

Agenda Item	3
Report No	PLN/PLS/01/26

HIGHLAND COUNCIL

Committee: North and South Planning Applications Committee
Date: 9 and 10 September 2026
Report Title: 25/03311/S37: Scottish Hydro Electric Transmission Plc
Land 2430M SW of Loch Buidhe, Bonar Bridge
Report By: North and South Area Planning Managers

Purpose/Executive Summary

Description: Spittal to Beaully 400 kV OHL - Install, operate and keep installed 173km of new 400 kV overhead electricity line, supported on steel lattice tower structures, between proposed new substations at Banniskirk (ND 15905 56823) in the area of Spittal, and Fanellan (NH 48534 43208) in the area of Beaully, with a connection via a proposed new substation at Carnaig (NH 65053 97458) near to the existing substation at Loch Buidhe, in the area of Bonar Bridge; associated permanent diversion works to 18km of existing 132 kV and 275 kV overhead electricity lines, including the temporary diversion works, and ancillary development and associated works.

Wards: 1 - North, West and Central Sutherland
3 - Wick and East Caithness
4 - East Sutherland and Edderton
5 - Wester Ross, Strathpeffer and Lochalsh
6 - Cromarty Firth
8 - Dingwall and Seaforth
12 - Aird and Loch Ness

Development category: National Development

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

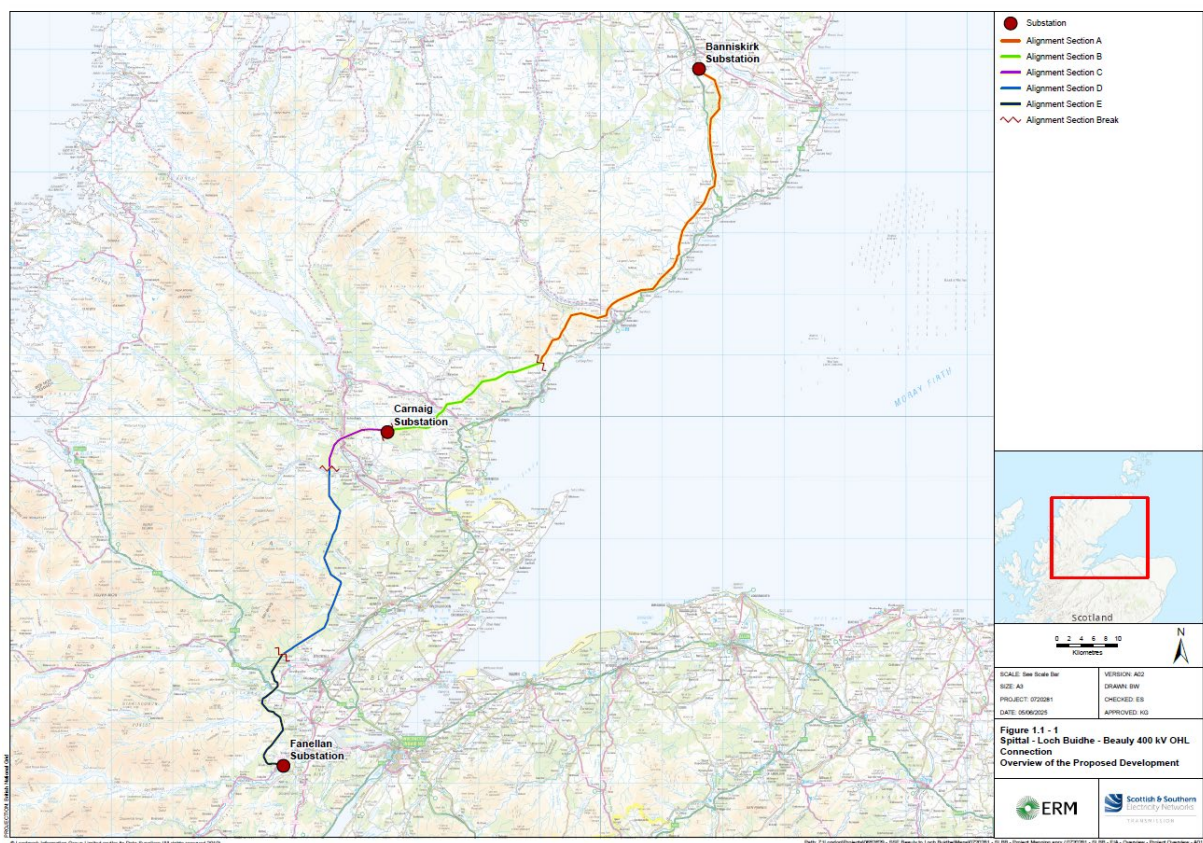
All relevant matters have been taken into account when appraising this application. It is considered that the proposal does not accord with the principles and policies contained within the Development Plan and is unacceptable in terms of applicable material considerations.

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 (ECU) on an application made under Section 37 of the Electricity Act 1989 (as amended), and for deemed planning permission under the Town and Country Planning (Scotland) Act 1997. This is for the construction and operation of electricity infrastructure, comprising a new 400 kilovolts (kV) overhead transmission line (OHL). This will extend over a distance of 173km between Spittal and Beauly via Loch Buidhe, referred to as the Spittal – Loch Buidhe – Beauly 400kV Connection. This application is a “National Development” as set out in the Scottish Government's fourth National Planning Framework Plan (NPF4).
- 1.2 As identified on EIAR Figure 1.1 (below), and in more detail in EIAR Volume 3, Chapter 3, Figure 3.1, the proposed OHL will connect the consented substation at Banniskirk (near Spittal - 24/04898/FUL) to the proposed substations of Carnaig at Loch Buidhe (24/05062/FUL) and Fanellan at Beauly (25/00826/FUL). Carnaig and Fanellan substations are currently the subject of planning appeals, which will be determined by Scottish Ministers.



- 1.3 For the purpose of the assessment, the proposed development has been presented within the EIA Report in five geographic sections:

Section A - Spittal to Brora (67km): Originates at Banniskirk substation, following a southerly direction west of Dunbeath, Berriedale and Helmsdale before continuing southwest to near Kintradwell.

Section B - Brora to Loch Buidhe (29km): Originates north of Brora, heading generally south-west towards Loch Buidhe Substation and the proposed new Carnaig substation.

Section C - Loch Buidhe to Dounie (14km): Originates at Carnaig substation, heading generally south-west towards Invershin and southwards to Dounie.

Section D - Dounie to Near Strathpeffer (37km): Originates at Carnaig substation, heading generally south-west towards Invershin and southwards to Dounie.

Section E - Near Strathpeffer to Beaully (26km): Originates north of Strathpeffer following a southerly direction to Fanellan substation.

1.4 The proposed development comprises:

- new double circuit 400kV OHL on steel lattice towers, including downloads, between the consented Banniskirk (ND 15905 56823) and Carnaig (NH 65053 97458) 400kV substations over a length of 96km;
- new double circuit 400kV OHL on steel lattice towers, including downloads, between the proposed Carnaig and Fanellan (NH 48534 43208) 400kV substations over a length of 77km; and
- permanent diversion works to existing 132kV and 275kV OHLs (referred to within this report as special arrangements) over a distance of 18km to enable the construction of the new OHL, as well as temporary diversion works required to construct the permanent diversions.

1.5 In total, the proposed development would comprise 191km of new OHL infrastructure. This includes new OHL and permanent diversion works. The proposed OHL would be supported by steel lattice towers measuring an average height of 57m spaced at around 350m intervals. The anticipated construction period would be 4 years with the OHL's infrastructure expected to be permanent.

1.6 The application also involves ancillary development to facilitate construction and operation of the OHL, for which deemed planning permission is sought. Ancillary Works comprise:

- access tracks (permanent, temporary, and upgrades to existing tracks) and the installation of structures, for example, bridges and culverts to facilitate access;
- public road improvements (PRI) which would be required in some areas to facilitate construction traffic;
- upgraded and new 'bellmouths' (junctions with curved entry and exit points) at public road access points;
- temporary measures required during construction, such as measures to protect existing infrastructure and water crossings during construction (such as scaffolding);
- formation of flat areas from which the conductor (cables) will be pulled during construction, which will contain earthed metal working surfaces referred to as Equipotential Zones (EPZs);
- working areas around infrastructure to facilitate construction;
- removal of redundant sections of the existing OHLs, following construction and energisation of the permanent diversion works; and

- tree felling and vegetation clearance to facilitate construction and operation of the OHL.

1.7 Special arrangements are required to facilitate the crossing of the new OHL with an existing 132 kV or 275 kV OHL. Six special arrangement crossings form part of the proposal:

Section	Crossing Point	Voltage	Proposed Arrangement
A	Crofts of Benachielt	132kV	Duck Under with Space Provision for Live Scaffolding
B	Strath Carnaig	132kV	Diamond Duck Under with Flat Formation Towers
C	West of Loch Buidhe	275kV	Diamond Duck Under with Flat Formation Towers
	Near Invershin	132kV	Duck Under with Wood Poles, with live line Scaffold Provision
E	North-West of Fairburn	132kV	Diamond Duck Under Arrangement
	West of Fanellan/Aigas Gorge	132kV	Duck Under with Wood Poles, with live line Scaffold Provision

1.8 Other associated works are required to facilitate construction of the proposed development or would occur as a consequence of its construction and operation. These works, listed below, do not form part of the description of the proposed development and are therefore not included in this application. On that basis they are not assessed in detail in the EIA Report. However, further detail on some of these elements is provided where available, as noted within the relevant appendices to EIA Report, and also considered as part of the cumulative assessment within the technical chapters as appropriate.

The associated works are:

- Borrow pits will be required to source stone for the construction of access tracks. As there is insufficient information on the location, number and scale of borrow pits at the time of submission, separate planning applications for these works will be sought by the Principal Contractors;

- Temporary construction compounds will be required along the route of the proposed development to facilitate its construction. The final location and design of temporary site compounds will be confirmed by the Principal Contractors, and separate planning permissions will be sought as required;
- New 400kV substations and High Voltage Direct Current (HVDC) Converter Stations at Banniskirk (ND 15905 56823) and Fanellan (NH 48534 43208), and a new 400kV substation at Carnaig (NH 65053 97458). Separate applications for planning permission under the Town and County Planning (Scotland) Act 1997 have been submitted by the applicant for these developments; and
- Modification of the existing distribution network to accommodate the new OHL. These works are likely to comprise short sections of the existing distribution network being diverted or undergrounded and would be undertaken by Scottish Hydro Electric Power Distribution (SHEPD). Consent would be sought by SHEPD as required.

1.9 The judgment in *Raeshaw Farms Ltd v Scottish Ministers* [2026] CSIH 10 has brought renewed focus to the need to accurately define the scope of “the project” for Environmental Impact Assessment (EIA) purposes. In this case, the EIAR does not treat the associated works identified in the above paragraph as forming part of the project. However, the adequacy of that approach is ultimately a matter for Scottish Ministers as decision-maker.

1.10 Officers however consider that these associated elements would form part of the EIA project, with an exception being construction accommodation which may serve multiple construction projects and could therefore fall outwith the confined scope of this particular project. Borrow pits, temporary construction compounds and modifications to the distribution network have therefore not been fully assessed within the EIAR. Nor has it been demonstrated, on the available information, that such effects are not identifiable or capable of meaningful assessment at this stage. In the absence of such assessment or justification, there is a reasonable basis for concluding that the requirements of the EIA Regulations have not been satisfied and that Regulation 3 prohibits the grant of consent. It is recommended that this forms a reason for raising objection to the application.

Consultation

1.11 The applicant undertook public consultation on a number of occasions between February 2023 and March 2025 primarily as in person consultation events supported with online resources. This included:

- Nine public events at locations between Halkirk and Beaully (Kilmorack) between 20 February and 2 March 2023, as well as a virtual event on 6 March 2023 during the route options stage of the project. Update events were held in March 2024 (at 14 locations between 11 March and 28 March).
- Pre-application consultation (PAC1) was undertaken in respect of the preferred alignment through a series of in person consultation events between 3 and 20 June 2024 at 14 venues between Halkirk and Kiltarlity. Attendance recorded by the Applicant across all the events was 552. Further detail on the Proposed Alignment and provide feedback to stakeholders was undertaken (PAC2). In person events were held at 12 venues between Spittal and Kiltarlity.

- The Applicant also held a number of public meetings (both in person and online) with Elected Members, Community Councils, and other community groups and interested parties between February 2023 and October 2024.

The application is supported by a Pre-Application Consultation Report which documents the consultation undertaken and sets out how the applicant responded to the responses received.

- 1.12 The applicant received advice from the Council's Pre-Application Advice Service for Major Developments in November 2023 (ref: 23/04004/PREMAJ). Key issues identified related to the landscape and visual impacts; particularly on the Special Landscape Area (SLA). Particular concerns were expressed with the B1 and B3 options due to the potential impacts on the Loch Fleet, Loch Brora and Glen Loth SLA. The merits of the community alternative route proposed in the southern area of Section D was also encouraged to be given due consideration, forming part of any further routing options developed for further consultation with the Council and other consultees. More widely, the southern part of Section D, to the north of Strathpeffer, and the entirety of Section E, were highlighted as areas that should be considered for undergrounding, due both to the density of population in this area, as well as the degree of landscape and visual intrusion of current electricity transmission infrastructure. The advice provided indicated support for project where the concerns of Council Officers, communities, and other key consultees regarding the OHL route can be satisfactorily addressed.

Submitted Information

- 1.13 The application is supported by an Environmental Impact Assessment Report (EIAR) which assesses the proposal in terms of: Landscape and Visual; Ecology and Nature Conservation; Ornithology; Water Environment; Geological Environment; Cultural Heritage; Forestry; Traffic and Transport; Noise and Vibration; and Tourism and Recreation. The EIAR also contains a schedule of environmental mitigation. A number of other supporting documents have been submitted including: an Aviation Risk Assessment; Electric and Magnetic Field Assessment; a PAC Report; Planning Statement and Socio-Economic Report.

Variations and Supplementary Environmental Information

- 1.14 No variations have been made to the proposed development during the consultation process.
- 1.15 Supplementary Environmental Information (SEI) was requested by the Council and other statutory consultees. In summary, on 10 December 2025 the Council specifically requested the submission of the following:
- Recreational Access Management – amendments to show the full extent of Core Paths and Rights of Way;
 - Transport - abnormal load vehicle details, routing, and identified road constraints. HGV traffic assessment for the intended main routes, identification of aggregate supplies, further detail of intended public road improvements, and further related transportation details to inform assessment of impact;

- Ecology and ornithology – additional protected species surveys for bats and wildcat, Habitat Management Plan disruption / compensation detail, a Great Crested Newt Species Protection Plan, and biodiversity enhancement details;
- Cultural Heritage - evaluation of setting for 17 listed heritage assets and 1 Garden and Designed Landscape; and
- Landscape and Visual – assessment at each viewpoint, review of additional receptors (routes, settlements and residential properties) to be covered in an updated assessment, and methodology queries to be addressed.

At the request of the Energy Consents Unit, in March 2026 SEI was submitted, however, this was limited to covering the following matters:

- Private Water Supplies;
- Further “visual material” in relation to 24 Scheduled Monuments; and
- A Heritage Assessment of the direct impacts on the Fairburn Garden and Designed Landscape.

On 2 July 2026 the applicant responded to the Council, explaining that a substantial proportion of the information requested would not normally be available during the consenting process, as it depends on detailed design progression or would usually be secured by condition. The applicant had stated that should this information be required, then a significant delay, in excess of 12 to 18 months, would be incurred, contrary to the targeted accelerated determination timeline and risks national infrastructure targets. Limited further clarification was however offered covering ecology matters.

Determination Procedure

- 1.16 The application relates to an Accelerated Strategic Transmission Investment (ASTI) project, which the Scottish Government has indicated should be determined within a 52-week timeframe, beginning from the date that the application is submitted. Following consultation with the Chair and Vice-Chair of the South Planning Applications Committee, Officers raised a timeous objection to the application under delegated powers on 30 October 2025.
- 1.17 In view of the objection raised by the Council and other statutory consultees, and the accelerated timeline identified, the application has been passed to the Planning and Environmental Appeals Division (DPEA) for a Public Local Inquiry (PLI) to be held. This process has commenced with a Pre-Examination Meeting held on the 11 August 2026. A Pre-Examination Meeting is a meeting between the Council, the Applicant and all other interested parties to discuss the procedure of the inquiry, rather than the merits of the case. The inquiry process will include a combination of further written submissions and hearing sessions due to be held between 23 November and 18 December 2026.
- 1.18 The inquiry programme and associated deadlines have been set by the Reporters and provide only limited opportunity for matters arising during the process to be referred to Committee. The Council, along with other interested parties, has raised concerns with the Reporters appointed to consider this inquiry regarding the practical and procedural constraints arising from the timetable, including the limited opportunity for the Council to consider further information submitted by the Applicant and, where necessary, report that information through the Council’s committee process before relevant inquiry deadlines are reached. Notwithstanding these representations, the Council has been

advised by the Reporters appointed to consider this inquiry that the inquiry process will continue in accordance with the timetable established.

- 1.19 In practical terms, this means that where further information or evidence is submitted by the Applicant, or where new procedural or evidential matters arise during the course of the inquiry, there may be insufficient time to fully assess that information and refer the matter back to Committee before a relevant submission deadline or inquiry session. Delaying the Council's response pending further Committee consideration could therefore result in the inquiry proceeding without the Council's position on that matter being fully presented. This is further complicated by the number of related electricity transmission proposals progressing through separate consenting and inquiry processes and the potential for further information arising through those processes to have implications for the cumulative assessment and the presentation of the Council's case.
- 1.20 In recognition of these constraints, a wider suite of delegated powers is sought to enable officers to manage the Council's effective participation in the PLI, including responding to further information and evidence, making necessary procedural submissions, refining or supplementing the Council's case and taking such other steps as may reasonably be required to protect the Council's interests throughout the inquiry process. Any exercise of these delegated powers would remain consistent with the substantive position and grounds established by Committee and would be informed, where appropriate, by specialist legal advice provided by our Legal Counsel. The decision of Committee will therefore determine the Council's position and grounds at PLI. Following PLI, the application will be determined by Scottish Ministers.
- 1.21 Appendix 1 provides a copy of the DPEA PLI Note of Pre-Examination Procedure Meeting 11 August 2026.

2 SITE DESCRIPTION

- 2.1 The proposed development is located entirely within the Highland Council area, and extends across 191km from Spittal in Caithness, to Loch Buidhe in Sutherland, to Beauly in Inverness-shire. The landscape within and surrounding the proposed development site comprises a mix of open uplands and moorlands, glens, mountains, small villages, watercourses and farmed landscapes. Due to the length of the proposed OHL, the EIAR refers to the proposal by geographical sections A-E.
- 2.2 The proposal is located within, or proximity to, the following designations for nationally and internationally important ecological and ornithological interests.

Section	Distance	Designation
A	0km (within)	Flow Country World Heritage Site (WHS)
	0km (within)	Berrideale and Langwell Waters Special Area of Conservation (SAC)
	0km (within)	Caithness and Sutherland Peatlands SAC / Special Protection Area (SPA) / Ramsar
	0.07km	River Thurso SAC

	0.02km	East Caithness Cliffs SPA
B	2.5km	Moray Firth SPA/SAC
	0.02km	Berriedale Cliffs Site of Scientific Special Interest (SSSI)
	0km (within)	Dunbeath Water SSSI
	0km (within)	Langwell Water SSSI
	0km (within)	Shielton Peatlands SSSI
	0km (within)	Berriedale Water SSSI
	0.04km	Mound Alderwoods SAC/SSSI
	0.04km	Dornoch Firth and Loch Fleet SPA/Ramsar
	0km (within)	Strath Carnaig and Strath Fleet Moors SPA/SSSI
	3.1km	Loch Fleet SSSI
	0.014km	Carrol Rock SSSI
	6.3km	Coir an Eoin SSSI
	6.3km	Caithness and Sutherland Peatlands SPA/SSSI
	7.6km	Lairg and Strath Brora Lochs SPA/SSSI
	15.7km	East Caithness Cliffs SPA
C	0km (within)	River Oykel SAC
	0km (within)	Strath Carnaig and Strath Fleet Moors SPA/SSSI
	0km (within)	Kyle of Sutherland Marshes SSSI
	9.4km	Mound Alderwoods SAC/SSSI
	8.1km	Caithness and Sutherland Peatlands SPA/Ramsar
	9.1km	Lairg and Strath Brora Lochs SPA/SSSI
	8.1km	Grudie Peatlands SSSI
D	0km (within)	Allt nan Caorach SSSI
	1.9km	Novar SPA
	7.8km	Morangie Forest SPA
	3.2km /1.9km to SSSI Boundary	Ben Wyvis SPA/SSSI
	9.4km	Glen Affric to Strathconon SPA
	4.7km	Cromarty Firth SPA/Ramsar/SSSI
	7.5km	Strath Carnaig and Strath Fleet Moors SPA/SSSI
	17km	Lairg and Strath Brora Lochs SPA/SSSI
	14.4km	Inner Moray Firth SPA/Ramsar
	12.8km	Dornoch Firth and Loch Fleet SPA/Ramsar
	14.2km	Caithness and Sutherland Peatlands SPA/Ramsar
E	4.4km	Inner Moray Firth SPA/Ramsar
	4.4km	Beaully Firth SSSI
	5.1km	Glen Affric to Strathconon SPA
	6.1km	Moray Firth SPA
	5.3km	Glen Strathfarrar SSSI
	7.6km	Cromarty Firth SPA/Ramsar/SSSI
	9.4km	North Inverness Lochs SPA
	9.4km	Balnagrantach SSSI

2.3 The route of the proposed line, Limit of Deviation (LoD) corridor and ancillary infrastructure is also be located within, or in proximity to the following designated and protected landscapes.

Proposed development is located **within** designations:

- Causeymire – Knockfin Flows Wild Land Area (WLA)
- The Flow Country and Berriedale Coast Special Landscape Area (SLA)
- Loch Fleet, Loch Brora and Glen Loth SLA

Other designations potentially influenced in the **wider study area**:

- Dornoch Firth National Scenic Area (NSA)
- Glen Strathfarrar NSA
- Ben Klibreck – Armine Forest WLA
- Central Highlands WLA
- Rhiddoroch – Beinn Dearg – Ben Wyvis WLA
- Ben Wyvis SLA
- Fannichs, Beinn Dearg and Glencalvie SLA
- Strathconnon, Monar and Mullardoch SLA

2.4 The line crosses a multitude of landscape character types as classified by NatureScot. These comprise:

- LCT 134 (Sweeping Moorland and Flows)
- LCT 135 (Rounded Hills – Caithness and Sutherland)
- LCT 142 (Farmed Lowland Plain)
- LCT 144 (Coastal Crofts and Small Farms).
- LCT 139 (Rugged Mountain Massif – Caithness and Sutherland)
- LCT 220 (Rugged Massif – Inverness)
- LCT 227 (Farmed Strath – Inverness)
- LCT 229 (Enclosed Farmland)
- LCT 330 (Rounded Hills and Moorland Slopes – Ross and Cromarty)
- LCT 331 (Rounded Rocky Hills – Ross and Cromarty)
- LCT 335 (Wooded Glens and Rocky Moorland)
- LCT 341 (Forest Edge Farming).
- LCT 345 (Farmed and Forested Slopes – Ross and Cromarty)
- LCT 346 (Open Farmed Slopes)
- LCT 342 (Farmed River Plains)

2.5 There are numerous visual receptors along the route of the line with building-based receptor locations, roads, Core Paths and other recreational routes and known outdoor locations where the view is one of the principal reasons for being at the location, such as parking and viewing areas, local outdoor visitor attractions having been assessed.

2.6 The site and its wider environment support a range of protected species and habitats. Terrestrial mammals include badger, brown hare, mountain hare, otter, pine marten, red squirrel, Scottish wildcat, water vole, bats (four species), reptiles (three species), and great crested newt. The proposed alignment of the OHL would cross watercourses, which support a range of aquatic habitats. Aquatic ecology found across the proposed site include Atlantic salmon, brown trout, European eel, Lamprey, water beetle and freshwater pearl mussel. Within the site and its wider environs, invasive non-native species (INNS) are present. Invasive non-native mammal species recorded across the proposed OHL site include American mink and sika deer. Fifteen invasive

non-native plant species were recorded across the proposed OHL site, as set out in Table 8.9 of Vol 2, Chapter 8 of the EIAR.

- 2.7 The OHL also intersects areas of forestry and ancient woodland. The EIAR states a direct loss of 536.74ha of woodland across the operational corridor. Further areas of forestry located adjacent to the proposed operational corridor and outwith the red line boundary of the proposal will require to be felled to mitigate risk of forest damage through windthrow. The applicant anticipates an additional area of some 536.65ha of management felling would be required, however this would be subject to separate discussions with landowners.
- 2.8 There are a number of cultural heritage assets within the LoD, comprising both designated and non-designated features, notably Fairburn Garden and Designed Landscape (GDL). More designated assets are located within the surrounding study area, notably Ardross Castle GDL, Castle Leod GDL, and the Spa Gardens Strathpeffer GDL as well as beyond the study area.
- 2.9 The proposed line is located within an area which is subject of other existing and planned major developments, which are subject of cumulative assessment. All major energy related projects in Highland are recorded on the Council online Energy Map. The EIA has considered two forms of cumulative assessment: in-combination effects and effect interactions.
- 2.10 In-combination effects refer to the combined impact of the proposed development with other reasonably foreseeable developments and are assessed within each topic chapter of the EIAR. This is undertaken using a two-stage approach, firstly assessing cumulative effects with associated SSEN Transmission projects to understand the wider network impacts, and secondly considering all other relevant developments to determine overall in-combination effects.
- 2.11 Effect interactions, addressed in a separate EIAR chapter, consider the combined or synergistic influence of multiple effects on a single receptor, where the interaction of different impacts may result in a greater overall effect than when considered individually.

3. PLANNING HISTORY

- 3.1 Appendix 2 details the planning history for the route of the proposed development. Owing to the line's geographical extent, details of the planning history for the site given is not comprehensive, focusing only on pertinent recent planning application activity:

4. PUBLIC PARTICIPATION

- 4.1 As a Section 37 application the public participation process is managed by the Energy Consents Unit. At the time of writing, 2,369 public comments were received by the Energy Consents Unit, with 1 representation in support and the rest objections. All letters of representation are available for inspection via the Energy Consents Unit website which can be accessed through the following link:

<https://www.energyconsents.scot/ApplicationDetails.aspx?cr=ECU00006008&T=4>

- 4.2 Advert Type: EIA Development

EIA Advertised: Edinburgh Gazette, Press and Journal (West), John O’Groats Journal, and Ross-shire Journal (05 September 2025 and 12 September 2025)

ECU EIA Representation Deadline: 12 October 2025

Supplementary Environmental Information (SEI) Advertised: Edinburgh Gazette, Press and Journal (West), John O’Groats Journal and Ross-shire Journal (13 March 2026 and 20 March 2026)

ECU SEI Representation Deadline: 15 April 2026

- 4.3 Material considerations raised in **objections** to the proposed development are summarised as follows:

EIA Deficiencies

- EIA is incomplete, lacking in information, and non-compliant with the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017;
- Failure to assess project with related substation applications as a whole - salami slicing of EIAs;
- Inadequate consideration of routeing alternatives, including subsea cabling and undergrounding;
- Inadequate mitigation measures, too generic and un-enforceable;
- Insufficient detail in Aviation Risk Assessment;
- Insufficient information on peat carbon assessment, peat surveys, and peat;
- Inadequate surveys which are incomplete or out of date in places; landslide hazard and risk monitoring, and peatland restoration;
- Inadequate surveys which are incomplete or out of date in places;
- Commitment to site-specific geotechnical investigations (boreholes, lab tests) is vague;
- Desktop checks for contaminated land may have missed unlicensed or historic deposits;
- Crossing schedules and CAR-qualifying works are incomplete;
- Adverse impacts from operational corona noise and construction noise and vibration;
- Information is under-modelled, operational substation tonality is not assessed;

Landscape and Visual Impact

- Adverse landscape and visual impact with inadequate assessment, viewpoint selection and visualisations;
- Cumulative impact - adds to existing energy infrastructure burden. Incomplete project list underestimates combined effects on landscape, ecology, and communities. Inconsistent cumulative baselines;
- Industrialisation of Highlands and rural areas;

Natural Heritage

- Adverse impact on Flow Country World Heritage Site;
- Adverse impacts on NSAs, WLAs, European sites including SPAs and SACs, SSSIs, SLAs, and valued cultural landscapes;
- Adverse impact on ecology, biodiversity, geodiversity, trees, soils and peatland, with insufficient Biodiversity Net Gain (BNG) provisions;
- Forestry loss including ancient woodlands;

- Adverse impact on habitats, protected species and ornithology;
- Contaminated land - disturbance of harmful pollutants;

Cultural Heritage

- Adverse impacts on archaeology, cultural heritage and built heritage, including scheduled monuments and the setting of listed buildings, and cumulative effects on cultural heritage;

Traffic and Transport

- Adverse construction transportation impacts on traffic volume and road safety, with HGVs and abnormal loads trying to navigate single track and minor local roads;
- Undermines Scotland's commitments to climate action;

Tourism and Recreational Access

- Adverse impact on tourism – including visitor economy and local livelihoods, recreation including Core Paths and walking routes, and rural tranquillity with loss of wilderness;

Amenity

- Adverse impact on local communities;
- Impact on health and wellbeing, and quality of life;
- Contradicts the principle of sustainable, community-focused development;
- Adverse impact on water environment, private water supplies, and drinking water protected areas;
- Adverse impact from light and dust;
- Loss of human rights - Article 8 (private and family life, home), Article 1 of Protocol 1 (peaceful enjoyment of possessions), Article 14 (non-discrimination), Aarhus Convention's principles of public participation in environmental decision-making;

Other

- Loss of croft land, food security risks;
- Increase in flood risk;
- Inadequate of public consultation;
- Economic and social impacts outweigh the benefits; and
- Failure to demonstrate compliance with NPF4, HwLDP, relevant statutory protections, and habitat regulations.

4.4 Material considerations raised in the **support** comment to the proposed development are summarised as follows:

- General support for transmission network upgrades to support offshore wind projects;
- Planning Policy - The strategic importance of the proposed development to deliver the National Spatial Strategy set out in NPF4; and
- Net Zero Targets - The proposed development would support the Scottish and UK Government targets to reach net zero emissions.

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

- Property value and desirability affected;
- Impact on viability of other development proposals (i.e. Carbisdale Castle development for tourism and affordable homes);
- Perceived breach of procedural fairness (exceeds intended scope of Section 37 and should submit a planning application);
- High energy costs for consumers;
- Cost of development;
- Unfair community benefit;
- Lack of local need for more electricity transmission / application is premature;
- Beaully will become a target for terrorist or foreign attacks;
- Disproportionate burden of national grid infrastructure compared to the rest of Scotland;
- Request for Public Local Inquiry;
- Politically driven / unnecessary;
- Lack of landowner consent - land protected by burden requiring Carbisdale Castle consent to develop; and
- Application being rushed through with insufficient timescale for public objections and relevant committees to assess application given the volume of information.

5. CONSULTATIONS

Community Councils (responses made to the Council and or ECU)

- 5.1 **Ardross Community Council (host)** object to the application citing substantial environmental and visual harm on the Highlands, irreversible environmental degradation in undisturbed areas, and the proposal does not adequately address unknown and unrecorded heritage assets likely to be affected. They requested that the confidential Private Water Supply (PWS) assessment be made available to them. Their secondary response to the SEI raised further requests to review PWS appraisals given several residents rely on PWS. Raised further concerns at the continued promotion of the overhead line infrastructure given its impact on the landscape, suggesting insufficient consideration has been given to less intrusive, more sustainable alternatives, with cost savings being prioritised. Regarding heritage, raised concern that the SEI fails to adequately address the unknown and unrecorded assets, highly likely to be affected.
- 5.2 **Beaully Community Council** object to the application due to adverse impacts on traffic, health, local facilities and services, economy, property values, environment, cumulative energy development, and neighbouring communities. Should consent be granted, they have suggested mitigation in relation to traffic, local economy, environment, services and facilities, housing and electricity costs. They have also requested conditions should consent be granted. The response recommends 28 planning conditions, including measures to mitigate construction traffic impacts, traffic calming within Beaully, establishment of a community liaison group, financial contributions to offset potential effects on tourism, landscape screening, and controls on noise, light and air pollution.
- 5.3 **Brora Community Council (host)** object to the chosen OHL route between Glen Loth and Ben Horn due to landscape and visual impacts on The Loch Fleet, Loch Brora and

Glen Loth SLA. Particularly, where the line crosses at Carrol Rock/Loch Brora. Raises concerns that the integrity and special qualities of the SLA will be undermined by this development, that in the future, it will be rendered questionable as a designation. Other concerns relate to the impact on the environment, biodiversity, flora and fauna; impact on transport infrastructure and local road access; impact on the local economy; tight timescale for response and conflict with planning policy. It considers that there are alternatives and, in view of the very high impact on the SLA, request a Public Inquiry to review the routing in the south part of Section A and the north part of Section B of this proposal.

- 5.4 **Contin Community Council (host)** object to the application. This is due to an inadequate justification of the need, insufficient consideration of alternatives, and opaque process in the route option selected. Public involvement in consultation process has been limited. The proposal would create an unacceptable visual impact and have an adverse effect on amenity use of Contin forest. It will also increase heavy traffic through Contin. There will be no local and little regional socio-economic benefit, and there could negative effects on tourism due to cumulative development. It requests a planning inquiry commission to review all works in the area as cumulatively the schemes have the potential to destroy the rural character of the whole area.
- 5.5 **Creich Community Council (host)** object to the application. This is due to a lack of need for the development. The EIA contains insufficient information on interlinked developments and mitigation and overall lacks a detailed assessment. It also results in the salami slicing of energy developments. The development would have a negative impact on the Flow Country WHS, landscape and visual amenity, residential amenity, ecology, nature conservation and peatland, ornithology, forestry, cultural heritage, traffic and transport, tourism and recreation, both in isolation and cumulatively. The proposal does not comply with the development plan, NPF4 or the Electricity Act. There is also no consideration for offshore cable alternatives. The short consultation period did not allow adequate time to review the information.
- 5.6 **Golspie Community Council (host)** does not object to the application, however it raises a number of concerns. There is no proven need for the development; it would cause irreversible damage to peatland; create carbon debt and will come at a large infrastructure cost. It will adversely affect the landscape and regional, national and international designations. Including the Dunrobin Glen and Big Burn SLA and the Flow Country WHS. It will also result in an increase in the risk of flooding, adverse effects on cultural heritage, biodiversity, burden on fragile local infrastructure, impact on local workforce and natural resources. It will also have an adverse impact on tourism and the economy and lead to traffic and transport issues. Local residents pay high rates for electricity yet have one of the highest rates of fuel poverty in the UK. Also considers that the consultation period was too short and would like a pause on all energy infrastructure and renewables in Highlands until a strategic plan is agreed.
- 5.7 **Halkirk and District Community Council (host)** object to the application. This is due to the impact on Halkirk and other areas, impact on people's lives, and a lack of need for the development. The EIA contains insufficient information on interlinked developments and mitigation, and overall lacks detailed assessment. It also results in the salami slicing of energy developments. Outlines that the development would have negative impacts on: the Flow Country WHS, landscape and visual amenity, residential amenity, ecology, nature conservation and peatland, forestry, ornithology, cultural

heritage, traffic and transport, tourism and recreation, as well as give rise to cumulative impacts. The proposal does not comply with the development plan, NPF4 and the Electricity Act. There is no consideration for offshore cable alternatives, and the short consultation period did not allow adequate time to review information. There is a shortfall of the current process when considering large industrial scale renewable energy developments and there should be a “pause” with all developments until there is an approved plan to assess developments against.

- 5.8 **Helmsdale Community Council (host)** object to the application. They raised concerns regarding the need for the development, impact on cultural heritage and tourism and recreation. It also raises concerns regarding the landscape and visual impact, particularly in relation to Loch Fleet, Loch Brora and Glen Loth SLA. Traffic and transport effects are also outlined, in relation to the condition of the road networks and increase in traffic.

Consider that the proposal is being pushed through with very little debate about the overall energy policy and its impact on Helmsdale and neighbouring Districts. They feel the Council not accepting comments from members of the public limits THC’s ability to gauge the level of local feeling on this development.

Also highlight high energy costs to fund the development, with little or no benefit to the environment, economy or community. Request a pause of development and a public inquiry before further extensive development is approved.

- 5.9 **Kilmorack Community Council (host)** object to the application. This is due to a lack of need for the development. The EIA contains insufficient information, insufficient mitigation provided, and salami slicing of energy developments. They feel the development would have a negative impact on the Flow Country WHS, landscape and visual amenity, ecology, nature conservation and peatland, ornithology, cultural heritage, traffic and transport, tourism and recreation, as well as give rise to cumulative impacts. The proposal does not comply with the development plan, NPF4 and the Electricity Act. There is no consideration for offshore cable alternatives, and the short consultation period did not allow adequate time to review information.

- 5.10 **Marybank Scatwell and Strathconon Community Council (host)** object to the application. This is due to potential adverse effects, within sections D and E of the route, on wildlife, cultural heritage, tourism, recreation, natural heritage, and visual amenity. They also raised concerns for residential amenity due to construction traffic. There has also been a lack of meaningful public consultation. There is also an inadequate justification of need, inadequate assessment of options, significant environmental impacts, unacceptable cumulative impacts, little socio-economic benefit to the region, and little direct economic benefit to the UK.

- 5.11 **Rogart Community Council (host)** object to the application. The short turnaround time does not allow the proposal to be fully examined. They raised concerns regarding the proximity of the pylon line to houses in Eiden, impacts from construction traffic, degradation of landscape, peat excavation, poor community engagement. The routing is unsuitable to the Loch Buidhe substation, via the Mound, the salmon ladder and Strath Carnaig runs through a SAC and the largest estuarine alder woods in Britain. It also requests a moratorium on energy development in the north. They also noted that the site address doesn’t convey scope of scheme.

- 5.12 **Strathconon Community Council** object to the application. This is due to inadequate justification of need, inadequate assessment of options, significant environmental impacts, unacceptable cumulative impacts, little socio-economic benefit to the region, and little direct economic benefit to the UK.
- 5.13 **Strathnairn Community Council** object to the application. This is due to a lack of demonstrable alternatives, inadequate plan in place for nature restoration works across the site, electromagnetic radiation and proximity to electromagnetic fields (EMF) scoped out too easily, and cumulative effects and negative impacts on local communities and landscape. They also raised concerns regarding contracts being awarded prior to consent being concluded. There has also been a failure to make accessible hard copies of core information and drawings, and misleading false instructions issued by applicant to all Community Councils.
- 5.14 **Strathpeffer Community Council (host)** object to the application. This is due to inadequate justification of need, inadequate assessment of options, poor public engagement, significant environmental impacts, unacceptable cumulative impacts, little socio-economic benefit to the region, and little direct economic benefit to the UK.
- 5.15 **Watten Community Council (host)** object to the application due to adverse impacts on health and wellbeing, environment, cultural heritage, peatland, woodlands, habitats and biodiversity, soil, ornithology, water environment, rural livelihoods, tourism and recreation, traffic and transport, landscape and visual amenity, cumulative impact, and impact from construction and operational noise. The area is already inundated with energy projects, the need for this development is unsubstantiated, the EIA underplays risks and the assessment of overall effects is inadequate. They also raised concerns regarding the routeing process, consideration of alternatives and conflicts with EIA regulations, NPF4 and planning policy.

Council Internal Consultees

- 5.16 **Access Officer** objects to the application. The Access Officer notes the proposed development will disrupt 78 Core Paths and other public access routes, impacting public use and enjoyment of many of these routes for a considerable period of time. The submitted Outdoor Access Management Plan does not acknowledge the significance of the statutory Core Path designations. It is not expected that any wider access route will be removed. Alternative provisions should be made where the development intersects with existing routes. Additional unlocked side gates, including sufficient level surfaced ground for passage, on all new or replaced access control infrastructure (field gates, etc) for existing and proposed permanent access tracks is required. A detailed schedule outlines affected Core Paths, public Rights of Way and wider network routes, and a condition is required for a revised Outdoor Access Management Plan (AMP) to safeguard public access rights. There are issues with the submitted mapping and scope, as there are a number of Core Paths not shown, but are within the Tourism and Recreation Study Area. The full extent of Core Paths and public Rights of Way in the study area should be included in the revised AMP.
- 5.17 **Development Plans Team** do not object to the application. In principle support is given as the proposal is classified as a national development under NPF4. However, recognition as a national development, and contribution towards meeting Scotland's

net zero emissions targets, does not provide unqualified support for the development. Compliance with relevant topic-based development plan policies is dependent upon the views of other consultees. Key points were highlighted, such as design, landscape and visual impact, impacts on natural and built heritage designations, the Flow Country WHS, protected species, woodland, soils, transport and access, water and drainage, residential amenity, community wealth building, developer contributions, and existing and proposed Local Place Plans.

