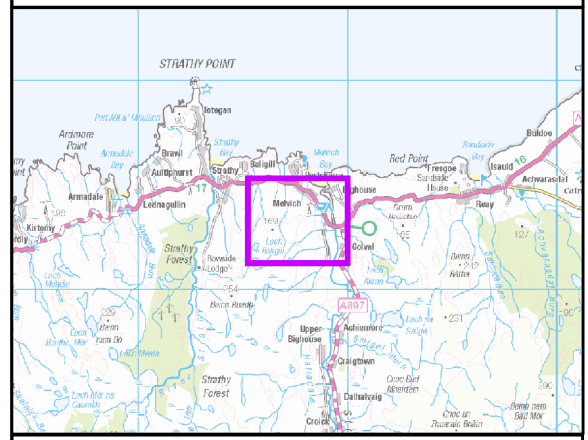
- Proposed Steel Lattice Tower
- Proposed OHL Alignment

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

- ▲ Existing Bellmouth (to be upgraded)
- Existing Access Track (to be upgraded)
- Proposed Permanent Access Track
- - - Proposed Temporary Access Tracks
- ▨ Limit of Deviation (Access Tracks)

Existing Infrastructure

- Existing Access Track



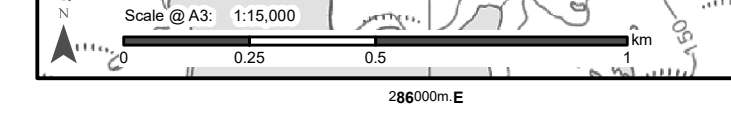
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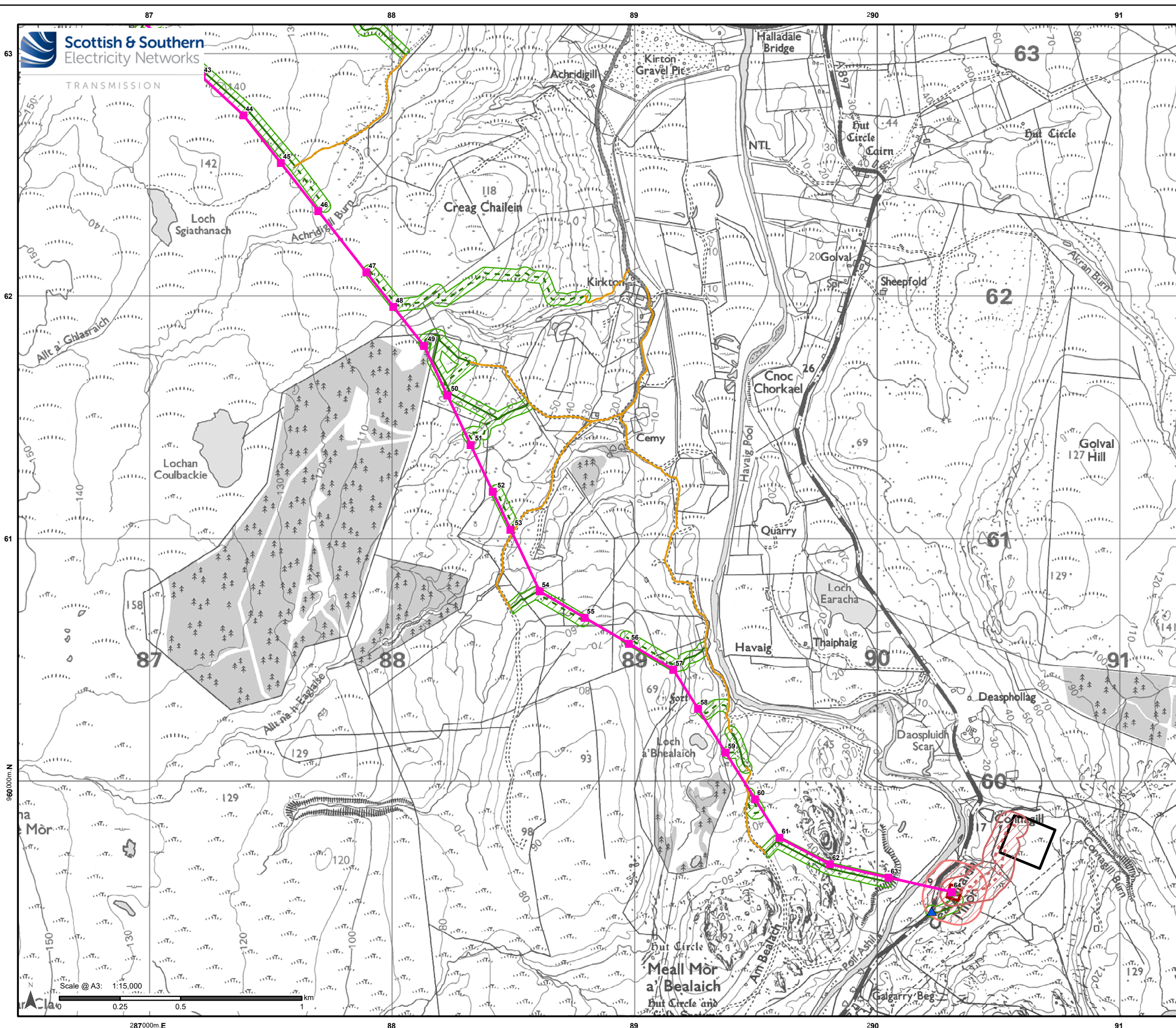
Project No: LT560
Project: Strathy South Wind Farm Grid Connection - EIA Report

Title: Figure V1-3.1.4: The Proposed Development – Proposed Alignment

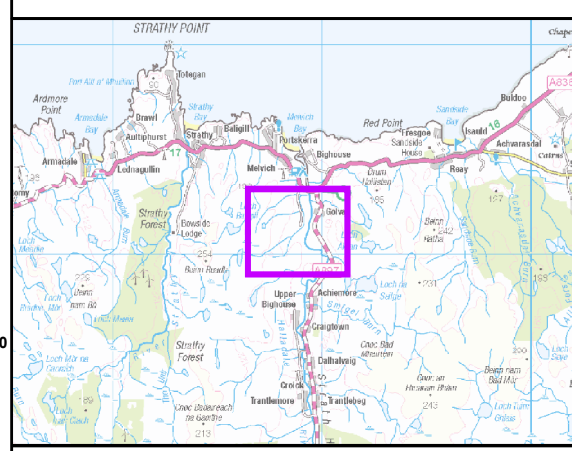
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- ### Legend
- Overhead Line (OHL) Works for which consent under Section 37 of the Electricity Act is sought**
- Proposed Steel Lattice Tower
 - Proposed OHL Alignment
- Ancillary Development for which Deemed Planning Consent (Town and Country Planning (Scotland) Act 1997 is sought)**
- Proposed Cable Sealing End (CSE) Compound
 - Limit of Deviation (CSE Compound)
 - New Bellmouth
 - Existing Access Track (to be upgraded)
 - Proposed Permanent Access Track
 - Proposed Temporary Access Track
 - Limit of Deviation (Access Tracks)
- Development which falls under the Town and Country Planning (General Permitted Development) (Scotland) Order 1992**
- Proposed Underground Cable (UGC)
 - Limit of Deviation (UGC)
- Existing Infrastructure**
- Connagill 275/132 kV Substation



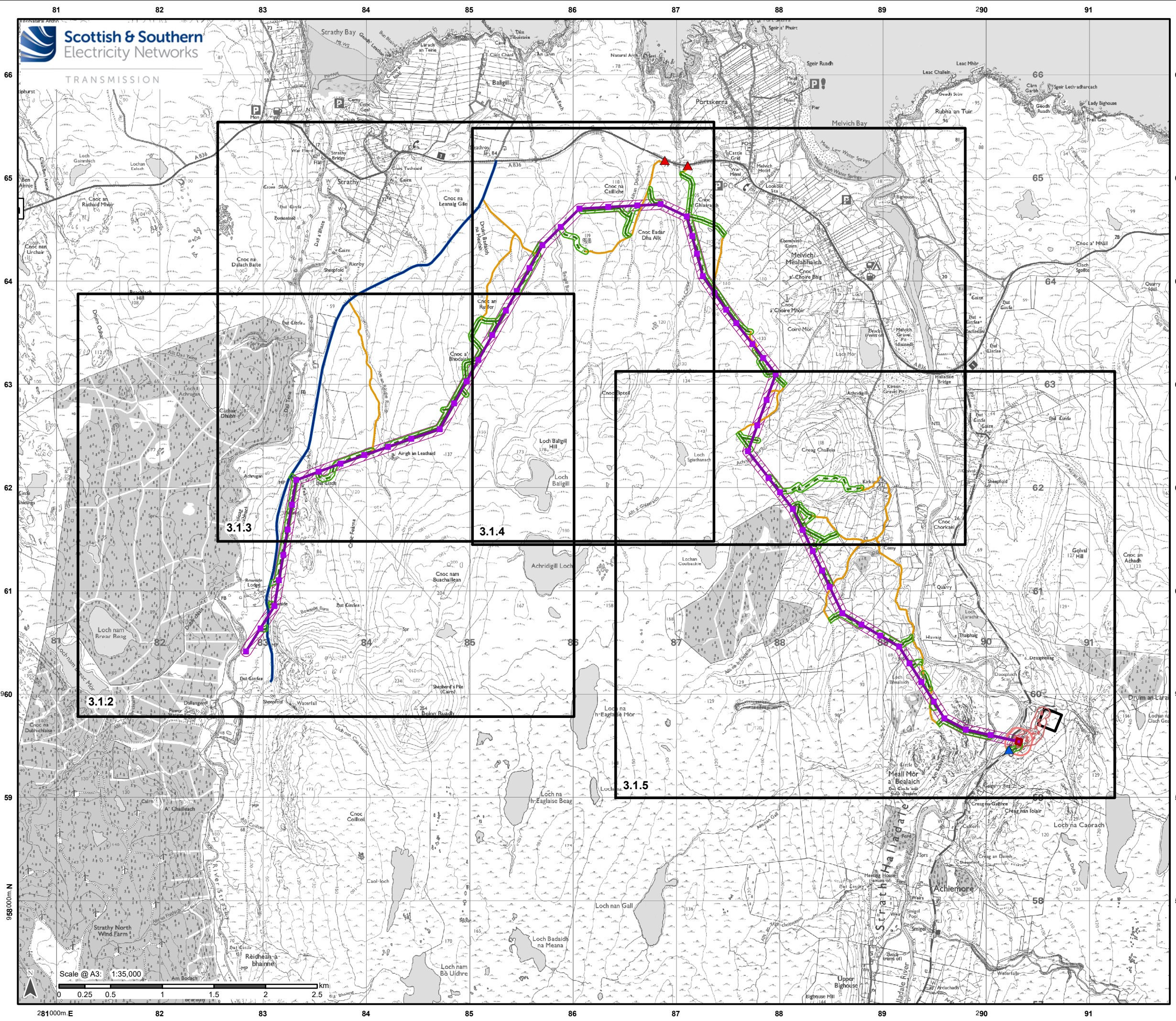
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Project No: LT560
Project: Strathy South Wind Farm Grid Connection - EIA Report

Title: Figure V1-3.1.5: The Proposed Development – Proposed Alignment

Drawn by: MT/SK Date: 06/02/2025

Drawing: 121008-EIAR-D-V1-3.1.5-1.0.0



Legend

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

- Alternative Steel Lattice Tower
- Alternative OHL Alignment
- Limit of Deviation (Alternative OHL)

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

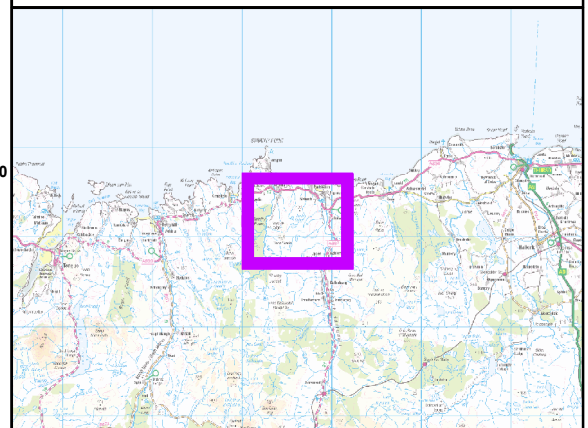
- Proposed Cable Sealing End (CSE) Compound
- Limit of Deviation (CSE Compound)
- Existing Bellmouth (To Be Upgraded)
- New Bellmouth
- Existing Access Track (to be upgraded)
- Proposed Permanent Access Track
- Proposed Temporary Access Track
- Limit of Deviation (Access Tracks)

Development which falls under the Town and Country Planning (General Permitted Development) (Scotland) Order 1992 Act 1997 is sought)