- 5.18 A further response regarding the WHS was provided on 06 March 2026, outlining that there is a process whereby the State Party, which in the case of The Flow Country WHS is the UK Government's Department for Culture, Media and Sport (DCMS), notifies UNESCO's World Heritage Centre (WHC) of any development proposals (major restorations or new constructions) that may affect the Outstanding Universal Value of a WHS, if consent may be given.
- 5.19 The proposed development was duly notified to the WHC (what is commonly referred to as a Paragraph 172 notification/report). The WHC has now responded to the State Party. The WHC and International Union for Conservation of Nature (IUCN) consider that the project, as currently proposed, should not be permitted, based on its own review of the submitted documentation and the assessment outcomes.
- 5.20 **Ecology Team** objects to the application. They highlight that insufficient information has been submitted in relation to biodiversity enhancements, impacts on bats, Scottish Wildcat, with no mitigation details provided for great-crested newt. It is also noted that the proposal goes through an existing Habitat Management Plan area with no further details to offset this impact submitted. The Ecology officer notes the proposed development would have impacts on badger, otter, pine marten, red squirrel, reptiles and water vole. However, subject to outlined mitigation measures, including the use of Species Protection Plans (SPPs), the Ecology Officer agrees with the applicant's assessment that effects will not be significant. In respect of ornithology no significant impacts are expected but full details of mitigation measures relating to black grouse is required. Conditions are requested securing: a Habitat Management Plan, enhancement areas shapefile, a Construction Environment Management Plan, the employment of an Environmental Clerk of Works, pre-construction surveys, a Bird Protection Plan, and informatives are to be attached regarding nesting birds and protected species.
- 5.21 **Environmental Health** does not object to the application, subject to conditions. With regards to the construction phase, conditions are requested to secure construction working hours in accordance with council recommended working hours; a Construction Noise and Vibration Management Plan; dust suppression scheme; and a Private Water Supply (PWS) Protection Plan. A re-assessment of potential impacts from construction noise will be required if any tower/construction activity is relocated beyond the assessed alignment. In relation to the operational phase, a condition is requested which secures mitigation measures controlling potential aeolian noise from the OHL components. SEI included a revised PWS assessment, with all PWS located within 250m of the LoD boundary included, adding a further 8 PWS compared to the original EIAR. The revised assessment identifies 21 PWS that could potentially be affected by the development. The Principal Contractor will require to undertake detailed risk assessments of all identified and any previously unregistered supplies. Where risks are identified, site-specific mitigation measures will be implemented through a

dedicated PWS Protection Plan. As such, Environmental Health raise no objections to the application, subject to conditions set out in the initial response.

- 5.22 **Forestry Officer** objects to the application. This is due to the loss of ancient woodland, adverse impact on native woodlands and fragmentation or severing of woodland habitats. There is also no commitment to minimise woodland loss through restructuring from conifer to native species along the operational corridor. The current area of Compensatory Planting details does not exceed the area of permanent woodland required to be removed to offset the loss of biodiversity and timber value. This is contrary to the Development Plan and the Scottish Government's policy on the Control of Woodland removal. However, if consent is granted, then a condition requiring compensatory planting is requested.
- 5.23 **Flood Risk Management Team (FRMT)** does not object to the application, subject to conditions. FRMT note that all permanent infrastructure is proposed to be located outwith flood risk areas. Where this cannot be achieved, a condition is required to ensure that there is no land-raising. FRMT further advise that all watercourse crossings will need to be designed to convey a 1 in 200 year plus climate change flood event. Larger crossings, where the design flood does not remain within bank, will need to be designed so that the crossing and access track do not impede floodplain conveyance. These matters should be secured by condition.
- 5.24 **Historic Environment Team (Archaeology)** object to the application. The application outlines direct and significant impacts upon 32 historic environment assets and at least 17 major adverse significant effects upon Scheduled Monuments have been identified. The application has not demonstrated that it would have an acceptable impact on the historic environment and therefore it does not accord with Highland Council Planning Policy 57 or the Highland Historic Environment Strategy. The Council's Archaeologist also suggest that there are additional or extended areas of archaeological potential (EAPs) that need considered and worked into the detailed mitigation proposals. A paleoenvironmental survey is also recommended. Should this application be consented, a full Programme of Archaeological Works will be required. HET recommend conditions requiring Written Scheme of Investigation (WSI) and details of an Archaeological Clerk of Works (ACoW) to secure mitigation.
- 5.25 **Historic Environment Team (Conservation)** object to the application. The EIAR identifies major impacts on at least six Listed Buildings (three are Category A). The Team also highlight that there are gaps in the evaluation for 17 listed heritage assets and Fairburn GDL. The proposal does not accord with HwLDP Policy 57 (Natural, Built and Cultural Heritage), the Highland Historic Environment Strategy (Strategic Aim 13), NPF4 Policy 7 and does not properly address Historic Environment Scotland Guidelines on the preservation of Listed Buildings and GDLs. Although direct impact to designated heritage assets has been scoped out, there are impacts on the settings of some designated heritage assets that should have been included in the mitigation process, specifically: LB1789 (Cat A) Contin Bridge; LB1769 (Cat A) Coul House; LB7165 (Cat B) Carbisdale Castle; LB14031 (Cat B) Fairburn House; and LB14030 (Cat A) Fairburn Tower, given there is potential for moderate to high adverse visual effects at these historic assets which warrants further review. The impact on Fairburn GDL is misrepresented, with four towers affecting the Designed Landscape, not one as stated in the River Conan EAP. Access tracks will also impact the area, requiring further mitigation to minimise impact. A detailed schedule lists heritage assets without

visual impact imagery despite pylons passing nearby which are clearly visible before and after they pass the heritage asset.

- 5.26 **Landscape Advisor (Ironside Farrar)** undertook a review of the LVIA and related studies to inform Officers. They advised that given the nature, scale and length of the proposed development, and the nature of the receiving landscape and visual environment, many short and long term significant adverse landscape, visual and cumulative effects are inevitable, some of which, including effects on SLAs and residential amenity, are significant enough for the Council to consider as a basis for objection to the proposed development as it stands. Also suggested potential large scale and generic localised mitigation measures to address some of the most severe effects; however, the scope for these may be limited by the many other environmental, technical and economic constraints that have informed the routing.
- 5.27 **Transport Planning** object to the application. Insufficient information has been presented in the application to allow for an adequate assessment. This includes an inadequate road and network capacity assessment, forecast traffic generation and route assessment, structural capacity, effects on road safety and cumulative implications. Transport Planning also object to the granting of deemed planning permission to any Public Road Improvement as ancillary development unless it is individually identified within the S37 application and sufficient information is given to enable suitable transport and environmental impact assessment to be made. Once an adequate assessment has been undertaken, Transport Planning highlight that to manage the impact, conditions will be required. This includes a Construction Traffic Management Plans and detailed design of the mitigation required affecting local roads.

Consultations Undertaken by The Scottish Government's Energy Consents Unit

- 5.28 **Arqiva Limited** does not object to the application. It confirms that, although some pylons are close to existing Arqiva assets, there is sufficient separation for them not to cause interference with existing broadcast networks. Should the location of any pylon change during the course of the consenting process Arqiva request that they are consulted further.
- 5.29 **AtkinsRéalis UK** does not object to the application. This consultee is responsible for providing Wind Farm/Turbine support services to the Telecommunications Association of the UK Water Industry (TAUWI).
- 5.30 **BT** does not object to the proposal, however they have identified that the proposal will cause interference to BT's current and planned radio network. They rejected structures 140, 264-266, 20, and 21.
- 5.31 **Crown Estate** does not object to the application. Crown Estate note that the proposed route affects land owned by Crown Estate Scotland at Kyle of Sutherland. It anticipates that agreement for the proposed overhead line will be reached between the Crown and the applicant in terms of the Crown's standard documentation and have no further comments to make.
- 5.32 **Health and Safety Executive (HSE)** does not object to the proposal. HSE advises that, as an overhead line development, the proposal does not appear to be of a type that would store or process hazardous substances in quantities that would give rise to

concerns relating to major industrial accidents. The development is not located within the safeguarding zone of a licensed explosives site and lies outwith HSE land-use planning consultation zones for hazardous substances consented sites and major accident hazard pipelines. Accordingly, HSE advises that there is no requirement for further consultation with its Land Use Planning Team.

- 5.33 **Highlands and Islands Airports Limited (HIAL)** object to the application. As the development may impact the safeguarding criteria and operation of Inverness Airport, it requests that an Aviation Impact Feasibility Study (AIFS) is submitted.
- 5.34 **Historic Environment Scotland (HES)** object to the application. Following the submission of further visualisations and a Designed Landscape Heritage Assessment, it maintains its objection in relation to the significant effects on the setting of 25 scheduled monuments. It confirms that it does not object to impacts upon the Fairburn GDL and removes its objection in relation to three scheduled monuments SM5224, SM424 and SM497. In relation to Cnoc Bad Asgaraidh, chambered cairn 570m E of, Langwell (SM423), HES notes the proximity of a proposed track to the scheduled area. If the development is consented in its present form, then HES advise that a condition is required securing a scheduled monument protection plan. This will ensure that the scheduled area is adequately protected during the course of construction works.
- 5.35 **Joint Radio Company** object to the application. The proposed development breaches one or more exclusion zones around base station sites. Further analysis and co-ordination are required.
- 5.36 **Kyle of Sutherland District Salmon Fishery Board** object to the application. No meaningful cumulative impact assessments are being undertaken in terms of the totality of energy and energy distribution developments in this area. Until a more coherent and strategic energy policy is put in place, it is suggested that this proposed development presents an unacceptable risk to the freshwater environment.
- 5.37 **Met Office** does not object to the application. The proposal is outside any of their standard 20km consultation zones and raises no concerns.
- 5.38 **Ministry of Defence Safeguarding** does not object to the application, subject to a condition. Confirms that the development falls within a Low Flying Area and Tactical Training Area, in which military aircraft may conduct low level flight training. The development has the potential to introduce a physical obstruction to low flying aircraft operating in the area. It requests that the route is chartered on aviation maps – this should be secured by condition.
- 5.39 **National Gas Transmission** does not object to the application. Confirms that there are no National Gas assets which would be affected in this area.
- 5.40 **National Air Traffic Services** do not object to the application. Confirms that it has no infrastructure within 10km of the proposed routing and do not anticipate any impacts from the development.
- 5.41 **NatureScot** object to the application on the basis of significant, irreversible harm to the Flow Country WHS, Caithness and Sutherland Peatlands SAC / Ramsar, Shielton Peatlands SSSI, and the Novar and Morangie Forest SPAs. Within the WHS, and the

underpinning SAC / Ramsar and SSSIs, the proposal would introduce pylons, tracks and temporary infrastructure affecting extensive areas of blanket bog. The resulting impacts on blanket bog habitat and site integrity across these internationally and nationally designated sites would be significant, unavoidable and incapable of mitigation, and therefore the development should not proceed. NatureScot has suggested suitable compensatory measures for the blanket bog qualifying interest that the applicant is encouraged to consider, to commit to 242.8ha of blanket bog restoration on areas outwith, but immediately adjacent to, the SAC / Ramsar, or restoration of areas within the SAC / Ramsar subject to agreement with NatureScot.

NatureScot has indicated discrepancies with the applicant's assessment of impact on WHS blanket bog. The applicant has split out blanket bog in 'poor' condition as blanket bog that is non-irreplaceable, and as such, has not been included in the assessment of loss of blanket bog. Whereas all blanket bog habitats should be included in the overall assessment of loss if they will be directly or indirectly be impacted for permanent and temporary impacts.

In relation to the SPAs, NatureScot consider there will be effects on breeding capercaillie through collision risk, disturbance, displacement and habitat loss, with no effective mitigation proposed. NatureScot advise the applicant will be required to submit a derogation case under the Habitats Regulations to Scottish Ministers in order for this development to proceed if consent were granted regarding Caithness and Sutherland Peatlands SAC / Ramsar, and Novar SPA and Morangie Forest SPA. NatureScot has provided suggested compensatory measures relating to Capercaillie that the applicant should consider creating new native woodland habitat around the SPAs; diversionary feeding for predators to reduce pressures on Capercaillie; habitat enhancement within the woodlands (within and out with the SPAs); and removal of redundant deer fencing, and appropriate marking of unmarked deer fencing to curtail collision risk.

NatureScot has confirmed it objects to the proposal, unless it is made subject to conditions that works are carried out strictly in accordance with the mitigation detailed in their appraisal for several SACs, SPAs, and Ramsar sites. NatureScot propose conditions for a bird flight diverter plan, additional bird flight diverters to be installed, use of buffer distances for avian species, additional habitat creation for Capercaillie, site specific method statements and a habitat management plan. These measures are required to be secured by condition, otherwise NatureScot's response is to be read as an objection.

NatureScot state in its response that the proposed development will not have a likely significant effect on Loch Watten SAC, Conon Islands SAC, Lairg and Brora Lochs SPA, Moray Firth SPA and Ben Wyvis SPA; and confirm that an Appropriate Assessment under the Habitats Regulations would not be required.

NatureScot consider impacts on Langwell Water SSSI, Loth Gorge SSSI and Kyle of Sutherland Marshes SSSI are likely to be temporary in nature and recoverable.

In terms of landscape designations, NatureScot agrees the development would not have significant effects on the Dornoch Firth NSA and that effects on Causeymire – Knockfin Flows WLA 36 would be localised.

NatureScot also raise concerns regarding golden eagle displacement, European Protected Species (bats and great crested newt), and conflicts with woodland creation proposals. Regarding golden eagle, the applicant has not provided full details of

proposed off-site habitat improvement which NatureScot advise could mean the impacts on golden eagle are greater than those presented in the EIAR. In terms of great crested newt (European protected species), NatureScot recommend survey data is gathered in accordance with guidance and offer discussions regarding a species protection plan. In terms of bat species affected by the proposal, NatureScot suggest creation of new woodland edges, or indeed inclusion of low growing scrub within the operational corridor could help reduce local effects on bat populations.

Notwithstanding its objection, NatureScot provide recommended conditions and mitigation measures for other designated sites within their consultation response. Following review of the SEI NatureScot maintain their objection and have no further comment.

5.42 **Network Rail** do not object to the application. However, it notes that any works over the railway will be subject to further agreement with Network Rail. All construction works must be undertaken in a safe manner which does not disturb the operation of the neighbouring railway. Details of all changes in ground levels, laying of foundations, and operation of mechanical plant in proximity to the rail line must be submitted to Network Rail's Asset Protection Engineer for approval prior to works commencing on site.

5.43 **Royal Society for the Protection of Birds (RSPB)** object to the application. Due to insufficient time provided for the statutory consultation period, RSPB note their objection focusses on the newly inscribed Flow Country WHS, and potential impacts on internationally designated sites for birds through which the proposed route passes through and likely to have the most impact on. Therefore, lack of comment on a site or species should not be taken to mean that RSPB do not have concerns in that regard.

RSPB have objected as the proposed development would result in direct and indirect loss of blanket bog and peatland habitat within the Flow Country WHS, which cannot be offset.

A conclusion of no adverse effect on site integrity of Caithness and Sutherlands SPA cannot be made in terms of potential displacement, disturbance and collision risk for Common Scoter.

Insufficient mitigation has been committed to in terms of mitigating potential impacts on Hen Harrier as a qualifying feature of the Strath Carnaig and Strath Fleet Moors SPA. RSPB Scotland consider additional information is required, including avoidance of construction work within the Hen Harrier breeding season and additional areas of line markers.

A conclusion of no adverse effect on site integrity of Novar SPA cannot be made in relation to Capercaillie due to potential disturbance. Further assessment and identification of mitigation as required is needed in relation to the access tracks.

RSPB has made further comments relating to concerns about collision risk and disturbance displacement impacts on Slavonian Grebe, and comments relating to delivery of biodiversity enhancement associated with the proposed development.

5.44 **Scottish Gas Networks (SGN)** do not object to the application. Confirms that there are no high-pressure assets within the vicinity of the proposal.

5.45 **Scottish Water** do not object to the application. The proposal falls within several drinking water protection areas (DWPA). It is therefore essential that water quality and water quantity in the area is protected. Loch Horn and Lunndaigh – Proposed Alignment is at the southeastern end of Loch Horn so relatively close to the intake position.

Control measures would have to be in place to protect all parties working over or on the River Glass and the source water for Newmore Wastewater Treatment Works (WTW). Activity should not direct flow out of catchment boundaries. Precautions should be taken to ensure the intake on the River Glass is not impacted by the work.

Scottish Water note there is a large diameter water and sewer mains, both raw and treated, throughout the site boundary. The applicant must identify any potential conflicts with this asset and contact SW for an appraisal of the proposals. Written permission must be obtained before any works are started within the area of its apparatus.

Scottish Water would like to be involved in the more detailed design phases. It should be notified of any pollution incidents impacting the water bodies as a result of the works.

Following review of the SEI provided by the applicant, advised that the original planning response remains unchanged.

5.46 **Scottish Environment Protection Agency (SEPA)** does not object to the application, provided its recommended conditions are applied to any consent if granted. Key concerns include lack of detailed quantitative risk assessments for groundwater abstraction impacts and insufficient information to determine all potential flooding impacts. SEPA also require further information and clarification regarding the private water supply assessment. SEPA highlights update to Surface Water and Small Watercourses (SWSW) Flood Maps. They request the applicant includes M10 habitat in Section B in the GWDTE Assessment.

It requests conditions to cover the following matters: implementation of mitigation measures; micro-siting and limits of deviation; Construction and Environmental Management Plan (CEMP); peat and carbon-rich soils management plan; private water supplies; Geotechnical Clerk of Works; Forestry Felling Plan; and flood risk.

Following review of the SEI supplied by the applicant, specifically regarding PWS, advised that the previously requested planning conditions are still relevant.

5.47 **The Flow Country Partnership** object to the application on the grounds of adverse impacts on The Flow Country WHS Outstanding Universal Values (OUV). Impacts to the OUV cannot be offset and therefore, the proposed development will not be able to compensate the loss of blanket bog habitat and enhancement measures will not negate the impact upon the WHS. This is also true of the WHS's carbon sequestration potential that, again, cannot be mitigated and offset. The scale of impact and loss of habitat outlined within the assessment is not consistent with the preservation and protection of the WHS's OUV.

5.48 **Transport Scotland** does not object to the application. Request that a Construction Traffic Management Plan (CTMP) is secured by condition. Following review of the SEI, the original planning response remains unchanged.

6. DEVELOPMENT PLAN POLICY AND OTHER MATERIAL POLICY CONSIDERATIONS

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

7. PLANNING APPRAISAL

- 7.1 The application has been submitted to the Scottish Government under Section 37 of the Electricity Act 1989 (as amended). Should Ministers approve the development, it will receive deemed planning permission under Section 57(2) of the Town and Country Planning (Scotland) Act 1997 (as amended). While not a planning application, the Council processes S37 applications in the same way as a planning application as 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 is required to:
- have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings, and objects of architectural, historic or archaeological interest; and
 - reasonably mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.
- 7.3 It should be noted that for applications under the Electricity Act 1989 that the Development Plan is just one of a number of 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 is still required 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) Development Plan and other planning policy;
 - b) Energy and economic benefit;
 - c) Routing, design evolution and alternatives;
 - d) Construction impacts;
 - e) Roads, transport and access;
 - f) Water, drainage and peat;
 - g) Natural heritage (including ornithology);
 - h) Design, landscape and visual impact;
 - i) Built and cultural heritage; and

j) Any other material considerations.

Development Plan / Other Planning Policy

- 7.5 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 the Inner Moray Firth Local Development Plan 2 (IMFLDP2) and various Supplementary Guidance documents.
- 7.6 Appendix 3 of this report provides an assessment of compliance with the Development Plan / Other Planning Policy.
- 7.7 In summary, 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 and Policy 11 Energy considers that Strategic Renewable Electricity Generation and Transmission Infrastructure will assist in the delivery of the Spatial Strategy and Spatial Priorities for the north of Scotland, and that Highland can continue to make a strong contribution toward meeting Scotland's ambition for net zero. Alongside these ambitions, the strategy for Highland aims to protect environmental assets as well as to stimulate investment in natural and engineered solutions to address climate change. This aim is not new and will clearly require a balancing exercise to be undertaken, which is reflected throughout NPF4.
- 7.8 At a regional level, the principal HwLDP Policy is 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. As the development would help reinforce onshore transmission infrastructure and facilitate an increasing proportion of electricity generation from renewable sources, the principle of the development receives policy support, subject to site selection, design and overcoming any unacceptable significant environmental effects.

Energy and Economic Benefit

- 7.9 In July 2022, the Electricity System Operator published the Pathway to 2030 Holistic Network Design ('HND') which sets out the strategic network requirements to facilitate the connection of 23GW of offshore wind projects. When combined with existing offshore wind projects and those already advanced in their development, the HND aims to enable the connection of 50GW of offshore wind in Great Britain by 2030.
- 7.10 In 2024, the National Energy System Operator (NESO) reviewed the requirement for onshore and offshore network reinforcements through their HND Follow Up Exercise, part of Beyond 2030. Beyond 2030 builds on the HND and designs for a further 21GW of offshore wind, following the ScotWind leasing round, to connect to the onshore electricity network. This identifies the requirement for new onshore network infrastructure between Caithness and Peterhead, of which this application will form part. Application ref: 25/03986/S37, for the Beauly to Peterhead 400kV OHL was

considered at the Highland Council's South Planning Applications Committee on 17 June 2026 where it was agreed to raise an objection.

- 7.11 Ofgem's Accelerated Strategic Transmission Investment (ASTI) framework provides a streamlined regulatory approval and funding route for the timely delivery of strategically important onshore electricity transmission infrastructure. The ASTI framework supports the Government's 2030 net-zero objectives by facilitating the connection of up to 71 GW of offshore wind capacity to the onshore transmission network. The proposed development is an ASTI project. There is a clear expectation from Government that such projects will be delivered by 2030, and this includes an indicative timeline for ASTI projects to be determined within 52 weeks.
- 7.12 The application is supported by a Socio-Economic Assessment (September 2025) which predicts an economic contribution of £269 million Gross Value Added (GVA) and 2,346 years of employment across Scotland. The applicant is engaged in the delivery of SSE's Just Transition Strategy which outlines initiatives such as prioritising local procurement, investing in skills development and increasing contracts awarded to businesses within regional and Scottish economies. The Highland Council area is expected to see a direct GVA contribution of £13.2 million. When combined with indirect and induced impacts, the total GVA contribution rises to £20.2 million. This phase will also support a total of 173 job years in the Highland Council area.
- 7.13 Given the requirement of NPF4 Policy 11c) for development proposals to only be supported where they maximise socio-economic impacts, in July 2023 the applicant launched a consultation on plans for their first ever community benefit fund. This is a £10 million fund which will see SSEN working with communities across the north of Scotland to channel funds into local projects. Following the Autumn Statement on 22 November 2023, the UK's Department for Energy Security and Net Zero also published its "Response to the consultation on Community Benefits for Electricity Transmission Network Infrastructure". In light of this, the applicant is expecting further community benefit funding opportunities, in the region of £100 million to be available for local projects. Community benefit however remains a non-material planning consideration and therefore the existence or absence of this fund can be given no weight in the decision-making process.
- 7.14 A further recent announcement was made by the UK Government on 10 March 2025 that the Planning and Infrastructure Bill will deliver an energy discount scheme for homes close to overhead transmission pylons required to deliver Clean Power 2030, with this scheme to be rolled out across England, Wales and Scotland. The statement explains that communities could get £200,000 worth of funding per km of new high voltage overhead line and £530,000 per substation. As the bill is at an early stage and is making its way through Parliament, it remains unclear if this detail will remain unaltered or what the scheme eligibility / commencement cut-off date will be. The applicant has however confirmed that this project will be eligible.
- 7.15 SSEN is the first signatory to the Highland Social Value Charter (HSVC). This agreement, signed in November 2025 sets out to deliver the following benefits arising from its portfolio of projects in the area:
- £1.8bn of contracts for local businesses
 - More than £200m spending on roads and bridges

- Support for the development of 500 homes
- 10% net gain in biodiversity and no net loss on woodland

7.16 Notwithstanding that these initiatives will address objectives for the benefit of communities in Highland, the wider community benefit should be considered separate to any planning process with no weight attributed to this in this current application.

Routeing and Design Evolution

7.17 Chapter 4 of the EIAR describes the routeing process and the alternatives considered. Firstly, a “do-nothing” scenario is considered and is discounted on the basis that the proposed development is of national importance, contributing significantly towards the delivery of the UK’s and Scottish Government’s net zero targets. This is because the current electricity transmission network would not have capacity to support the transfer of power from both onshore and offshore renewable generation in the north of Scotland to centres of demand further south.

7.18 The EIAR includes consideration of subsea HVDC cables as an alternative technology. It notes that they can transmit electricity over long distances and avoid certain onshore constraints, however they were discounted for several other reasons. Their capacity is significantly lower, with typical HVDC technology providing around 2 GW compared to approximately 6 GW for a 400kV overhead line, meaning multiple systems would be required to achieve equivalent capacity. In addition, subsea cables are substantially more expensive (around five times the cost of overhead lines) and require significant associated onshore infrastructure, including converter stations of around 9.3 hectares at each landfall.

7.19 Underground cable (UGC) was also considered as an alternative technology; however, it was not progressed due to a combination of technical, environmental and economic constraints. UGC is substantially more expensive than overhead line infrastructure, with significantly higher construction and lifetime costs, and would introduce inefficiencies into the transmission network, requiring additional infrastructure such as reactive compensation equipment and expanded substations. It also entails a wide and continuous construction corridor, extensive excavation and permanent access requirements, resulting in greater disturbance to soils, peatland, groundwater and habitats. Furthermore, underground cables are more challenging to install and maintain, particularly in upland terrain, and faults can take significantly longer to repair, posing risks to network reliability. On this basis, UGC was not considered a reasonable or viable alternative.

7.20 The EIAR therefore concludes that OHL technology is the most appropriate solution in this case. EIAR Chapter 4 moves through four principal stages of design evolution, as follows, with the location of the proposed OHL being further refined and stakeholder consultation carried out at each stage:

- Stage 0: Routeing Strategy Development;
- Stage 1: Corridor Selection;
- Stage 2: Route Selection; and
- Stage 3: Alignment Selection.

Each stage is an iterative process and involves an increasing level of detail and resolution, bringing cost, technical and environmental considerations together in a way which seeks to achieve the best balance.

- 7.21 The applicant is required to follow a series of guidelines for the routeing of new high voltage OHLs which have been established within the electricity supply industry – known as the Holford Rules. This sets a hierarchical approach to routeing which advocates avoiding areas of high amenity value, minimises changes in direction, takes advantage of topography and which minimise visual interaction with other transmission infrastructure. The applicant has developed its own guidance to reflect modern practice, incorporating environmental, technical and economic considerations within an iterative process.
- 7.22 In relation to landscape and visual matters, the following design principles were taken into account during the routeing process, in accordance with the steps outlined in the Holford Rules:
- “avoid if possible major areas of highest landscape value (including those covered by national and international designations and other sensitive landscapes);
 - avoid by deviation, smaller areas of high amenity value;
 - try to avoid sharp changes of direction and reduce the number of larger angle towers required;
 - avoid skylining the route in key views and where necessary, cross ridges obliquely where a dip in the ridge provides an opportunity;
 - target the route towards open valleys and woods where the scale of poles or towers will be reduced and views broken by trees (avoid slicing through landscape types and try to keep to edges and landscape transitions);
 - consider the appearance of other lines in the landscape to avoid a dominating or confusing wirescape effect;
 - arrange wherever practicable that parallel or closely related routes are planned with tower types, spans and conductors forming a coherent appearance; and
 - approach urban areas through industrial zones and consider the use of undergrounding in residential and valued recreational areas.”

Stage 1: Corridor Selection

- 7.23 The corridor selection stage represents the first refinement of the route, whereby a broad study area, shaped by topographical constraints and the need to avoid major environmental sensitivities, was analysed via a high level desk based exercise to identify corridor options. Due to the length of the proposed OHL and to ensure the presentation of information and appraisals was easily comprehended, the corridor was separated into two geographic sections. The Northern Corridor Options reflected the area between Spittal and Loch Buidhe, whilst the Southern Corridor options reflected the area between Loch Buidhe and Beaully. Two corridor options were identified on the northern section of the proposed OHL – a western corridor and an eastern corridor. Three corridor options were identified on the southern section of the proposed OHL – a western corridor, a central corridor and an eastern corridor, as shown in the Figures 2 and 3 below.

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Figure 2 - Northern Corridor Options

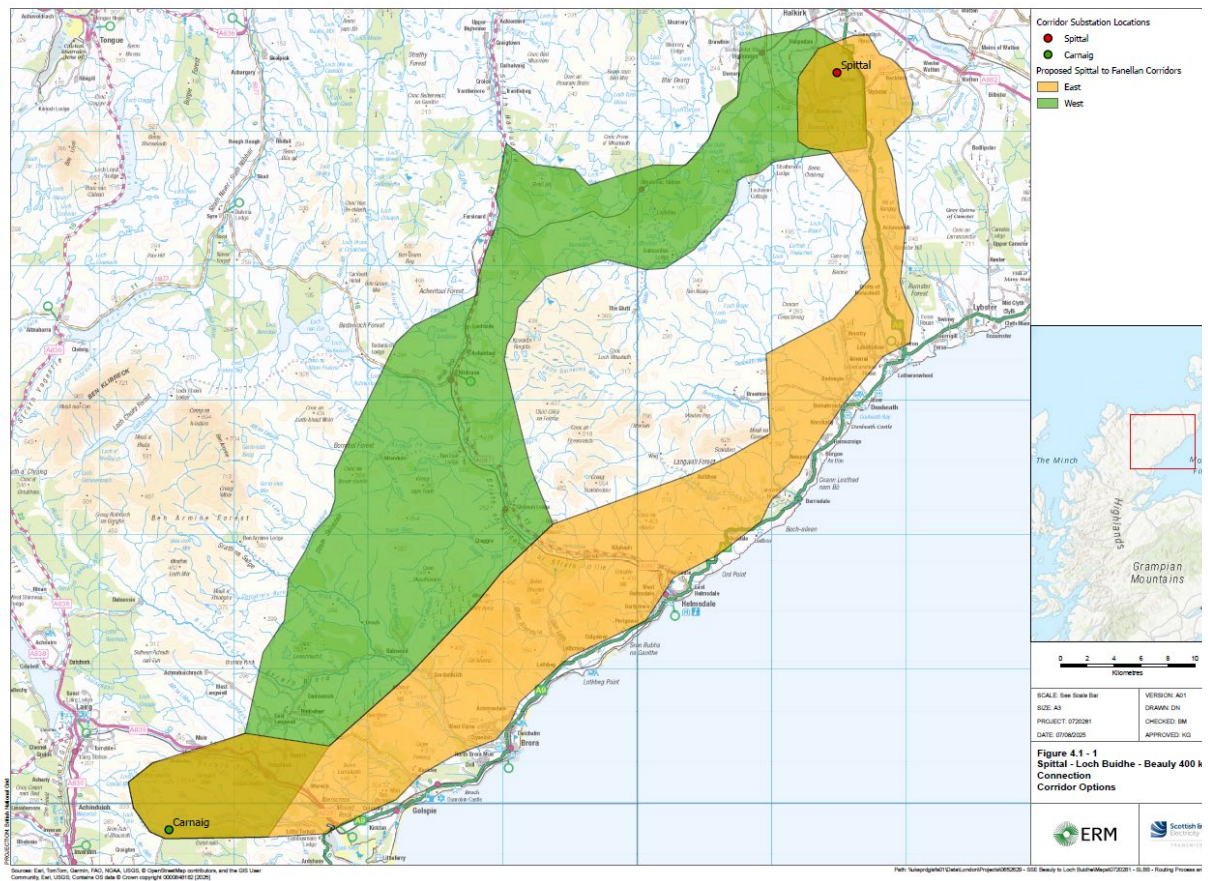
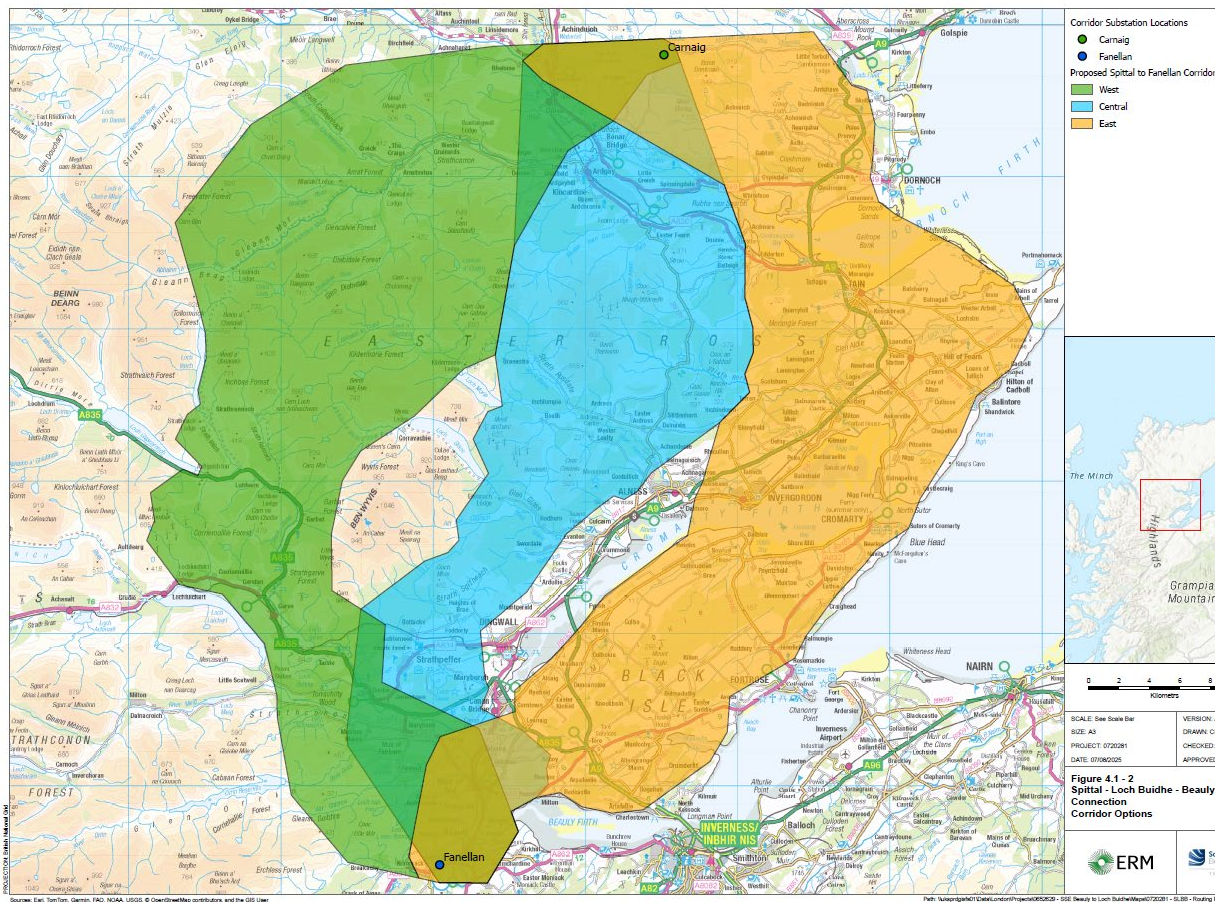


Figure 3 - Southern Corridor Options



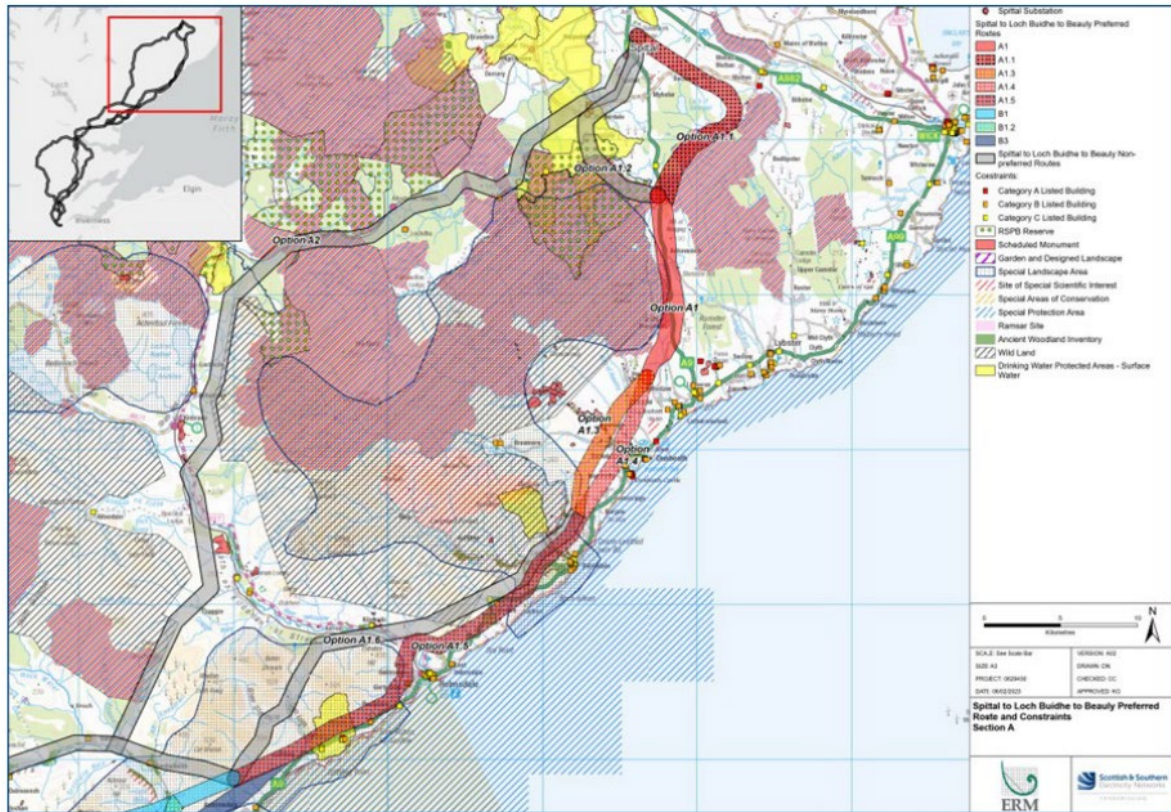
- 7.25 The applicant undertook a corridor options appraisal which concluded there was no clear preferred corridor due to the challenging terrain and the large number of technical, environmental and community constraints within all corridor options. In the southern section, the eastern corridor (shaded yellow) was considered to be significantly constrained by environmental, community and engineering factors. Therefore, the western and eastern corridors in the northern section and only the central and western corridors in the southern section were selected as the appropriate geographical areas for identification and appraisal of route options, in Stage 2.