- Proposed Underground Cable (UGC)
- Limit of Deviation (UGC)

Existing Infrastructure

- Existing Access Track
- Connagill 275/132 kV Substation



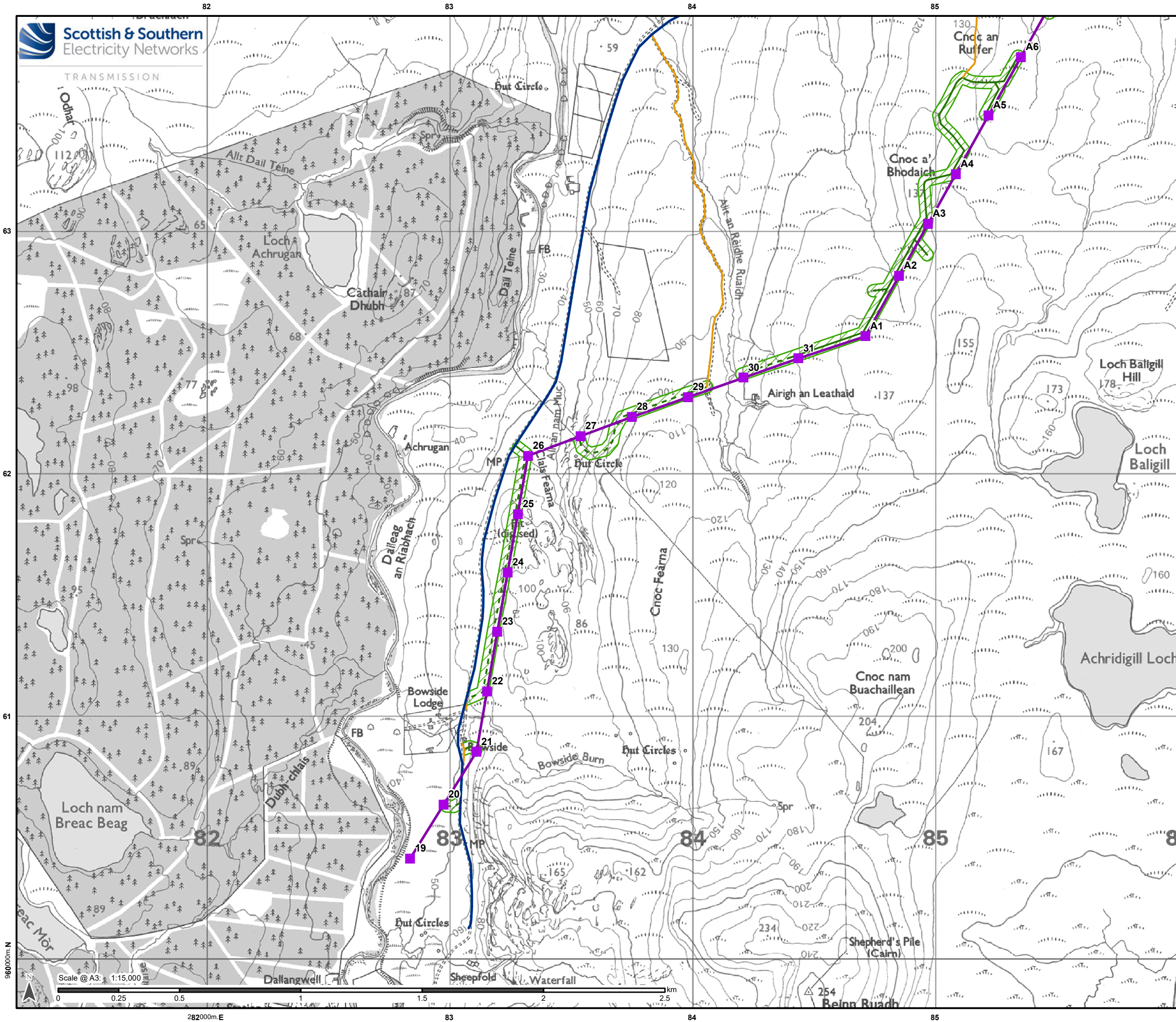
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Project: Strathy SouthWind Farm Grid Connection - Gate Check Report

Title: Figure V5-3.1.1: The Proposed Development (Alternative Alignment)

Drawn by: MT/SK Date: 06/02/2025

Drawing: 121008-EIA-V5-D3.1.1-1.0.0



Legend

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

- Alternative Steel Lattice Tower
- Alternative OHL Alignment

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

- Existing Access Track (to be upgraded)
- Proposed Permanent Access Track
- - - Proposed Temporary Access Track
- Limit of Deviation (Access Tracks)