Stage 2: Route Selection

- 7.26 The route selection stage further refined the preferred corridors by identifying and assessing narrower route options within each corridor. To support the routing stage, the applicant utilised Artificial Intelligence (AI) based software to identify and assess narrower route options. The route options identified within the Preferred Corridor were around 1km wide to allow for a reasonable number of alignment options to be identified.
- 7.27 Due to the length of the proposed OHL, and to make the presentation of information and appraisals more easily comprehended by stakeholders, the route was separated into five route 'Sections' from north to south (Sections A to E). A number of route options, ranging between two and six, were identified within each Section. All options

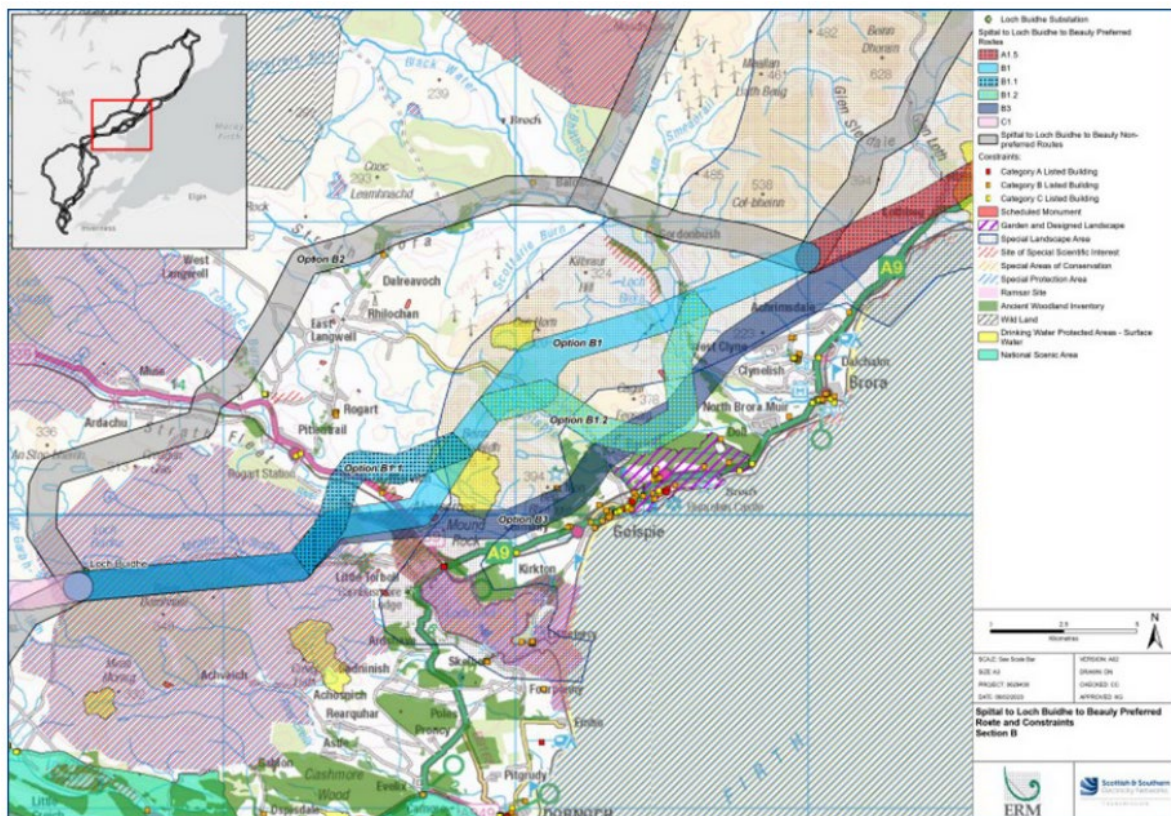
identified were allocated an alpha-numeric descriptor code (e.g. A1, A1.1). The applicant's assessment and analysis of the route options for each section is set out in EIAR Chapter 4 The Routeing Process and Alternatives. The proposed route for each section is highlighted below.

7.28 **Figure 4 - Section A Route Options and Constraints**



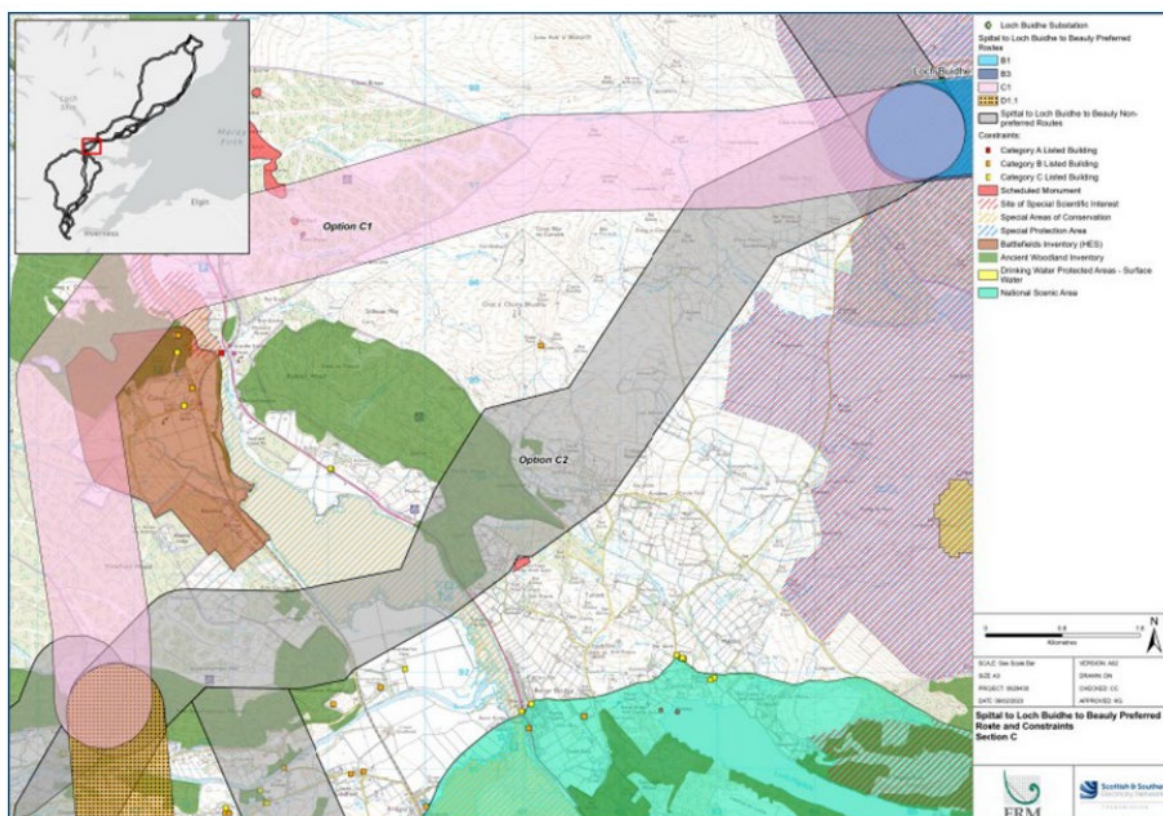
- 7.29 Constraints between Spittal and Brora include local settlements such as Dunbeath and Helmsdale, alongside the Spittal Hill Wind Farm and a number of other proposed wind farms. In addition, there are numerous designated sites including SACs, Special SPAs for birds and SSSIs, as well as the RSPB reserve, Causeymire – Knockfin Flows WLA and the Ben Klibreck – Armine Forest WLA. The terrain in the area is mix of moderate hills with some steep slopes, and then areas with more gradual undulated terrain.
- 7.30 Two main routes are identified, A1 and A2 as illustrated above. There were three pairs of sub options within Option A1 (A1.1 and A1.2 / A1.3 and A1.4 / A1.5 and A1.6). A comparative assessment of each of these pairs was undertaken and the preferred combination of sub options was then compared with Option A2.
- 7.31 As a result of analysis of feedback from communities, statutory consultees and other local groups and key agencies, SSEN remained of the opinion that, subject to further consideration of environmental constraints and sensitivities at the alignment selection stage, Option A1 (with sub-options A1.1, A1.3, A1.5 and A1.6 (southern end) would be taken forward as the proposed route. The main reasons for the selection of Option A1 (and its sub-options) were the potential to avoid or minimise impacts to designated sites, peat, habitat and landscape character, as well as less challenging terrain and significant areas of unavoidable peatland, when compared with Option A2.

7.32 Figure 5 - Section B Route Options and Constraints



- 7.33 Constraints between the villages of Brora and Golspie include a number of designated areas including the Strath Carnaig and Strath Fleet Moors SPA and SSSI, the Dornoch Firth and Loch Fleet SPA and Ramsar, Mound Alderwoods SAC and SSSI and Strathfleet SSSI. The terrain in this section has a mix of high hills and steep slopes and as such there are a number of wind farms to avoid including the constructed Kilbraur Wind Farm and its consented extension. On the approach to the Loch Buidhe substation, there are existing overhead lines to be avoided where possible.
- 7.34 Three main route options are identified, those being B1, B2 and B3. There are two sub options within Option B1.
- 7.35 As a result of analysis of feedback from communities, statutory consultees and other local groups and key agencies, SSEN remained of the opinion that, subject to further consideration of environmental constraints and sensitivities at the alignment selection stage, Option B1 (with sub-option B1.1) was likely to be a more preferential route than Options B2 or B3 and would be taken forward as the proposed route. The main reasons were due to the reduced potential to impact protected species as well as less challenging terrain, steep gradients and peatland.

7.36 **Figure 6 - Section C Route Options and Constraints**

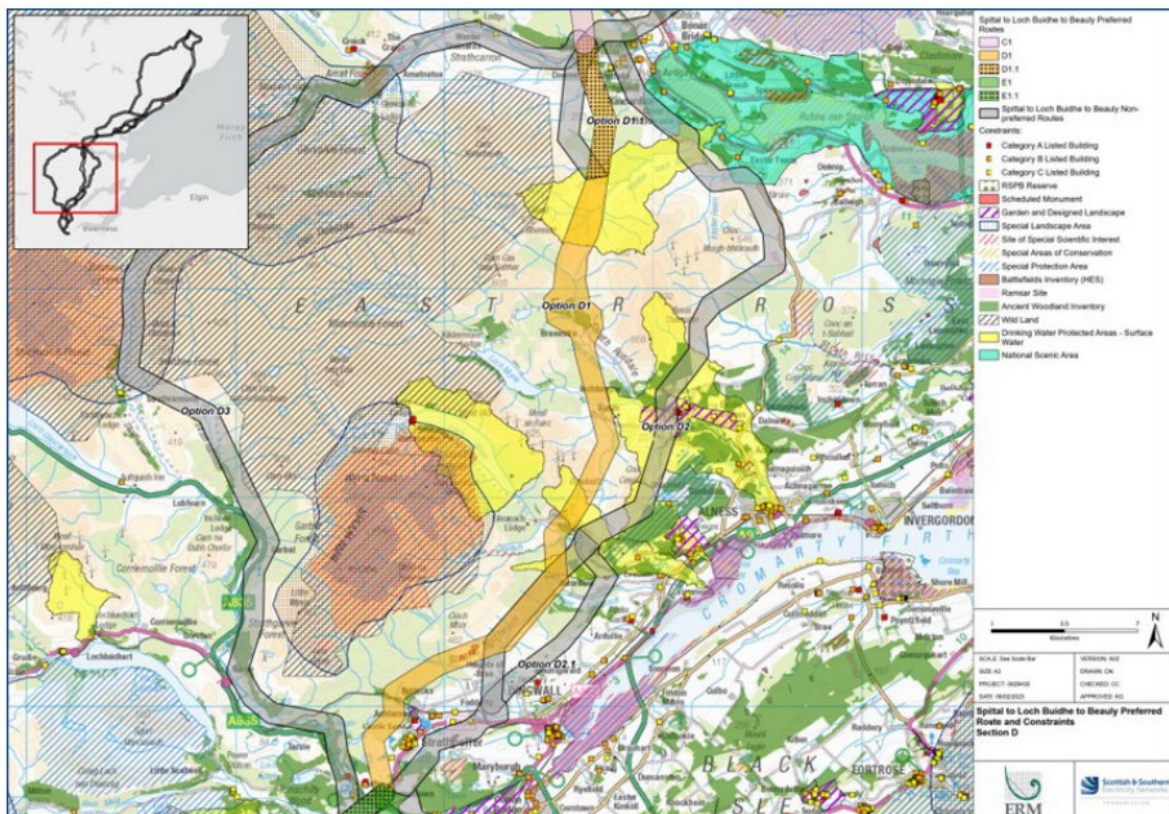


7.37 Proximity to local properties around the areas of Bonar Bridge, Culrain, Carbisdale, Drumaliah and Tulloch were noted as a constraint in this section. Other constraints in this section included a number of natural heritage designations such as the Dornoch Firth NSA, Strath Carnaig and Strath Fleet Moors SPA and SSSI, the River Oykel SAC and Kyle of Sutherland Marshes SSSI. There are a number of scheduled monuments and listed buildings, the Battle of Carbisdale Registered Battlefield and areas of ancient woodland within this section.

7.38 Two route options are identified, options C1 and C2 as illustrated above.

7.39 As a result of analysis of feedback from communities, statutory consultees and other local groups and key agencies, SSEN remained of the opinion that, subject to further consideration of environmental constraints and sensitivities at the alignment selection stage, Option C1 was a more preferential route than Option C2 and would be taken forward as the proposed route. The main reasons were due to the reduced technical considerations associated with crossing the Kyle of Sutherland.

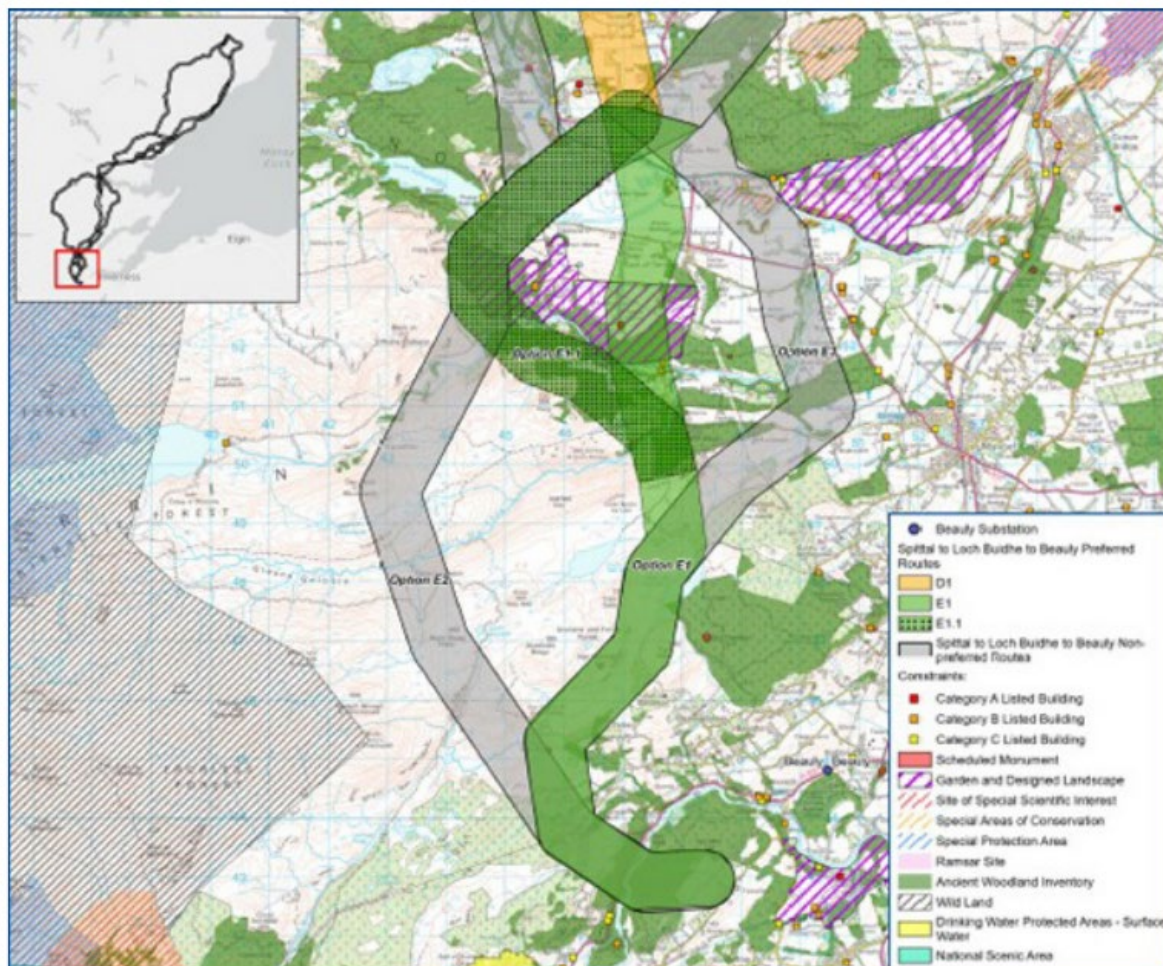
7.40 Figure 7 - Section D Route Options and Constraints



- 7.41 Local settlements including Airdross, Alness, Dingwall, Evanton, Contin and Strathpeffer are key constraints in this section. Other constraints include commercial forestry areas and areas of ancient woodland, the Novar SPA, the Amat Wood SAC and SSSI, Category A listed buildings such as the Airdross Castle, and the Airdross Castle GDL. There are a number of existing overhead lines within this section including the existing 132kV Beaulay – Shin and 275kV Beaulay – Loch Buidhe. The terrain in this section varies with large sections comprising very challenging hilly terrain.
- 7.42 Three routes are identified as D1, D2 and D3 as illustrated. There is one sub option for each of options D1 and D2. In response to the consultation, local community groups from the Strathpeffer area suggested an alternative route option in Section D that would re-route the proposed southern section of D1 to the west of Strathpeffer; the suggested route would be an OHL solution across land at Tarvie, Little Scatwell and then following a route to the south of Loch Achonachie until it joins up with the northern part of the Section E route options. Exploration of this new route option was encouraged by Council Officers.
- 7.43 As a result of analysis of feedback from communities, statutory consultees and other local groups and key agencies, SSEN remained of the opinion that, subject to further consideration of environmental constraints and sensitivities at the alignment selection stage, Option D1 (as well as an alternative route option proposed by the community) was a more preferential route than Options D2 or D3 and would be taken forward as the proposed route. However, based on further assessment, SSEN Transmission did not proceed with the sub-option D1.1 and the northern section of D1 was therefore the preferred route. The main reasons were that it would avoid direct impact on SAC, SPA

and SSSI sites, has potential to minimise impact on cultural heritage receptors as well as landscape character and designations and has comparatively lower gradients and fewer interactions with existing infrastructure and dwellings.

7.44 **Figure 8 - Section E Route Options and Constraints**



7.45 Constraints in this section included areas of ancient woodland, the Fairburn GDL and Grade A-listed Fairburn Tower, Conon Islands SAC and Lower River Conon SSSI, and the Brahan GDL. There are a number of existing OHLs in the area including the 132kV Beauty – Corriemoillie OHL near to Muirton Mains and Loch Achonachie. Proximity to properties in this area was also a key consideration.

7.46 Three route options are identified, E1, E2 and E3 as illustrated. One sub option for E1 has been identified, E1.1.

7.47 As a result of analysis of feedback from communities, statutory consultees and other local groups and key agencies, SSEN remained of the opinion that, subject to further consideration of environmental constraints and sensitivities at the alignment selection stage, Option E1 (with sub-option E1.1) would be taken forward as the proposed route. The main reasons were that it presents the best opportunity to minimise impact on the Fairburn GDL, Fairburn Tower A Listed Building, visual receptors and habitat.

Stage 3 Alignment Selection

- 7.48 The alignment selection stage involves the development of a Potential Alignment within the Proposed Route (Stage 2), which is technically feasible and economically viable, and which minimises disturbance to the environment wherever possible; and to those living, working, visiting or using it for recreational purposes. This is the final design evolution stage is the alignment selection phase which has produced the alignment that is the subject of the current application.
- 7.49 In considering the potential environmental constraints of the Potential and Alternative alignments, the following tasks were undertaken during the alignment selection stage:
- Desk-based review and targeted site survey by project landscape architects, ecologists, ornithologists, archaeologists, geologists and hydrologists to review alignment options and provide advice on variants or micro-siting opportunities for positioning of towers and indicative construction access;
 - Targeted Phase 1 / National Vegetation Classification (NVC) habitat surveys and protected species surveys to supplement existing data;
 - Review of ornithological survey data and records for the area, including requests for data held by RSPB, and targeted bird surveys to supplement existing survey data;
 - Review of comments received from stakeholders during the route options stage;
 - Workshops with SSEN Transmission, the OHL Contractors and environmental consultants to discuss alignment options, prior to the identification of a preferred alignment and design solution;
 - Site reconnaissance visits by the SSEN Transmission engineering team and environmental consultants to review alignment options; and
 - Workshops with statutory consultees to present the preferred alignment and design solution, and seek preliminary feedback, prior to more formal consultation.
- 7.50 The applicant's assessment of the alignment options identified, and the environmental and technical constraints associated with them is set out in EIAR Chapter 4, illustrated at Figure 4.3 Part 1 and Part 2. A summary of the main reasons each alignment option has been chosen is summarised below:

Proposed Alignment

- A1.1 - minimises impacts on the Caithness and Sutherland Peatlands SPA/Ramsar/SAC and Shielton Peatlands SSSI, The Flow Country WHS and Class 1 Peatland.
- A1.2 - was the only option identified in this section.
- A1.3 - avoids interaction with The Flow Country WHS.
- A1.4 - was the only option identified in this section.
- A1.5 - was the only option identified in this section.
- B1.1 - was the only option identified in this section.
- B1.2 - was the only option identified in this section.
- C1.1 - reduces potential impacts to forestry areas, avoided existing wind farm infrastructure as well as marginally less challenging terrain.
- C1.2 - involves less challenging terrain, earthworks and access.
- D1.1 - would be marginally less visible from residential properties in Strathrusdale as there were similar constraints technically within this section.

- D1.2 - would reduce impact on Strath Sgitheach and Firth View settlement scheduled monuments and avoid an area of Grade 2a Ancient Woodland.
- E1.1- would reduce potential impacts to Grades 1a and 2a Ancient Woodland and ornithology as well as flood zones, less challenging terrain and proposed wind farm infrastructure.
- E1.2 - would avoid or minimise impacts on cultural heritage features, including scheduled monuments and Grade 2a Ancient Woodland as well as reduced visual impact on residential properties in Torgormack and Farley and less challenging terrain.
- E1.3 - avoids direct impact on Dun Fionn prehistoric fort and a less challenging crossing of the Crask of Aigas.

Proposed Design

- 7.51 The 400kV OHL will be of a double circuit design, entirely supported by grey galvanised steel lattice towers from the applicant's AS4 Tower Suite. The towers will support six conductor bundles (three electrical wires per bundle) on six cross-arms (three on each side) and an earth wire between the peaks.
- 7.52 A total of 529 new towers are proposed and would measure a typical height of between 49m to 71m, with an average height of 57m. As a point of reference, the largest transmission towers currently used in Highland are used on the Beauly to Denny 275/400kV transmission line, measuring between 42m and 65m in height. The towers would be spaced at around 350m apart, although this distance will vary depending on topography and altitude.
- 7.53 Full details of the tower design types, including indicative heights and positions can be found in EIAR Volume 5, Appendix 3.1: Indicative Tower Schedule. Tower numbers are labelled as North (N) 1 to 297 for towers between the proposed substations at Banniskirk and Carnaig (Sections A and B) and South (S) 1 to 232 for towers between the proposed substations at Carnaig and Fanellan (Section C, D and E).
- 7.54 The application is for the line to be sited and contained within a routing corridor, known as a horizontal LoD. The LoD is designed to allow flexibility in the final siting of individual towers, poles, and other infrastructure to reflect topographical, engineering, and environmental constraints. The following typical parameters have been identified for horizontal LoD for the OHL Infrastructure:
- OHL (steel lattice) – 200m total LoD (100m either side of the centre line); and
 - Access tracks – 200m total LoD (100m either side of the centre line) for new access tracks, and 20m total LoD (10m either side of the centre line) for upgrades to existing tracks.
- 7.55 The applicant has sought to increase or decrease from the typical horizontal LoD to account for local constraints or known engineering challenges and environmental sensitivities. This is of particular importance at the crossing of existing transmission infrastructure where modification of 132kV or 275kV OHLs are needed to facilitate safe crossing of the proposed 400kV infrastructure.
- 7.56 84 LoD variations are therefore proposed which alter the proposed corridor where the infrastructure would be sited. In some area the LoD is proposed to extend out to a

corridor width of up to 2,200m (in order to accommodate special arrangement construction works and avoid a Scheduled Monument at Tower S22-S23), however in other locations the LoD is proposed to be refined inwards. A full summary of all proposed LoD variations is set out in Table 3.1: Summary of Significant LoD Variations of EIAR Volume 2: Chapter 3 – Description of The Proposed Development. Given how extensive the proposed LoD for the special arrangements, should these be consented, their finalised layout design is recommended to be subject to the Planning Authority's prior approval by condition.

- 7.57 An Operational Corridor (OC) is required through areas of woodland and commercial forestry to ensure the safe operation of the OHL. The width of the OC would vary depending on the nature of the woodland or forestry but typically requires a distance of 45 m either side of the OHL. Similarly, a 10m wayleave corridor is proposed for either side of new access tracks proposed within woodland.
- 7.58 Equipotential Zones (EPZ) pulling positions are temporary working areas for the installation of the conductors onto the towers. The area required at each EPZ is specific to both the line angle (or turning angles) of the conductors at the tower, as well as the height of the proposed tower at that location. To accommodate this, each proposed pulling position and its LoD has been defined individually. The LoD required is indicatively 1.5 times the height of the proposed tower (m) but is dependent on topography and other local constraints.
- 7.59 A vertical LoD, i.e. the maximum height of a pole or tower above ground level, is also sought to allow a height increase of up to 9m in general on the proposed tower height presented within the Indicative Tower Schedule. The 9m variation is consistent with the extension panels to which steel lattice towers are designed (i.e. in 3 m lengths), and therefore any increase of steel lattice towers would be no greater than 9m (equivalent to 3 x 3 m panel extensions). The vertical LoD provides some flexibility to account for presently unforeseen issues.
- 7.60 The proposed OHL would not have a fixed operational life. Regular inspections are to be undertaken to identify any unacceptable deterioration of components, so that they can be replaced. Inclement weather, storms or lightning can cause damage to either the insulators or the conductors on OHLs. If conductors are damaged, short sections may have to be replaced. During the operation of the OHL, it will be necessary to manage vegetation along the Operational Corridor (OC) to maintain required safety clearance distances.

Suggested Potential Design Amendments

- 7.61 While the preferred alignment is the settled approach of the applicant, and is ultimately the development to be assessed, it is considered that there may be benefit from considering amendments to the design to address concerns on landscape and visual impacts, and natural heritage. These suggestions are made in the knowledge that there may be other more compelling environmental or technical matters outweighing the landscape and visual effects.
- 7.62 The key affected route sections where it would be beneficial to revisit the routing, or understand more clearly why the proposed development alignment is preferred to the alternatives, are:

- Section A – Towers N24 to N28 are located within the Flow Country WHS and would therefore have impacts on the outstanding universal value of the WHS, and the underpinning Caithness and Sutherland Peatlands SAC. Potential solutions would be re-routeing to follow boundary of the WHS (and underpinning designations) with the operational Halsary Wind Farm, which may require a more detailed study of the ability to site transmission infrastructure in proximity to turbines and avoid wake exclusion zone. Alternatively, explore removal of select turbines at Halsary.
- Section A - Towers ca. N60 to N90 from A9 crossing to Borgue, which affects views from the A9 towards Scaraben and The Flow Country and Berriedale Coast SLA. Potential solutions would be re-routeing east of A9, or to a lower alignment west of the A9 and/or the use of low-profile towers to reduce skyline effects in views should any reduction in tower heights for this location be technically feasible .
- Sections A and B - Towers ca. N150 to N260 passing through the Loch Fleet, Loch Brora and Glen Loth SLA and significantly affecting several Special Qualities and the integrity of the designation. Potential solution could be re-routeing inland or the coastal side of the designated area to avoid its core, the currently proposed skylining, and crossing of valleys at their most scenic points.
- Section C - Towers ca. S15 to S30 passing across the Kyles of Sutherland and near Carbisdale Castle. Potentially less sensitive further to the northwest.
- Section E - Towers ca. S160 to S195 passing west of Strathpeffer, across Strathconon and across the western edge of Fairburn GDL. Potential solution would be to route much further westwards through the forested hills and away from settlements and open valley landscapes.

Construction Impacts

- 7.63 The construction phase comprises vegetation clearance and felling, creation of access and enabling works, construction of foundations, erection of towers and stringing overhead cables. Construction activities are anticipated to take place over a period of approximately 48 months, with a further 7 months being required for dismantling works associated with the existing OHL. This estimate is however reliant upon working hours being 7 days per week between approximately 07.00 to 19.00 hours March to September and 07.30 to 17.00 hours (or within daylight hours) October to February.
- 7.64 Given the strategic nature of the project, Environment Health are supportive of maximising construction hours, however, have reservations relating to residential amenity and the potential duration of impacts this may have on local communities in the vicinity of the works, as well as along access roads and tracks. As such, a condition is required to limit construction activities for which noise is audible at the curtilage of any noise sensitive property, to 08:00 and 19:00 Monday to Friday, 08:00 and 13:00 on Saturdays or at any time on a Sunday, unless otherwise authorised in writing by the Planning Authority.
- 7.65 The application is supported by EIAR Chapter 15 on Noise and Vibration which includes consideration of construction impacts. The chapter includes a desk-based assessment of construction noise which notes that potential construction noise levels from work sites cannot be calculated until detailed information about the proposed

construction activities is available. The desk-based assessment is therefore based on a predicted worst-case scenario based on construction activities and expected noise levels detailed in EIA Appendix 15.2: Construction Activities.

- 7.66 The Environmental Impact Assessment (EIA) includes a desk-based assessment of construction noise, carried out in accordance with BS5228: Code of Practice for Noise and Vibration Control on Construction and Open Sites. BS5228 recommends noise limits of LAeq,T 65 dB for daytime, 55 dB for evenings, and 45 dB for night-time. Given the proposed working hours include evenings and weekends, the assessment has applied a limit of 55 dB, as it proposed weekend working. The assessment has identified any properties which are located within 500m of the centreline of the proposed alignment as noise sensitive receptor (NSRs), and 89 NSRs have been included.
- 7.67 The assessment identifies that 55 dB limit, for evenings and weekends will be exceeded during all phases of construction, at up to 41 NSRs. The civil / access works are the noisiest phase with 18 NSR predicted to exceed 70dB. If construction takes place in the evenings and weekend working hours, noise is predicted to be above the 55 dB limit during felling at 47 NSRs, tower assembly and erection at 42 NSRs, foundation works at 47 NSRs, civil/access works at 58 NSRs and stringing at 23 NSRs and is therefore predicted to result in major (significant) impacts. The outcome of the assessment indicates that the construction noise will have a significant adverse impact. It is acknowledged that the predicted noise levels presented in the EIA do not take into account any reductions from mitigation measures. Section 15.9 of the EIA outlines examples of potential mitigation and confirms that best practice will be adopted to minimise noise impacts, in accordance with BS5228. However, no specific mitigation scheme has been proposed at this stage. The applicant confirms a Construction Noise Management Plan (CNMP) will be undertaken by principal contractor. This CNMP will include the following mitigation measures:
- Controlling noise at source,
 - Managing transmission paths,
 - Restricting operational times of equipment, and
 - Engaging in community liaison.
- 7.68 A cumulative assessment has also been undertaken for other development within the vicinity, (e.g. Banniskirk, Carnaig and Fanellan Substations, BBNP OHL, and nearby windfarms). The assessment has identified that there would be an increase in the impact of the construction noise, if works coincide with other developments. The assessment states in such circumstances, the principal contractor must create a more detailed CNMP to include working times, activities, a schedule of work and enhanced mitigation measures, where required.
- 7.69 In view of the proposed 7 days a week working, exceedance of both the daytime and evening noise limits at numerous NSRs, and potential increased impact due to cumulative noise, local residents in the vicinity of the towers will experience little or no respite from construction noise. It is therefore considered that construction activities will have a significant detrimental impact on the amenity of local residents.
- 7.70 EIAR Chapter 15 includes a desk-based assessment vibration impacts during construction. The construction activities which have the potential to induce vibration are piling during the foundation phase.

- 7.71 A worst-case assessment has been undertaken for compaction, percussive piling, vibratory piling, and dynamic compaction. The results indicate that dynamic compaction causes the highest impact, with a predicted vibration level of 15.33 mm/s.
- 7.72 This level of vibration is typically regarded as intolerable for anything more than brief exposure, and the assessment concludes that dynamic compaction would result in a major and significant impact, if undertaken. Therefore, if dynamic compaction is required, mitigation measures must be implemented to reduce its impact.
- 7.73 An assessment of ground-borne vibration associated with traffic using the newly constructed access roads has also been undertaken. The findings conclude that the impact will be minor or not significant.
- 7.74 However, it is noted that any road defects located within 15 metres of NSRs should be addressed. Specifically, defects should be repaired and/or vehicle speeds reduced in these areas to minimise the potential vibration impact on nearby receptors.
- 7.75 In view of the potential adverse impact from construction noise and vibration, a Construction Noise and Vibration Management Plan (CNVMP) is required to be secured by condition, should any consent be granted. The CNVMP shall be prepared in accordance with BS5228-1:2009+A1:2014 and shall include:
- Details of the mitigation measures to be implemented to minimise noise and vibration from construction activities, including those recommended in Chapter 15.8 and 15.9 of the EIA;
 - Proposals for monitoring noise and vibration throughout the construction period; and
 - Details of the community liaison for engaging with affected residents, including communication of potential impacts and complaint procedures.
- 7.76 The nature of the project anticipates the need for a Construction Environmental Management Document (CEMD), in association with the successful contractor engaged. This may be secured via condition and should include site-specific environmental management procedures which can be finalised and agreed through appropriate planning conditions. Such submissions are expected to be “plan based” highlighting the measures being deployed to safeguard specific local environmental resources and not simply re-state best practice manuals. Due to the scale of the development SEPA will control pollution prevention measures relating to surface water run-off via a Controlled Activities Regulations Construction Site Licence.
- 7.77 In addition to the requirement for submission and agreement on a CEMD, the Council and Transport Scotland will require the applicant to provide a Construction Traffic Management Plan (CTMP) for the use of the road network.
- 7.78 Should the development be granted consent, a series of Community Liaison Groups should be set up for each section of the line to ensure that the community council and other stakeholders are kept up to date and consulted before and during the construction period.

Roads, Transport and Access

- 7.79 EAIR Chapter 14 considers the transport and access implications of the proposals, supported by several appendices including an Outline Construction Traffic Management Plan (Volume 5, Appendix 14.5) and a Transport Assessment (Volume 5, Appendix 14.6). Given the nature and scale of this development, the extent of local public roads impacted will be significant, including for twin-track and minor single-track routes during the construction phase. Once operational the transport movements will be limited to periodic maintenance. To assess the impacts during the construction phase, the applicant's Transport Assessment has been broken down into eight sections. Development construction traffic will be primarily associated with the import of construction materials which are anticipated to be transported by Heavy Goods Vehicles (HGV's); no abnormal load vehicles are currently anticipated. However, crane deliveries may constitute abnormal loads due to their width. This will only be confirmed and detailed within the finalised CTMP prior to installation activities. There will be significant lengths of the public road network that will experience relatively large increases in traffic because of the construction works, particularly large proportional increases in HGV traffic. A 7-day working week throughout the project is suggested in the submission. Whilst this should help to reduce the overall duration of the project, it does mean that there will not be any respite from the impacts of construction traffic on the local public roads during their use for construction access purposes.
- 7.80 Transport Planning has highlighted several significant concerns regarding deficiencies in the Transport Assessment, essentially centred on a lack of information, which has led to it recommending that the Council should object to:
- the granting of S37 consent for the Beauly to Spittal OHL. The team has been unable to adequately assess the impact caused by the construction traffic and the public road improvements (PRIs) on the local road asset, Highland communities, businesses, visitors and on environmental receptors; and
 - the granting of deemed planning permission to any Public Road Improvement as ancillary development unless it is individually identified within the S37 application and sufficient information is given to enable suitable transport and environmental impact assessment to be made.
- 7.81 These concerns, which were relayed to the Energy Consent Unit in October 2025, in an effort to reinforce the need for information in order to fully assess the proposal, relate to:
- Extra-ordinary high numbers of commercial vehicles needed during construction;
 - Around 170km of public road affected by proposed road works;
 - Around 121 bridges, 23 known culverts and 58 retaining walls affected by the proposed construction routes;
 - The widespread nature of the access routes making it difficult to control construction traffic and limit damage (in contrast to wind farms where there is usually one main access route);
 - The fragile nature of many of the rural local roads impacted; and

- Other major developments which may be constructed at the same time such as the substations for this OHL, other OHL developments such as Beaulieu to Peterhead and the Western Isles HVDC Link.

- 7.82 Abnormal load movements are expected to comprise 100t crawler cranes required for erection of the towers. There may be other abnormal load deliveries on low loaders (for example crusher plant). Due to the requirement for access along minor single lane roads by 100t cranes to each of the 529 tower sites, the risk is high without suitable initial impact assessment. No indicative abnormal construction vehicle delivery routes have been identified in EIAR Chapter 14. In the Outline Construction Traffic Management Plan (Appendix 14.5) section 3.5.2 states that there is no requirement for abnormal loads which is likely to be incorrect. Transport Planning presume the statement confirms that there is no requirement for special abnormal indivisible loads (such as those for wind turbine delivery) nor the traffic management measures associated with them such as police escort and trial runs which is accepted.
- 7.83 The development is largely within rural parts of Highland where many roads have not been re-constructed to meet modern design standards and there is limited historical information on the road asset. The local road network has been strengthened in a practical and cost-effective way to support the day-to-day traffic it supports. In this regard such roads are described as evolved and they may be fragile. Fragile roads are those that are vulnerable to costly damage, degradation and failure causing delay and disruption to Highland communities, and the project itself, if there is a significant increase in HGV traffic. HGVs cause almost all the vehicle damage to the road (wear is proportional to the axle load to the power of 4) as set out in the DMRB CD224. Therefore, traffic consisting of cars and light vehicles are not considered in this section. The Transport Assessment submitted has not assessed the capacity of either the main or local roads to support the increase in HGV construction traffic. This poses a high risk of widespread damage, degradation, failure and disruption to the public road asset causing likely disruption to the Highland communities and the travelling public that rely on it.
- 7.84 Compared to urban areas the average daily HGV traffic on the main rural roads is low. These roads typically have substandard geometry including narrow lanes, pinch points, tight bends and lengths of single lane carriageway (with passing places). The A839, A897 and B870 have not been assessed within the EIAR Chapter 14. They have been identified for Public Road Improvements (PRIs) without any explanation. Transport Planning has assumed these routes are fragile.
- 7.85 The A862, A831, A832, A834, A836, B817 and B9176 are proposed to be used for construction traffic. No formal assessment of the capacity of these roads to support the increase in HGV traffic has been submitted. Most of these routes are subject to significant increases in HGV traffic (greater than 30%) and some increases are as high as 636%. No PRIs are identified for these routes. No explanation is given why some main roads are identified for PRIs but these are not. Transport Planning considers these routes require initial assessment to identify if they are fragile to the increased traffic.
- 7.86 The EIAR lists improvement works on the local road (PRI) with a total length of around 160km which is significant. Brief details are given below with a more detailed summary in Appendix 3 of the Transport Planning's consultation response dated 24 October

2025 (TP 24/10/2025). Many of the minor roads are single track and construction of the PRI will require extensive road closures. Appendix 3 (TP 24/10/2025) also includes an initial estimate for risk level for the public roads affected. Figures showing the PRIs and the estimated risk levels are also included in Appendix 3 (TP 24/10/2025).

- Caithness and Sutherland: 29 local public roads affected by 25 road improvement schemes - Total Length: over 120km;
- Ross and Cromarty: 12 public roads affected by 8 road improvement schemes - Total Length: 40km; and
- Inverness: 6 public roads affected by 4 road improvement schemes - Total Length: 7km.

7.87 As set out in Volume 2 Chapter 3 of the EIA submission section 3.3.1 Deemed Planning Permission is sought as part of the Section 37 application for the (PRIs). The only description given of the PRIs is 'road widening'. No dimensions for the required public road width have been identified in the report. No Limit of Deviation or corridor for the PRIs has been identified (only for the private access tracks in section 3.8.8). Without this information the assessment undertaken in EIA Volume 5 Appendix 3.7 PRI Environmental Appraisal cannot be relied on to give an accurate result.

7.88 The information below on estimated daily two-way construction vehicle movements for the duration of the works has been taken from the appendices of the submitted Transport Assessment (TA).

Section 1 – Banniskirk to Latheron (A9, B870 and C1053)	Car / LGV's	HGV's
	117	256
		Total: 373
Section 2 – Latheron to Helmsdale (A9, C1065, 1043 Achorn Road and A897)	380	816
		Total: 1,197
Section 3 – Helmsdale to Brora (A9, A897, Clynelish Road)	271	996
		Total: 1,267
Section 4 – Brora to Evelix (A9, A839, A836, Migdale Road (U3521)	450	592
		Total: 1,042
Section 5- Evelix to Tain (A9, A836, C1136 Church Street, C1136 Inveroykel Culrain, C1138 Cadh' an Tartair	101	142
		Total: 244
Section 6 – Tain to Evanton (A9, B9176, U1990)	109	139

		Total: 246
Section 7 – Evanton to Tore Roundabout (A9, B9176, B817 N.of Evanton, B817 S. of Evanton, U1999, U1991, A834	86	122 Total: 208
Section 8 – Tore Roundabout to North Kessock (A9, A835, A832, A862, A831, Torgomack (1104) and Achonochie Road	127	127 Total: 254

- 7.89 The vehicle classifications used within EIAR Chapter 14 are however inconsistent. Throughout, the term HGV is used, but within the Outline Construction Traffic Management Plan the terms Light, Medium and HGV are used.
- 7.90 The limited data provided indicates that the projected increase in HGV traffic will be substantial, ranging from a minimum of 23% to 595%. However, these forecasts cannot be accepted at this stage as the methodology behind the predictions remains unclear. Specifically, further detail is required on how the estimated volume of materials was calculated, what assumptions were made regarding typical load sizes and the location of quarries and suppliers within each section.
- 7.91 It is particularly concerning that no assessment has been carried out on the impact of construction traffic on the Council's fragile and vulnerable minor roads. These roads are predominantly single-track with passing places and are susceptible to damage from increased HGV movements. A significant number of minor roads are expected to be used for transporting materials, yet there is currently no understanding of what the impact will be on these roads.
- 7.92 Despite the limitations of the assessment provided, the overall conclusions set out in Table 14.37 in EIAR Chapter 14, which identify the impact on communities and non-motorised users as Major is accepted. Accordingly, it is expected that the proposed mitigation measures would be appropriate to reflect this level of significance. The current mitigation outlined, namely measures within the Construction Traffic Management Plan and the avoidance of construction traffic during periods of 'increased non-motorised user activity', is considered inadequate. Given the predicted major impacts on communities and vulnerable road users, these proposals are insufficient to address the scale of construction traffic anticipated.
- 7.93 It is disputed that Core Paths located within one metre of the proposed development will not be affected. Pedestrians, cyclists and horse riders passing so near to active construction areas cannot be unaffected. Where there is recognised routes or significant levels of non-motorised user activity appropriate assessment and consideration of suitable mitigation measures is required. The PRIs proposed only include road widening, junction enhancements and the provision of new or improved passing places. These physical mitigation measures would require to also incorporate

facilities for non-motorised users, particularly in areas where a significant increase in HGV traffic is anticipated.