Existing Infrastructure

- Existing Access Track



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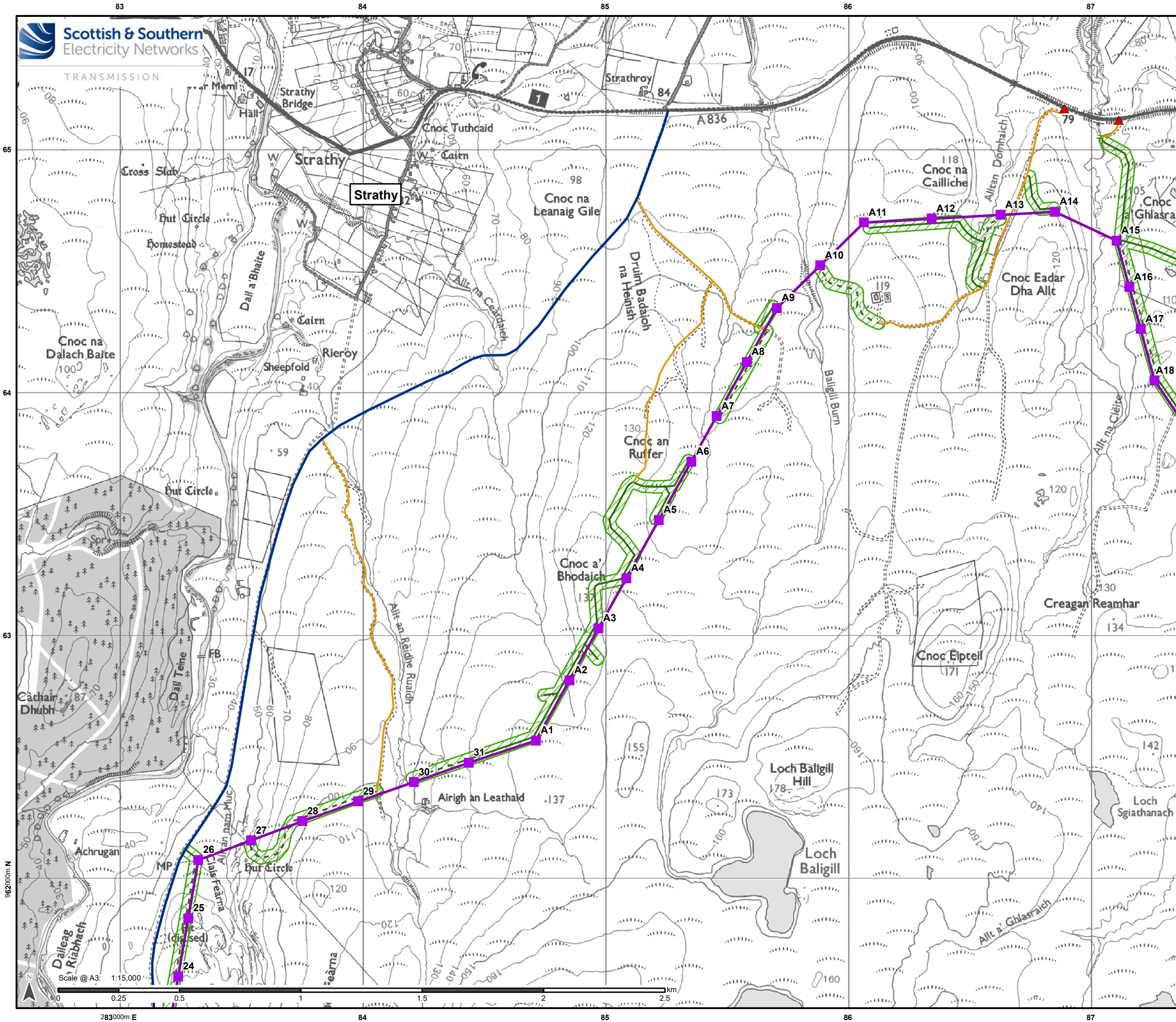
Project: Strathy SouthWind Farm Grid Connection - Gate Check Report

Title: Figure V5-3.1.2: The Proposed Development - Alternative Alignment

Drawn by: MT/SK

Date: 30/01/2025

Drawing: 121008-EIA-V5-D3.1.2-1.0.0



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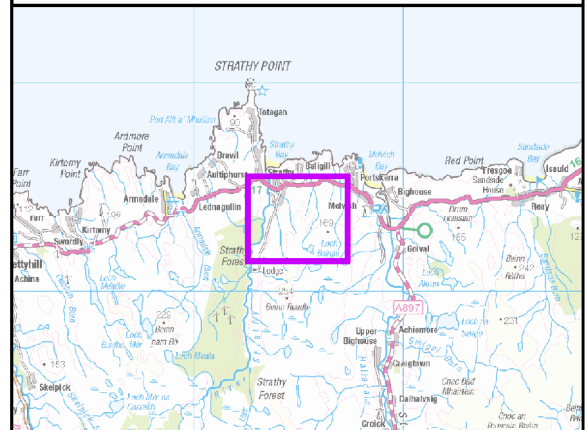
- Alternative Steel Lattice Tower
- Alternative OHL Alignment

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

- ▲ Existing Bellmouth (To Be Upgraded)
- Existing Access Track (to be upgraded)
- Proposed Permanent Access Track
- - - Proposed Temporary Access Track
- ▨ Limit of Deviation (Access Tracks)

Existing Infrastructure

- Existing Access Track



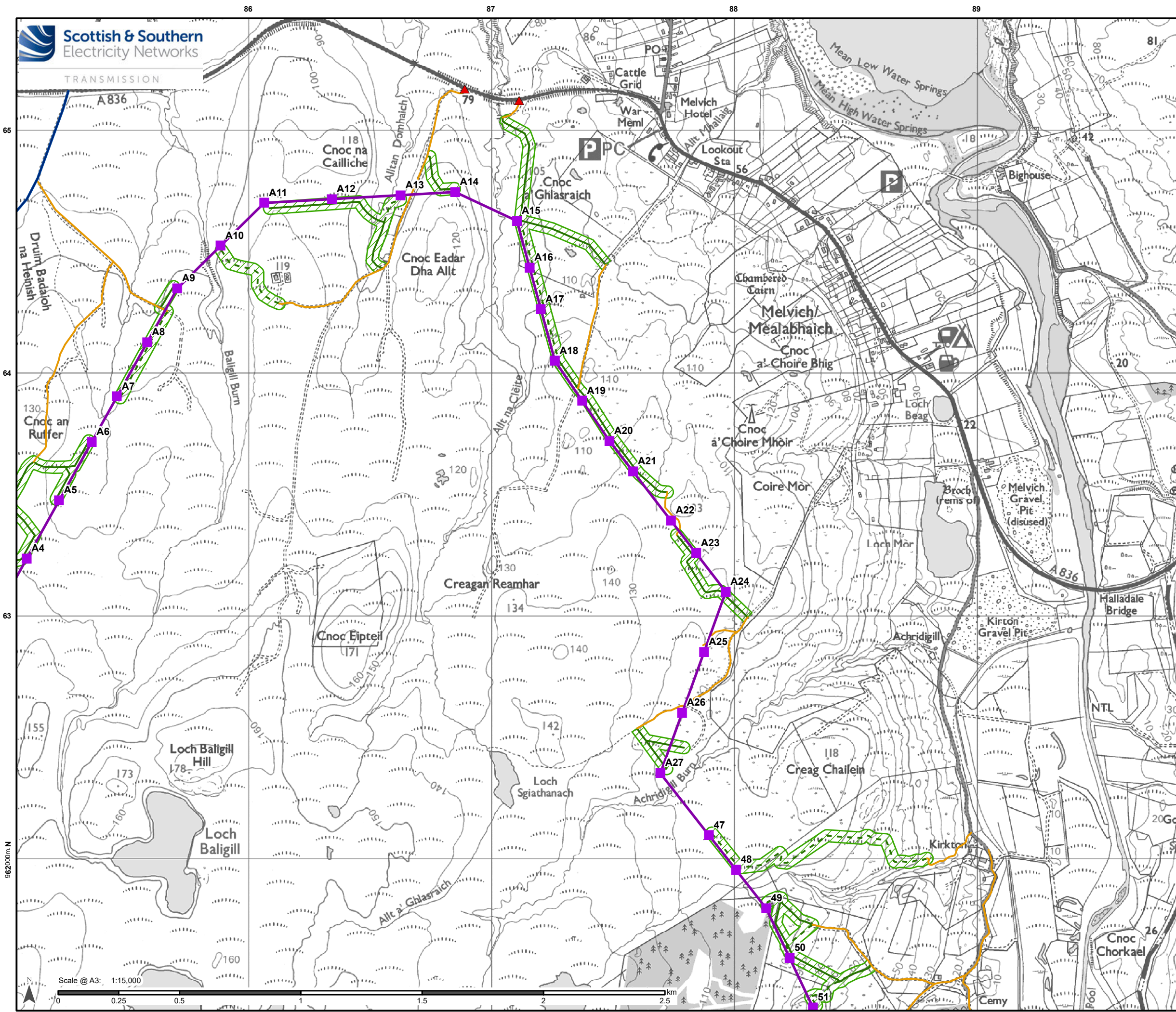
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Project: Strathy SouthWind Farm Grid Connection - Gate Check Report

Title: Figure V5-3.1.3: The Proposed Development - Alternative Alignment

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Drawing: 121008-EIA-V5-D3.1.3-1.0.0



Legend

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

- Alternative Steel Lattice Tower
- Alternative OHL Alignment

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

- ▲ Existing Bellmouth (To Be Upgraded)
- Existing Access Track (to be upgraded)
- Proposed Permanent Access Track
- - - Proposed Temporary Access Track
- ▨ Limit of Deviation (Access Tracks)

Existing Infrastructure

- Existing Access Track



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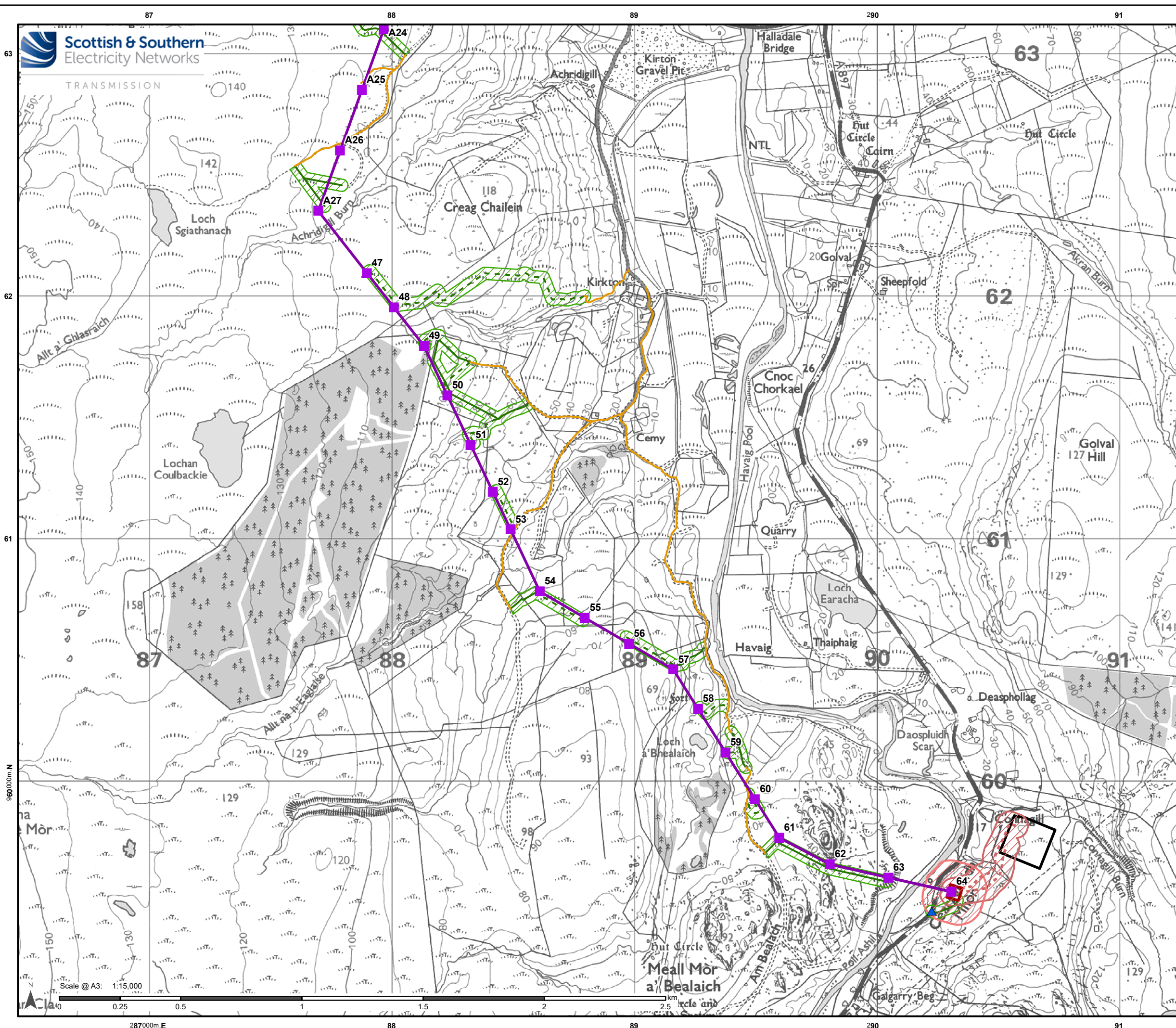
Project: Strathy SouthWind Farm Grid Connection - Gate Check Report

Title: Figure V5-3.1.4: The Proposed Development - Alternative Alignment

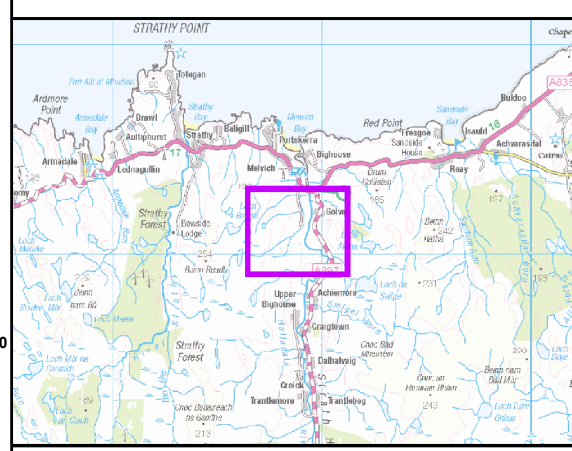
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Date: 30/01/2025