- 7.94 EIAR Chapter 14 outlines that the cumulative effects assessment is based on identifying developments that have either received consent or are at the planning stage with an accompanying Transport Assessment. However, a review of Table 14.35 reveals that several substantial developments have been omitted. These include replacement substations at Aigas and Glen Strathfarrar, battery energy storage systems in Beaully and Caithness and wind farms such as Coille Beith. The assessment focuses on six 'relevant locations', yet none are situated around Beaully, an area with a high concentration of energy infrastructure projects. This omission is concerning given the likely cumulative impact on local roads and communities.
- 7.95 The assessment acknowledges that Rule 1 and Rule 2 thresholds from the IEMA Guidelines (10% and 30% increases in HGV traffic) are exceeded and therefore further assessment is required. The reported increases range from 75% to 1415%, with three of the six roads showing HGV increases above 500%. Despite these figures, the assessment concludes that cumulative effects are not expected to significantly alter the impacts already predicted for the proposed development.
- 7.96 It is not accepted that such percentage increases can be considered not significant and that the cumulative impact will be limited simply because projects may not overlap or because material supply constraints will stagger activity. There is no guarantee that these scenarios will occur. There is a concern that the cumulative effects assessment is underestimating impacts by not including all relevant developments and failing to assess all affected roads and communities. Based on the information provided, the conclusions drawn from the cumulative assessment are contested. A revised assessment is required, carried out in consultation with the Council, to agree on which developments, both consented and in planning, should be included and which roads must be assessed.
- 7.97 Should the proposed development be granted consent, a wear and tear agreement under Section 96 of the Roads (Scotland) Act 1984 will be required to protect the local road network from any damage inflicted by the construction traffic, with this to be established and in place prior to the main construction works for each section of the line. These will be consistent with current best practice and need to highlight potential cumulative impacts arising with other major developments.
- 7.98 In summary, the transport and access mitigation measures associated with the construction of the line are incomplete. As such, it is not possible to provide sufficient confidence that the development can progress without substantial impact on the roads and communities which serve them. It is considered that the EIAR under assesses the impacts of the proposals on the local road network. Accordingly, the conclusions in terms of effects cannot be relied on and as a consequence this has resulted in a recommendation to object.
- 7.99 It is recognised that the complexity of the project may mean that the design will not have been sufficiently advanced to a stage that can properly assess and mitigate the impacts of the whole project at this moment in time. It is acknowledged that transport impacts could be reserved to planning conditions and resolved at a later point. Discussions on that have already taken place and will no doubt continue throughout

the process as the Council continues to work collaboratively with the applicant. However, such an approach leaves considerable risk to both the Council and the applicant without a supportable strategy or attempt to resolve the Council's concerns which is of fundamental concern to project deliverability. The key outcome is clearly securing appropriate mitigation for all users of the transport network.

Water Environment and Flood Risk

- 7.100 EIAR Chapter 10 assesses potential effects of the proposed development on the water environment. Key sensitive receptors include surface water, groundwater, flood risk, Drinking Water Protection Areas (DWPAs), Private Water Supplies (PWS), groundwater dependent terrestrial ecosystems (GWDTEs) and designated sites. The assessment is informed by a comprehensive desk study, consultation responses and field surveys. While baseline conditions are described by section, potential impacts are assessed collectively, which is considered an appropriate approach for a development of this scale. The EIAR concludes that no significant residual effects are identified for the water environment, through a combination of embedded and additional mitigation.

Water Supplies

- 7.101 The proposed development crosses multiple catchments, with PWS and DWPAs identified as highly sensitive receptors. Several DWPAs lie within 1km of the route in Sections B and D, and PWS are present across all sections. On receipt of SEI submitted in March 2026 which identifies private water supplies within 250m of the LOD, Officers agree with SEPA's position that upgrades to existing access tracks should also be included in the scope of the PWS assessment within 100m either side of the access track where the upgrade will comprise of excavations. This would ensure consistency with other similar projects, and compliance with SEPA guidance. Further survey work and identification of PWS, including a 12-month pre-construction monitoring programme where required, will be necessary, which can be secured via a suitably worded condition. Water quality monitoring and pollution prevention measures are proposed through the CEMP and associated General Environmental Management Plans.
- 7.102 During operation of the proposed development, effects on the water environment are expected to be minimal due to limited maintenance requirements. Pollution risk impacts on groundwater and surface water flows, and flood risk are anticipated to be negligible if best practice measures and agreed controls are implemented. Ongoing protection of PWS, DWPAs and designated sites would rely on routine inspection, maintenance and the application of the mitigation measures set out in the EIAR and CEMP.
- 7.103 Regarding cumulative effects on the water environment, the applicant states these have been assessed as significant only where an overlap in construction exists. The applicant assumes that other developments will also employ effective controls and good practice measures, therefore no significant in-combination effects are anticipated.

Groundwater Habitats

- 7.104 Potential effects on GWDTE and designated sites with hydrological connectivity to the development site are assessed within the EIAR and identified as highly sensitive receptors. Two moderately groundwater-dependent habitats are present in Sections A,

B and E, with other areas sustained mainly by rainfall. The applicant has undertaken a standalone GWDTE Assessment in accordance with SEPA guidance. The EIAR also acknowledges uncertainty regarding how impacts on the Flow Country WHS will be addressed, and offsetting impacts is not appropriate in a WHS context, as set out in NatureScot's response. The proposal's effect on groundwater habitats within the WHS is assessed within the Natural Heritage section of this Report.

- 7.105 SEPA agrees that the three GWTDE habitats identified in Table 4 of the GWDTE Assessment are most at risk; however, it requests that the applicant also includes M10 habitat in Section B between towers N218-219, as the new cut and fill track cuts through and upslope of this habitat. SEPA highlights that the extent of impacts of GWDTE may change due to the uncertainty of the final OHL and access track routing, and it is therefore requested the finalised list is included in the final CEMP and secured as a condition.
- 7.106 SEPA has confirmed the mitigation measures set out in the Schedule of Mitigation in EIAR Chapter 19 are acceptable and should be secured by condition. The mitigation measures relate to a Pollution Prevention Plan (PPP), use of silt traps, settlement lagoons, dewatering of all excavations (including foundation construction), and excavations within 250m of GWDTE will be >1m and within 100m will be <1m. SEPA also request that no micro-siting within the LoD takes places which further encroaches into potentially moderate or high GWDTE identified in the EIAR, which is to be secured by condition. Overall effects on GWDTEs are assessed as negligible and not significant. This is not disputed, by with GWDTE impacts being capable of being effectively managed through the conditions proposed by SEPA.

Flood Risk

- 7.107 Flood risk effects are assessed as being of medium sensitivity, with design measures proposed to minimise changes to drainage patterns. The proposed design and layout set out in the EIAR shows twenty-three tower locations are identified within SEPA's recommended riparian corridor, requiring micro-siting, enhanced mitigation and monitoring.
- 7.108 Residual flood risk impacts are assessed by the applicant as not significant with mitigation. However, SEPA note that there is insufficient information to fully demonstrate this, therefore further assessment is required, including consideration of SEPA's surface water flood mapping.
- 7.109 The Council's Flood Risk Management team (FRM) consider, where siting proposed infrastructure out with flood risk areas is not possible, the applicant will need to ensure no land raising, so that there is no loss of flood plain capacity. It is recommended that this is secured by planning condition.
- 7.110 In summary, an assessment has been undertaken as part of the EIA to identify and address impacts of the proposed development on the water environment. It is recommended that a suitably worded condition can ensure delivery of pre-construction monitoring of PWS. With regard to flood risk, the EIAR contains insufficient information to demonstrate that residual flood risk impacts would be not significant. An additional condition is recommended.

Natural Heritage (including ecology, ornithology, biodiversity enhancement, peat and forestry and woodland.)

- 7.111 The EIAR has identified potential significant effects on natural heritage features, including forestry and woodland, bird species and habitats, European protected species, designated sites for species and habitats, and irreplaceable habitats. The EIAR also assesses cumulative effects with other developments. The applicant has provided information relating to delivery of biodiversity enhancement as part of the EIAR.
- 7.112 EIAR Chapter 8 assesses the potential ecological impacts arising from construction and operation of the proposed development. The key effects identified include temporary and permanent habitat loss, habitat fragmentation, disturbance and displacement of protected species, direct mortality during construction activities, hydrological changes affecting sensitive habitats, and biosecurity risks such as the spread of invasive species and disease.
- 7.113 Ecological key sensitive receptors include internationally and nationally designated sites, Annex I and other high-value or irreplaceable habitats (including GWDTEs and ancient woodland), and species protected under national and international legislation. The study area comprises the development footprint and a 2km buffer, with baseline conditions established through desk studies, field surveys and consultation responses. The assessment scope was refined as additional survey information became available.
- 7.114 EIAR Chapter 9 assesses the potential effects of the proposed development on birds during construction and operation. The key effects identified include temporary and permanent habitat loss, disturbance and displacement, barrier effects, and collision risk with overhead line infrastructure. Electrocution risk was scoped out of the assessment as the proposed lattice tower design provides sufficient separation between conductors and tower arms to prevent electrocution of even the largest bird species present.
- 7.115 Disturbance, displacement and barrier effects during operation were also not considered further, as available evidence indicates birds habituate to operational overhead lines and such effects are unlikely to occur at a population level. The applicant's assessment therefore focuses on effects considered most relevant to sensitive species and locations.
- 7.116 Ornithological baseline conditions were established through desk-based studies, field surveys and consultation, with ornithological designated sites identified within a 20km search area in accordance with NatureScot guidance. Important Ornithological Features were identified for each section and assessed in detail. Effects on species considered to be of local importance only were not assessed further. For non-designated populations, assessment was undertaken at Natural Heritage Zone (NHZ) scale where applicable, while functionally linked bird populations were assessed in relation to the relevant designated sites.
- 7.117 The EIAR includes an assessment of cumulative effects on ecology and ornithology. Cumulative significant adverse effects are predicted for bats from the proposed development and the proposed Beaulieu to Blackhilllock to New Deer to Peterhead 400kV OHL.

Designated Sites

- 7.118 The proposed development is extensive in length and passes through or is adjacent to a number of designated sites for nationally and internationally important habitats, terrestrial species and ornithology. Section 2 of this report sets out all such designations within the study area. The applicant has undertaken a desk-based assessment, field surveys for protected species and consultation with relevant organisations to inform the EIA. The applicant has sought to minimise impacts on designated sites as far as practicable. The EIAR states seventeen sites designated for non-avian ecological features were identified to be potentially impacted by the proposed development.
- 7.119 The applicant notes in the EIAR that embedded mitigation during the design process, and further mitigation measures during pre-construction, construction and operational phases will be implemented to reduce overall impacts to not significant.
- 7.120 The EIAR assesses statutory designated sites with ecological features located within 1km of each section of the proposed development. For ornithological designated sites, a study area was identified of 20km based on the maximum published core foraging range and territory sizes of sensitive bird species as per NatureScot guidance.
- 7.121 As the proposed development has the potential to have likely significant effects on European Sites (SAC, SPA and Ramsar), the requirements of the Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations') apply. Consequently, Scottish Ministers must, as the competent authority, carry out an Appropriate Assessment (AA) of the implications of the proposed development on the integrity of SACs, SPAs, and Ramsar sites in light of their site conservation objectives. The proposed development may be consented only after Scottish Ministers have established beyond reasonable scientific doubt that there will be no adverse impact on the integrity of SPAs, SACs and Ramsar sites, both on its own and in combination with other plans and projects impacting on the SPA/SAC/Ramsar site. The applicant has provided information in the EIAR to inform the competent authority's Appropriate Assessment.
- 7.122 The EIAR states the proposed development has been designed to minimise impacts on designated sites for ecology and ornithology. The EIAR concludes that for the ecologically designated sites, no significant effects are expected on any of these sites. For ornithology designated sites, the applicant has taken forward for more detailed assessment where results of baseline surveys have identified potential impacts on qualifying features within connectivity distances.
- 7.123 The EIAR has provided assessments of the impacts of the proposed development on designated sites within the red line boundary or within connectivity distance, which are set out in the table below; alongside the position of NatureScot. This is followed by Sections A-M, which describes designations that require additional mitigation to conclude no adverse effects on integrity. For the remaining three designated sites included in the table below, it is considered by NatureScot that the applicant has included in the EIAR sufficient mitigation to address impacts on the designations.

Designation	EIAR Conclusion	NatureScot Position
Flow Country World Heritage Site	Not significant	Disagree (Objection)
Caithness and Sutherland Peatlands SAC/Ramsar	Significant effects , but no adverse effect on site integrity with mitigation	Disagree with extent of mitigation (Objection)
Shielton Peatlands SSSI	Not significant	Disagree (Objection)
Novar SPA	Not significant	Disagree (Objection)
Morangie Forest SPA	Not significant	Disagree (Objection)
(A) Berriedale and Langwell Waters SAC	Not significant	Agreed subject to conditions requiring compliance with detailed additional mitigation measures
(B) Dunbeath Water SSSI	Not significant	Agreed subject to conditions requiring compliance with detailed additional mitigation measures
(C) Berriedale Water SSSI	Not significant	Agreed subject to conditions requiring compliance with detailed additional mitigation measures
(D) Mound Alderwoods SAC/SSSI	Not significant	Agreed subject to conditions requiring compliance with detailed additional mitigation measures
(E) Caithness and Sutherland Peatlands SPA/Ramsar (avian interests only)	Significant effects but no adverse effect on site integrity with mitigation	Agreed subject to conditions requiring compliance with detailed additional mitigation measures
(F) Cromarty Firth SPA and Ramsar	Not significant	Agreed subject to conditions requiring compliance with detailed additional mitigation measures

Inner Moray Firth SPA/Ramsar (included in discussion with (F))	Significant effects but no adverse effect on site integrity with mitigation	Agreed subject to conditions requiring compliance with detailed additional mitigation measures
(G) Glen Affric to Strathconon SPA	Not assessed in detail (Scoped Out)	Recommend conditions requiring compliance with detailed additional mitigation measures
(H) East Caithness Cliffs SPA	Significant effects but no adverse effect on site integrity with mitigation	Agreed subject to conditions requiring compliance with detailed additional mitigation measures
(I) Strath Carnaig and Strath Fleet Moors SPA/SSSI	Significant effects but no adverse effect on site integrity with mitigation	Agreed subject to conditions requiring compliance with detailed additional mitigation measures
(J) Dornoch Firth and Loch Fleet SPA/Ramsar	Not significant	Agreed subject to conditions requiring compliance with detailed additional mitigation measures
(K) Strathfleet SSSI	Not significant	Agreed subject to conditions requiring compliance with detailed additional mitigation measures
(L) Alt nan Caorach SSSI	Not assessed	Recommend conditions requiring compliance with detailed additional mitigation measures
River Oykel SAC	Not significant	Agreed based on mitigation included in the EIAR, it is considered the proposal would not have likely significant effects
River Thurso SAC	Not significant	Agreed based on mitigation included in the EIAR, it is considered the proposal would not have likely significant effects
Caithness Lochs SPA	Not significant	Agreed based on mitigation included in the EIAR, it is considered the

		proposal would not have likely significant effects
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Designations - Additional Mitigation Required to Conclude No Adverse Effect on Site Integrity

- 7.124 **A – Berriedale and Langwell Waters SAC** is designated for internationally important Atlantic salmon. NatureScot object as it considers the proposed development could have a likely significant effect on the qualifying interests of the SAC. However, it considers that, if the proposed development is carried out in strict accordance with its recommended mitigation, there would be no adverse effect on site integrity. NatureScot recommend a Site-Specific Method Statement for the SAC be agreed prior to construction that should include reference to relevant mitigation in terms of GEMPs and biosecurity plans; and methods for ensuring how any existing track upgrades/replacement bridges, or new water crossings within and upstream of the SAC will avoid damage to the qualifying interest. Subject to implementation of the identified mitigation, it is considered the proposal would not adversely affect the Berriedale and Langwell Waters SAC.
- 7.125 **B – Dunbeath Water SSSI** is designated for its nationally important geology, and upland birch woodland habitat. The proposed development would over-sail the SSSI, but some tree felling may be required to create and maintain the operational corridor. NatureScot consider that the geological feature would not be affected by the proposed development. In terms of the habitat feature, embedded mitigation set out in the EIAR, and additional mitigation in the proposed development HMP. NatureScot consider that implementation of the additional mitigation will ensure no adverse effects on the SSSI. Subject to implementation of the mitigation identified, it is considered the proposal will not adversely affect the Dunbeath Water SSSI.
- 7.126 **C – Berriedale Water SSSI** is designated for nationally important upland birch woodland. The proposed development would over-sail the SSSI, but some tree felling may be required to create and maintain the operational corridor. A temporary compound at proposed tower N110 is also proposed which could extend into the SSSI where woodland habitats may be present. NatureScot consider that implementation of embedded mitigation set out in the EIAR, and additional mitigation in the proposed development HMP will ensure no adverse effects on the SSSI. Subject to implementation of the mitigation identified, it is considered the proposal will not adversely affect the Berriedale Water SSSI.
- 7.127 **D – Mound Alderwoods SAC** is designated for internationally important Alder woodlands on floodplains habitat, and is underpinned by the **Mound Alderwoods SSSI**, and overlaps with the **Dornoch Firth and Loch Fleet Ramsar**, both which share the same qualifying interest as the SAC. NatureScot object as it considers the proposed development would have a likely significant effect on the wet woodland of the SAC/SSSI and Ramsar site. However, it considers that if the proposed development is carried out in strict accordance with its recommended mitigation, it could be concluded that there would be no adverse effect on site integrity. NatureScot recommend a Site-Specific Method Statement for the SAC is to be agreed prior to construction and should include reference to relevant mitigation in terms of GEMPs and biosecurity plans; and methods for ensuring how any existing track

upgrades/replacement bridges, or new water crossings within the SAC/SSSI/Ramsar will avoid damage to the qualifying interest. Subject to implementation of the identified mitigation, the proposal would not adversely affect the Mound Alderwoods SAC/SSSI and Dornoch Firth and Loch Fleet Ramsar site.

- 7.128 **E - The Caithness and Sutherland Peatlands SPA and Ramsar** are designated for their internationally important breeding and wintering bird species. There are concerns that surveys in the EIAR have under-estimated breeding wader abundance, illustrated to an extent that for some wader species, where the flight activity detected during vantage point surveys is higher than might be expected based on the assessment of breeding activity. It is recommended the applicant considers installation of additional bird flight diverters as part of mitigation to address impacts on breeding waders that are a qualifying interest of the SPA/Ramsar. It is also recommended the applicant provides consultees with more information on these matters to enable a conclusion of no adverse effect on site integrity to be drawn. There are concerns regarding Common Scoter, a qualifying interest of the Caithness and Sutherland Peatlands SPA, for which this SPA supports around half of the UK population. Common Scoter is a red-listed rare breed of sea duck, that use freshwater lochs in the Flow Country for breeding and raising chicks. The proposed development could impact on Common Scoter through collision mortality, displacement and disturbance. Whilst it is noted that bird flight diverters are proposed to be installed to address risk of collision mortality for this species, it is recommended further investigation is undertaken by the applicant to understand the most effective model of diverter for Common Scoter due to difference bird species' spatial perceptions of objects when in flight and their ability to avoid obstacles. It is considered further information is required to be provided by the applicant regarding survey methods that have been carried out to detect this species at key 'staging' lochs in proximity to the proposed development.
- 7.129 It is considered through provision of further information to confirm survey methods, and mitigation for Common Scoter to ensure construction and felling in key breeding locations is not carried out within key breeding periods for this species during August and September. It is also recommended that a buffer distance of 800m is implemented during forestry works around key lochs to mitigate and minimise the risk of disturbance to pre- and post-breeding Common Scoter at Loch Toftingall and Loch Stemster. Mitigation measures for Common Scoter are required to ensure no adverse effect on site integrity of the Caithness and Sutherland Peatlands SPA and Ramsar site; therefore, it is recommended a suitably worded condition is included to secure a sufficient bird protection plan.
- 7.130 **F- Cromarty Firth SPA and Ramsar site and Inner Moray Firth SPA and Ramsar** are designated for breeding and wintering seabirds, waders, goose species, breeding osprey, and coastal and intertidal habitats (Ramsar only). The two SPAs share land outwith their boundaries that have connectivity distance with the proposed development for osprey. The applicant has proposed to install bird flight diverters in Aigas gorge to mitigate the impacts on osprey; however, NatureScot recommend that additional mitigation is required through the installation of additional bird flight diverters in Section E at Towers S176-178 to reduce the risk of collision risk for Osprey. Subject to implementation of the mitigation identified, it is considered the proposal will not adversely affect the Cromarty Firth SPA and Ramsar Site and Inner Moray Firth SPA, and Ramsar site for the breeding osprey qualifying interest.

- 7.131 **G - Glen Affric to Strathconon SPA** is designated for internationally important breeding Golden Eagle. The EIAR states sixteen eagle flights were recorded in Section E of the proposed development, within foraging distance (<9km) of the SPA, with three of these flights recorded crossing the proposed alignment, and one at collision risk height. NatureScot consider these birds are within foraging distance of the SPA and are likely to be connected to the population in the SPA. The loss of SPA birds as a consequence of collision with the OHL would undermine the conservation objectives to maintain the population. The applicant has not proposed to install bird flight diverters along the section of the proposed alignment to mitigate collision risk for Golden Eagle. However, NatureScot consider additional mitigation is necessary to meet the conservation objectives of the SPA. This would involve the installation of bird flight diverters between towers S184 and S190 with final details of diverter locations to be provided within the Bird Flight Diverter Plan secured as a condition. Subject to implementation of the mitigation identified, Officers consider the proposal will not adversely affect the Glen Affric to Strathconon SPA.
- 7.132 **H - East Caithness Cliffs SPA** is designated for breeding Herring gull and breeding Great black-backed gull. The SPA is located to the southeast of the proposed development, along the coast at Dunbeath, Berriedale, Latheron to Wick in the northeast. The applicant has identified the need for bird flight diverters to mitigate the effects on the qualifying interests of the SPA. However, NatureScot require a Bird Flight Diverter Plan to be produced and agreed prior to construction. That should aim to achieve 5m spacing where operational constraints allow. Subject to implementation of the mitigation identified, the proposal will not adversely affect the East Caithness Cliffs SPA.
- 7.133 **I - Strath Carnaig and Strath Fleet Moors SPA** is located predominantly in Section B of the proposed development and overlaps with Section C and is underpinned by the **Strath Carnaig and Strath Fleet Moors SSSI**. It is designated for internationally important breeding Hen Harrier. The SPA supports approximately 12 pairs of breeding Hen Harriers, which equates to approximately 2.5% of the GB population. The existing Carnaig substation is located within the SPA, as are a number of existing OHLs. In terms of cumulative effects of the proposed OHL and the proposed Carnaig 400kV substation on the SPA, this is assessed as negligible effects that are not significant. It is considered by the applicant that due to the habitat changes that will be undertaken to accommodate both the OHL and substation, in that an area of forestry will be felled to create open-ground habitat, that this will have a minor positive cumulative effect on supporting habitats for hen harrier, a species that favours open-ground for foraging, roosting and nesting. The EIAR states approximately 12.42ha of suitable open habitat for breeding, foraging and roosting hen harrier will be permanently lost, and approximately 67.66ha temporarily lost as a result of the proposed development in Section B. Approximately 44.46ha of woodland habitat will be permanently converted to open habitat as a result of felling forestry along the alignment of the OHL.
- 7.134 The applicant has assessed the impacts of the construction and operation of the OHL on breeding and wintering hen harrier as negligible and not significant. NatureScot require, as a condition of consent, that bird flight diverters are installed to mitigate the impacts on hen harrier. The following mitigation is necessary to ensure no adverse effect on site integrity for the SPA: no construction work during the Hen Harrier breeding season; the OHL is marked with bird flight diverters for its entire length within

the SPA; and OHLs out with the SPA but are within functionally linked habitat to the SPA are also marked. Subject to implementation of the mitigation identified, the proposal will not adversely affect the Strath Carnaig and Strath Fleet Moors SPA.

- 7.135 **J - Dornoch Firth and Loch Fleet SPA/Ramsar** is for internationally important populations of wintering wader bird species, and breeding osprey. The proposed development is not located within the designations; however, there could be connectivity. The applicant has identified the need for bird flight diverters to mitigate the effects on the qualifying interests of the SPA. However, NatureScot require a Bird Flight Diverter Plan to be produced and agreed prior to construction. That should aim to achieve 5m spacing where operational constraints allow. Subject to implementation of the mitigation identified, the proposal will not adversely affect the Dornoch Firth and Loch Fleet SPA/Ramsar.
- 7.136 **K - Strathfleet SSSI** is designated for nationally important moine geology, and upland oak woodland habitat. The proposed development would pass through the designated site in Section B, comprising two temporary tower compounds, two permanent towers, and temporary access tracks. The EIAR states no permanent or temporary losses are predicted to habitats for which the SSSI is designated. However, NatureScot consider the works to be carried out within the SSSI could adversely affect the natural heritage interests and therefore advise additional mitigation is required. NatureScot recommend a Site-Specific Method Statement for the SSSI is to be agreed prior to construction and should cover all work within the SSSI; further detail of the mitigation is set out within NatureScot's response relating to avoidance of an area of bed rock; rock outcrop must remain exposed during construction of towers and tracks; and any imported material must be removed during track reinstatement works. Subject to implementation of the mitigation identified, the proposal will not adversely affect the Strathfleet SSSI.
- 7.137 **L – Allt nan Caorach SSSI** is designated for its nationally important upland birch woodland and subalpine dry heath habitats. The proposed development would pass through the designated site in Section D. Although no permanent or temporary infrastructure is proposed to be situated within the SSSI, the need to maintain an operational corridor without the risk of trees falling and for safety reasons is required. This will result in the permanent loss of 0.65ha of upland birchwoods. NatureScot consider the dry heath feature of the SSSI will remain unaffected. NatureScot consider that provided the additional mitigation via the 'proposed development HMP' is implemented, adverse effects on the objectives of the designation, and overall integrity of the area would recover within a reasonable timeframe. Subject to implementation of the mitigation identified, the proposal will not adversely affect the Allt nan Caorach SSSI.

Designations – Flow Country World Heritage Site

- 7.138 The applicant has assessed impacts of the proposed development on the Flow Country WHS. The EIAR notes that offsetting of impacts on a WHS is deemed inappropriate by UNESCO and explains the applicant has applied the mitigation hierarchy to avoid, minimise, and restore. The applicant considers that through avoidance of impacts and embedded mitigation, the proposed development would not disrupt the primary ecological process of the WHS to sustain the Outstanding Universal Value (OUV) and would not have an adverse effect on the OUV. However, NatureScot object to the proposed development, as it could affect globally important natural heritage interests.

It is considered the negative impact on the Flow Country WHS would be significant and cannot be avoided or mitigated.

- 7.139 The Flow Country WHS is located within Section A of the proposed development. The OHL extends from the Banniskirk Substation near Spittal southwards to be within The Flow Country, at approximately proposed Tower N24 and would include siting of steel lattice towers and sections of permanent access track. The proposed development then exits the WHS at proposed tower N28, and re-enters it at Tower N31 to N37; then at tower N126 to N136, and N147 and N148 (based on alignment presented in EIAR). The WHS was inscribed in 2024 in recognition of its Outstanding Universal Value (OUV) as the world's finest actively accumulating blanket bog system. Protection for The Flow Country is provided through international and national designations for habitats, species and ornithology, which are discussed further below (SPA, SAC, Ramsar and SSSI). The numerous designations which underpin the WHS are an indication of the importance of this habitat and area within the Highlands. The far-reaching benefits of blanket bog to sequester carbon, provide foraging and breeding habitat for birds; and address the dual climate and nature emergency are well documented.
- 7.140 The Flow Country WHS meets criteria (ix) of the ten criteria set out by UNESCO for a site to be of Outstanding Universal Value (OUV) and therefore inscribed as a WHS. Criteria (ix) states "to be outstanding examples representing significant on-going ecological and biological processes in the evolution and development of terrestrial, fresh water, coastal and marine ecosystems and communities of plants and animals".
- 7.141 The applicant notes in EIAR Chapter 4 that despite an extensive routeing process, the length of the OHL and technical complexities of a project of this scale, several towers have been positioned within the WHS, and other underpinning designated sites. In terms of the WHS in Section A, other constraints have influenced the OHL alignment brought forward in the EIA application, notably environmental, engineering and economic.
- 7.142 Based on NatureScot's appraisal, there will be approximately 25 steel lattice towers located within the WHS. In addition, sections of permanent and temporary track are proposed, plus compound areas and EPZs. Approximately 60.87ha of blanket bog within the WHS will be impacted by the proposed development. Of which, around 13.24ha will be impacted by permanent infrastructure, and around 47.63ha from temporary infrastructure.
- 7.143 NatureScot raise concern that the applicant's approach to assessment of blanket bog in the EIAR refers to 'blanket bog' and 'wide peatland landscape complex' when discussing direct and indirect peatland impacts. This could have the effect of under-representing the extent of impacts on this habitat associated with the WHS. Based on NatureScot's response, the conclusions in the applicant's assessment of the WHS's OUV cannot be relied upon.
- 7.144 Significant negative impacts on the WHS, that cannot be avoided or mitigated, forms a key reason for NatureScot's objection to the proposal. It is considered that, in the interest of safeguarding the attributes of the OUV, that these are shared concerns.

- 7.145 Should consent for the proposed alignment through the WHS ultimately be granted, robust justification would be required within the final Peat Management Plan to demonstrate why any permanent access tracks should remain within the WHS and why these cannot be temporary.

Designations – Adverse Impact on Site Integrity

- 7.146 **The Caithness and Sutherland Peatlands SAC and Ramsar site** - NatureScot also objects to the application because of the impact it is predicted to have on the blanket bog qualifying interest of the Caithness and Sutherland Peatlands SAC and Ramsar site. Ten steel lattice towers would be located within the boundary of the SAC and Ramsar site, which would also require EPZ pulling positions at angle towers, temporary construction compounds at each tower location, and temporary or permanent access tracks also required to access tower locations. NatureScot advises that proposed development will adversely affect the integrity of the site, as it will result in the loss of blanket bog, and there is no proposal to carry out restoration to offset the loss of peatland and therefore this is an outright objection.
- 7.147 The SAC and Ramsar site are underpinned by multiple SSSIs and is also designated as a SPA for its internationally important ornithology qualifying interests. The SAC and Ramsar site are designated for their internationally important blanket bog habitat, vascular plants, freshwater habitats, mammals and other upland habitats; the Ramsar site is also designated for ornithological interests. Of greatest concern are the impacts the proposed development would have on the blanket bog qualifying interest of the SAC and Ramsar site. The applicant states the proposed development would result in the loss of 24.28 ha of blanket bog habitat; for comparison, using international sized football pitches, this is equivalent to around 34 football pitches.
- 7.148 While the efforts made by the applicant to minimise the impact of the routing of the OHL on sensitive habitats including the SAC and the Ramsar site are recognised, the conclusion made by the applicant in the Shadow HRA is not agreed. Based on the information provided by the applicant, and the appraisal carried out, the proposed development will adversely affect the integrity of the site, as it will result in the loss of blanket bog, and there is no proposal to carry out restoration to offset the loss of peatland. NatureScot conclude in its appraisal that as competent authority, Scottish Government will be unable to conclude that there will be no adverse effect on site integrity, which is the test that must be met under the Habitats Regulations, as the blanket bog conservation objections for the SAC and Ramsar site cannot be met. The applicant may therefore need to prepare a derogation case should this development proceed and Scottish Ministers would need to consider if the tests in Regulations 49 and 53 of the Habitats Regulations can be met. Suitable compensatory measures would thereafter need to be agreed.
- 7.149 **Shielton Peatlands SSSI** - NatureScot have objected to the proposed development due to the impacts on Shielton Peatlands SSSI, designated for its nationally important blanket bog habitat. Ten tower bases, temporary access tracks, permanent access tracks and two (2no.) temporary EPZ pulling positions at tower N24 would be located within the SSSI.

- 7.150 The Shielton Peatlands SSSI underpins the Caithness and Sutherland Peatlands SAC, SPA and Ramsar site, designated for its nationally important blanket bog and breeding bird assemblage. The proposed development will result in unavoidable adverse effects on the natural heritage interests of the SSSI which are of national importance, namely blanket bog, which cannot recover within a reasonable period of time, even with mitigation. Further detail relating to the SAC and Ramsar site are provided in Annex A of NatureScot's response to the ECU's consultation, which also relates to the Shielton Peatlands SSSI.
- 7.151 **Novar SPA and Morangie Forest SPA** - NatureScot objects to the application because of the impact it is predicted to have on the capercaillie metapopulation of the Novar and Morangie Forest SPAs. While the proposed development would not be located within either SPA, at its closest point the proposed development would be approximately 1.9km from the Novar SPA and approximately 8km from the Morangie Forest SPA. NatureScot advises that it has been unable to identify any mitigation measures that would satisfactorily mitigate collision risk.
- 7.152 Novar SPA and Morangie Forest SPA are located in Section D of the proposed development. Novar SPA and Morangie Forest SPA are designated for internationally important breeding populations of Capercaillie (*Tetrao urogallus*). Novar SPA represents 1.2% of the UK population of Capercaillie. Morangie Forest SPA represents 2.8% of the UK population of Capercaillie¹. For context, Capercaillie is a Red List species which is in critical decline and unfavourable conservation status; the UK population is found solely in Scotland. Capercaillie favour habitat associated with Caledonian pine forests, with retained areas of heather and blaeberry. Capercaillie are highly sensitive to disturbance, and prone to collisions with infrastructure.
- 7.153 The two SPAs are geographically separate designated sites, however due to their proximity to one another and the same qualifying interest, the following sections of the report discuss the impacts of the proposed development on these designated sites together to avoid duplication. The EIAR assesses that the impacts on Morangie Forest SPA, through disturbance, displacement and collision risk, would be negligible and not significant. However, NatureScot considers that the effects on Capercaillie within undesignated woods in Easter Ross could also affect SPA populations of Capercaillie. The impacts to all Capercaillie in this area are therefore considered as part of a single Novar SPA and Morangie Forest SPA meta-population; see Annex F in NatureScot's consultation response for further information.
- 7.154 The EIAR desk-based survey found presence of suitable capercaillie habitat in Section D; however, the species was not recorded during baseline surveys, nor were there any records during surveys in Section E. Due to the relatively small population and elusive nature of the species, Capercaillie was considered as part of the assessment of Section D and E. No evidence of breeding Capercaillie was recorded during the baseline surveys, however historic records obtained from RSPB indicated a field record within 2km of the proposed development. Capercaillie have a moderate to high sensitivity during the non-breeding season, during which birds can tolerate disturbance to within 100m. However, during the breeding season, birds have increased sensitivity to

¹ The figures associated with the citation represent the percentage of population at the time of designation. Therefore, noting the declines in population of breeding Capercaillie associated with these designated sites, these figures may have changed over time.

disturbance; for males it is up to 1,000m and females it is 150m, as per NatureScot guidance. The applicant has assessed in the EIA that due to no records falling within minimum distances of disturbance, the risk of disturbance during construction is assessed as of negligible magnitude and not significant.

- 7.155 The construction of the proposed development and maintenance of the operational corridor in Section D is predicted to result in the permanent loss of over 100ha, and temporary loss of 23.99ha, of woodland located around 1.9km (at closest point) to west of the Novar SPA. While the species mix of woodland (predominantly conifer) is not optimum for Capercaillie, it would provide a source of cover and limited feeding opportunities and could support birds of the established Novar SPA population. Further management felling (out with control of the applicant at present) may cause further alteration to forest cover for Capercaillie. The applicant has assessed impacts on Capercaillie to be a permanent impact of small magnitude, and to be significant at international scale in the absence of mitigation. The applicant has set out additional mitigation in the EIAR to address this significant impact and considers with mitigation this impact would be not significant.
- 7.156 No Capercaillie flights were recorded during surveys. Capercaillie are vulnerable to collision risk with overhead wires compared with other bird species. The applicant considers birds part of the resident SPA population would unlikely interact with the OHL; however dispersing birds may cross the OHL alignment. Capercaillie typically fly at low heights, and therefore the applicant considers the risk of collision for Capercaillie with the conductors or earth wire of the proposed development would be low. As such the risk of collision has been assessed as negligible and not significant.
- 7.157 NatureScot however consider that direct impacts to the SPA populations are probable, due the high sensitivity of Capercaillie to disturbance and collision with infrastructure. NatureScot conclude that there will be likely significant effects on breeding capercaillie of Novar SPA and Morangie Forest SPA due to direct loss from collision mortality; barrier effects due to presence of infrastructure; indirect loss of habitat due to disturbance and displacement; and direct loss of supporting habitat. As such, the competent authority, Scottish Ministers, is required to undertake an appropriate assessment in view of the conservation objectives of the SPAs. The proposed development may only be consented if it can be ascertained beyond reasonable scientific doubt the proposed development will not adversely affect site integrity.
- 7.158 Based on the information provided, NatureScot advise that it cannot be ascertained that the proposal will not adversely affect the integrity of the Novar SPA and Morangie Forest SPA. This is due to the risk of collision with proposed infrastructure to capercaillie dispersing between the SPAs and nearby woodlands. This means two conservation objectives for the SPAs, regarding population viability and distribution of species, could be undermined. At the time of writing, information regarding measures to mitigate the risks for Capercaillie in terms of the above noted conservation objectives has not been provided by the applicant. According to NatureScot's response, the applicant has indicated that marking the proposed infrastructure would not be possible for operational reasons. Further discussion with NatureScot is therefore required for the applicant to present mitigation measures for Capercaillie, to ensure no adverse effect on site integrity.

Designations – Conclusion

- 7.159 Overall, the proposed development could have impacts on a wide range of qualifying interests of designated sites along the proposed alignment due to the proximity of the alignment to the designations, or indeed the alignment being located within designations. Of greatest concern are the impacts of the proposed development on the Flow Country WHS, Caithness and Sutherland Peatlands SAC and Ramsar, and the Novar and Morangie Forest SPAs.
- 7.160 The impacts on the OUV of the WHS cannot be mitigated, offset or compensated for. In the case of the Novar SPA and Morangie Forest SPA, the applicant has stated for operational reasons the OHL cannot be fitted with bird flight diverters and therefore further discussion regarding options for mitigation are required to ensure the conservation objectives of the SPAs can still be met. In terms of the Caithness and Sutherland SAC and Ramsar site, the applicant has not included a proposal to carry out restoration to offset the loss of peatland. In the absence of this information, a conclusion of no adverse effect on site integrity cannot be reached. The SAC and Ramsar site are underpinned by the Shielton Peatlands SSSI, which the proposed development would have unavoidable adverse effects on the blanket bog feature and unable to recover in a reasonable timeframe.

Protected Species

- 7.161 The applicant has undertaken a desk-based assessment, and field surveys on protected species to inform the EIA. A wide range of protected species have been recorded within the proposed development site and study area, including:
- Great crested newt (GCN)
 - Bats
 - Scottish wildcat
 - Badger
 - Otter
 - Pine marten
 - Red squirrel
 - Reptiles
 - Water vole
 - Other aquatic species
- 7.162 Where significant impacts have been assessed, appropriate mitigation has been applied. The applicant considers the impacts on protected species have been fully mitigated through mitigation by design, embedded mitigation and additional mitigation; the exception to this is for bats. The proposed development is predicted to have significant impacts on bats using commuting and foraging routes, for which it is not possible to mitigate due to safety risks associated with maintaining the operational corridor for the proposed development.
- 7.163 The Council's Ecology Officer found there was incomplete information relating to European Protected Species, notably great crested newt (GCN), bats and Scottish wildcat. Further information on these species was requested but was not provided. The assessment of the impacts is therefore based on information set out in the EIAR.