Drawing: 121008-EIA-V5-D3.1.4-1.0.0



- ### Legend
- Overhead Line (OHL) Works for which consent under Section 37 of the Electricity Act is sought**
- Alternative Steel Lattice Tower
 - 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
 - Limit of Deviation (CSE Compound)
 - New Bellmouth
 - Existing Access Track (to be upgraded)
 - Proposed Permanent Access Track
 - Proposed Temporary Access Track
 - Limit of Deviation (Access Tracks)
- Existing Infrastructure**
- Existing Access Track
 - Connagill 275/132 kV Substation
- Development which falls under the Town and Country Planning (General Permitted Development) (Scotland) Order 1992**
- Proposed Underground Cable (UGC)
 - Limit of Deviation (UGC)



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Project No: LT560
 Project: Strathy SouthWind Farm Grid Connection - Gate Check Report

Title: Figure V5-3.1.5: The Proposed Development - Alternative Alignment

Drawn by: MT/SK Date: 06/02/2025

Drawing: 121008-EIA-V5-D3.1.5-1.0.0

VOLUME 4: APPENDIX V1-3.2: FURTHER ENGINEERING DESIGN INFORMATION

VOLUME 4: APPENDIX V1-3.2: FURTHER ENGINEERING DESIGN INFORMATION

This appendix provides the following information to support **Volume 1: Chapter 3: The Proposed Development** and **Volume 5: Chapter 3: The Proposed Development – Alternative Alignment**:

- Schematic of L7c Towers (see Plate 1);
- Schematic of L8c Towers (see Plate 2);
- Schematic of Terminal 'H' wood pole structure (see Plate 3);
- Schematic of Angle 'H' wood pole structure (see Plate 4); and
- Typical Underground Cable Working area (see Plate 5).

Plate 1: Schematic of L7c Towers (Standard Height) from left to right: Suspension Tower, Tension Tower x 2, Terminal Tower

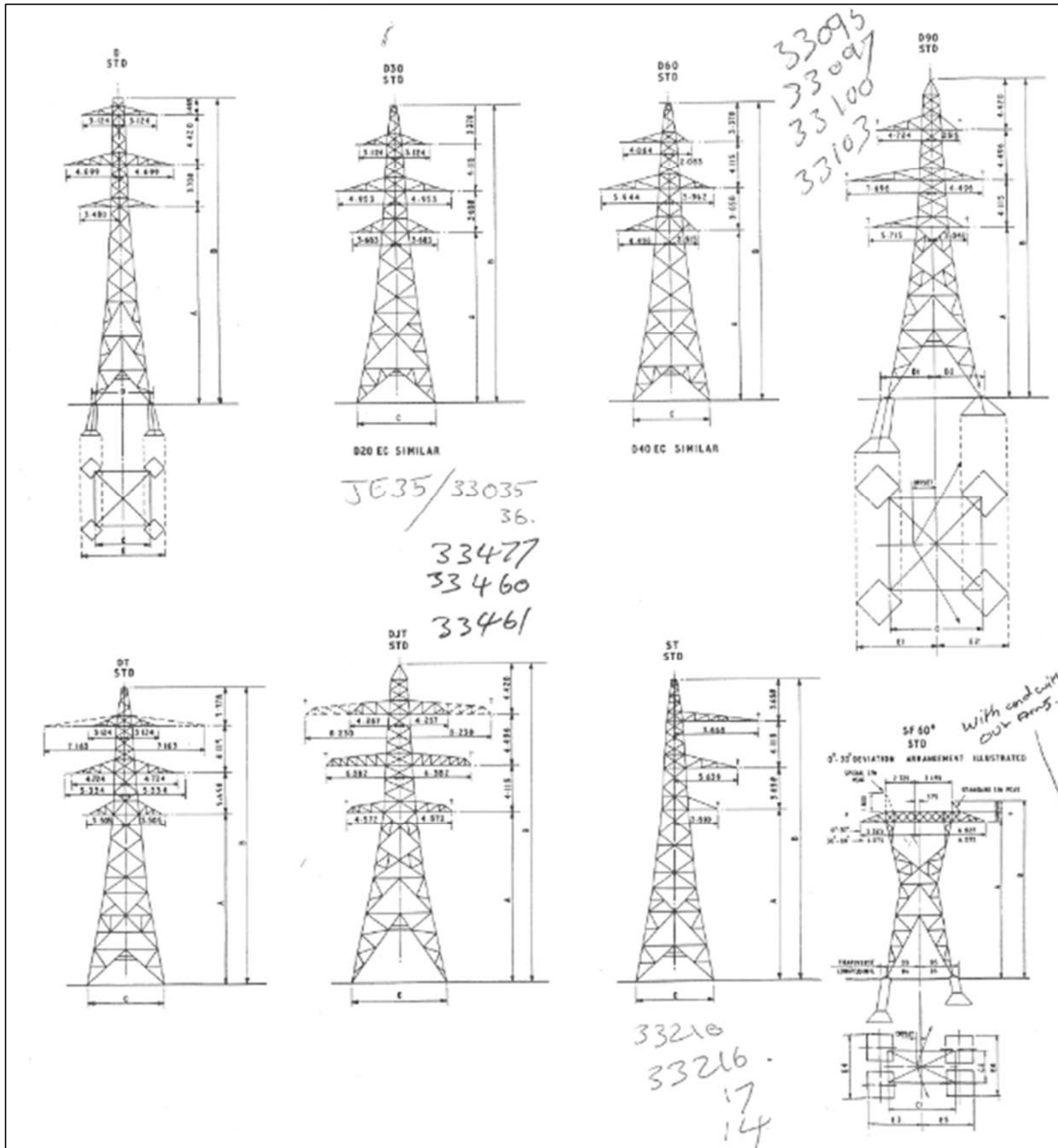


Plate 2: Schematic of L8c Towers (Standard Height)

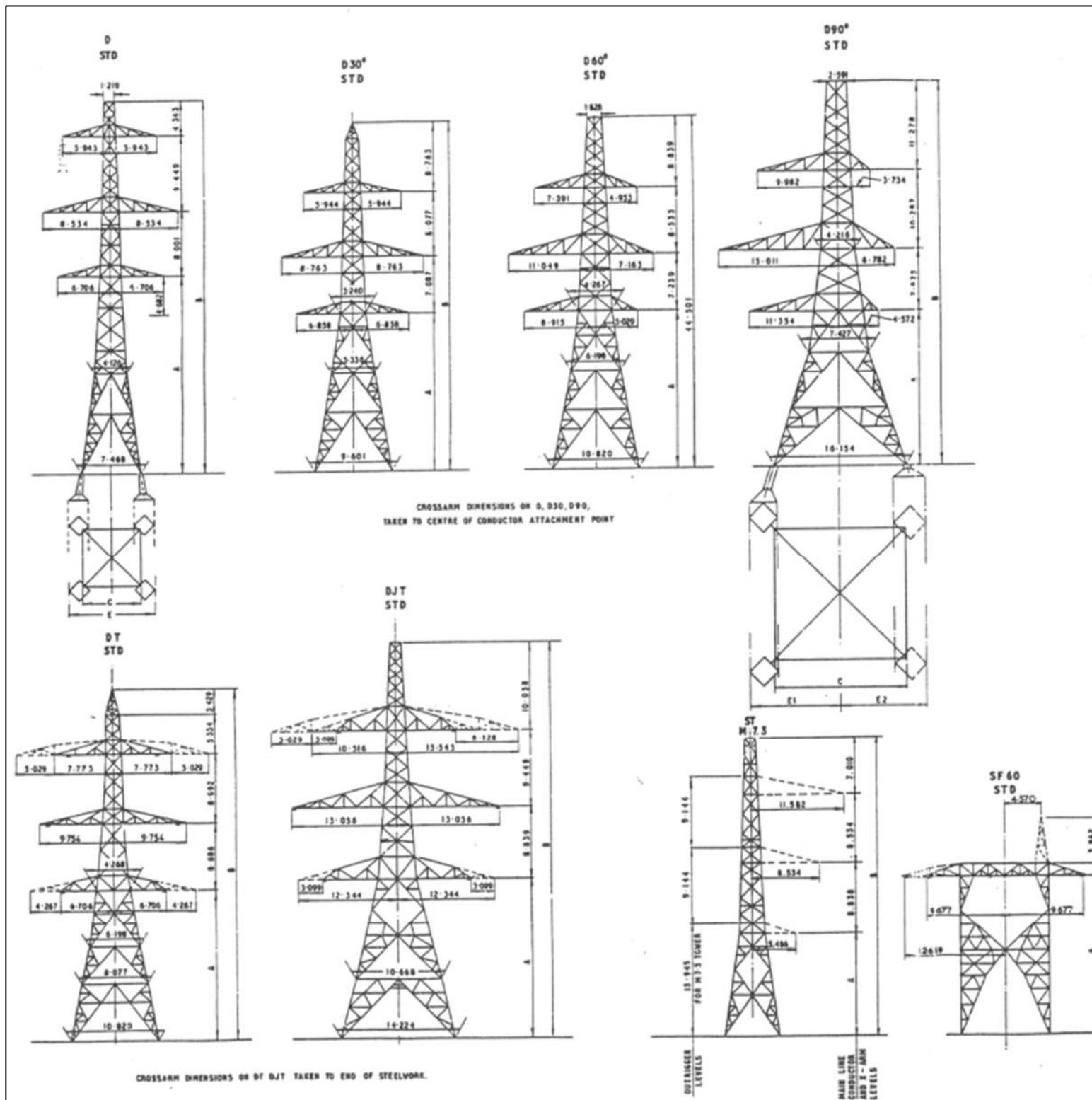


Plate 3: Schematic of Terminal 'H' wood pole structure

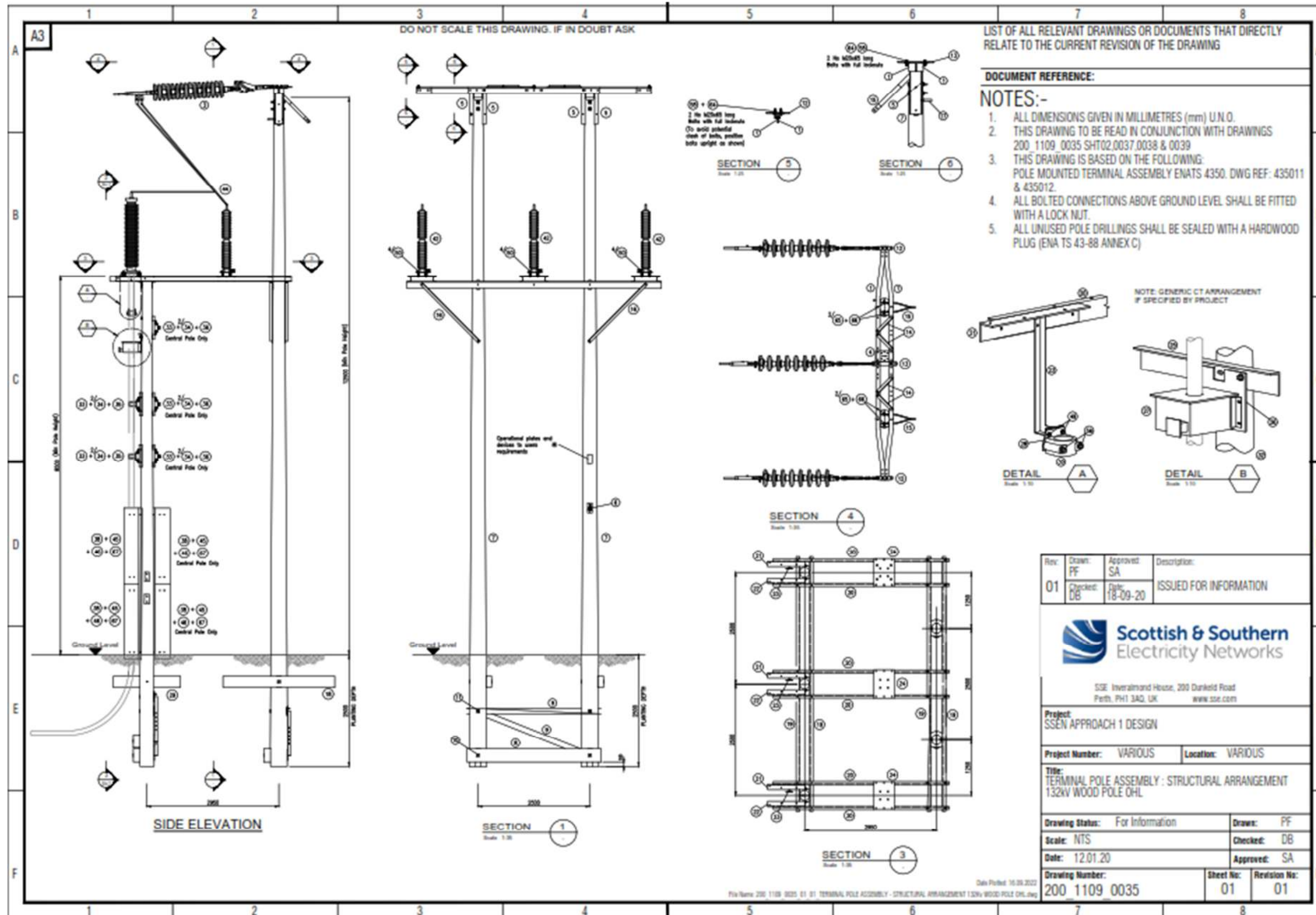


Plate 4: Schematic of Angle 'H' wood pole structure