- 7.164 **Great Crested Newts** form a locally rare and isolated population, with significant impacts predicted due to habitat loss, barrier effects and works close to a breeding pond. The EIAR states exclusion zones will be set up around newt ponds up to 250m; and any works within 250m of a confirmed newt pond will be completed under licence by NatureScot and under guidance by a suitably qualified and experienced ECoW. Suitable newt-proof fencing will be used for works within the exclusion zones, to prevent movement of newts to work areas. Following works, habitat within the fenced areas will undergo enhancement, and fencing removed, in line with details to be provided in the Habitat Management Plan (HMP). The applicant has set out in the EIAR that measures relating to GCN will be set out within a Great Crested Newt Management Plan will be developed by the principal contractor and implemented via the CEMP. However, the Council's Ecology Officer has indicated detailed mitigation is required to prove the impact can be reduced to not significant. While the EIAR suggests impacts could be reduced with mitigation, a Species Protection Plan has not been provided, and sufficient detail is lacking to demonstrate that effects would be reduced to not significant.
- 7.165 **Scottish Wildcat** - A potential Scottish wildcat den has been identified close to proposed infrastructure within a priority area, and further investigation is required in accordance with NatureScot guidance. The applicant stated, in a letter to the Council in July 2026, that pre-construction survey work could be a condition of consent if granted. As Scottish wildcat is a European Protected Species, full impacts are required to be known prior to determination of an application. The Council's Ecologist therefore expected further survey work to be undertaken.
- 7.166 **Bats** - The Council's Ecologist considers that the survey coverage is inadequate, with no activity surveys undertaken and insufficient information on species presence, foraging routes or application of the mitigation hierarchy. Seven potential roost features would be removed without confirmation of roosting status. The EIAR concludes that there will be significant cumulative effects between the proposed development and the proposed Beauly to Blackhillock to New Deer to Peterhead 400kV OHL, with significant adverse effects predicted on bats.
- 7.167 For other protected species, there is general agreement with the applicant's conclusions, subject to licensing where required. Impacts on badger, otter, pine marten and red squirrel are predicted not to be significant with embedded mitigation and adherence to Species Protection Plans. Reptiles are present throughout the route, and a localised significant effect is predicted; mitigation and licensing would therefore be required. Water vole populations occur near proposed water crossings, with minor habitat loss predicted; with appropriate mitigation and licensing, impacts are considered not significant.
- 7.168 The EIAR also identifies the presence of several Invasive Non-Native Species (INNS), including American mink, Rhododendron and Japanese knotweed. An INNS Management Plan would therefore be required, secured by condition, to address biosecurity risks during construction and operation.

Wider Countryside Ornithology

- 7.169 The applicant has assessed a number of important ornithological features as part of the EIAR, and with mitigation measures, conclusions are that effects on all bird species will be not significant. However, the Council's Ecologist finds that there is a level of detail absent from the EIAR in relation to mitigation measures for a number of bird species. Several bird species not associated with designated sites were recorded across the proposed development.
- 7.170 Pink-footed Geese were identified in three sections, with limited habitat loss and relatively few flights at collision risk height (CRH); impacts are assessed as not significant and no additional mitigation is proposed. Common gulls were recorded in two sections, with permanent and temporary habitat loss and moderate CRH activity, however, impacts on breeding and collision risk are also assessed as not significant and this is agreed.
- 7.171 Black Grouse were recorded in four sections, with substantial permanent habitat loss and lek sites within potential disturbance distance. Additional mitigation and commitment to habitat enhancement elsewhere are proposed; however, details of these measures have not yet been provided. It is recommended that full mitigation and compensation proposals for black grouse are obtained prior to determination.
- 7.172 The presence of an operational OHL could result in Golden Eagle displacement from habitats within their territories, with potential effects on other Golden Eagle territories. The applicant has acknowledged the increased risk of displacement and the proximity of a nest to the proposed development. Measures and interventions are therefore set out within the EIAR Biodiversity Net Gain Report (Volume 5 Appendix 8.8). However, the information lacks detail and is insufficient to understand at this stage if the measures will be effective to reduce impacts on Golden Eagle. Therefore, there is concern that the assessment on impacts of displacement on Golden Eagle could be greater than stated in the EIAR, which could impact on the favourable conservation status of the species within the region covered by the peatlands of Caithness and Sutherland, which is present in Sections A and B of the proposed development.
- 7.173 Raptor species recorded include: Honey Buzzard, Goshawk, Red Kite, White-tailed Eagle and Barn Owl. Habitat loss within potential territories is noted for several species, although collision rates are generally low and impacts are assessed as not significant. Pre-construction bird surveys will be required to confirm raptor activity and inform mitigation. For Barn Owl, breeding and roosting sites fall within disturbance distance; however, additional mitigation including nest monitoring and nest box provision is proposed, resulting in a not significant residual impact.
- 7.174 In summary, in relation to protected species outwith designations and wider countryside birds, it is concluded that there will be a significant adverse impact on bats, with the extent of effects GCN and Scottish Wildcat being inconclusive and therefore, as a worst case, could be significant. Impacts on wider countryside birds are expected to be suitably mitigated through planning condition. It is acknowledged that extensive further pre-commencement protected species survey effort will be required, the findings of which are expected to inform finalised Species Protection Plans and inform

the micro-siting of infrastructure within the LoD. As such, Scottish Ministers will need to satisfy themselves of this matter.

Peat

- 7.175 EIAR Chapter 11 assesses the effects of the proposed development on geology, peat and soils. Impacts on designated sites where peat is a qualifying interest are addressed separately in the natural heritage section of this report. The applicant states that peatland constraints have been considered during route selection and alignment, with peat probing used to inform design and avoid, where possible, Class 1 and 2 peatland and areas of deep peat.
- 7.176 The assessment is supported by an outline Peat Management Plan and a Peat Landslide Hazard Risk Assessment. Embedded mitigation measures have been incorporated through design development, with further mitigation to be secured via micro-siting and the Construction Environmental Management Plan. Subject to the implementation of best practice construction techniques and site-specific mitigation, the applicant concludes that no significant adverse effects on the geological environment are predicted
- 7.177 Peat is present across all sections of the route, with depths ranging from shallow peat to over 7.5 m in depth. Peat probing surveys have informed route alignment, infrastructure micro-siting and avoidance of deeper peat where practicable, and the extent of probing undertaken is considered sufficient. Notwithstanding this, the Council objects to the proposal due to its detrimental effects on blanket bog, peat and other carbon-rich soils, notably within designated sites, aligning with NatureScot's position.
- 7.178 There are concerns regarding the applicant's assessment of blanket bog in the EIA, as they consider blanket bog in 'poor' condition as blanket bog that is non-irreplaceable habitat, and as such have not included this blanket bog in poor condition in the assessment of loss. This approach is not advised nor approved by NatureScot, and therefore the approach taken in the EIA to assess impacts risks undermining the extent of impacts of the proposed development on blanket bog habitat. Rather, all blanket bog habitat, regardless of condition, is irreplaceable habitat, and should be included in the overall assessment of loss, as to whether they will be directly or indirectly affected by permanent or temporary impacts. Annex B of the Biodiversity Net Gain Report in Appendix 8.8 of the EIAR states that there will be direct impacts (permanent and temporary) to blanket bog of 135.01ha, and indirect of 359.12 ha, total 494.13 ha. Critically however, these numbers exclude blanket bog in poor condition and blanket bog within a designated site, therefore, it is considered potential loss of blanket bog as a result of the proposed development remains unclear and could be greater than what has been reported in the EIA.
- 7.179 A Peat Landslide Hazard Risk Assessment indicates minor or negligible effects in most sections following mitigation but identifies a moderate and therefore significant effect in Section B, where a historic peat slide is present. Ongoing monitoring and additional mitigation at construction stage would be required to manage landslide risk.
- 7.180 The applicant's Peat Carbon Assessment concludes that the development would result in a negligible adverse impact on peat carbon storage, based on conservative assumptions and mitigation measures including peat reuse and restoration. Given the

applicant's assessment of blanket bog, the decision maker should satisfy themselves of the accuracy of this assessment.

Forestry and Woodland

- 7.181 EIAR Chapter 13 Forestry considers potential significant effects of the proposed development on forestry, including cumulative effects with other developments.
- 7.182 The EIAR forestry chapter states that the proposed development is likely to impact on 536.74ha of woodland associated with construction and operation. This total figure comprises the following quantities and types of woodland:
- 451.03ha of commercial conifer woodland;
 - 12.23ha of Ancient Woodland; and
 - 73.48ha of semi-natural broadleaved woodland.
- 7.183 The applicant sets out there will require to be management felling of forests/woodland adjacent to the Operational Corridor (OC) to mitigate the risk of windblow. The amount of woodland/forest to be undertaken as part of management felling totals 536.65ha, which will comprise commercial conifer forests. The Implementation Guidance on the Scottish Government's Control of Woodland Removal Policy sets out every effort should be made to minimise woodland loss, which could be achieved through restructuring from commercial conifers to native woodland, allowing a significant reduction of the OC and associated woodland removal. There is currently no commitment to restructure the OC in order to reduce woodland loss within areas of commercial conifer woodland.
- 7.184 For a 400kV OHL, the EIAR notes a typical OC would be 90m (45m either side of the centreline of the OHL). Where the OHL/OC would pass through areas of native woodland, the EIAR notes reduced extents of woodland removal are proposed, as native tree species are lower in height than conifer species. However, the applicant notes the forestry assessment has been based on a 90m OC for the entire OHL alignment, thus not taking into account areas of reduced woodland removal within the OC; therefore, the applicant notes the assessment presents a worst-case scenario.
- 7.185 The forestry assessment that has been carried out as part of the EIA has been limited to woodland removal required for the OC, required access, EPZ pulling positions and special arrangements. The 536.65ha of woodland removal proposed as part of management felling out with the OC to mitigate the risk of windblow has not been assessed as part of this application. The EIAR notes the management felling would be under the control of the relevant landowner and not the applicant.
- 7.186 It is welcomed that the compensatory planting will be delivered within Highland, and productive or native woodland will be replaced with similar types of woodland. However, at present, the area of compensatory planting for the proposed development does not exceed the area of permanent woodland removal to offset the loss of biodiversity and timber value. In order to compensate for the loss of woodland, and deliver a demonstrable biodiversity enhancement, the expectation is that the area of compensatory planning exceeds the area of permanent woodland removal. This is expected to be resolvable, with the necessary extent of compensatory planting to be defined and secured by conditions.

Biodiversity Enhancement

- 7.187 The Council aims to ensure that development delivers a positive effect for biodiversity. In the applicant's view, this project is expected to make a contribution toward the delivery of biodiversity enhancements to ensure biodiversity is in a demonstrably better position than without intervention. The habitats present across the site have been subject to a Biodiversity Net Gain (BNG) Report in Volume 5, Appendix 8.8 of the EIAR. However, concerns with the level of information provided in the EIAR to allow adequate assessment of biodiversity enhancement requirements of the development have been raised leading to an objection from the Ecology Officer.
- 7.188 The applicant has committed to provide a minimum of 10% biodiversity net gain (BNG). The BNG calculations include approx. 689.86ha of habitat (excluding irreplaceable habitats e.g. blanket bog and ancient woodland), with baseline biodiversity units (BU) calculated at 6,554.94 BU, and post-development BU calculated at 2,997.92 BU. This is a 54% net loss of biodiversity in terms of BU. At the time of consultee response, the applicant had provided no confirmed details relating to the delivery of offsetting and enhancement.
- 7.189 An outline Habitat Management Plan (HMP) has been provided as part of the EIA submission. The proposed strategies set out in the HMP are to ensure habitat management measures are implemented are acceptable. The Ecology Officer agrees with the proposed enhancement measures of peatland restoration and habitat management for specific receptors such as great crested newt, freshwater pearl mussel.
- 7.190 There is a significant number of current and upcoming applications relating to electricity transmission and associated infrastructure in Highland. The Ecology Officer's objection is noted regarding biodiversity enhancement, however the biodiversity enhancement and compensation measures required for this application can be secured through the overarching Memorandum of Understanding recently concluded between SSEN and the Council.
- 7.191 In summary, the proposed development could achieve positive biodiversity effects providing that sufficient off-site habitat creation measures are identified, quantified, implemented, and maintained. This therefore ensures that the proposed development will leave the natural environment in a demonstrably better state than before development work began.

Landscape and Visual

Landscape and Visual Impact Assessment (LVIA) Methodology

- 7.192 The applicant has undertaken a Landscape and Visual Impact Assessment (LVIA) as reported within Chapter 7 of the EIAR. In doing so the effects of the proposed development on landscape character and receptors within a 10km 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 provided from a range of viewpoints and produced in accordance with both the Council's and NatureScot Visualisation Standards. While photomontages provide a useful aid in showing the appearance of the proposed development, they are

just one tool used in the assessment of visual effects. A series of Zone of Theoretical Visibility (ZTV) drawings (Figures 7.1 – 7.5) are included in the assessment which shows theoretical bare ground visibility excluding screening effects from vegetation and buildings. Any potential screening effects have been verified through a combination of assessing LVIA baseline photography and undertaking site visits by Officers. The ZTVs show a 2, 5 and 10km buffer. However, when considering visual effects on residential properties, only properties and property groupings that lie within approximately 500m of the OHL are included, so it would have been useful to also show a 500m buffer on the figures.

- 7.193 The methodology for the LVIA broadly follows that set out in Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3) although some inconsistencies, lack of clarity and points of disagreement are noted and need to be further explored. As set out in para 3.32 of GLVIA 3 the “LVIA should always clearly distinguish between what are considered to be significant and non-significant effects.” The applicant judges Significant effects following the combination of judgements based on the Sensitivity of the Receptor, as defined by the receptor’s susceptibility against the importance of the view / landscape, against the Magnitude of Change. In the submitted LVIA, effects of Major, Major-Moderate and Moderate correspond to Significant effects. Those effects classified as Moderate-Minor, Minor, Minor-Negligible or Negligible are considered to be Not Significant.
- 7.194 In relation to the landscape assessment, Table 1 of Appendix 7.2 lists detailed criteria for 3 categories of landscape value and Table 3 lists detailed criteria for the 4 categories of landscape sensitivity. However, there is no equivalent table of written criteria for landscape susceptibility, although Table 3 considers both value and susceptibility to change. In relation to the visual assessment, as with landscape, there are tables for value of views and visual sensitivity, but no criteria or list detailing susceptibility levels for visual receptors. There is no clear agreement with the criteria as written in Table 4. This appears to conflate both sensitivity and magnitude criteria such that a sensitive receptor (such as a resident) for which the changed aspect is ‘unimportant’ or ‘has detracting features’ is downgraded in sensitivity. These latter aspects should be assessed under Magnitude of Change as visual receptor sensitivity should be largely determined by the activities and expectations of the human receptor(s) at the location. However, despite this, in the detailed assessments all residential receptors appear to have a High sensitivity.
- 7.195 The LVIA’s methodology explains that visualisations have been produced to support the LVIA work and are intended to show the appearance of the proposed development within the landscape setting and how it would be likely to appear in views experienced by people. The visual assessment has been undertaken as a receptor-based assessment (giving consideration to all potential visual receptors) rather than a ‘single point’, viewpoint-based assessment. In this regard, the visualisation locations do not comprise specific viewpoints for visual assessment and a viewpoint based assessment has not been undertaken. The VLS therefore illustrate representative viewpoints, albeit that the applicant’s visual assessment is a receptor based (describing effects primarily in relation to receptors rather than specific viewpoint locations). In that way the applicant has presented a more cohesive analysis of their reasoning of the Significance of the Effect from visual receptor groups, routes, and tourist viewpoints.

- 7.196 A series of 94 visualisation viewpoints have been provided supporting the LVIA. Where visualisations have been provided, wirelines of cumulative developments have not been included (such as the proposed Fanellan substation which is a key component of the proposed development and the special arrangements for crossing existing 132kv lines northwest of Fairburn or West of Fanellan/Aigas Gorge, for example), and risks underplaying the cumulative effects of the proposal in-combination with other existing developments. Photomontages provide a useful aid in showing the appearance of the proposed development and are one of several tools used by the Council in the assessment of landscape and visual effects.
- 7.197 As noted above, two sets of visualisations have been prepared; to address the different requirements of the Council and NatureScot. The THC visualisations provide full and enlarged scale A3 visualisations (50mm and 75mm focal length respectively) as well as more panoramic unscaled views and wirelines. Overall, these are informative, however some of the scaled images do not represent the worst-case view. Several of the 75mm visualisations appear to be twice the scale of the 50mm scaled view, suggesting 100mm focal length equivalent, assuming the former is correctly scaled.
- 7.198 This approach has not provided the visualisation evidence to support the judgement for several receptor groups, creating ambiguity as to the veracity of the LVIA's conclusions. Consequently, the applicant appears to have downplayed the importance of its own visualisations in the overall LVIA. A request for all the properties identified within the 500m LVIA study area to include visualisations and for a summary assessment (sensitivity, magnitude and significance) for all of the 94 Viewpoints was relayed to the Energy Consents Unit, however, the applicant responded that it was not going to provide this information. It is however acknowledged that it is not a fundamental requirement for an LVIA to provide a detailed assessment for all viewpoints.
- 7.199 A number of errors have been identified within the LVIA including factual errors and misattribution, inconsistencies in application of the LVIA methodology and in the detailed assessments, potentially missed receptors, and differences in the assessment of the same designation or receptor across different sections of the proposed development.
- 7.200 Due to the length of the proposed development, the detailed assessment is divided into five route Sections and summarised in the main LVIA chapter. Effects of construction and operation are assessed at the same level of detail. However, relatively little difference in level of effects is assessed between these. The review of the assessment concentrates on the longer-term operation of the proposed development.
- 7.201 Some areas of difference in approach to each route Section is noted and some errors, inconsistencies and lack of information is highlighted. This may arise at least partially from the size and complexity of the assessment process referred to above.
- 7.202 The LVIA assesses most of the Significant landscape effects during construction and operation of the proposed development as localised within a few hundred metres of the alignment, an assessment that can broadly be agree with. However, it is considered that the LVIA falls short in respect of assessments on landscape designations, and that

the integrity of one, possibly two Special Landscape Areas is judged to be Significantly affected.

- 7.203 Significant visual effects of the proposed development extend further afield. Most of the LVIA assessments of Significant effects on receptors lying with proximity of the alignment and Not Significant effects on receptors that are well-separated can be agreed with. However, on balance more Significant visual effects in intermediate situations can be concluded. In some locations receptors do not appear to have been included in the assessment.
- 7.204 The cumulative assessment assesses the cumulative effects of each route Section in detail and identifies relative few Significant effects. Primarily this is in relation to the adjacent route Section(s) and the three substations, but secondarily to other related developments in the study area including wind farms, OHLs and BESS. However, several issues with the assessment are noted where far more cumulative effects would be perceived by receptors. This is because the assessment does not include similar existing developments such as nearby overhead lines and is inconsistent in its inclusion of receptors lying in the overlaps between route Section study areas. The cumulative assessment is also limited in scope and appears inconsistent and lacking in many respects:
- It doesn't assess the additional cumulative effects of the proposed development;
 - It doesn't include similar existing developments in the cumulative baseline, which would be perceived by receptors as part of a cumulative effect; and
 - There appear to be significant inconsistencies and omissions in the detailed assessments.
- 7.205 The EIAR provides a detailed rationale for need of the proposed development and details of the multi-stage selection process for the proposed alignment. This is based on multiple environmental and operational factors, in which landscape and visual effects are included.
- 7.206 It is clear from the assessment process that the choice of route alignment for some Sections is not necessarily driven by landscape and visual factors and that routing decisions for adjacent Sections either end of a route Section can constrain the scope for avoiding sensitive receptors. Furthermore, the nature of the proposed development is such that Significant adverse landscape and visual effects are inevitable in almost any circumstance.

Landscape Character

- 7.207 The proposed development, crossing from Spittal to Beaully, would pass through a wide range of landscapes characterised by mountain glens, inland and coastal loch-shores, and moorland, interspersed with areas of forest and settled agricultural land and glens. A detailed description of the baseline landscape character for each Section of the proposed development is provided within Part 1.3 of the Section specific LVIAs (Volume 5, Appendices 7.5 to 7.9).
- 7.208 As assessed in the LVIA, the proposed development would result in localised Significant adverse effects to the character of the host LCTs through which it passes, but less so on areas it does not directly affect. The extent and severity of the effects on

any particular LCT would relate to its key characteristics and the route taken by the alignment. Broadly speaking, the effects are less Significant and adverse in areas of large scale, flat and gently undulating topography and simple patterns than they are in areas of smaller scale, complex and steep topography and pattern. The proposed development would also have a greater effect on LCTs with limited levels of human development, perceived wildness or scenic character.

- 7.209 The proposed development would directly affect 16 LCTs, with several indirect effects on those further in the study area mainly affected by views of the proposed development (see LVIA Tables 7.3 and 7.4 respectively). Many of the LCTs appear in more than one route Section and detailed descriptions are given in Sections A – E assessments (Volume 5, Appendices 7.5 – 7.9). The detailed assessments for Sections A – E include the LCTs lying within 10km for each Route Section. This includes areas of up to 10km overlap where two Sections meet, and some LCTs are affected by both Sections.
- 7.210 Significant adverse effects are mainly limited to LCTs directly affected by the construction and operation of Sections of the proposed development. For these, Significant effects are assessed in the LVIA for a limited distance from the alignment, typically between approximately 700m – 1000m depending on sensitivity to the proposed development, extent of visibility etc. Beyond this distance, effects on the wider LCT, or on indirectly affected LCTs lying beyond this distance, are usually assessed as Not Significant.
- 7.211 The greatest number of significantly affected LCTs are crossed by Section E; this is due to a combination of the relative length of route Sections and the extent and variety of LCTs crossed by Section E. While Section A is much longer, there is less variety in the landscape so LCTs are mostly significantly larger in extent and/or less sensitive to the proposed development than those in the south.
- 7.212 In some cases (mainly Section B) construction effects are assessed at a higher magnitude and level of effect, due to the extent of disruption, presence of temporary access tracks and general activity during this phase. However, it should be noted that the construction period is estimated to be limited to around 48 months, whereas the operational development will be notionally permanent.

Section A: Spittal to Brora

- 7.213 Between Spittal and Brora, the proposed development would traverse a diverse range of landscapes in the north-east of Scotland. From north to south, the proposed development runs from Spittal across broad peatland landscapes following the route of the existing 132 kV line towards Latheronwheel and then extends south-west across the rolling moorland hills above the coastal shelf between Dunbeath and Beinn Lunndaidh. The extent of views across the landscape reflects the change in landform, the openness of the landscape in the north affording expansive views across the Flow Country west of the A9(T) and the proposed development to the east, views becoming confined where the landscape exhibits a greater sense of enclosure and becomes more undulating in nature. Built form and settlement is largely limited to scattered individual properties close to road infrastructure in the north and to the coastal shelf and narrow glens in the south.

- 7.214 Landscape effects would be less consequential in the broad, simple open landscapes of Caithness, especially where there is also an existing level of development. However, in the south of Caithness and into Sutherland the effects of Section A are of greater consequence as the proposed development affects views to and from the Lone Mountain LCT of Scaraben which has a distinctive profile and wild characteristics. Along the coast, south of Latheron, the more complex and intimate topography of river valleys and coastal landscapes is affected, as well as views inland to the mountain and moorland landscapes. West of Helmsdale, the Section A alignment moves inland, passing through a range of hills divided regularly by narrow steep-sided flat-bottomed valleys which include rivers and lochs.
- 7.215 Five directly affected LCTs are assessed as having Significant effects within a few hundred metres. No indirectly affected areas lie that close, and none are assessed as Significantly affected. Significant effects on LCT 135 Rounded Hills - Caithness and Sutherland are Major-Moderate up to 1km and LCT 142 Strath - Caithness and Sutherland Major-Moderate up to 600/700m. The same LCT is affected in Sections B and C, but distances of Significant effects differ notably from this. These effects are not disputed.

Section B: Brora to Loch Buidhe

- 7.216 Between Brora and Loch Buidhe, the proposed development would extend from the hills north of Brora in the east to Loch Buidhe in the west. The Section traverses LCTs relating to strath and upland landscapes (**see Volume 3, Figure 7.3**), exhibiting a distinct contrast between the vast open moorlands and the incised valleys of the lochs and river catchments through which it passes. The moorlands are sparsely settled with limited access and are often associated with sheep grazing, shooting estates and/or windfarm developments. This contrasts with the river valleys and coastal areas with which settlements (for example Brora) and transportation links (for example the A9(T)) are largely concentrated. To the east the coastal plain includes the river estuaries and large areas of managed farmland interspersed by larger coastal settlements.
- 7.217 The proposed development has Significant adverse effects on both the rolling, largely wild and undeveloped hills and the more intimate, steep-sided, settled valleys where the OHL is often skylined above either side and cuts across the valleys in a perpendicular alignment. Due to its high position, it is also often skylined when seen from the coastal area, affecting the backdrop of hills.
- 7.218 In contrast to Sections A, C, D and E, construction effects in this Section are assessed by the LVIA at a higher magnitude and level of effect, due to the extent of disruption, presence of temporary access tracks and general activity during this phase. This may reflect a slightly different approach by the assessors involved in this assessment.
- 7.219 Two directly affected LCTs are assessed as having Significant effects. No indirectly affected LCTs are assessed as Significantly affected. Significant effects on LCT 135 Rounded Hills - Caithness and Sutherland are Major-Moderate up to 2km and LCT 142 Strath - Caithness and Sutherland Major-Moderate up to 1km. The same LCT is affected in Sections A and C but distances of Significant effects differ notably from this. These effects are not disputed.

Section C: Loch Buidhe to Dounie

- 7.220 Between Loch Buidhe and Dounie, the proposed development would extend in an arc through the uplands to the west of the Dornoch Firth. The hill summits and plateaux are characterised by open swathes of moorland and large areas of forestry. Built form and settlement is limited to very localised areas, coinciding with the lower-lying straths that extend through the hills. Within these sheltered river valleys, the landscape exhibits a greater sense of enclosure. The water courses extending along the strath floor form a key focal point, typically abutted by areas of wetland and rough pasture, as well as parcels of woodland and localised tree cover.
- 7.221 Two directly affected LCTs are assessed as having Significant effects within a few hundred metres. No indirectly affected areas are assessed as Significantly affected. Significant effects on LCT 135 Rounded Hills - Caithness and Sutherland are Major-Moderate up to 600/700m and LCT 142 Strath - Caithness and Sutherland Major-Moderate up to 700/800m. The same LCT is affected in Sections A, B and D but distances of Significant effects differ from this (despite joining Section D within the same area, Strath Carron). These effects are not disputed.

Section D: Dounie to Near Strathpeffer

- 7.222 Between Dounie and Strathpeffer, the proposed development would extend north-south across the rolling landform between Strathcarron in the north (where it adjoins Section C) and the hillside above the Peffery Burn in the south (where it adjoins Section E). The local landscape comprises a series of slopes and summits that are characterised by open swathes of moorland and large areas of forestry. In addition, the alignment extends across a number of enclosed river valleys and wider straths, including Glen Glass. Built form and settlement is limited and predominantly focused across the lower-lying agricultural landscape to the east. In addition, there are localised elements of large-scale infrastructure, including Novar Wind Farm to the west of the Section D alignment, and Beinn Tharsuinn Wind Farm to the east, as well as existing OHLs.
- 7.223 Five directly affected LCTs are assessed as having Significant effects. One indirectly affected area LCT 329 – Rounded Mountain Massif is assessed as Significantly affected, lying within 170m at closest point of the alignment and incurring Major effects on areas within 900m. Significant effects on LCT 135 Rounded Hills - Caithness and Sutherland are Major-Moderate up to 700/800m and LCT 142 Strath - Caithness and Sutherland Major-Moderate up to 600/700m. The same LCT is affected in Section C, but distances of Significant effects differ from this (despite the two Sections joining Section C within the same area, Strath Carron). These effects are not disputed.

Section E: Near Strathpeffer to Beaully

- 7.224 Between Strathpeffer and Beaully, the proposed development would be located inland from the Beaully Firth, extending from the Peffery Burn in the north, to Fanellan in the south. The landscape is characterised by areas of farmland within the lower-lying strath at the northern end of the alignment, which transitions to areas of forestry on the adjoining slopes, and areas of open moorland across the more elevated plateau further south. At its southern end, the Section E alignment transitions back down towards lower-lying farmland, through areas of forestry and woodland. Built form comprises

scattered dwellings and farmsteads within lower-lying areas, as well as localised infrastructure elements on the elevated hillsides and summits, including transmission masts and wind turbines. In addition, existing 132 kV OHLs extend through the local landscape at the southern end of Section E.

- 7.225 Section E begins north of Strathpeffer, heading south to Fanellan substation, following a much more convoluted alignment. This passes through a much more varied and populated landscape of valleys, hills, moorland and farmland. Due to the variation in character, more LCTs are affected, despite the shorter route length.
- 7.226 Ten directly affected LCTs are assessed as having Significant effects in Section E. No indirectly affected areas are assessed as Significantly affected. The assessment identified differing extents of Significant effects on different LCTs and sometimes within an LCT (between 100 and 900m), explaining this is due to varying degrees of tree cover. These effects are not disputed.

Conclusions on Landscape Character

- 7.227 Overall, the findings of the LVIA in relation to Significant effects to LCTs being within a limited distance (between approximately 700-1000m) of the route alignment is agreed. However, it is not clearly explained why the distances vary between LCTs. There are also some inconsistencies between the detailed assessments in the appendices and the summaries in the LVIA.

Designated and Protected Landscapes

- 7.228 Landscapes recognised for their natural beauty and scenic appeal may be designated at an international, national, or regional / local level, and are typically subject to protection by planning policy. Landscape designations are considered in the determination of the sensitivity of landscape and visual receptors as they provide an indication of value ascribed to the landscape or visual resource.
- 7.229 The assessment of effects on landscape designations carried out in Appendix 7.4 is summarised in section 7.9, paras 7.9.60 et seq. Eleven areas are affected by one or more Sections of the proposed development as detailed above. Of these the following are assessed as Significantly affected (including relevant route Sections):
- The Flow Country and Berriedale Coast SLA (Section A);
 - The Loch Fleet, Loch Brora and Glen Loth SLA (Sections A and B); and
 - A small part of the Rhiddoroch - Beinn Dearg - Ben Wyvis WLA (Section D).
- 7.230 In relation to nationally designated landscape and WLAs, NatureScot concluded that there would be no Significant adverse effects on the special qualities or integrity of the Dornoch Firth National Scenic Area (NSA). They also concluded that whilst the proposed development would result in some adverse effects on WLA36: Causeymire-Knockfin Flows, the effects would be localised, and the wild land qualities would remain well expressed. They, however, did not comment on the assessment of the Rhiddoroch - Beinn Dearg - Ben Wyvis WLA which the applicant has concluded Significant effects on a small part of the WLA extending to the outermost 400-500m of the WLA to the east of Cnoc a' Bhreac Leathaid, Carn a Chlaiginn and Carn an Laith-bhaid with no Significant effects on the WLA as a whole.

- 7.231 In relation to the SLAs, considerable lengths of Sections A and B lie within the Loch Fleet, Loch Brora and Glen Loth SLA, directly affecting its character and significantly affecting some of its Special Landscape Qualities (SLQs). South of the SLA, Sections B and C continue the pattern of crossing hills and valleys, including the Fleet, Kyles of Sutherland and Glen Carron. They do not lie within a landscape designation and are routed well to the north and west of the Dornoch Firth NSA. South of Glen Carron, Section D heads south across hills and moorlands which are often characterised by extensive commercial forestry. While there would be localised Significant effects on landscape character, no designated landscapes are directly affected and effects on nearby SLAs would be limited and Not Significant. No landscape designations are directly affected in Section E. However, the alignment would have particularly Significant adverse effects on the area just south of Strathpeffer, including a lengthy and widely visible crossing of Strathconon east of Contin and lying within the western edge of the Fairburn Garden and Designed Landscape (GDL).
- 7.232 The effects on the two SLAs are direct as well as indirect. The LVIA finds Significant effects on some of their SLQs, but in neither case does it conclude these to lead to Significant effects on the overall integrity of the designation. While it is agreed that there would be Significant effects on some SLQs, it is disputed that the overall integrity of the designations is not compromised. The following general points should be noted:
- The SLQs cited are not necessarily consistent with those listed in as SLQs in THC's assessment of SLAs but are an amalgam of some of these and of the list of Key Characteristics;
 - There are some errors in the assessments, including stating wrongly the length of the proposed development within the Loch Fleet, Loch Brora and Glen Loth SLA;
 - There is an inconsistency in approach to the assessments of the same designation between route Sections A and B, suggesting two different assessors;
 - There are additional Significant effects on SLQs in both SLAs; and
 - There is disagreement with the LVIA conclusion that the integrity of the designation is in both cases not compromised – the effects of Sections A and B on the SLQs of the Loch Fleet, Loch Brora and Glen Loth SLA would clearly affect its overall integrity in particular.

The Flow Country and Berriedale Coast SLA

- 7.233 Section A passes within 500m of the SLA by the A9 at Loch Rangag and crosses through the Berriedale Coastal area between Newport and Badbea. At Loch Rangag, the proposed development is east of and parallel to the existing 132kV OHL. Both lie just outside the SLA boundary, which follows the A9 road. While the proposed development is larger, it is not a novel effect and slightly further from the SLA boundary (see VP12) so does not affect views of the SLA from the A9 at this point. South of the road crossing at Braehungie, the proposed development appears in views west towards the SLA from the A9, appearing in front of the distinctive Scaraben hills and Morven (see VP13). While also seen with the existing OHL and a small wind farm in this view, it is much more prominent than either, and this affects appreciation of this view as seen from the A9. Approximately 6km of the proposed development lies within the SLA, to the northwest of the A9 along the Berriedale Coast. For most of this section

it closely parallels the existing OHL, which lies slightly closer to the A9 and coastline. Where visible, it appears much more prominently than the existing OHL, due to the much larger tower height and slightly higher position in the landscape (see VPs 18 and 19). Generally, it is seen against the backdrop of hills within the SLA, rather than towards the coast (see VPs 18, 19, 21 and 22).

7.234 The LVIA lists 7 SLQs, highlights 3 and assesses localised Significant effects on two, stating the integrity of the SLA will not be affected. Several issues with the assessment are considered as follows:

- The SLA assessment is in general confused, often referring to areas well south of the SLA (Helmsdale and Strath Ullie) and referring once to Section B, which is well south of the SLA;
- The SLQs appear to be a combination of 'Key Landscape and Visual Characteristics' and SLQs from the THC SLA assessment document;
- At least one further SLQ from the THC assessment should have been listed, describing the Langwell and Berriedale valleys in the section where the SLA covers the coastal strip: 'In further contrast to the elevation and exposure of the mountain summits and the wide expanse of the peatland, the deep wooded sections of the Berriedale and Langwell glens provide an intimacy of scale and shelter and are dotted with buildings and other welcoming signs of human habitation' VPs 18-20 show how the proposed development crosses both of these, dominating the narrow, intimate topography and detail of vegetation and settlement;
- This, and possibly 4 other of the listed SLQs (including the two LVIA-identified ones) would be Significantly affected;
- The effects would be localised to the northeastern and southeastern edges of the SLA, with no direct effects on the extensive mountain and moorland areas (although certainly an adverse effect on views towards them). In most cases, there is the existing 132kV OHL nearby and in the view. However, the latter is far smaller, lower in the landscape and less visible (e.g. VPs 13, 18, 19) and several SLQs are Significantly affected, representing the experience of the SLA as seen from the A9 and coastal section; and
- Significant effects on overall integrity can still result from few and localised significantly affected SLQs if they represent a unique area or quality of the landscape designation.

Loch Fleet, Loch Brora and Glenloth SLA

7.235 Sections A and B pass NE-SW along the length of the SLA through the middle, except at Loch Fleet, where the SLA bends south-eastwards to the coast and the proposed development exits the area well to the west of Loch Fleet. Approximately 30km of the proposed development lie in the SLA. Major landscape and visual effects occur around Loch Brora crossing. LVIA assesses Significant (Major and Major-Moderate) effects on 3 SLQs but does not consider these to compromise the integrity of the designation.

7.236 The review of LVIA Sections A, B and SLA assessments indicates several issues:

- The SLQs are mainly 'Key Landscape and Visual Characteristics' from the THC SLA assessment document, the SLQs including 'Historic Features' and

Integrated Combination of Landforms' are separately listed and only one or two of these are cited in the LVIA;

- Different approaches to assessment for Sections A and B – possibly reflecting two different assessment teams and insufficient high-level oversight;
- Section A assessment appears more accurate, consistent and realistic, whereas Section B has a number of errors (stating only 1km of proposed development directly affects SLA when it's closer to 15km; missing out an important SLQ covered by Section A; and not mentioning integrity of the designation) and concludes with fewer and less Significant effects, despite probably affecting the SLA more severely;
- It would have been clearer to assess the SLA as a whole by bring the two assessments together, which might also iron out inconsistencies between the two assessments; and
- In contrast with the LVIA assessment, it is clearly arguable that the extent of proposed development within the core of the SLA, affecting several SLQs and with LVIA-assessed Major Adverse landscape and visual effects would also Significantly affect the overall integrity of the designation.

Other Designated Landscapes

- 7.237 The effects on the SLQs of the remaining designated landscapes are not considered to be Significantly affected by the proposed development. This includes the Fannichs, Beinn Dearg and Glencalvie SLA, Ben Wyvis SLA and Dornoch Firth NSA, Causeymire - Knockfin Flows WLA and Rhiddoroch - Beinn Dearg - Ben Wyvis WLA (the latter WLA as a whole).

Conclusions on Designated Landscapes

- 7.238 There is broad agreement with the assessment that there would be Significant effects on SLQs of The Flow Country and Berriedale Coast SLA and Loch Fleet, Loch Brora and Glenloth SLA. However, there are some differences, specifically on further affected SLQs and with the LVIA conclusion on that there would be no Significant effects on the integrity of the designation.
- 7.239 There would be inevitable Significant landscape effects of the proposed development. The principal concerns relate to the most affected areas of designated landscape, where many of the more sensitive characteristics are expressed as SLQs. In contrast to the LVIA, the judgement is that, at least in the case of the Loch Fleet, Loch Brora and Glen Loth SLA, effects are numerous and sufficiently widespread, adverse and Significant to compromise the overall integrity of the designation.
- 7.240 In relation to landscape impacts, no national landscape designations, WLAs or World Heritage Sites are Significantly affected, and direct effects on these are largely avoided.

Visual Effects

- 7.241 The assessment of visual effects covers a range of receptors including settlements, residential properties, transport routes, recreational routes and outdoor locations. The locations of these are shown on Figures 7.4 – 1 to 14. The visual assessment has been undertaken as a receptor-based assessment (giving consideration to all potential visual

receptors) but does not also include a series of 'single point', viewpoint-based assessments as it is not a fundamental LVIA requirement in accordance with GLVIA 3. In this regard, the visualisation locations do not comprise specific viewpoints for visual assessment and a viewpoint-based assessment has not been undertaken. Detailed assessments have been undertaken in Appendices 7.5 – 7.9, Volume 5 (Visual Receptors in Route Sections A – E) where both stand-alone and cumulative effects are assessed.