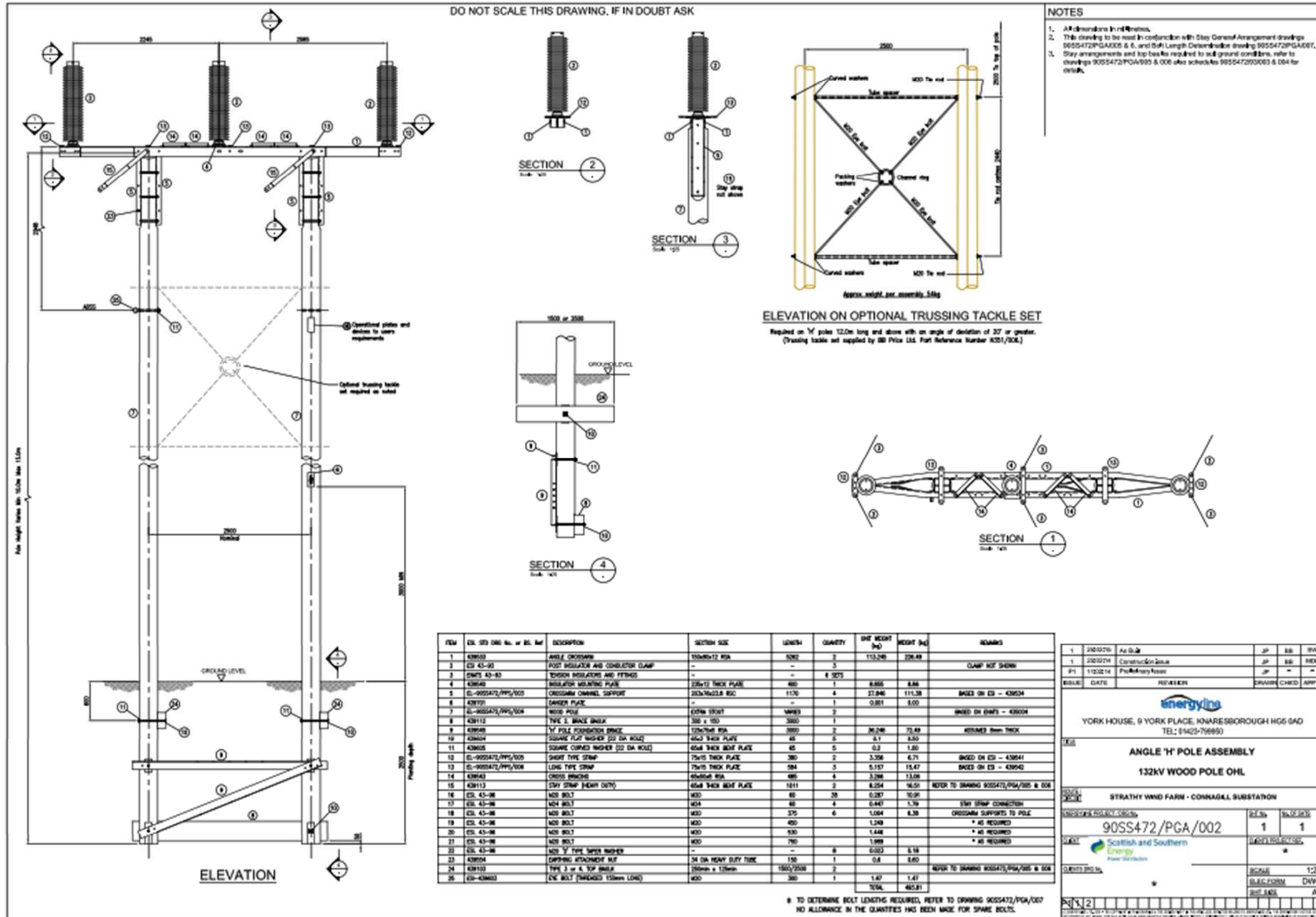
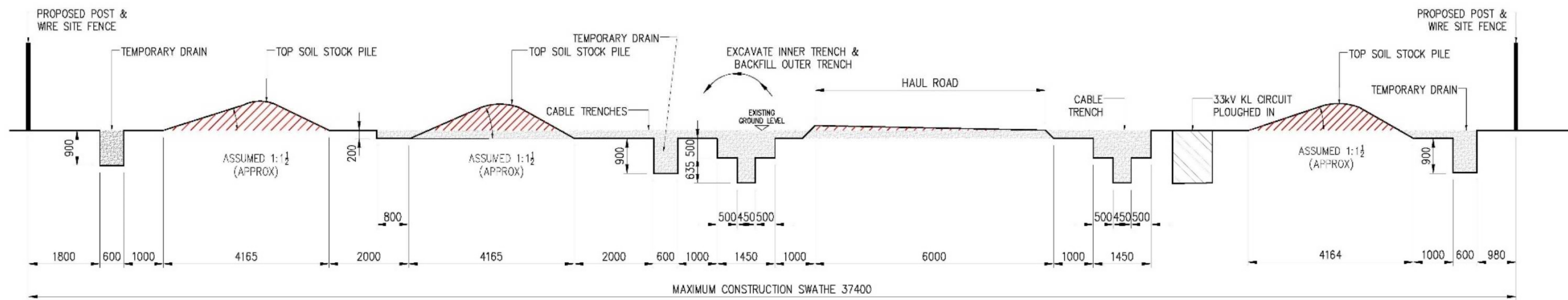


Plate 5: Typical Underground Cable Working Area



TYPICAL 37.4m SWATHE ALONG GENERAL ROUTE