- 7.242 Unsurprisingly, there is some difference between the applicant's assessment and the appraisal undertaken by Officers, which is to be expected when such assessments are dependent on the application of professional judgement. Differences in judgement on the visual receptors are set out in Appendix 5 of this report.
- 7.243 The applicant has assessed construction and operation effects in equal detail, as two separate stages. It is noted that the construction stage for any one location would be temporary and short to medium term and that the visualisations show the longer-term/permanent operational stage. Therefore, the appraisal of visual effects concentrates on the latter.
- 7.244 The study areas for Sections A – E include areas of up to 10km overlap where two Sections meet, where some receptors could be affected by two Sections. In the case of transport receptors such as A roads and railways, some such as the A9 are long enough to be affected by several Sections of the proposed development.
- 7.245 The applicant's assessment reports Significant visual effects within the five geographical Sections of the proposed development as follows:
- **Section A:**
 - Twelve (12no.) residential properties/receptors;
 - Short sections of four (4no.) recreational routes (comprising four individual grouped Core Paths) and two (2no.) outdoor locations (Berriedale Braes viewpoint and the summit of Creag Thoraraidh) would likely occur; and
 - Short sections of three (3no.) transport routes (B870, A897 and the Far North Railway Line via Helmsdale).
 - **Section B:**
 - Eleven (11no.) residential properties located within close proximity of the proposed development; the number is reduced to eight (8no.) during operation;
 - Short sections of six (6no.) recreational Core Paths routes and one (1no.) outdoor location (Duke of Sutherland Monument); and
 - In terms of road / rail users, there would be Significant effects on views from short sections of five (5no.) transport routes comprising the Far North Rail Line, minor roads within the valleys and the A839.
 - **Section C:**
 - Five (5no.) residential properties located within close proximity of the proposed development, and at the settlement of Culrain.
 - Short sections of seven (7no.) recreational routes (comprising the Inverness to John O' Groats National Cycle Trail and six (6no.) Core Paths) and three (3no.) outdoor locations (Carbisdale Castle, The Scap, and Dounie Estate); and

- Short sections of four (4no.) transport routes comprising the Far North Rail Line, A836, A837, and the Culrain – Inveroykel Minor Road.
- **Section D:**
 - Seven (7no.) residential properties (all located within 500 m of the proposed development). There would be no Significant effects in views from settlements due to their spatial separation from the proposed development and / or intervening screening due to landform and tree cover;
 - Short sections of three (3no.) recreational routes (RD-12, RD-19, and RD-22) and one outdoor location (OD-03 Dounie Estate); and
 - Short sections of two (2no.) minor roads (RD-01 and RD-02), which would extend directly under the proposed development. During operation, when vegetation has re-established, there would continue to be Significant effects.
- **Section E:**
 - Four (4no.) settlements, and 19 isolated dwellings located within close proximity to the proposed development;
 - In terms of road and rail users, short sections of three (3no.) A-roads, on rail link, and three (3no.) minor roads; and
 - Short Sections of 14no. recreational routes and five (5no.) outdoor locations. During operation, when vegetation has re-established, there would continue to be Significant adverse effects.

7.246 Significant adverse effects are mainly limited to receptors lying within a limited distance from the alignment, typically up to 1km depending on sensitivity to the proposed development, extent of visibility etc. Beyond this distance, with a few notable exceptions, effects are usually assessed as Not Significant. The greatest numbers of Significantly affected visual receptors are affected by Section E. This is due to the higher level of population and development in the area crossed by Section E.

7.247 Having undertaken an appraisal of the LVIA's findings, many of the visual effects are not being contested and therefore the content of the applicant's LVIA can be generally relied upon as fair and reasonable assessment of the likely visual effects arising from the proposed development. There are, however, exceptions where there is disagreement on the effects in relation to some receptors resulting in additional Significant effects as noted further below and in Appendix 5 of this report. The following general points on the visual assessment are to be noted:

- Most of the assessments of Significant effects for receptors that are close to or pass under the proposed development and the non-Significant effects of receptors that have a distant and/or limited view are agreed. However, there is some degree of difference on effects that are intermediate between these extremes;
- More reference could be made in the detailed assessment tables to the relevant representative viewpoints to assist the reader in visualising effects;
- Some receptors shown on the visual receptor figures have not been included in the assessment; and
- It appears that most of the visual receptors located in the four study areas overlaps between two Sections of route are only assessed for one or other Section and not both. This has implications for the cumulative assessment.

Section A: Spittal to Brora

- 7.248 This Section of the proposed development begins at the site of the recently consented Banniskirk substation, and courses southeast over Spittal Hill, east of Loch Toftingall and the operational Halsary Wind Farm, where it joins up with the alignment of the existing 132 kV line along the A9(T) in a southerly direction. The landform in this Section is made up of different landscape characters, predominantly it is flat, gently undulating and generally smooth which is characteristic of LCT 134. Due to the generally flat nature of the landform, views of the surrounding landscape by road users on the A9 can extend far to the west, to the lone mountains at Morven and Scaraben, which provide a striking contrast from the undulating rolling nature of the Caithness terrain. Along this Section of the alignment, the proposed OHL would be visible in proximity by road users travelling in both directions on the A9(T) as the OHL courses south, alongside other renewable and grid infrastructure. It is considered the effects on visual receptors at this Section would not be Significant, however cumulative effects could be experienced principally by road users travelling in both directions due to the existing OHL and wind turbines alongside the proposed OHL. North of Latheron on the A9, the proposed development then leaves the A9 route to travel west towards Houstry, crossing the A9(T) north of the C-class road C1065. As the proposed development travels southwest, it takes an alignment on ground higher than the existing 132kV OHL. This position on the higher ground, combined with the size and scale of towers would make the proposed OHL more prominently visible than the existing OHL and wind farm when travelling in both directions on the A9(T). The lone mountains (Morven, Scaraben and others), located with the Flow Country and Berriedale Coast SLA, to the west of the A9(T) are visually prominent due to their contrast to the flat undulating terrain of Caithness. As a result, these prominent hills would be viewed through existing turbines and OHL, with the proposed development adding to existing infrastructure, with several towers skylining across the view.
- 7.249 The alignment of the proposed OHL generally avoids the main settlements of Halkirk, Dunbeath, Berriedale and Helmsdale, and follows the route of the existing OHL. However, due to the size and scale of the towers, and position on higher ground the proposed development is more visible, with some skylining occurring, despite clear effort by the applicant to minimise its visibility through routeing and alignment design.
- 7.250 The LVIA identifies Significant adverse effects for eleven (11no.) residential properties/receptors located within close proximity of the proposed development. Furthermore, Significant effects on short sections of four (4no.) recreational routes (comprising four individual grouped Core Paths) and two (2no.) outdoor locations (Berriedale Braes viewpoint and the summit of Creag Thoraraidh) would likely occur. Regarding road and rail users, the LVIA concludes Significant effects on views from short sections of three (3no.) transport routes (B870, A897 and the Far North Railway Line via Helmsdale).

Effects on Residential Receptors

- 7.251 The applicant has assessed effects of the proposed development on 13 residential receptors, which are defined in the LVIA as “residents within settlements and isolated dwellings in closest proximity to the proposed development”. Of these, eleven (11no.) have been assessed as Significant, and a further two (2no.) have been assessed as

ranging from Not Significant to Significant depending on specific location/orientation of the property within the receptor group. These findings; are largely agreed with however, Appendix 5 of this report expands on concerns and nuances noted regarding the applicant's assessment for individual receptors.

7.252 There is disagreement with the applicant's assessment of the proposed development on the residential receptor SA-12 (The Bungalow, Ousdale and Keepers Cottage). It is considered that the applicant's assessment of low magnitude, and a moderate adverse (Significant) effect is too low. Keeper's Cottage is at a distance of 187m from the proposed development, with an open rear view. Keepers Cottage ought to be assessed as high magnitude, and Major effect (Significant), and the two other properties in the receptor group would be assessed as medium magnitude, and Major-Moderate effect (Significant). The RVAA carried out by the applicant suggests Medium/ Moderate-Major for Keepers Cottage; however, this too is considered low as the proposed angle tower higher on the hill to the north would dominate the property seen from the rear or from the approaches. The wireline in Appendix 5, Figure 1.7b of the LVIA shows the tower would require some form of modular extension or plinth which would further increase the effect. Effects on this property would exceed the residential visual amenity threshold.

7.253 The applicant has concluded in their LVIA for Section A that no Significant effects were identified for other isolated or clustered properties or settlements within the Study Area. They consider this due to distance of properties from the proposed development, intervening landform and tree cover which limit wider visibility. No assessment of Halkirk has been included despite it being approximately 3-4km from the proposed development where it begins near Spittal Hill, and some properties on the southern fringes of the settlement would see the proposed development and substation; however, it would be Not Significant for the settlement as a whole.

7.254 It is considered there could be cumulative effects on four (4no.) residential receptor groups (SA-01 to SA-04) due to the proposed development. All nearby dwellings are assessed in the LVIA as having little or no scenario 1 cumulative effects:

- Minor and none for SA-01 and SA-02 in scenario 1 due to restricted views of Banniskirk substation, assessed as Major for scenario 2 due to Ouglassy wind farm;
- Halsary (SA-03) assessed as no effect in scenarios 1 and 2; and
- Several dwellings on the A9 near Rangag (SA-04) the same.

The LVIA does not consider *existing* similar developments including Bad a Cheo Wind Farm and the existing 132kv OHL. If these are considered, then all these properties would have Significant cumulative effects, e.g. SA-03 has the existing OHL 500m to the west and wind turbines within a few hundred metres N and W. The proposed development would be approximately 256m at closest and with Major effects to the S and SE (see VPs 10 and 11 for general environs). The assessment also refers to scenario 2 developments being screened by topography. As these are proposed wind farms located within a few km in an open, almost flat landscape, this suggestion of screening seems unlikely.

From the A9 and properties at Rangag, the proposed development would be seen close to the road, side by side with the existing OHL (see VP12), so there may be Major adverse and Significant cumulative effects.

Effects on Recreational Receptors

- 7.255 The applicant has assessed effects of the proposed development on six (6no.) outdoor areas which are defined in the LVIA as “tourists visiting cultural heritage locations / outdoor locations where enjoyment of the view is one of the principal reasons for being at the location”. Walking and wheeling routes and trails have also been assessed, defined in the LVIA as “walkers / cyclists on promoted long-range recreational trails, Core Paths and national cycleways”. Of the outdoor areas, two (2no.) have been assessed as Significant. Generally, the applicant’s assessment can be agreed with. However, the applicant’s assessment of the Core Path at Badbea (RA-16: Core Path CA04.03 is disputed. A gravel track off the A9(T) that leads to Badbea. Users of the Core Path in the direction towards the A9(T) would have views of the proposed development and consider effects would be greater than what has been assessed.
- 7.256 The applicant considers the proposed development would have no Significant effects on receptor OA-4, ranging from none to Moderate-Minor adverse effects, depending on proximity to the proposed development and proportion of view occupied. However, it is considered that the effects on the path at Badbea Historic Clearance Village would be Significant, as visitor sensitivity would be medium/high, and change to view would be of a medium magnitude; and not the medium sensitivity, and medium/low magnitude that the applicant has assessed it as part of the LVIA.

Effects on Transport Routes

- 7.257 The applicant has assessed effects of the proposed development on nine (9no.) transport receptors, defined in the LVIA as “road users / passengers on key transport routes, comprising A-roads, B-roads and rail lines”. The applicant has identified the proposed development would have Significant effects on three (3no.) of the transport receptors, which Officers generally agree with.
- 7.258 The LVIA magnitude assessment of Medium relating to users of A9 section RA1-4 (Roads A9, A882, A99) is agreed. However, given the expansive views across the Flow Country and Berriedale Coast SLA to the mountains, it is considered that receptors would be at least medium sensitivity (not Low-Medium) and effects Moderate Adverse and Significant. Officers also raise concern regarding effects on the North Coast 500 (NC 500) (RA-19). This receptor is present across the entirety of the proposed development alignment; however, comments here relate to the NC 500 in Section A. While it is agreed that effects are Not Significant, it is considered the sensitivity should be high resulting in effects greater than Minor adverse. The NC 500 is a nationally promoted tourist route. The proposed development would be visible on the NC 500 approaching Helmsdale; towers would be visible as they drop down into Strath Ullie. Vehicles would be slowing approaching the 30mph speed zone, so views for passengers would be sustained for longer than if travelling at higher speeds. View of Strath Ullie when crossing bridge over River Helmsdale would have views of approximately three towers and associated cables. This is estimated as the bridge itself is not covered by a viewpoint.

Visual Appraisal Conclusions on Section A

- 7.259 Overall, the alignment in Section A has sought to minimise visual effects on receptors noted in the appraisal however due to the size and scale of the towers and positions

on higher ground amidst the generally flat, undulating landform of Caithness, the proposed development would be visible at various locations. Significant adverse effects have been concluded for a number of visual receptors. This is largely agreed with. However, the applicant's conclusions on receptor RA-16: Core Path CA04.03 is disputed. A gravel track off the A9(T) that leads to Badbea. Furthermore, the conclusion made regarding residential receptor SA-12, located near Ousdale in Caithness, where the proximity of the proposed development would breach the residential visual amenity threshold is not agreed with, rather the visual effects would be Major adverse and Significant. Furthermore, it is considered that there would be cumulative visual effects on receptor groups SA-01 to SA-04 shown in Figure 7.4 of the EIAR.

Section B: Brora to Loch Buidhe

- 7.260 This Section of the alignment extends from the hills north of Brora south-westwards across Loch Brora and Loch Fleet to the proposed Carnaig Substation, south of Loch Buidhe. The landscape comprises a mix of strath and upland landscapes, as well as contrasting open moorland and deep, steep-sided valleys associated to lochs and rivers. Theoretical Visibility of the OHL is greatest from higher ground in Section B, while views from lower-lying valleys are generally more limited and often influenced by forestry cover. This Section of the route passes through an area that already contains several existing and consented wind farms. The proposed alignment generally avoids the main settlements of Brora, Golspie, Lairg and Dornoch.
- 7.261 The OHL avoids both the Dunrobin GDL and the Ben Klibreck - Armine Forest WLA. However, the alignment passes through the Loch Fleet, Loch Brora and Glen Loth SLA for approximately 14.8km, continuing from Section A where some of the greatest landscape and visual effects of the proposed development are experienced. These effects are most evident where the OHL crosses open valleys and waterbodies and where towers and conductors are visible on the skyline. It is considered that Major adverse and Significant landscape and visual effects would occur at the Loch Brora crossing within the SLA. This is due to the long conductor spans across the loch (see VP35 and VP36) and the prominent position of towers and conductors in relation to the distinctive landforms on the western side of the valley. The valley sides rise around 150-200m above the relatively flat valley floor, meaning that towers of approximately 50-65m in height would appear as large and noticeable vertical structures in nearby views in the landscape when viewed from nearby receptors. The surrounding steep-sided, flat-topped hills rise between approximately 150m and 500m above the loch such that the line of towers remains a prominent feature in views and is not diminished by the scale of the wider landscape. The visual effects are further increased by the presence of distinctive landforms such as the cliffs and flat-topped hills of Ben Horn and Carrol Rock, which are only around 100-150m high. In this setting, the proposed towers and conductors would appear prominent and detract attention from these important landscape features. The Loch Brora crossing lies centrally within the Loch Fleet, Loch Brora and Glen Loth SLA. The long spans across the loch, prominent towers on the valley sides, and their relationship with key landforms would have a substantial adverse effect on the landscape character and special qualities of the SLA. The landscape and visual effects at the Loch Brora crossing are considered to be to be Major Adverse and Significant.
- 7.262 Section B is the only Section where construction effects are consistently assessed as greater than operational effects. The LVIA identifies Significant adverse visual effects

during construction for eleven (11no.) residential receptors in proximity to the OHL, reducing to eight (8no.) during operation. Given that construction effects would be temporary and short to medium term, the review of the assessment has focused on the longer-term operational effects illustrated by the visualisations. The LVIA also identifies Significant visual effects on sections of six (6no.) recreational Core Paths and one (1no.) outdoor location, the Duke of Sutherland Monument. Significant adverse effects are similarly predicted for short sections of five (5no.) transport routes, including the Far North Railway Line, minor roads and the A839. Appendix 5 of this Report sets out those aspects of the visual assessment where there is difference from the applicant's conclusions.

Effects on Residential Receptors

- 7.263 The applicant has assessed effects on sixteen (16no.) residential receptors, although not all assessments are included within the LVIA (SB-4, SB-9 and SB-10). Of these, eleven (11no.) were recognised to have Significant effects during construction, reducing to only eight (8no.) once the OHL is operational. The findings are largely agreed with; however, Appendix 5 of this report expands on concerns and nuances regarding the applicant's assessment for individual receptors.
- 7.264 The LVIA's assessment of SB-2 (Killin) and SB-3 (Carroll Cottage), two isolated farmhouses within the Loch Fleet, Loch Brora and Glen Loth SLA that benefit from expansive views across Loch Brora is not agreed with. In relation to SB-2 (Killin), located approximately 147m from the OHL, it is considered that the property would experience a High magnitude of change and Major Adverse Significant visual effects. As illustrated by Viewpoint 35 and Appendix 7.11 RVAA – Figure 1.8a-b, views from the dwelling and its curtilage would be dominated by the closest tower, with only limited screening provided by sparse tree cover to the north-east. Residents would also obliquely see the OHL crossing Loch Brora and hills beyond from its front elevation and wider curtilage, forming a prominent feature within the wider outlook. While the applicant's RVAA assesses the effects as a Medium magnitude of change and Major-Moderate Adverse Significant, Officers consider that the close proximity of the OHL (approximately 147m from the dwelling and 126m from the curtilage) and its extent within the view would not be materially mitigated by existing sparse trees to the northeast. As such, there is potential for effects to exceed the residential visual amenity threshold.
- 7.265 Similarly, receptor SB-3, which is sited approximately 207m from OHL on the opposite side of Loch Brora from Killin, is considered to have a Higher Magnitude than identified by the applicant, resulting in a Major Adverse Significant effect. As illustrated in Appendix 7.11 RVAA, Figures 1.9a-b, views from the property would be dominated by the nearest tower (N222), with no intervening tree screening. While the principal elevation of the property faces south, away from the OHL, residents would nonetheless experience oblique views of the OHL as it crosses Loch Brora and extends across the hills beyond, passing behind the property and ascending the valley sides to the west. The applicant's RVAA assesses the receptor as experiencing only a Medium Magnitude, resulting in a Major-Moderate Adverse Significant effect. This assessment is not agreed with, whereby the magnitude is considered to be higher given the proximity, prominence and limited screening of the proposed infrastructure. It is also noted that, for both properties, the applicant's assessment suggests that screening would be reduced during winter months because of leaf fall. This does not appear to

be accurate in all cases. Such seasonal variation in screening could only reasonably apply to vegetation on the north-eastern side of Killin, whereas Carroll Cottage benefits from no meaningful nearby tree screening and therefore would not experience any notable change in screening effectiveness during winter.

- 7.266 Surprisingly, SB-4 (Glen Cottage, Dunrobin Glen) has not been assessed within the applicant's LVIA. The property is identified as a receptor in Figure 7.4-5 but is not otherwise mentioned or assessed, except as a reference point within the assessment of Core Paths around Ben Bhraggie and Loch Lundie. This property would likely experience views of the proposed OHL at approximately 1.2km, where it would cut perpendicularly across another of the glens that characterise the SLA. Given the proximity and scale of the development, it is considered likely that the resulting visual effects would be Significant. As indicated in Appendix 5 of this report, receptor SB-1, located at a greater distance of approximately 1.7km, is recognised as experiencing Significant visual effects. Glen Cottage would also experience Significant visual effects, and its omission represents a deficiency in the assessment.
- 7.267 As the OHL extends further southwest, it crosses Strath Fleet inland from Loch Fleet. At this point, the route is no longer located within the SLA. There are three consecutive receptor groups associated with scattered properties along the A839: SB-5 Morvich, SB-6 East Kinnauld and SB-7 West Kinnauld. The LVIA identifies SB-5 and SB-6 as experiencing Moderate Adverse Significant visual effects as a result of the proposal. However, the LVIA assesses SB-7 West Kinnauld as experiencing Minor Adverse, Not Significant visual effects. However, this receptor would have clear views of the proposed OHL as it cuts across the flat-bottomed strath and containing slopes. The OHL would also be seen skylining against the surrounding hills in a manner comparable to views experienced within glens located further north in the SLA. In addition, the proposed OHL would run broadly parallel to the existing OHL, separated by only a few hundred metres, giving rise to cumulative visual effects. On this basis, it is considered that receptor group SB-7 would experience Moderate Adverse Significant visual effects, consistent with the conclusions reached for receptor groups SB-5 and SB-6.

Effects on Recreational Receptors

- 7.268 The applicant has assessed the effects of the OHL on ten (10no.) recreational routes, six (6no.) of which are identified to experience Significant effects, and one (1no.) outdoor location. There is general agreement with the applicant's assessment of these recreational receptors. As with the residential receptors, some of the more notable visual effects are associated with recreational receptors in the vicinity of the Loch Fleet, Loch Brora and Glen Loth SLA.
- 7.269 The Core Path which runs from Doll Bridge to Loch Brora valley RB-8 (Core Path SU06.14: Doll Bridge - Loch Brora) follows the River Brora through woodland before opening out along the southern shore of Loch Brora. The LVIA identifies Moderate Adverse Significant effects on sections of the route within 2km of the OHL, reducing to Minor Adverse Not Significant effects across the wider route during operation. It is accepted that views of the OHL would be intermittent along the wooded sections of the river but more apparent where the route emerges into the open landscape around the loch albeit these would be long range. The route would gain views of the OHL as it descends into the valley, crosses the loch and climbs back up to the moorland,

backdropped by landscape and the sky, hence Significant effects within 2km. A further route within the vicinity of Loch Brora, a vastly open and designated landscape, is RB-9 (Core Path SU06.02: Loch Brora West Track), which runs along the western side of Loch Brora and affords more open views towards Killin and the OHL as it descends into and crosses the valley. The route crosses under the proposed alignment and has long range views of the valley as it clears the woodland, like that of RB-8. The LVIA identifies Moderate Adverse Significant effects on sections of the route within 2km of the OHL, reducing to Minor Adverse Not Significant effects across the wider route during operation. However, visual effects are considered to increase in magnitude within approximately 500m of the OHL, resulting in more pronounced effects near the crossing point. The Core Path passes directly beneath the OHL where it crosses Loch Brora, near Carroll Rock, where the conductors would be clearly visible spanning the Loch. The prominence of the OHL in this location is heightened by its relationship with the Loch, the alignment of towers along the valley, and the backdrop of distinctive surrounding landforms.

- 7.270 Recreational users of Core Path SU20.10 (RB-12), which connects Little Torboll and Eiden, are also likely to experience Significant visual effects from the OHL. As the route intersects the alignment, users would experience open, close-range views of the proposal, with visibility extending up to 2km in places. Intermittent views would also be available as the OHL crosses the River Fleet valley, broadly parallel to the existing overhead line. The LVIA assesses effects on this route as Major Adverse Significant within 500m of the OHL, reducing to Minor Adverse Not Significant effects across the wider route during both construction and operation. Many towers would be seen along the top of the landscape as it snakes across hilltops and passes across the valley floor. This will add a new prominent focus hence Major adverse effects within close range of the OHL.
- 7.271 As the OHL approaches the proposed Carnaig Substation at the southern end of Section B, receptor RB-14 (Core Path SU09.19: Achvaich to Loch Buidhe) is assessed in the LVIA as experiencing Moderate Adverse (Significant) effects. It is disappointing that no viewpoint has been provided for this location, given its proximity to the proposed substation. Users of the Core Path would experience views of the OHL on approach to the proposed Carnaig Substation. Views would also include the existing OHL and the infrastructure proposed within Section C, giving rise to cumulative effects. It should be noted that RB-14 is not included within the cumulative assessment presented in Table 7.7, despite the likelihood combined effects.
- 7.272 The Duke of Sutherland Monument (OB-1) is the only identified outdoor location receptor within Section B. Accessed via Core Path SU12.14, which forms part of the route network assessed under RB-9, the monument is located approximately 3km south of the proposed development. The OHL would be visible to the north and west, although views eastwards would be more limited due to intervening woodland. The LVIA assesses the receptor as experiencing Moderate Adverse Significant operational effects, a conclusion that is agreed with. The proposal would be seen crossing the open moorland to the northwest of the monument, with towers viewed at distance and generally backdropped by the surrounding landscape. While panoramic views are available from the monument, the OHL would affect only part of the outlook. Importantly, the principal views from the monument southwards towards the coast would remain unchanged.

Effects on Transport Routes

- 7.273 The applicant has assessed effects on six (6no.) transport receptors, with Significant effects identified by the LVIA on five (5no.).
- 7.274 The most Significant effect is recognised to be along Gordonbush Road (RB-3), the stretch of road extending west from the A9 at Brora, north of the River Brora towards Loch Brora towards Balnacoli and the Balnacoli Estate. Along this route, road users would experience views of the alignment descending into the valley, spanning the loch, and then climbing back onto the surrounding moorland, where it would form a prominent element within the landscape. The LVIA assesses operational effects as Moderate Adverse Significant within 3km, a conclusion generally agreed with given the openness of the valley and the visibility of the OHL within wider views. However, as with RB-9, Officers consider visual effects to increase in magnitude within approximately 500m of the OHL, resulting in more pronounced effects near the crossing point, as illustrated by Viewpoints 35 and 36 where the route passes directly beneath the alignment. Given the importance of these views within a dramatic and designated landscape, visual effects near the OHL are of greater significance. Although these views would be experienced briefly by road users, the scale and prominence of the OHL at the crossing point would increase the overall visual effect.
- 7.275 The Far North Railway Line (RB-6) traverses the River Fleet valley within Section B. Between Pittentrail and Morvich, the valley is relatively broad and, owing to limited vegetation cover, allowing for extensive long-range views. The LVIA assesses operational visual effects as Moderate Adverse Significant within 2km of the OHL, reducing to Not Significant across the wider route. Along this Section, rail passengers would pass beneath the OHL where it crosses the valley floor and its enclosing valley slopes, which typically rise to between 150m and 250m. Beyond the valley floor, the towers would be visible against the skyline of the surrounding hills, creating a visual relationship comparable to that experienced within the glens of the SLA further north. In addition, the OHL would run broadly parallel to the existing OHL, separated by only a few hundred metres in places, giving rise to cumulative visual effects and reinforcing the influence of transmission infrastructure within views from the railway corridor.

Visual Appraisal Conclusions on Section B

- 7.276 Overall, the alignment of Section B has managed to minimise visual effects on the larger settlements and transport routes, benefitting predominantly from screening afforded by intervening landform and areas of tree cover. As such, Significant adverse effects have been limited to, and views from 8 residential receptors, 5 transport routes, 6 recreational routes and 1 outdoor location. It can be concluded that the most Significant visual effects within Section B are experienced by receptors in the vicinity of the Loch Fleet, Loch Brora and Glen Loth SLA.

Section C: Loch Buidhe to Dounie

- 7.277 This Section of the OHL is the shortest of the entire alignment, stretching from the proposed Carnaig Substation to the south of Loch Buidhe, culminating just to the north of the River Carron, to the northwest of Ardgay. Section C of the OHL extends in an arc from the north in a south-westerly direction across the Kyle of Sutherland, avoiding the Dornoch Firth NSA, striding through the uplands to the west. The landscape

through this Section is characterised by a mix of hill summits and high ground characterised by extensive moorland and large areas of forestry. Built form and settlement is limited to very localised areas, typically the lower lying straths, avoiding larger settlements such as Lairg, Dornoch and Tain, but also minimising the effect on Bonar Bridge and Ardgay to be insignificant. At distances greater distances potential views of the proposed development would be limited to localised summits and typically comprise a lesser number of towers.

- 7.278 The LVIA identifies Significant adverse visual effects for five (5no.) residential properties/receptors located within proximity of the proposed development. Significant effects on sections of seven (7no.) recreational routes and three (3no.) outdoor locations. Regarding road and rail users, Significant adverse effects on views from sections of four (4no.) transport routes comprising the Far North Rail Line, minor roads, A836 and A837. Appendix 5 of this Report sets out where there are differing views of the assessment.

Effects on Residential Receptors

- 7.279 The applicant has assessed effects on nine (9no.) residential receptors, five (5no.) of which (1no. settlement and 4no. residential properties) are recognised to experience Significant visual effects. While these findings are agreed, Appendix 5 of this Report expands on concerns with the applicant's assessment for individual receptors.
- 7.280 Despite the OHL route being aligned to avoid the larger settlements within the vicinity of Section C, Culrain is recognised as the only settlement receptor assessed to have a Significant visual effect. The LVIA assesses Culrain to experience Moderate Adverse Significant visual effects as the OHL is operational. However, it is considered that the Significant effect to be increased to a Major-Moderate Adverse level, particularly when viewed to the west of the village. As demonstrated by VP 52, the OHL will be approximately 1km from Culrain, and will become the tallest feature in the view, particularly to the west and northwest, skylining along the top of the existing hillside, worsened by the proposed felling. The OHL will become the dominant feature across the hillside. Views to the northeast of the village, show the rise of the towers as it rises over the hillside, however the OHL will not be the dominant feature given the expansive view. Views of the proposal to the north are somewhat contained by intervening landform and tree cover within Carbisdale Wood.
- 7.281 Located north of Carbisdale Castle, SC-6 Creide, is a residential property situated on raised ground near the banks of the Kyle of Sutherland. This receptor is identified by the LVIA as experiencing the greatest visual effects from the OHL in Section C in regard to residential receptors, with Major Adverse Significant effects predicted due to its proximity to the alignment and the angle of view occupied, particularly during winter months. SC-6 has been included within the RVAA and is located approximately 210m from the proposed infrastructure, or around 195m from the property curtilage. The front of the house faces north viewing over the front curtilage and parking area with the higher ground adjacent to the Kyle of Sutherland visible in the background. There is a bank of mature trees to the east and south-east of the property that somewhat limits views across the Kyle of Sutherland in an easterly direction. At this property towers will be experienced at proximity, with tower S24 located circa 230m from the property, with limited screening, viewed against the backdrop of sky and landscape, with a filtering of intervening tree cover. Whilst some tree cover exists which will filter principal views to

the east, in this direction, tower S23 will appear in the centre of the Kyle, as the alignment descends the valley sides and strings across the valley floor, with peripheral views across Kyle of Sutherland experienced. At this property a high degree of the OHL skylining on hills to the northeastern side of the Kyle of Sutherland will be experienced.

- 7.282 Further northeast of SC-6, SC-7 (Oak Bank) is a residential property located near the banks of the Kyle of Sutherland. The property is partially screened by surrounding trees and an area of woodland running parallel to the river corridor to the east. Situated approximately 340m from the OHL, the LVIA assesses operational visual effects as Major-Moderate Adverse Significant, primarily due to the property's proximity to the alignment and the extent of the view occupied, particularly during winter months. Despite the filtering of views due to tree cover, the line of towers as they descend the valley to the southeast and string across the Kyle will dominate views peripherally, with Tower S23 in direct view. Similarly to SC-6, there will be a clear degree of skylining of the OHL at this location, with the potential for further cumulative effects with the existing 132kV OHL which passes under the proposal and would create a complex wirescape as shown in VP 49.
- 7.283 On the opposite side of the Kyle of Sutherland, receptors SC-8 and SC-9 comprise two residential properties at Invershin. The LVIA assesses Invershin Farm (SC-8) as experiencing Major-Moderate Adverse Significant visual effects due to its proximity to the alignment and the extent of the view occupied, particularly during winter months. Located approximately 330m from the OHL, the proposed development would be visible at close range, with tower S23 prominently positioned within centred southward views down the valley corridor. While vegetation within the property curtilage would partially filter views to the east and southwest, the OHL would remain visible as it crosses the Kyle, with additional cumulative effects arising from its alignment alongside the existing 132kV OHL. The effects at The Bungalow (SC-9), located approximately 460m from the OHL, are predicted to be less pronounced due to the greater separation distance and increased screening. Tree cover within the curtilage and the property's orientation, which directs primary views east and west, further reduce visibility. The nearest structure, Tower S22 to the south, would be partially screened, and both the LVIA and Officers therefore assess the receptor as experiencing Moderate Adverse Significant visual effects.

Effects on Recreational Receptors

- 7.284 The applicant has assessed the effects of the OHL on fourteen (14no.) recreational routes, seven (7no.) of which are identified to experience Significant effects, and eight (8no.) outdoor locations, three (3no.) of which are recognised to be Significant. The applicant's assessment of these recreational receptors is generally agreed with.
- 7.285 Similar to the residential receptors, the most Significant visual effects within Section C are experienced by recreational users in the vicinity of the Kyle of Sutherland, Culrain and Carbisdale Castle. RC-9 (Core Path SU08.02: Carbisdale) comprises a circular route through Carbisdale Wood, accessed from Culrain. The path offers a variety of views, with visibility generally directed north and west, although often filtered by woodland cover. More open views are available from higher elevations, subject to localised screening. The existing steel lattice OHL is already visible in views to the east and south-east. The LVIA assesses visual effects as Major Adverse Significant within 600-700m of the OHL, reducing to Moderate Minor Adverse Not Significant effects

across the wider route. Officers disagree with the latter conclusion. While woodland provides some screening, proposed felling works would open views, particularly towards the west. It is agreed that effects would be Major Adverse Significant near the alignment; however, the path intersects the OHL corridor on two occasions, with Tower S28 located immediately adjacent to the path and Tower S27 approximately 130m away. Although the most affected views would occur along the western, higher-elevation sections of the route, the proposal would be visible across a broad arc from west to north-east, albeit intermittently due to tree cover. There is also potential for more distant views of the OHL where it crosses the Kyle of Sutherland further to the northeast. Given the sensitivity and the magnitude of change, it is considered the visual effects on the wider route to remain Significant.

- 7.286 RC-9 connects directly with RC-10 (Core Path SU03.01: Cornhill to Culrain), sections of which also pass through woodland. Officers generally agree with the LVIA assessment of this route (RC-10), which identifies Major Adverse Significant effects within 800m of the OHL, reducing to Moderate-Minor Adverse Not Significant effects across the wider route during operation. The path intersects the alignment between Towers S27 and S28, and again between Towers S31 and S32. Once operational, the lattice towers would be experienced near users, with the closest towers located approximately 130m and 90m from the path at the respective crossing points. The clearest views would occur within 800m of the OHL, where the towers and conductors would be readily apparent against the background landscape and sky, creating a notable visual influence on the recreational experience.
- 7.287 Of the three outdoor locations within Section C identified as experiencing Significant visual effects from the OHL, Carbisdale Castle (OC-1) (VP57) is considered to experience the greatest effect. Situated on elevated ground overlooking the Kyle of Sutherland, the castle affords panoramic views north to northwest along the Kyle and towards Achany Glen, while views to the east and south are influenced by extensive woodland and forestry. The LVIA assesses effects at the Castle as Major-Moderate Adverse Significant, applicable to locations around the Castle with the most open outlook. However, it is considered the effects to be Major Adverse Significant, reflecting both the high sensitivity of the receptor and the high magnitude of change. A substantial proportion of the view would be affected by the alignment, particularly within views across the Kyle of Sutherland to the northeast to northwest. Towers would be visible on both sides of the valley and would skyline as they climb both valley sides, in addition to the conductors spanning the Kyle. To the northeast, the OHL would also be visible against a backdrop of both sky and landscape, although experienced in the context of existing plantation forestry. Views of the Castle from the northeast to northwest would also be significantly affected due to the introduced transmission infrastructure across the valley. While mature woodland limits views to the west, the principal panoramic outlook across the Kyle of Sutherland would be notably affected. The alignment would detract from the existing viewing experience and, in some locations, become the dominant focal feature. Tower S24 would occupy a prominent central position within views across the Kyle and would be readily apparent when the Castle is viewed from the north. Although some tree and woodland screening is present around the Castle, this is limited in the northeastern direction, allowing direct views of the alignment as it ascends the opposite valley side. The existing 132kV OHL also passes beneath the proposed alignment, introducing additional transmission infrastructure into the view.

Together, these lines would create a more complex and visually prominent scene across the floor of the Kyle when viewed from the Castle.

Effects on Transport Routes

- 7.288 The applicant has assessed effects on seven (7no.) transport receptors, with Significant effects identified by the LVIA on four (4no.).
- 7.289 The A836 (RC-1) within this Section follows the Kyle of Sutherland between Easter Fearn and Kincardine. The road passes beneath the OHL in the vicinity of Invershin, where users travelling in both directions would experience close-range views of the lattice towers. The most prominent views would occur along a section of approximately 700m, south of the junction with the A837, where Tower S22 would be located around 15m to the west of the road. However, these close-range views are limited to a relatively short section of the wider A836 route. Across most of the route, road users would experience intermittent or more distant views of the OHL, with woodland providing increasing levels of screening further north. As such, there is general agreement with the LVIA, which identifies Major-Moderate Adverse Significant effects within 700m of the OHL in Section C, reducing to Moderate-Minor Adverse Not Significant effects across the wider route during operation.
- 7.290 The A837 (RC-3) would also experience similar Significant visual effects near the OHL within Section C, although views would be locally filtered by roadside vegetation, particularly in the vicinity of Inveran. The LVIA assesses effects as Major-Moderate Adverse Significant within 700-800m of the alignment, based on proximity and the proportion of views occupied during winter months, reducing to Minor Adverse Not Significant across the wider route. Most effects would be experienced between Inveran and the junction with the A836, broadly corresponding with the section identified for RC-1 and lying within 700-800m of the proposed development. Tower S22 would be the closest structure, located approximately 110m from the road. Due to the orientation of the route, the clearest views would primarily be experienced by road users travelling south-east. From sections of the route further north-west, the OHL would generally be viewed at greater distances and would appear less prominent. However, the extent of Significant effects are considered to extend to approximately 1.6km from the OHL, as illustrated by Viewpoint 47. Road users travelling south-east along the A837 would continue to experience notable views of the OHL as it descends the valley side to the east and spans across the Kyle of Sutherland. Tower S24 occupies a prominent and central position within views, drawing the viewer's attention and increasing the visual influence of the OHL. Consequently, Significant visual effects are considered to extend beyond the 700-800m range identified in the LVIA.

Visual Appraisal Conclusions on Section C

- 7.291 Overall, the alignment of Section C has managed to minimise visual effects on the larger settlements and routes, benefitting predominantly from screening afforded by intervening landform and areas of tree cover. As such, Significant adverse effects have been limited to, and views from 1 settlement, 4 residential receptors, 4 transport routes, 7 recreational routes and 3 outdoor locations. The most Significant visual effects within Section C are concentrated in and around the Kyle of Sutherland, Carbisdale Castle

and Culrain, where the proposal crosses the valley and occupies a prominent position within views.

Section D: Dounie to Near Strathpeffer

- 7.292 This Section follows a primarily north-south alignment across the rolling landform between Dounie (in the north) to approximately 2.4km northwest of Strathpeffer (in the south). The alignment generally follows the landform, as far as practicable. The local landscape comprises a series of slopes and summits that are characterised by open swathes of moorland and large areas of forestry, the alignment extends across a number of enclosed river valleys and wider straths, including Glen Glass.
- 7.293 The most northerly extent of Section D which crosses Strathcarron is of some concern due to the Significant adverse effects identified on a number of receptors. Strathcarron is a fairly shallow river valley with an open farmed floor along much of its length and broad leaf tree cover along the riparian edge. The upper slopes of the river are forested and lead to moorland above. The area contains several scattered dwellings and farmsteads and is popular for outdoor activities and field sports with a number of sporting estates operating within the strath also providing tourist accommodation. The OHL will cut across the strath in a north south alignment, and some effort has been made to position the towers at the edges of the valley floor to lessen the visual effect. Visual effect will be felt by the removal of forest on both sides of the strath. The Alignment Section Break between Sections C and D lies at the treeline on the northern slope of Strathcarron, however cumulative effects for receptors in the strath have not been undertaken.
- 7.294 The LVIA identifies Significant adverse visual effects for seven residential dwellings, two minor roads, three recreational routes, and one outdoor location. Appendix 5 of this Report sets out where there are differing views on visual assessment.

Effects on Residential Receptors

- 7.295 The proposed alignment allows some separation and screening from the main settlements and routes which are in low lying areas close to the shores of the Cromarty and Dornoch Firths. Strathpeffer (SD-10), Swordale (SD- 11), Dingwall (SD-12), Ardgay (SD-13), and Evanton (SD-14) are assessed as Moderate Minor (Not Significant), Jamestown (SD-15) is also assessed as Moderate-Minor (Not Significant) with the majority of residents completely unaffected by Section D. Residents at Contin (SD-16) would experience no views of Section D and therefore experience no effect. Visual effects are therefore more likely to be felt by isolated dwellings and farmsteads, minor roads, recreational routes, and outdoor locations.
- 7.296 A number of scattered dwellings (SD-01, 03, 07, 08 and 09) lie on the north side of the strath, within a dispersed settlement at Strathcarron, with the closest being 210m to the east of the OHL. These properties have been assessed in the LVIA as having Major-Adverse effects (Significant) or Major-Moderate Adverse Effects (Significant), which Officers agree with. There are more than five properties nearby, which do not appear to have been assessed, with potential views on this section of Strath Carron, including houses south of the river looking north to Section C, which have not been assessed despite VP60 being on this side. These properties have also only been assessed within the LVIA for Section D despite the Alignment Section Break being at

the tree line part way up the northern slope, and with VP60 being on southern side of the strath.

- 7.297 South/southwest of Strathcarron, the Section is predominantly empty except for some isolated dwellings: SD-02 West End (Major Adverse), SD-04 Glaike Croft (Major Adverse), SD-05 Fannyfield (Major-Moderate Adverse) and SD-06 Tighnacraig (Major-Moderate Adverse). Officers agree with the assessments made, and while some properties will experience major Significant adverse effects it is noted that no properties will exceed the residential visual amenity threshold.

Effects on Recreational Receptors

- 7.298 Thirty-eight recreational routes have been identified in the visual assessment. Likely Significant effects have been identified at three routes (short sections), during both construction and operation. Of these paths, one would be located directly under the alignment. The key effects are summarised in EIAR Volume 5: Appendix 7.8 which there is agreement with.
- 7.299 Nine outdoor locations have been identified in the visual assessment. Likely Significant effects are identified at one location OD-03 Dounie Estate. The proposed development would be partially visible in views to the west against the background landscape, heavily filtered by tree cover within Strathcarron valley. Within wider views to the southwest, the proposed development would be experienced at greater distance. Views would be intermittent and subject to screening by intervening tree cover within the river corridor and intervening farmland. Based on the clearest views during winter months, visitors would experience Moderate Adverse (Significant) effects during construction and operation.
- 7.300 The proposed development passes approximately 3.6km to the east of Ardross Castle with its associated GDL and nearby Core Paths. These sit within a scenic river valley with valued, designated landscape assets (Ardross Castle GDL). Viewpoints within the area (63 and 64) as well as 62 above the GDL indicate limited visibility of the proposed development which is distant and backdropped by hills that host a wind farm. Very limited views from ground level in GDL due to extensive trees and plantations. Upper floors of Castle would have more visibility, but at nearly 4km distance. Associated Core Paths all have limited views and have been assessed as having Negligible effects. Noted that VPs 62-64 photomontages state distances to the proposed development are at least 1km greater than ZTV map indicates. While the proposed development will be visible within the landscape to the southwest, it will be viewed relatively low down within the landscape, against a backdrop of hills with existing wind farm development visible above the skyline. Viewpoints further to the west (VP61 and VP65) will experience greater visual effects than those closer to the Castle and GDL.
- 7.301 The OHL alignment runs southwest past Fyrish Monument (OD-09) and (RD-47), a key recreational viewpoint and path network, where key views lie towards the Cromarty Firth. The low-lying nature of the construction activities at this point in combination with the spatial separation from the monument, means that they would exert very limited influence on existing views.
- 7.302 Core Paths around Knockfarrel will have views of the OHL at a distance, however these views are high within the landscape with some skylining, and cross a large extent of

the views northeast, north and northwest. While many of these paths will have views to the south screened by the landform, the summit will experience a near 270-degree panorama of the OHL. This includes cumulative views of Section E as the section break lies to the east of Strathpeffer.

Effects on Transport Receptors

- 7.303 The routing of the OHL will avoid any Significant effects on key routes. There is some concern that the effects on the A9 (RD-09) from VP71 may be slightly underplayed given the OHL is seen high within the landscape and across a large proportion of the view, skylining on places. Overall, however the effects on this route are agreed to be Minor and Not Significant.
- 7.304 Four key minor roads have been identified within the Study Area for inclusion in the visual assessment. Two of these minor roads have been included on the basis the proposed development would extend directly across them. These comprise Cadh' an Tartair Road (RD-01) and the minor road to the south of the River Carron (RD- 02), which are both located within Strathcarron. The key views from these routes are assessed as being limited to short sections within 700m of the proposed development, where road users would experience a Major-Moderate Adverse (Significant) effect during construction and operation (VP 60) on the minor road to the south of the River Carron. It is considered that the effects may be slightly underplayed at close range given the crossing of both routes. Effects on RD-01 may be felt more widely to the west; however, this is likely to be cumulatively with Section C. Views of the OHL climbing the southern slop of the strath are likely to be more filtered.
- 7.305 The other two minor roads included in the assessment are located at greater distance from the proposed development (1.4 km or more), comprising Smoogro Road (RD-04) and Old Evanton Road (RD-06). In each case, potential views of the construction activities and steel lattice towers would be restricted by roadside vegetation / intervening tree cover, in combination with the intervening landform, and the increasing distance of view (refer to Viewpoints 7-72 Heights of Brae and 7-74 Heights of Inchvannie on Smoogroo Road). It is considered that the effects connected with VP72 may be underplayed, some views may be screened by landform and tree cover, views northwest towards Ben Wyvis, an important feature in the landscape are not, but overall would be considered not Significant.

Visual Appraisal Conclusions on Section D

- 7.306 Overall, the routing of this Section has managed to minimise visual effects on key settlements and routes, utilising the terrain to limit Significant adverse effects to views from seven residential dwellings, two minor roads, three recreational routes, and one outdoor location. There would be no Significant effects in views from settlements due to their spatial separation from the proposed development and / or intervening screening due to landform and tree cover. There would also be Significant effects applicable to short sections of three recreational routes (RD-12, RD-19, and RD-22) and one outdoor location (OD-03 Dounie Estate). In terms of road users, there would be Significant effects on short sections of two minor roads (RD-01 and RD-02), which would extend directly under the proposed development. During operation, when vegetation has re-established, there would continue to be Significant effects.

Section E: Near Strathpeffer to Beaully

- 7.307 Section E would be located inland from the Beaully Firth, extending from approximately 2.4km northwest of Strathpeffer in the north (where it adjoins Section D), to the proposed Fanellan Substation approximately 2.8km northwest of Kiltarlity in the south. The landscape is characterised by areas of farmland within the lower-lying straths at the northern end of the alignment, which transitions to areas of forestry on the adjoining slopes, and areas of open moorland across the more elevated plateau further south. At its southern end, the Section E alignment transitions back down towards lower-lying farmland, through areas of forestry and woodland. Built form comprises scattered dwellings and farmsteads within lower-lying areas, as well as localised infrastructure elements on the elevated hillsides and summits, including transmission masts and wind turbines. In addition, existing 132 kV OHLs extend through the local landscape at the southern end of Section E.
- 7.308 Section E therefore traverses the most populated, varied and actively managed landscapes along the whole development which gives greater potential for visual effects to be felt by receptors. Furthermore, the features within the landscape provide a sense of scale against which the proposed development is viewed.
- 7.309 The alignment would have particularly Significant adverse effects on the area just south of Strathpeffer, including a lengthy and widely visible crossing of Strathconon east of Contin and lying within the western edge of the Fairburn GDL. While not designated, this landscape is valued locally as the 'gateway' to the west.
- 7.310 The LVIA identifies Significant adverse visual effects for four settlements, 19 isolated dwellings, seven roads, 14 recreational routes, and five outdoor locations. Appendix 5 of this Report sets out where there are differing view on the visual assessment.

Effects on Residential Receptors

- 7.311 Given the more populated nature of Section E, effects on main settlements have been limited but not completely avoided. Significant adverse effects were identified for four settlements, and 19 isolated dwellings. Effects will be experienced at the outer edges of Jamestown (SE-20), Contin (SE-21), Strathpeffer (SE-22) and Marybank (SE-23) with the majority of each settlement experiencing non-significant effects.
- 7.312 While Kiltarlity sits in close proximity to the proposed Fanellan substation, which is the southern terminus for the OHL, the proposed development would be well screened from much of the core of the village due to topography and tree cover. The proposed development will be visible at higher ground around the primary school and at a distance from the wider dispersed communities to the west and south.
- 7.313 A cluster of properties lie between Jamestown and Contin (SD-02 Mid Lodge, SE-15 Coul Garden Cottage, SE-10 Achnacoul Lodge, SE-07 Broompark, SE-03 Heights of Kinnahaird, SE-11 Oakmor) and to the east of Contin on the A835 (SE-06 Grieve's Cottage, SE-09 Kinnahaird, SE-04 Bruiach Cottages and SE-05 Ben View). The applicant's assessment can be broadly agreed with although the effects on SE-02, SE-07, SE-10 and SE-11 are considered to have been under-assessed.

- 7.314 Achederson Farmhouse (SE-16) is an isolated dwelling to the southwest of Aultgowrie. The effects have been assessed as Major-Moderate adverse and Significant, however the OHL crosses the access to the property. The primary direction of view from is east towards the proposed development. Existing intervening woodland is thin in places and likely to be removed to create wayleaves thereby losing any filtering benefit. The extent of the proposed development is such at least 4no towers will be visible with the development approaching from the north, passing the property to the east and continuing to extend south of the property. As such it is considered that it should be Major adverse and Significant.

Effects on Recreational Receptors

- 7.315 The NC 500 is a nationally promoted tourist route. Despite directly crossing the NC 500 route to the east of Contin VP81 at quite an open and exposed location, the LVIA has assessed the effects as Minor Adverse (Not Significant). This appears to result from mis-identifying the NC 500 route as being between Muir of Ord and Alness going up the east coast only; and does not recognise or assess that the route returns from the west coast via the A835(T), A832 and A862. Whilst a promoted tourist route and therefore well used by tourists who are looking to appreciate the surrounding landscape, the A835 is also a busy 60mph trunk road. Effects should be considered similarly for the roads identified.
- 7.316 25 recreational routes have been identified in the visual assessment. Likely Significant effects have been identified at 14 (small sections), during both construction and operation. Of these paths, five would be located directly under the alignment route and six others would be located within 1 km of the closest tower. The applicant's assessment can be broadly agreed with.
- 7.317 Core Paths around Knockfarrel will have views of the OHL at a distance, however these views are high within the landscape with some skylining, and cross a large extent of the views north, northwest and southwest. While many of these paths will have views to the southwest screened by the landform, the summit will experience a near 270-degree panorama of the OHL. This includes cumulative views of Section D as the Section break lies to the east of Strathpeffer.
- 7.318 Eight outdoor locations have been identified in the visual assessment. Significant effects are identified for five locations, during both construction and operation. The OHL will be substantially obscured by trees from most VPs close to Fairburn GDL (84-86), but more problematic is the view from VPs 78-83 towards GDL which show the proposed development wrapping round back of it, including behind the widely visible Fairburn Tower (VPs 78-82). Fairburn Tower (OE-04) and Activity Centre (OE-03) indicate effects of Moderate Adverse level (Significant) due to partial screening by surrounding trees. Falls of Orrin (OE-02) fairly well screened by trees and topography so given Low/Moderate Adverse which is probably a precautionary assessment.

Effects on Transport Receptors

- 7.319 Ten key transport routes have been included in the visual assessment. Likely Significant effects are identified for sections of seven of these routes, during both

construction and operation. Five of these transport routes would be located directly under the alignment.

- 7.320 The A835T has expansive views across Strathconon with many towers showing in the open landscape then climbing up to the backdrop hills to its southwest (VPs 79-81). The LVIA correctly assesses High magnitude/ Major-Moderate Adverse and Significant effects within 400/500m. However, it is considered that an intermediate assessment of Medium sensitivity (or Moderate Significant effects) at 500m-2km depending on visibility would be appropriate (see VP84 at 1.7km and VP83 at 1.8km which some may consider Medium magnitude). The proposed development will be visible across a wider area between Achilty and near the A832 junction with large extents of the proposed development visible at distance in discrete sections filtered by tree cover and landform. Wider extents of the A835 towards Tore and Ullapool would be Negligible and Not Significant.
- 7.321 The LVIA misrepresents the extent of the A862 which suggests it lies between the A833 (Kiltarlity to Drumnadrochit road) junction and Inverness. The route actually connects Inverness, Beaully, Muir of Ord, Conon Bridge, Maryburgh, Dingwall and connects to the A9 at Ardullie. The ZTV indicates 35-51 Towers visible along part of the route between Muir of Ord and Conon Bridge (albeit at distance) with lower levels of visibility along the rest of the route within the study area. Overall, however it is considered that any effects would be Not Significant across the route.
- 7.322 Similarly, localised Significant adverse effects are predicted for several minor roads within the study area.

Visual Appraisal Conclusions on Section E

- 7.323 Overall, the routing of this Section has tried to minimise visual effects. However, given the nature of this Section being relatively populated and settled, Significant visual effects have been unavoidable. Significant adverse effects have been assessed from four settlements, 19 residential dwellings, seven transport routes, 14 recreational routes, and five outdoor locations.

Residential Visual Amenity Assessment (RVAA)

- 7.324 The Residential Visual Amenity Assessment (RVAA) has been undertaken broadly in accordance with the guidance provided in the Landscape Institute (LI) Technical Guidance Note (TGN) 2/19: Residential Visual Amenity Assessment (RVAA1). In this respect Residential Visual Amenity means:
- “the overall quality, experience and nature of views and outlook available to occupants of residential properties, including views from gardens and domestic curtilage” (LI TGN 2/19, Para. 1.2).
- 7.325 RVAA is a stage beyond the LVIA and focusses exclusively on private views and private visual amenity. A RVAA may be used by the decision maker when weighing potential effects and a judgement in relation to the Residential Visual Amenity Threshold in the planning balance. Volume 5: Appendix 7.11 - Residential Visual Amenity Assessment provides the assessment of effects upon the residential visual

amenity of people at residential properties within 225 m of the main alignment of the proposed development.

- 7.326 The RVAA assesses Significant visual effects at all 19 residential properties lying within 225m of the proposed alignment. The majority of are within route Sections A (seven properties) and E (six properties). However, the RVAA judgements conclude that the residential visual amenity threshold would not be exceeded in any of these.
- 7.327 The RVAA has been undertaken using an appropriate methodology and is reasonably well illustrated. The scope of the assessment and the majority of conclusions can be accepted. However, some inconsistencies are noted and it is considered that the residential visual amenity threshold would be exceeded in at least two properties.
- 7.328 Some of the detailed assessment of specific receptors in the RVAA has been reviewed and the following conclusions reached:
- That residents in all 19 of the properties would experience Significant adverse visual effects from one or more aspects/ areas of their dwelling;
 - That some inconsistencies/ errors in application of the RVAA assessment methodology exists and there is a difference in judgement with some of the assessments of magnitude and significance within the LVIA; and
 - Most of the properties would not experience effects that exceed the residential visual amenity threshold. However, it is considered that residents in at least two of the properties (Section A: SA-12 Keeper's Cottage, Ousdale and Section B SB-02 Killin near Loch Brora) would experience effects that exceed the threshold.

Routeing, Embedded Mitigation and Potential for Mitigation

- 7.329 The route selection process and criteria detailed in EIAR Chapter 4 has been reviewed although it is noted that no reference is made to this in the LVIA (Chapter 7). Chapter 4 details a thorough, multi-staged iterative process of selecting and assessing alternative route corridors, route options and alignments and summarises at a more strategic level the environmental and technical reasons for choosing the proposed alignment. While the broad reasons are stated, the site-specific reasons for any one part of the routeing decisions are not given in any detail.
- 7.330 It is recognised that the route alignment process is driven by the need to achieve a balance between environmental, technical and cost considerations throughout the route. This includes the risk of adverse landscape and visual effects, but it is understood that in some locations the choice of route is not necessarily driven primarily by landscape and visual considerations. Mitigation measures for the proposed development are however generic, dictated by the technical requirements and the linear nature of an OHL.
- 7.331 The potential for mitigating the effects of the proposed development through localised secondary measures, including minor route adjustments, landscape reinforcement and/or screening through tree planting are limited. In some cases, the measures may in themselves lead to secondary effects on other landscape and visual receptors. However, these too should be explored, should more wholesale realignments prove unfeasible. Potential design amendments on key affected route Sections are

highlighted in the Routeing and Design Evolution section of this Report, where there is a clear desire for the applicant to revisit the routeing or explain more clearly why the proposed development is preferred to the alternatives. These suggestions are made in the knowledge that there may be other compelling environmental or technical matters that may, in the mind of the decision maker, outweigh the landscape and visual effects. There is still an opportunity for this to be revisited and explained further in detail as part of the forthcoming PLI. Particularly where the route selection was made on a misapprehension as to level of impacts in certain locations, for example the absence of identity of impact on integrity of two SLAs, which would require reconsideration.

Conclusion on Landscape and Visual Effects

- 7.332 The LVIA broadly conforms with accepted current LVIA guidance and practice. Due to the length of the proposed development, the detailed assessment is divided into five route Sections. Both short term construction effects and long-term operational effects are assessed. The LVIA findings regarding the extent of Significant landscape and visual effects are broadly agreed. Nevertheless, several apparent errors and inconsistencies have been identified and there is disagreement on some of the findings, particularly in relation to effects on two local landscape designations and the basis of the cumulative assessment.
- 7.333 The proposed development would cause Significant adverse direct and indirect effects on landscape character during construction and in operation. Significant effects would primarily be to directly affect LCTs over an area within a few hundred metres of the proposed development and effects would be more limited in areas and LCTs only indirectly affected by views and visibility.
- 7.334 In relation to landscape impact, no national landscape designations, Wild Land Areas or World Heritage Sites are Significantly affected as a whole, and direct effects on these are largely avoided. However, there would be Significant direct and indirect effects on two local landscape designations. The LVIA assesses that some of the SLQs of The Flow Country and Berriedale Coast SLA and The Loch Fleet, Loch Brora and Glen Loth SLA would be Significantly affected. It is considered that further SLQs would be Significantly affected and that, at least in the case of the second SLA, Officers firmly conclude the effects would be numerous and extensive enough to compromise the integrity of the designation.
- 7.335 There would be many adverse visual effects during construction and operation. Affected receptors would include individual dwellings, settlements, roads, railway, recreational routes, viewpoints and visitor attractions. Most Significant effects would be on receptors lying within around 1km, potentially up to, or in excess of 2km for some sensitive receptors. Effects on linear receptors such as roads and paths may be extensive, but most Significant effects would be limited to sections of the routes within a few hundred metres of the alignment. There is agreement with most of the Significant effects on visual receptors lying within proximity of the alignment and Not Significant effects on receptors that are distant from it. However, on balance more Significant visual effects in intermediate situations are considered to occur. In some locations some receptors do not appear to have been included in the assessment.
- 7.336 Large scale energy transmission schemes would be expected to result in Significant visual effects; however, such effects do not automatically translate to unacceptable

effects. This is a matter of planning judgement when considering the merits of any given scheme.

- 7.337 There are many related or similar existing and proposed developments in the study area. The proposed development would therefore contribute to cumulative landscape and visual effects and the LVIA assesses several Significant effects for each route Section. The most likely effects of each Section would be with the adjacent proposed route Sections and the proposed substations that would be constructed only because of the proposed development. Other effects would be with electricity transmission and generation developments including other OHLs, wind farms and BESS. The LVIA cumulative assessment is considered to be relatively limited in its scope and that the cumulative effects that receptors would be most likely to notice would be with existing nearby infrastructure including OHLs, wind farms and substations.
- 7.338 There are potential ways of mitigating some of the more severe or extensive adverse landscape and visual effects. This includes avoiding effects on landscape designations and landscape character by reconsidering some of the main routing choices as well as more localised secondary landscape measures which may address more localised effects on individual visual receptors.
- 7.339 It is concluded that, given the nature, scale and length of the proposed development and the nature of the receiving landscape and visual environment, many short and long term Significant adverse landscape, visual and cumulative effects are inevitable, some of which, including effects on SLAs and residential amenity, are Significant enough for the Council's holding objection to the proposed development to be maintained. Potential large scale and generic localised mitigation measures as outlined above have been suggested and could address some of the most severe effects, however, the scope for these may be limited by the many other environmental, technical and economic constraints that have informed the routing.

Built and Cultural Heritage

- 7.340 The proposed development has the potential to impact, both directly through the groundworks required in association with the construction of the OHL and associated public road works to accommodate this, and upon the setting of built and cultural heritage assets. The EIAR identifies the below assets within Chapter 12.6 with clarifications provided and designation references provided as footnotes to go towards explanation of any apparent discrepancies.

Section A

- 7.341 Within the proposed development there are two scheduled monuments.

Within 10km there are:

- 226 scheduled monuments;
- 10 Category A listed buildings;
- One garden and designed landscape; and
- One conservation area.

Within 5km there are:

- 54 Category B listed buildings; and

- 42 Category C listed buildings.

Within the proposed development there are 411 non-designated assets. Within 1km there are 645 non-designated assets.

Assets located within the proposed development, which are potentially susceptible to direct impact comprise:

- Five scheduled monuments; and
- 411 non-designated assets.

Assets assessed to be associated with the proposed development, which are potentially susceptible to impact as a result of changes in setting, comprise:

- 94 scheduled monuments;
- Six Category A listed building;
- Three Category B listed buildings;
- One Category C listed building;
- One garden and designed landscape; and
- Two asset groupings of significant non-designated assets.

Section B

7.342 Within the proposed development there are no designated assets.

Within 10km there are:

- 51 scheduled monuments;
- 15 Category A listed buildings; and
- One Garden and Designed Landscape.

Within 5km of the proposed development there are:

- 84 Category B listed buildings; and
- 36 Category C listed buildings.

Within the proposed development there are 191 non-designated assets. Within 1km there are 358 non-designated assets.

Assets located within the proposed development, which are potentially susceptible to direct impact comprise:

- One scheduled monument; and
- 191 non-designated assets.

Assets assessed to be associated with the proposed development, which are potentially susceptible to impact as a result of changes in setting, comprise:

- 23 scheduled monuments;
- Two Category B listed buildings; and
- One asset grouping of significant non-designated assets.

Section C

7.343 Within the proposed development there are:

- Three scheduled monuments;
- One Category B listed building; and

- One registered battlefield.

Within 10km there are:

- 41 scheduled monuments; and
- 2 Category A listed buildings.

Within 5km there are:

- 23 Category B listed buildings; and
- 22 Category C listed buildings.

Within the proposed development there are 56 non-designated assets. Within 1km there are 362 non-designated assets.

Assets located within the proposed development, which are potentially susceptible to direct impact comprise:

- Three scheduled monuments;
- One registered battlefield; and
- 56 non-designated assets.

Assets assessed to be associated with the proposed development, which are potentially susceptible to impact as a result of changes in setting, comprise:

- Five scheduled monuments;
- One registered battlefield.
- One Category A listed building;
- Two Category B listed buildings; and
- One Category C listed building.

Section D

7.344 Within the proposed development there are:

- One scheduled monument;
- One Category B listed building;
- Four Category C listed buildings; and
- Two garden and designed landscapes.

Within 10km there are:

- 80 scheduled monuments;
- 37 Category A listed buildings;
- Two garden and designed landscapes; and
- Three conservation areas.

Within 5km there are:

- 154 Category B listed buildings; and
- 159 Category C listed buildings.

Within the proposed development there are 172 non-designated assets. Within 1km there are 519 non-designated assets.

Assets located within the proposed development, which are potentially susceptible to direct impact comprise:

- One scheduled monuments;

- One Category B listed building;
- Two garden and designed landscapes; and
- 172 non-designated assets

Assets assessed to be associated with the proposed development, which are potentially susceptible to impact as a result of changes in setting, comprise:

- 10 scheduled monuments;
- One Category A listed building;
- Two Category B listed buildings;
- Three Category C listed buildings;
- Two garden and designed landscapes; and
- One asset grouping of significant non-designated assets.

Section E

7.345 Within the proposed development there are:

- One conservation area;
- Two category B listed buildings; and
- One garden and designed landscape.

Within 10km there are:

- 63 scheduled monuments;
- 12 Category A listed buildings;
- Five garden and designed landscapes; and
- One conservation area.

Within 5km there are:

- 122 Category B listed buildings; and
- 64 Category C listed buildings.

Within the proposed development there are 198 non-designated assets. Within 1km there are 771 non-designated assets.

Assets located within the proposed development, which are potentially susceptible to direct impact comprise:

- Three Category B listed buildings;
- One garden and designed landscape; and
- 199 non-designated assets.

Assets assessed to be associated with the proposed development, which are potentially susceptible to impact as a result of changes in setting, comprise:

- 16 scheduled monuments;
- Two Category A listed buildings;
- Six garden and designed landscapes; and
- One significant non-designated asset.

7.346 Historic assets scoped out of having potential setting impacts are outlined in EIAR Volume 5, Appendix 12.1: Scope and Method of Assessment, section 1.5.5-8. Following consultation with HES and the sieving exercise, it was agreed to scope out setting assessment for the below assets, since they are unlikely to experience

significant effects. Some have been included in Volume 5, Appendix 12.6: Setting Assessment Tables, due to the potential for non-significant impacts:

- Achingale Mill (LB14976);
- Dunbeath Castle (LB7936);
- Dunbeath Castle Inventory Garden and Designed Landscape (GDL00150);
- Helmsdale Bridge (LB7193);
- Loth Parish Church (LB7149);
- Foulis Castle (LB7911);
- Tulloch Castle, Caisteal Gorach (LB24520);
- Castle Leod (LB7826);
- Novar (GDL00303);
- Castle Leod (GDL00094); and
- Contin Bridge over River Black Water (LB1789).

7.347 There is enough information within the EIAR to understand that the proposed development will have a significant adverse impact on the integrity of the settings of at least 46 designated assets. The information provided in the EIAR is however insufficient to determine the full extent of the potential impacts on a number of designated assets.

7.348 Historic Environment Scotland (HES) and the Council's Historic Environment Team (HET) (Archaeology and Conservation) both object to the proposed development based on the significant adverse impact on the setting of designated historic assets, and the direct and potentially harmful impacts on assets which cannot be fully understood with the information provided within the EIAR. Based on the information provided, the proposed development is considered to be contrary to NPF Policy 7, Parts c), h) ii and i). The proposed development does not align with Policies HEP1, HEP2 and HEP4 of the Historic Environment Policy for Scotland. The proposed development also fails to comply with HwLDP Policy 57.

Scheduled Ancient Monuments

7.349 The proposed development has the potential to impact around 10% of Scotland's scheduled monuments, a total of in the region of 800. HES have identified that development will have significant adverse impact on the integrity of the setting of 28 Scheduled Monuments. The impacts on these scheduled monuments raise issues in the national interest for HES in their advisory role.

7.350 The Scheduled Ancient Monuments are as follows:

1. Achkinloch, stone setting SW of, Loch Stemster (SM420)
2. Achkinloch chambered cairn 755m SW of, Loch Stemster (SM419)
3. Buolacrabher, chambered cairn 1350m SSW of (SM5224)
4. Buolacrabher, chambered cairn 1550m S of (SM445)
5. Buolacrabher, Settlement 1170m S of (SM6014)
6. Cairn Liath, long cairn and round cairn (SM438)
7. Loedebest, cairn 500m SSE of (SM5191)
8. Loedebest, chambered cairn 400m WNW of (SM5163)
9. Loedebest, settlement (5152)
10. Achorn Bridge, settlements 1100m NNE of (SM5150)

11. Balcraggie Lodge, settlement 700m N of (SM5230)
12. Achorn, broch 200m NW of (SM511)
13. Achorn Bridge, prehistoric and post medieval settlement 400m ENE of (SM512)
14. Upper Borgue, broch (SM596)
15. Upper Borgue, standing stone 410m SSE of (SM502)
16. Clais-Cairn, chambered cairn 550m SW of (SM424)
17. Rinsary, homestead 500m WNW of, Berriedale (SM3473)
18. Cnoc Bad Asgaraidh, chambered cairn 570m E of, Langwell (SM423)
19. Tural Rock, hut circle complex 250m NW of Langwell Tulloch broch (SM13631)
20. Langwell Tulloch, broch 400m SE of Tural Rock (SM3441)
21. Caen, long cairn 460m NNW of (SM1771)
22. Caen, long cairn and round cairn 470m and 490m W of (SM1770)
23. Caen, long cairn 530m NW of, Helmsdale (SM432)
24. East Kinnauld School, broch NE of (SM1862)
25. East Kinnauld, fort 1000m NE of Eiden (SM1861)
26. Balnacrae, chambered cairn 230m WSW of (SM2396)
27. Dun Garbhlaich, fort, Kilmorack (SM2422)
28. Dun Mor, fort (SM4979)

7.351 A detailed assessment on the significance and setting of each asset listed above as well as HES's assessment in the impacts of the proposed development on each asset is set out in their consultation response. They conclude for these assets "The impact of the proposal changes key factors of setting to the extent that the understanding, appreciation and experience of the monument are not retained intact and there is a significant adverse impact on the integrity of the setting of the monument. The impact on this monument is such that HES object to the scheme in its current form and alignment."

7.352 Additional Information in the form of Further Visual Material and Photomontages was provided in March 2026 for 24 Scheduled Ancient Monuments. In light of the additional information, HES removed objections in relation to the following assets for which further information is provided below:

- Buolacrabher, chambered cairn 1350m SSW of (SM5224);
- Clais-Cairn, chambered cairn 550m SW of (SM424); and
- Dun Mor, fort (SM4979).

HES maintain its objection to the remaining 25 scheduled monuments. It has provided additional comments on seven of those based on the visualisations provided, which are available to view on the ECU online casefile.

Inventory Gardens and Designed Landscapes

7.353 **Fairburn GDL:** Direct impacts on Fairburn GDL would result from both Towers S182 to S186 being erected within the boundary of GDL, and the felling of woodland for the operational corridor of the OHL. There would also be management felling and new and upgraded access tracks. The assessment in EIAR Chapter 12 at 12.4.4 and 12.7.32 states that this would be a small degree of physical impact resulting in a Major effect on the GDL. It is not possible to understand this impact and resulting conclusion from the limited information provided in the EIAR. It is also unclear why footnote 29 states that this Major effect should be considered as not significant. If the effect is not

significant this should be reflected in the assessment itself and its conclusion whereas a Major effect should be significant according to the methodology in EIAR Appendix 12-1. The lack of substantive narrative and information for this assessment further adds to the uncertainty of the current assessment for this asset. Based on the current information, there may be significant direct impacts on the GDL, however, it is possible that this impact would not raise issues of national interest. The Council's Historic Environment Team (HET) consider that any impacts would be significantly adverse.

- 7.354 HES agree with the assessment in the EIAR that the proposed development would have a Minor effect on the setting of Fairburn GDL, which is noted as not significant in EIA terms. According to the EIAR any impact to the setting of the GDL and wider scenic views would arise from the introduction of OHL towers into wider landscape views from north of the River Conan valley. The proposed development, whilst not directly obscuring the GDL, would backdrop the policy, cutting across the wooded uplands to the south-west of the policy. These views already contain electrical infrastructure in the form of OHL towers, cutting across the GDL on a north-west to south-east alignment as well as wind turbines atop Bein an Rubha Riabhaich.
- 7.355 While there is insufficient information to fully assess the direct impact of the construction of towers, woodland removal and alteration of access roads, it is considered likely by HET that these would be significant. HET consider that the effects on the setting of the GDL have been understated or misrepresented through the omission of supporting information to allow this to be fully assessed.
- 7.356 SEI was prepared by the applicant on the Direct Effects on Fairburn Garden and Designed Landscape Heritage Assessment. It summarises that a review of the EIAR confirms that direct impacts on designated heritage assets have been largely avoided through refinement of the project design and the application of embedded mitigation. In reference to Fairburn GDL, a medium magnitude of direct impact is anticipated for the GDL, within the western plantation woodland (between Towers S182-S186), due to tower construction, management felling (OC) and access track works. This reflects the compound nature of impacts to the asset's Scenic, and to a lesser degree Archaeological and Nature Conservation interests. Given the diverse nature of the contributing interests to cultural significance, and the nature of impact from the proposed development, the resulting magnitude of impact assessment only marginally concluded that the combined direct impact was to be considered medium, rather than low.
- 7.357 The applicant concludes that the proposed development has been designed to avoid or minimise direct interaction with designated heritage assets wherever practicable, consistent with Historic Environment Policy for Scotland (HEPS). Embedded mitigation and ongoing consultation with HES will ensure that any further direct impacts to cultural heritage are appropriately managed through the detailed design and construction phases.
- 7.358 HES note that the direct impacts are in the western woodland areas of the Inventory site which are composed of commercial conifer plantation and are less sensitive to change. The route of the OHL has deliberately avoided interacting with the most significant sections of the GDL as advised by HES. Where the access tracks would

interact with the 'Woodland Garden' area of the GDL the applicant will adopt appropriate mitigation measures and consult with HES, which is welcome.

- 7.359 HET are not in agreement with HES on this matter. The GDL comprises more than the designed landscape itself. Fairburn House and Fairburn Tower are both integral elements of the designed landscape and are also listed buildings in their own right. Accordingly, consideration needs to be given not only to the setting and significance of the GDL as a whole, but also to the individual settings and significance of those listed buildings and their relationship with the designed landscape. HET is of the view that those matters have not been properly assessed. In its view, the proposed installation of five 60m towers would have an adverse impact upon elements within the GDL and upon the appreciation of the designed landscape and its associated architectural features. This is compounded by the proposed removal of approximately 14ha of woodland, which is itself clearly identified as an important component of the GDL and its overall setting. These effects have not been adequately considered in accordance with HES guidance, *Managing Change in the Historic Environment: Setting*. As a consequence, HET advise the assessment has not properly identified the nature or extent of the likely effects upon the GDL, Fairburn House or Fairburn Tower, and no meaningful mitigation has been developed in response to those effects.
- 7.360 **Ardross Castle:** The EIAR states that any impact to the setting of the GDL would arise from the introduction of OHL towers into the wider landscape from the GDL and into scenic views facing west along the River Alness valley. A negligible impact to the setting and scenic value of the GDL is predicted. The remaining historic, archaeological architectural, artistic, horticultural and conservation values that contribute to the cultural significance of the GDL would be unaffected. A Negligible impact to setting and scenic value would result in a Negligible adverse effect to cultural significance. (EIAR Appendix 12-6, p.134). HES agree with this assessment. The impact on the setting of Ardross Castle GDL is considered to be minor rather than negligible, but would remain non significant.
- 7.361 **Castle Leod:** The EIAR states that any impact to the setting of the GDL would arise from the introduction of OHL towers into wider landscape views when viewed from the uplands south of the GDL, namely from the key scenic viewpoint of Knockfarrel. The proposed development, whilst not directly obscuring the GDL, would backdrop the estate, cutting across the wooded uplands of Craeg Ulladail, the valley of the Peffery Burn and the uplands of Druim a Chuilein. It would erode the landscape relationship with the Peffery Burn valley, erode the scenic value of the GDL, bringing infrastructure into a landscape largely free of infrastructure and eroding the distinctive contrast between the wooded GDL and upland moor and plantation that backdrops the River Peffery valley to the north. A Low impact to the setting and scenic value of the GDL is predicted, having a slight adverse impact to the ability to appreciate and experience the asset. The remaining historic, architectural, artistic, horticultural and conservation values that contribute to the cultural significance of the GDL would be unaffected. A Low impact to setting and scenic value would result in a Minor adverse effect to cultural significance, which is not significant in EIA terms. (Appendix 2-6, Page 156). While not visible from within the Castle Leod GDL, the OHL would be visible in the important view towards the GDL from the Knockfarrel Viewpoint.
- 7.362 **The Spa Gardens, Strathpeffer:** The EIAR concludes that there would be a Minor effect on the setting of the GDL. The GDL comprises an unusual example of pleasure

grounds laid out as part of a 19th century health resort. Views out from the gardens extend into the town. The gardens are an important component of the Strathpeffer townscape. Given the position of the GDL within the town and intervening landforms it is agreed that any effects will be minor.

Listed Buildings

7.363 The EIAR assess the effects on listed buildings as collated in the table below:

Asset Type	Impact	Major	Moderate	Minor	Negligible	No Effect
Cat A	Direct					
	Setting			3	7	
Cat B	Direct					6
	Setting		1	4	7	2
Cat C	Direct					6
	Setting				4	1
Total	Direct					12
	Setting		1	7	18	3

These figures have been collated from EIAR Table 12.2: Summary of Effects (Section A), Table 12.3: Summary of Effects (Section B), Table 12.4: Summary of Effects (Section C), Table 12.5: Summary of Effects (Section D) and Table 12.6: Summary of Effects (Section E).

7.364 HES generally agree with the assessments set out in the EIAR for the Category A listed Ardross Castle, Coul House and Fairburn Tower where minor effects have been concluded. Concerns have been raised regarding the potential cumulative effects on Ardross Castle with the proposed Ceislein Wind Farm, however, no specific assessment on the level of cumulative impact can be made by HES at this time.

7.365 Although underplaying some instances of impact on setting within the EIAR, HET consider that the proposed development will have major impacts on at least 6 Listed Buildings. Having reviewed the EIAR mapping, Cultural Heritage Viewpoints, and correlating them with heritage assets, HET consider there appears to be gaps in the evaluation of setting for 17 listed heritage assets, for which there will be a direct and high impact. Although in EIAR Section 12.4.3 it is noted that “Direct impact to designated heritage assets has been scoped out”, HET state it is clear that there are impacts on the settings of some designated heritage assets that should have been included in the assessment and mitigation process.

7.366 The following assets are considered likely to experience the most significant effects:

- LB1769 – Coul House (Category A);

- LB7165 – Carbisdale Castle (Category B);
- LB14031 – Fairburn House (Category B);
- LB14030 – Fairburn Tower (Category A) - In particular, there is potential for views of the proposed OHL towers through the GDL from a number of viewpoints identified within the designation/listing information;
- LB7021 – Morvich Lodge, Strath Fleet (Category B);
- LB267 – Invershin Farm and Salmon Station (Category B);
- LB279 – Shin Viaduct over the Kyle of Sutherland (Category A);
- LB14032 – Aultgowrie Lodge (Category B); and
- LB14020 – Orrin Bridge at Aultgowrie Lodge (Category B).

It should be noted that LB267, Invershin Farm and Salmon Station, does not appear to have been included in the assessment table.

- 7.367 To properly understand the likely effects on the settings of these listed buildings, HET stated it would be helpful to have visualisations from appropriately selected strategic viewpoints to show potential impacts on the setting of the Listed Building's in accordance with HES guidelines on Managing Change: Setting. This should include both views to the Listed Building's and views from the Listed Building's would help to determine whether there is the potential for mitigation based on the scale of the tower and its proximity to the Listed Building. HET has been engaging further with the applicant on this matter ahead of the scheduled PLI.

Conservation Areas

- 7.368 As set out in the EIAR and following the HES sieving exercise and field setting assessment, it was concluded that it was appropriate to scope out further setting assessment for the following four conservation areas present within the baseline, as the potential for impact as a result of the proposed development was assessed as 'No Impact'. This is agreed given the screened townscape setting and lack of visibility and external view contributing to their heritage significance:
- Beaully Village Square (CA102);
 - Dingwall (CA107);
 - Strathpeffer (CA123); and
 - Lybster (CA114).

Inventory Historic Battlefields

- 7.369 The routing of the proposed development around the northern and western edges of the Carbisdale battlefield would not have a physical impact on the archaeological remains as it would run outwith the Inventory boundary of the battlefield.
- 7.370 Viewed from the east (Volume 5 - Appendix 12-8-1 CHVP-42-BTL19, Volume 5 - Appendix 12-8-1 - CHVP-43-BTL19), the proposal presents as a line of pylons running along the high ground approximately along the north and west designation boundary of the battlefield. It crosses the Carbisdale burn and, at the NW corner of the boundary,

it oversails the designated area between pylons. It passes behind Craigcaoinichean, dropping briefly out of sight of the floodplain.

- 7.371 The proposed OHL would present a horizontal frame to views to and across the battlefield from the south and the east as shown in the visualisations provided (Volume 5 - Appendix 12-8-1 CHVP-42-BTL19, Volume 5 - Appendix 12-8-1 - CHVP-43-BTL19). This has the potential to be distracting and could arguably change the sense of place that is part of the experience of visiting the battlefield as a place of commemoration. As advised by HET, this does result in an adverse impact on the battlefield. Visualisations have not been supplied from the floodplain; potentially less of each pylon on the west ridgeline would be visible as they are footed westwards of the break of slope, but this has not been evidenced. However, although there would be a visual impact, efforts have been made to ensure that pylons have not been sited within the battlefield, and that key views are not interrupted. On balance the development proposals protect the cultural significance of the battlefield in line with NPF4 Policy 7 j).
- 7.372 In summary, HES object to the proposals owing to the significant adverse impact on the integrity of the setting of 25 Scheduled Monuments. The Council's HET also raise concern, notably owing to disputed impacts on the Fairbairn GDL and lack of mitigation, as well as due to potential significant adverse setting impacts for at least 6 Listed Buildings, with a further 17 requiring further assessment albeit this is the subject of recent dialogue with the applicant. While the number of unresolved built and cultural heritage constraints appears lengthy, this is a reflection of the scale and distance of the proposed development, traversing a region rich in-built heritage. Given the importance of these assets, and relative weight that must be attributed to them in the decision-making process, it is recommended that the Council raise an objection to the development on these grounds.

Any Other Material Considerations

Agriculture

- 7.373 The application is not supported by a specific assessment of the potential effects of the proposed development on agricultural land use. The proposed overhead line (OHL) crosses an area of Class 3.1 land to the east of Contin which is classified as prime agricultural land as well as Class 3.2 land at Loch Brora and at Rogart. While this section of the route is relatively limited in extent, and the permanent land-take associated with the development is modest, there remains potential for impacts on agricultural operations. In particular, consideration should be given to the interaction between the OHL and modern agricultural practices, including the use of vehicles and spray systems. The presence of overhead infrastructure has the potential to introduce operational constraints and safety risks, including an increased risk of electrocution where large-scale agricultural machinery is used in proximity to the line. The Council does not possess specific expertise in this area, and as such, it is not considered appropriate to rely on this as a reason for objection. However, third-party respondents have already raised concerns regarding agricultural impacts with the DPEA, ensuring that this matter will be considered by Scottish Ministers.

Aviation

- 7.374 The proposed project falls within the safeguarding Low Flying Tactical Training area. In the interest of aviation safety, a condition is required to receive finalised details of the precise locations and heights of all substantive, above ground construction and permanent plant equipment / infrastructure, construction timescales, and any aviation warning lighting details. Note that no OHL operational visible aviation lighting will be required.

Decommissioning

- 7.375 The applicant is seeking consent in perpetuity for the development. The EIAR states that the effects associated with the construction phase can be considered to be representative of worst-case decommissioning effects, and so a separate assessment of decommissioning has not been carried out. Compliance with best practice processes and methods at that time could be required through a Decommissioning Environmental Management Plan which can be secured by condition.

Monitoring

- 7.376 Given the complexity of major developments, and to assist in discharge of conditions, the Planning Authority usually seeks that the developer employs a Planning Monitoring Officer (PMO). The role of the PMO, amongst other things, would include the monitoring of, and enforcement of compliance with, all conditions, agreements and obligations related to this consent (or any superseding or related permissions) and shall include the provision of a bi-monthly compliance report to the Planning Authority.

Tourism and Recreation

- 7.377 The EIAR considers effects arising for recreation and tourism receptors, including recreational and tourist facilities, public access, tourist events and accommodation. The proposed development includes several embedded mitigation measures. These measures form part of the proposal and have been taken into account in the assessment of effects. They include:
- An Outdoor Access Management Plan (OAMP) to maintain safe access to Core Paths and recreational routes during construction;
 - Outline Construction Environmental Management Plan (OCEMP) includes the need for public notices to be issued before construction works commence to inform recreational users of dates and durations of the works;
 - Outline Construction Traffic Management Plan (OCTMP) to manage traffic effects and maintain access to recreational and tourism receptors; and
 - Construction Noise Management Plan (CNMP) to reduce noise impacts, following an agree Construction Method Statement.
- 7.378 During the construction phase, there may be increased demand for tourist accommodation from the temporary construction workforce. Although up to 1,000 workers could be required on site at peak construction time, not all will require accommodation as some may be locally based. Demand for local accommodation is expected to be greatest during the early construction phases, with much of the peak workforce noted within the EIAR to be accommodated in dedicated worker villages,

reducing pressure on tourist accommodation providers. Nevertheless, there are concerns regarding this assumption, as no planning permissions have been granted for the proposed worker accommodation villages at this stage. As such, reliance on these facilities to mitigate demand for local tourist accommodation is considered premature, and there remains potential for greater pressure on existing accommodation. It is agreed that the demand for temporary worker accommodation would reduce significantly over the lifecycle of the proposal and is unlikely to adversely affect the availability of tourist accommodation, as accommodation requirements during operation would be limited largely to periodic maintenance activities.

- 7.379 The NC500 passes through sections A and B, and lies adjacently to sections C, D and E. The popular tourist route has the potential to experience temporary effects during construction, including traffic disruption, changes to road safety, and reduced amenity for cyclists and other non-motorised users because of increased construction traffic. The EIAR concludes that the temporary increase in construction traffic would result in negligible to minor effects on vehicle delays and road safety, which are not considered significant. While increased traffic may adversely affect the amenity of non-motorised users along sections of the NC500, including the A9 at Achavanich, Helmsdale, Brora and Golspie, the mitigation measures set out in the Outline CTMP are expected to reduce these impacts such that no significant residual effects would remain. Consequently, the overall effect on the NC500 is assessed as minor adverse and not significant.
- 7.380 In relation to temporary or permanent changes in the availability, accessibility and amenity of tourism and recreation assets, the EIAR identifies that the proposal crosses or passes close to a number of Core Paths and recreational routes. Across sections A to D, temporary disruption may occur during construction as a result of path closures, construction activities, tree felling and the use of sections of the Core Path network as construction access routes. However, mitigation measures set out in the draft Outdoor Access Management Plan (OAMP), together with the availability of alternative routes and potential long-term path improvements, are expected to minimise impacts. While temporary visual effects and disruption may reduce the attractiveness of some tourism and recreation assets, particularly around Dunbeath, Brora, Golspie and Culrain, these effects are anticipated to be minor adverse effect that is not significant.
- 7.381 In Section E, temporary disruption to recreational users may similarly occur during construction. Although mitigation measures and path improvements are expected to reduce impacts, significant adverse visual effects and disruption to popular walking routes around Strathpeffer and Contin could reduce the attractiveness of the area and certain tourism and recreation receptors. Consequently, the effect within the Strathpeffer and Contin area is assessed as moderate adverse and significant during construction. Mitigation including measures to be set out in an agreed construction method statement, and continued engagement with relevant stakeholders, would reduce the magnitude of the impact, resulting in a minor adverse effect that is not significant.
- 7.382 The OHL also intersects The Flow Country WHS at Achavanich and Helmsdale (Section A). While localised effects on the amenity of visitors to the WHS as a result of construction activity, landscape change and noise, the EIAR notes that the areas affected are small when compared to the wider designation size and currently provide very limited tourism infrastructure. Given the scale of the impact and the small

proportion of the WHS affected, while there is the potential for a direct impact on the WHS, for effects on amenity for visitors to the WHS, the EIAR assess this to have a negligible effect that is not significant.

- 7.383 The Strathpuffer mountain bike event, held annually in Contin Forest, utilises Core Path RC10.07 (Kinellan Link Path), which is crossed by the proposal. Tower S163 would be located approximately 30m from the path, and sections of RC10.07 are proposed for temporary use as construction access routes, with associated tree felling also having the potential to affect the route. While construction activity could result in some disruption to the event, the draft OAMP includes measures to manage interactions with access routes, and ongoing engagement with event organisers is proposed to minimise impacts. The EIAR concludes that, given the event's medium sensitivity and the ability to manage construction activities around event timings, the effect would be minor adverse and not significant.
- 7.384 The Council's Access Officer has concerns, advising that the OHL route will cause significant disruption and disturbance to numerous access path and tracks, including seventy-eight Core Paths used by the public, affecting the enjoyment of many of these routes for a considerable period of time. The submitted OAMP fails to recognise the significance of the statutory Core Path designations and the Access Officer argues that no Core Path should be obstructed, access deterred or restricted during the construction period unless agreed with the Council and may require an Access Exemption Order under section 11 of the Land Reform (Scotland) Act 2003. It is not expected that the development will remove any wider access route but the development, where it does intersect with these routes should provide alternative provision. Additional unlocked side gates, including sufficient level surfaced ground for passage, on all new or replaced access control infrastructure for existing and proposed permanent access tracks is required. The Access Officer has provided a detailed schedule outlining affected Core Paths, public Rights of Way and wider network routes, and a condition is requested for a revised Outdoor Access Management Plan (AMP) to safeguard public access rights.
- 7.385 The assessment of cumulative effects has considered other SSEN Transmission projects, including substations, as well as relevant third-party developments. Potential cumulative effects relating to tourist accommodation have been identified, particularly in the event of overlapping construction programmes increasing demand for accommodation. However, the applicant's mitigation solution aiming to accommodate most of the construction workforce for the proposal and interrelated projects within camp style workforce accommodation is assessed to reduce the demand and supply usage on tourist accommodation. As stated, before however planning permission has not been granted for any of these accommodation camps along the alignment. In general, all associated developments are expected to implement similar mitigation measures, including maintaining access and managing traffic, and therefore would not give rise to significant in-combination effects on recreation and tourism receptors. The EIAR identifies potential cumulative effects on tourism and recreation receptors, including Core Paths, arising from the proposal in combination with other developments. While direct impacts on the Core Path network in the study area are expected to be limited from other developments, there is potential for cumulative visual and noise effects to reduce amenity for recreational users.

- 7.386 The assessment demonstrates that the proposal would not result in widespread or long-term significant effects on recreation and tourism. The majority of effects, both during construction and operation, are assessed as Minor adverse and therefore not significant. Following mitigation, the EIAR concludes that there would not be any significant adverse residual effects on tourism and recreation during construction or operation.
- 7.387 In general, the reported recreation and tourism impacts are not contested, however, this assessment is presumably in part based on the findings of the applicant's LVIA with which there is disagreement with many of the reported level of effects for receptors, several of which are frequented by tourists or visitors to the area. These routes and locations are not used exclusively by visitors but are important recreational assets enjoyed by residents and visitors alike and are actively promoted as public recreational spaces. Accordingly, these impacts have been captured within the Landscape and Visual section of this report.

Non-Material Considerations

- 7.388 Non-material considerations raised within the representations include concerns regarding alleged profiteering, the perceived lack of need for the development, and assertions relating to an oversupply of renewable energy generation in the north of Scotland, as well as energy pricing and constraint payments. These matters fall outwith the scope of material planning considerations and therefore are not relevant to the determination of this application.
- 7.389 In this regard, it is noted that the Scottish Government has declared a climate and nature emergency, and there is a recognised urgent need to reduce greenhouse gas emissions. Transmission infrastructure required to support the transition to a low-carbon energy system is identified as a national development and is therefore supported in principle.
- 7.390 Similarly, while community benefit is acknowledged as having the potential to assist in delivering a just transition to net zero, such arrangements are voluntary and do not constitute a material planning consideration, as previously outlined in the socio-economic section of this report.
- 7.391 Impacts on property values are also not material planning considerations, as these relate to private interests rather than the public interest. Furthermore, planning decisions should not be influenced by emotive arguments relating to cultural identity where these are not grounded in material planning impacts. Any generalised distrust of government or developers within the energy sector is likewise not material, and neither the identity of the applicant nor their track record constitutes a relevant planning consideration in the assessment of this proposal.

8. Matters to be Secured by Legal Agreement

- 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 Minister (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 Memorandum of Understanding with the

Council, additional off-site compensatory planting / biodiversity enhancement 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.
- 8.3 Given the concerns expressed with the applicant's Transport Assessment and inability to assess the totality of the whole project's impact on the Council's road and path network, the Council may through the course of PLI proceedings suggest the applicant enter into a legal agreement as a mechanism to deliver transport infrastructure to enable the project's delivery, should this not be achieved through the implementation of a package of Public Road Improvement works, the scope of which has not been agreed and should also cover active travel and wider access works.
- 8.4 Owing to the extent of significant landscape and visual impacts associated with this project, with several towers being dominant in views, a condition or legal agreement should also be imposed to secure a substantial element of public art; the scope of which has not been agreed to date but could portray the history and character of energy's influence on this part of Highland.

9. CONCLUSION

- 9.1 The proposed Spittal to Beaully 400kV Overhead Line represents infrastructure of national significance and is identified as a National Development within National Planning Framework 4 (NPF4) carrying substantial weight in view of its role supporting the reinforcement of the electricity transmission network and supporting Scotland's transition to a net zero economy. The EIAR demonstrates clear and substantive benefits in terms of enabling renewable energy generation, strengthening grid capacity and delivering socio-economic benefit at regional and national levels. In principle, the development aligns with the strategic objectives of NPF4 and is supported by Development Plan policy provided its environmental effects are satisfactorily mitigated.
- 9.2 Although the overriding need for the development is understood and receives strong policy support, when considered in the round, the proposed development would give rise to a number of significant adverse effects that have not been satisfactorily addressed or mitigated with insufficient regard having been had to certain key cultural heritage and other attractions in Highland.
- 9.3 The construction traffic impacts of the development also remain unclear with the design not having been sufficiently advanced to assess and mitigate the impacts of the whole project. Transport impacts are insufficiently assessed with fundamental uncertainties regarding traffic generation, route capacity, road condition, and cumulative impacts. The absence of robust evidence prevents confidence that the public road network can safely accommodate construction traffic without unacceptable disruption to other users. Leaving such matters to

conditions to be resolved at a later point without a supportable strategy or attempt to resolve the Council's concerns is of fundamental concern. It is however appreciated that further information on these aspects is anticipated to be provided as part of the PLI for the Scottish Government's appointed Reporters to consider further, and the Council will continue to work collaboratively with the applicant to help progress this project whilst securing appropriate mitigation for all users of the transport network.

- 9.4 There will be significant adverse effects to the setting of 25 Scheduled Ancient Monuments; potentially up to 17 Listed Buildings; and adverse impacts directly, and to the setting of, Fairburn Garden and Designed Landscape are predicted. The exceptional significance of the heritage assets, and the introduction of prominent electrical infrastructure within the setting of these assets, is of major concern.
- 9.5 Elsewhere, the applicant has taken steps to reduce landscape and visual effects through the scheme's design and routing. However, significant adverse impacts remain. Owing to the scale of the project such significant effects would cause significant adverse direct and indirect effects on multiple Landscape Character Types, as well as numerous residential, recreational, and transport receptor groups. This includes two properties that would experience effects that exceed the residential amenity threshold. In the majority of cases, it is accepted that the predicted effects have been mitigated so far as possible, and certain significant adverse effects can be accommodated and are expected owing to the magnitude of the infrastructure proposed. The severity of some of the impacts however remains of significant concern.
- 9.6 There will be significant direct and indirect effects on two local landscape designations. The LVIA assesses that some of the Special Qualities (SQs) of The Flow Country and Berriedale Coast Special Landscape Area (SLA), and The Loch Fleet, Loch Brora and Glen Loth SLA, would be significantly affected. Further SQs would be significantly affected and that, at least for The Loch Fleet, Loch Brora and Glen Loth SLA, the effects would be numerous and extensive enough to compromise the integrity of this regionally important designation. This material difference in assessment is considered to undermine the Applicant's route selection, which should therefore be reconsidered. Should the routing remain unaltered, and no suitable further justification be forthcoming, this is deemed sufficient justification for refusal of the proposed development by Scottish Ministers.
- 9.7 There would be many adverse visual effects during construction and operation. Affected receptors would include individual dwellings, settlements, roads, railway, recreational routes, viewpoints and visitor attractions. Most significant effects would be on receptors lying within 1km, and potentially up to 2km for some sensitive receptors. Effects on linear receptors such as roads and paths may be extensive, but most significant effects would be limited to sections of the routes within a few hundred metres of the alignment, with the routing having to strike a balance between a multitude of design factors.
- 9.8 Potential ways of mitigating some of the more severe or extensive adverse landscape and visual effects have been suggested. This includes avoiding effects

on landscape designations and landscape character by reconsidering some of the main routing choices as well as more localised secondary landscape measures which may address more localised effects on individual visual receptors. The suggested alternatives would undoubtedly give rise to further environmental effects, technical constraints, as well as potentially incurring a greater economic cost for what is ultimately passed onto energy consumers. That said, such alternatives are worthy of further consideration by the applicant and Scottish Ministers when determining the acceptability of the proposal.

9.9 In addition, adverse effects on site integrity cannot be ruled out for internationally designated sites for habitats and ornithology. In Section A, the Caithness and Sutherland Peatlands Special Area of Conservation (SAC) (designated for internationally important blanket bog), and at the time of writing, the applicant has provided no means to mitigate the effects. Additionally, in Section D, adverse effects on site integrity cannot be ruled out for the Novar Special Protection Area (SPA) and Morangie Forest SPA, which are designated for breeding Capercaillie – a grouse species in considerable decline. Further discussion to identify mitigation measures is required, as the applicant has indicated that marking the OHL to mitigate impacts on Capercaillie cannot be undertaken for operational reasons; it is unclear what these operational reasons are and if alternative mitigation measures have been explored.

9.10 Of paramount concern is the impacts the proposed development will have on the Flow Country World Heritage Site (WHS), inscribed by UNESCO in 2024, for it is the most outstanding example of blanket bog habitat worldwide. As set out in NatureScot's objection, which is supported, the impacts the proposed development are predicted to have on the Outstanding Universal Value (OUV) of the WHS cannot be mitigated, offset or compensated for. WHS status evidences the importance of this habitat to not just the local environment to support a vast array of flora and fauna, but it indicates the importance of blanket bog habitats globally for carbon sequestration. NatureScot has raised concerns regarding the applicant's assessment of blanket bog impacts and suggest impacts on blanket bog could be greater than reported. On these matters relating the WHS, its underlying designations, and SPAs, the Council relies on the evidence provided by NatureScot who has objected to the application. Consequently, NatureScot will be providing evidence to the PLI on these matters, and it is recommended that the Council does not provide additional evidence but supports NatureScot's position of objection, owing to the project's impacts on capercaillie, blanket bog and the OUV of the WHS. These impacts may necessitate further amendments to be made to the design or routing of the line, or further mitigation to be introduced, with NatureScot advising that this may be a case for derogation under the Habitats Regulations.

9.11 In terms of the impacts of the development on the natural environment more generally, there are significant impacts on certain protected species, and extensive losses of woodland and habitats which is to be expected for a linear project of this nature, where there are several technical design and environmental constraints to be considered. Such impacts may be capable of being mitigated and compensated for to varying degrees through conditions, with the applicant having committed to delivering 10% biodiversity enhancement to be delivered

across various large sites in Highland at strategic scale. Unfortunately, specifics on where these measures will be introduced and details of habitat creation and management are not at a suitably advanced stage to be presented within the application. Owing to the number of infrastructure projects of this nature planned within the region, the lack of further evidence on the delivery of this aspect is of concern, and it is hoped that SSEN will be able to demonstrate further progress ahead of the Scottish Government's determination of this application. With PLI proceedings underway, engagement on this matter will continue, as well as several other conditions matters, as set out within this report, should consent ultimately be forthcoming.

- 9.12 Accordingly, and notwithstanding the acknowledged national need of the proposed OHL, it is concluded that the proposed development, as currently presented, gives rise to unacceptable environmental and amenity impacts. The application therefore fails to achieve an appropriate balance between the need for national infrastructure and the need to protect the environment through which it traverses. Overall, this is a challenging and ambitious project aimed principally to meet tight and time critical net zero targets, however, owing to the expedited application preparation and determination timeline, the proposed development is considered, on balance, to be contrary to the Development Plan, and there are no material considerations to suggest that approval should be granted. Schedule 9 of the Electricity Act sets out what an applicant shall do in relation to the preservation of amenity. It is considered that the proposal has not had adequate regard to the desirability of preserving natural and built heritage and the significant detrimental effects cannot be mitigated. It is therefore recommended that the Council maintains its objection to the application.

10. IMPLICATIONS

- 10.1 Resource: Not applicable
- 10.2 Legal: If the committee determine to maintain the Council's objection, the Council will continue to participate in the scheduled Public Local Inquiry proceedings ahead of the application's determination by Scottish Ministers.
- 10.3 Community (Equality, Poverty and Rural): Not applicable
- 10.4 Climate Change/Carbon Clever: The application is for national electricity grid infrastructure, therefore helping to deliver a contribution toward climate change targets.
- 10.5 Risk: Not applicable
- 10.6 Gaelic: Not applicable

11. RECOMMENDATION

Action required before consultation response issued - None

- 11.1 It is recommended to:

a) maintain the Council's **OBJECTION** to the application for the amended reasons set out below; and

b) delegated powers to allow Officers, in consultation with the North and South Planning Committee Chairs to deal with subsequent matters arising through the PLI, including responding Supplementary Environmental Information and all other PLI related consultations and correspondence.

Reasons for Objection

Natural Heritage – Flow Country World Heritage Site

1. As assessed by NatureScot, in its consultation response dated 6 October 2025, the application is contrary to NPF4 Policy 4 part (a), NPF4 Policy 7 part (I), Highland-wide Local Development Plan Policy 69 Electricity Transmission Infrastructure, and Policy 57 Natural Built and Cultural Heritage, in that it will lead to significant loss of peatland and bog habitat within the Flow Country World Heritage Site (WHS). The mitigation hierarchy does not apply as it is not possible to offset any impacts upon the WHS in terms of the qualities of its Outstanding Universal Value (OUV), which include the peatland and its ecosystem processes. Consequently, it is concluded that the location, type and scale of the development will have an unacceptable impact on the receiving environment and could not be avoided or mitigated.

Natural Heritage – Other Designations

2. As assessed by NatureScot, in its consultation responses dated 6 October 2025, the application will have an adverse effect on the integrity of a number of international designated sites including (but not limited to):
 - Caithness and Sutherland Peatlands Special Area of Conservation (SAC) and Ramsar site, with the application affecting the integrity of these sites due to the loss of its qualifying habitat – blanket bog;
 - Furthermore, the proposed development will result in unavoidable adverse effects on Shielton Peatlands Site of Special Scientific Interest (SSSI), designated for its nationally important blanket bog habitat; and
 - Novar and Morangie Forest Special Protection Areas (SPAs), with the application affecting the integrity of this site and its qualifying species – Capercaillie.

The application is therefore contrary to National Planning Framework 4 Policy 11 Energy, Policy 4 Natural Places, and Highland-wide Local Development Plan Policy 69 Electricity Transmission Infrastructure, and Policy 57 Natural, Built and Cultural Heritage and 58 Protected Species.

Landscape Impacts

3. The proposed development will result in significantly detrimental direct and indirect effects on landscape character during construction and in operation. Significant effects would primarily be to directly affected Landscape Character Types (LCTs) over an area within a few hundred metres of the proposed

development, and effects would be more limited in areas and LCTs only indirectly affected by views and visibility. The extent and severity of the effects on any particular LCT will relate to its key characteristics and the route taken by the alignment. The effects are less significant and adverse in areas of large scale, flat and gently undulating topography and simple patterns than they are in areas of smaller scale, complex and steep topography and pattern. The proposed development will also have a greater effect on LCTs with limited levels of existing development, perceived wildness or scenic character.

In relation to designated landscapes, the proposed development will result in significantly detrimental direct and indirect effects on several SLQs of The Flow Country and Berriedale Coast SLA, and The Loch Fleet, Loch Brora and Glen Loth SLA, where many of the more sensitive characteristics are expressed as SLQs. Furthermore, the adverse significant effects will be numerous and sufficiently widespread to compromise the overall integrity of The Loch Fleet, Loch Brora and Glen Loth SLA.

Visual Impacts

4. The proposed development would have a significantly detrimental effect on visual amenity including cumulative impacts with other existing OHLs, wind farms and other planned transmission and energy infrastructure without adequate mitigation on the following visual receptor groups including individual dwellings near to the route, road users along key routes and at gateways, users of recreational routes, including on the hills, along river and at valley / firth crossings:

Section A:

- Road users and residents along the A9 crossing (Viewpoints (VPs) 12, 13, and 14);
- Views to / from Scaraben (VPs 13 and 17);
- North West of Helmsdale, Marrel, Caen (VPs 25, 26, 27 and 28);
- Potential Residential Visual Amenity Threshold (RVAT) breach at Keepers Cottage near Ousdale (SA-12);
- Badbea RA-16: Core Path CA04.03;
- Glen Loth Crossing (VPs 29 and 30);

Section B:

- Several receptors at Loch Brora crossing (VPs 35, 36, and 37) including, but not limited to, residents at Killin (SB-2), Carroll Cottage (SB-3), Gordonbush/Old Town (SB-1) and Glen Cottage (SB-4);
- Several receptors at Strath Fleet crossing (VPs 40 - 45) including, but not limited to, residents at West Kinnauld (SB-7);
- Potential Residential Visual Amenity Threshold (RVAT) breach at Killin (SB-2);

Section C:

- Several receptors at Kyle of Sutherland, Culrain and Carbisdale, (VPs 47-53);

Section D:

- Residents and road users at Strathcarron and Boath;

Section E:

- Several receptors at Strathpeffer-Contin-Fairburn GDL loop (VPs 74-86) including residents, road users, recreational users and tourists (NC500 in particular).

In relation to both landscape and visual impacts, the application is therefore contrary to National Planning Framework 4 Policy 11 Energy, Policy 4 Natural Places, and Highland-wide Local Development Plan Policy 69 Electricity Transmission Infrastructure, Policy 57 Natural, Built and Cultural Heritage and Policy 61 Landscape.

Cultural Heritage

5. The proposed development, due to its scale, character and prominent siting, would result in significant adverse impacts on several built and cultural heritage features, including scheduled monuments, Garden and Designed Landscapes (GDLs) and listed buildings. The impacts on these features have not been adequately assessed within the EIAR and therefore any mitigation proposed does not adequately address these impacts. Reference is made to:
 - a) HES objection, dated 6 October 2025 and 15 April 2026, based on the application's impact on 25 scheduled monuments with the integrity of their setting being significantly affected; and
 - b) The Historic Environment Team (Conservation) objection, dated 8 October 2025, to the application due to potential adverse impacts on the setting of up to 17 listed buildings, including but not limited to: Carbisdale Castle, Ardross Castle, Castle Loud, Coul House Hotel, and Fairburn Tower, as well as direct impacts and setting impacts on the Fairburn GDL.

The application is therefore contrary to National Planning Framework 4 Policies 11 Energy, and 7 Historic Assets and Places, and Highland-wide Local Development Plan Policies 69 Electricity Transmission Infrastructure, 57 Natural, Built and Cultural Heritage, and 28 Sustainable Design.

Roads, Transport and Access

6. The proposed development is contrary to National Planning Framework 4 Policy 13 Sustainable Transport, and Highland-wide Local Development Plan Policy 56 Travel, as the applicant has failed to provide sufficient information to enable an adequate assessment of the impact of construction traffic on the local road network and its users. The submitted Environmental Impact Assessment Report, Transport Assessment, and supporting documentation, underestimate the scale and nature of traffic impacts, do not adequately assess the capacity, condition and safety of affected rural roads, fail to properly consider cumulative impacts and associated activities such as timber extraction, and do not demonstrate that safe and suitable access arrangements can be achieved. As a result, it cannot be concluded that the development would avoid unacceptable impacts on road safety, network integrity, and the amenity of local communities.

Assessment of the 'Whole Project'

7. Any required 'ancillary works' including but not limited to borrow pits, quarries, temporary construction compounds, and other modifications to the existing distribution network are an essential and functionally interdependent element of the proposed development, but this land-take and infrastructure has not been included within the application and has not been assessed in the EIAR. It is therefore considered, having regard to *Raeshaw Farms Ltd v Scottish Ministers* [2026] CSIH 10, that there is insufficient environmental information before the decision-maker to conclude that the true nature and scope of the project, and its likely significant environmental effects, have been lawfully and adequately assessed for EIA purposes.

Tackling the Climate and Nature Crises

8. For the reasons set out above the application does not comply with:
National Planning Framework 4 (2023)

- Policy 1 - Tackling the Climate and Nature Crises
- Policy 2 - Climate Mitigation and Adaptation
- Policy 4 - Natural Places
- Policy 5 - Soils
- Policy 7 - Historic Assets and Places
- Policy 11 - Energy
- Policy 13 - Sustainable Transport
- Policy 14 - Design Quality and Place
- Policy 18 - Infrastructure First

Highland-wide Local Development Plan (2012)

- Policy 28 - Sustainable Design
- Policy 36 - Development in the Wider Countryside
- Policy 55 - Peat and Soils
- Policy 56 - Travel
- Policy 57 - Natural, Built and Cultural Heritage
- Policy 61 - Landscape
- Policy 69 - Electricity Transmission Infrastructure

In those circumstances, having regard to provisions of Schedule 9 Paragraph 3 (1) and (2) of the Electricity Act 1989 in the consideration of proposals for which consent under Section 37 is required, no or insufficient regard has been had to the desirability of conserving flora fauna and physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest and there has been a failure to take reasonable steps to mitigate the effects of the proposals thereon.

Signature: Bob Robertson

Designation: Acting Area Planning Manager – South / pp. Area Planning Manager North

Authors: Peter Wheelan (Strategic Projects Team Leader)
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Background Papers: Documents referred to in report and in case file.

Relevant Plans: Plan 1.1 - Figure 1.1 Overview of the Proposed Development – part 1
Plan 1.2 – Figure 1.1 Overview of the Proposed Development – part 2
Plan 1.3 – Figure 1.1 Overview of the Proposed Development – part 3
Plan 2 - Figure 3.1 The Proposed Development Part 1
Plan 3 - Figure 3.1 The Proposed Development Part 2
Plan 4 - Figure 3.1 The Proposed Development Part 3
Plan 5 - Appendix 3.1 Indicative Tower Schedule
Plan 6 - Appendix 3.2 Further Engineering Design Information
Plan 7 - Figure 7.1 ZTV
Plan 8 - Figure 7.4 Visual Receptors Part 1
Plan 9 - Figure 7.4 Visual Receptors Part 2
Plan 10 - Figure 7.5 Cumulative Sites

PRIORITY APPLICATION FOR TRANSMISSION INFRASTRUCTURE SECTION 37 - ELECTRICITY ACT 1989 SECTION 57(2) - TOWN AND COUNTRY PLANNING (SCOTLAND) ACT 1997
TRL-270-4: SPITTAL – LOCH BUIDHE – BEAULY 400KV CONNECTION
Note of Pre-Examination Meeting 11 August 2026 10:30 (held virtually)

IMPORTANT – This note provides an invitation to participate in the PLI procedures. It also constitutes a ‘procedure notice’ under the terms of the Code of Practice for Handling Inquiries under the Electricity Act 1989.

Item 1 - Reporters’ opening remarks and introductions by participants

1. The reporters welcomed the attendees and explained the purpose of the meeting: to discuss procedural arrangements for the Public Local Inquiry (PLI). Lorna McCallum, David Liddell and Keith Bray of the Planning and Environmental Appeals Division (DPEA) are the reporters appointed to consider the case jointly, to hold the PLI and to report back to Scottish Ministers. Ministers will decide whether or not to consent the application, after consideration of the reporters' report of the PLI.
2. All attendees at the meeting consented to being filmed and that a record would be kept for future use. The recording of the meeting is now available [here](#) on the DPEA YouTube channel. Those attending the meeting are set out at Appendix 1.
3. The reporters explained that active participation in the meeting had to be limited for practical reasons. The other parties who have opted in but were not actively participating in the meeting will still be able to be involved in the PLI and it was explained how they can do so. However, parties who have opted-in will be required to confirm if they wish to go onto actively participate in the inquiry after hearing what was said at the meeting. The re-confirmation procedure is explained under later items of the agenda.
4. Although there was extensive discussion at the meeting and differing views expressed on procedures and timescales, this note now sets out the reporters' procedures and arrangements for the PLI.
5. Unsolicited submissions made by parties are unlikely to be considered by the reporters. Parties should instead adhere to the procedures set out in this note.
6. Parties are to consider if there is scope and merit in grouping together in making their case within the PLI procedures.

Item 2 - Guidelines for the inquiry process

7. The application is one of the priority applications for strategic transmission infrastructure. There is Scottish Government [Guidance on priority applications for](#)

[transmission infrastructure](#) and a [Code of practice](#) for handling inquiries under the Electricity Act 1989. [Reporters Guidance Note 30](#) on Community Hearings is also relevant to the PLI procedures.

8. While there are no detailed rules for inquiries under the Electricity Act, the guidance and the code set out procedures to follow. The code aims for proceedings to be conducted in a proportionate, fair, transparent, and efficient manner.

Item 3 - Potential requirement for ‘Additional Information’

9. The term ‘Additional Information’ has a specific meaning within [The Electricity Works \(Environmental Impact Assessment\) \(Scotland\) Regulations 2017](#) (the EIA Regulations). It relates to extra environmental information that is directly relevant to reaching a reasoned conclusion on the significant effects of a development on the environment in terms of the EIA regulations.

Raeshaw Farms judgment

10. The recent Raeshaw court judgement concerns whether a windfarm and associated grid connection properly constitute a ‘single project’ requiring an Environmental Impact Assessment (EIA). The implications of that case for this application are that Ministers will require to undertake a specific evaluation of the proposal in order to identify the ‘project’ for EIA purposes.

11. The initial views of the [applicant](#) and the [council](#) have been provided on whether matters identified as other works in the EIA Report (Volume 1, Chapter 3) ought to be included within the scope of this project for EIA purposes and whether this might require Additional Information to be submitted.

12. Once a Further Written Submission (FWS) procedure is complete, reporters will determine whether there is a need for Additional Information or whether other procedures are required. At that point, Additional Information will only be sought by reporters if it is needed to complete advice to Ministers concerning the implications of the Raeshaw case.

Cumulative baseline

13. The reporters sought the view of the applicant on whether any update to the cumulative baseline was to be provided. The applicant indicated that it plans to prepare an update on the cumulative baseline. The reporters therefore formally request that for the purposes of the inquiry Regulation 20(6) of the EIA Regulations 2017 applies to that request. The deadline for that is **11 September 2026**.

14. The reporters consider that parties could specifically comment on the cumulative baseline update if they wish, and a FWS request will accommodate that. However, parties could also instead take the Additional Information into account in any responses they provide on other FWS, in hearing statements, or through closing submissions (including for the applicant).

Derogation (Habitats Regulations)

15. Since issuing the agenda the applicant had advised it proposed to submit, on a without prejudice basis, a shadow derogation case in relation to potential impacts on the Caithness and Sutherland Peatlands Special Area of Conservation (SAC), the Novar and Morangie Forest Special Protection Areas (SPAs) and in relation to the Flow Country World Heritage site.

16. This matter was discussed and the applicant confirmed that a package of information will be prepared, including updated reports to inform Appropriate Assessments, compensation plans for the SAC and SPA, an updated Outstanding Universal Value (OUV) impact assessment and supporting appendices. The reporters consider that these details should be provided as Additional Information for the purposes of the inquiry under Regulation 20 (6) of the EIA Regulations 2017. The Additional Information will not be required to be separately advertised in the press by the applicant. This matter is referred to in further detail in agenda item 4.

17. The draft derogation case and package of Additional Information should both be submitted **by 11 September 2026** to allow the rest of the PLI to be conducted in accordance with the timetable confirmed in Appendix 3. The reporters intend to seek comments on the draft derogation case and package of information on ecology as part of their request for further written submissions. The applicant can respond to any comments within their hearing statements or closing submissions.

Agriculture

18. Although not identified under item 2 of the agenda, the reporters raised the topic of agriculture. They noted that the applicant will be aware of the exchanges on this topic in both the Kintore to Tealing and Beaully to Peterhead PLI's.

19. The reporters have considered the matters raised in the representation from the National Farmers Union (NFU) and taken account of the requirements of Regulation 19(2) of the EIA Regulations. It is their conclusion that Additional Information on the proposed development's effects (including cumulative effects) on agricultural operations is required to enable the reporters and Scottish Ministers to reach reasoned conclusions on the significant effects of the development. Therefore, it is requested that the applicant submits this as Additional Information required for the purposes of the inquiry under regulation 20(6) of the EIA Regulations. This Additional Information should be submitted by **11 September 2026** to allow the PLI timetable to proceed as planned. The reporters will seek comments on this information as part of their request for FWS. The applicant can respond to any comments within their hearing statements or closing submissions.

Item 4 - Procedures to be followed

a. Outline of procedure options and evidential requirements

20. The reporters explained the differences between procedures at the meeting and the requirements in relation to each. Some important points are set out below.

21. Where parties are making comments as part of the 'Further Written Submissions' process they should only comment on topics included within their original representation. Comments must be provided strictly within the deadlines set.
22. In advance of all hearing sessions (except conditions) the participants must prepare a hearing statement. For topic-based hearings those statements must be made with regard to the scope of the hearing, as set out in Appendix 2. For Community Hearings the written statement should be based upon the party's original representation.
23. The decisions on the exact format and timing of the community hearings will be taken once parties have confirmed their participation in the inquiry procedures. Further information is provided at agenda item 6 below.
24. For the PLI, the reporters envisage that the oral sessions will be webcast (live and/or recorded), but this will be subject to staff/resource availability. Any venues chosen will need to be suitable for webcasting. A hybrid session (i.e. both in person and online) may be considered but only in exceptional circumstances and only if technically feasible.
25. The type of procedure to be followed in the PLI, or indeed the absence of any further procedure, is not an indication of the importance of a particular issue. Where reporters have indicated no further procedure this does not indicate that those matters are not of importance, it is simply an indication that they believe that there is sufficient information on that topic for the purposes of drafting the report to Ministers.
26. When reporters write their report to Ministers they will take into account not just the environmental information submitted by the applicant and the evidence gathered through the PLI but also the consultation responses and the letters of representation already lodged.
27. Parties who have already opted into the inquiry, by responding to the DPEA letter of 19 June, must confirm by **Tuesday 1 September 2026** their intention to go on to actively participate in the inquiry procedures and specifically which elements they wish to take part in. They should do so by completing the form provided in the letter accompanying this note. It is important that parties only select those procedures in which they intend to actively participate.
28. The reporters have identified the need for accompanied site inspections for the topics of residential visual amenity and cultural heritage. Specific FWS on this matter will determine the exact number/nature of the site visits.
29. That all said, parties are not required to actively participate in the inquiry procedures or feel obliged to do so. Some parties may wish to rest on their existing representations to the Energy Consents Unit.

b. Parties' views on the proposed procedures

30. Following the extensive discussion at the meeting, the procedures to be followed in this case and the scope of the hearings are set out in Appendix 2. These procedures include hearings, FWS and site inspections.

31. The reporters have considered the applicant's request for a hearing rather than an inquiry session in relation to the ecological matters (1) listed in Appendix 2. They also noted NatureScot's preference for ornithological matters to be addressed by means of further written submissions. The reporters agree to a hearing but, consider that the package of Additional Information (referred to under agenda item 3 above) should address the objections raised by NatureScot, the RSPB and the Highland Council in their consultation responses dated 6 and 30 October 2025 in relation to the effects on the Flow Country World Heritage Site, the Shielton Peatlands SSSI and the Caithness and Sutherland Peatlands Special Area of Conservation (SAC) and Ramsar site and effects on the Novar and Morangie Forest Special Protection Areas (SPAs). The Additional Information should, in relation to those designated sites, address the effects on blanket bog, peatland habitats/ecosystems and also ornithology. The reporters reserve their position on the need for an inquiry until they have received the package of information that is to be submitted under Regulation 20 (6) (as noted in agenda item 3) and comments are obtained from NatureScot, the RSPB, and the council. At this stage, the reporters agree with NatureScot that site inspections are not essential for this topic.

32. The reporters have concluded that there is no need for a separate policy hearing. They are content for policy to be addressed, as may be relevant, within each of the individual topic-based hearings.

33. Taking account of concerns raised regarding the timing of the council's committee consideration of this application and the pressures on participating parties, the reporters have split the matters to be dealt with by means of further written submissions into three batches. The timetable for the further written submissions procedures is set out in Appendix 3. Appendix 4 provides details of the topics to be addressed in each of the three batches of further written submissions, an indication of to whom the requests will be made and who will be invited to comment. Appendix 5 constitutes the first batch of requests for further written submissions.

34. The reporters will, by 11 September, circulate a list of the parties actively participating in each of the procedures to all of those who have confirmed their intention to do that.

35. Parties who are opting-in to actively participate will need to prepare and submit their case in advance, to allow the other parties to see what evidence is being presented and to avoid any surprises. Deadlines for submitting evidence (Appendix 3) will be strictly applied.

36. While unaccompanied site inspections have already been completed by the reporters, additional unaccompanied site inspections will also be carried out.

c. How to participate

37. Only parties who have already opted in and who re-confirm their intentions can actively participate. If you do not confirm participation in a procedure, we will assume that you are opting out of that particular part of the process. Parties who have already opted into the inquiry process must respond completing the form provided if they wish to actively participate in the different elements of inquiry process and identify specifically which parts they wish to participate in. This must be done by **1 September 2026**. The link to that form is contained in the covering letter issued with the note of the pre-inquiry meeting. The reporters agreed to contact Mr Kelly and Mr Heathcote separately regarding this matter.

38. If you choose not to actively participate and are content to rest on your existing submissions, you need not respond. Parties are not required to participate in all of the hearing sessions. Parties who do not confirm participation in any of the specific procedures will be assumed as opting out of those procedures. However, parties may still follow the progress of the case on the DPEA website and the DPEA YouTube channel.

d. Opportunities for joint working

39. The reporters welcomed the efforts made on joint working to date and encourage parties to work jointly where they share common interests.

e. Whether oral sessions should be in person or virtual and locations

40. The reporters heard the strong preference that hearings be held in person. The in-person topic-based hearings will take place in a single location; the reporters will choose a venue to suit as many as possible. To accommodate the alterations to the inquiry timetable the reporters have now decided that the topic-based hearings in the week commencing 14 December will take place virtually.

41. The applicant should now liaise with the DPEA case working team with regards to potentially suitable venues. Any suggestions for venues should be provided by **1 September 2026**.

f. Accompanied site inspections

42. The reporters sought views from the parties on matters relating to accompanied site inspections. The conclusions of the reporters in this respect are set out in Appendix 2 in terms of the procedures to be followed.

Item 5 - Community hearings

43. The reporters made it clear that opted in parties who wish to take part in a community hearing must respond confirming their intention to do so. Parties who wish to just attend a community hearing only to observe need not confirm that.

44. If a community council or other organised group wish to participate in a community hearing it is expected that one person would speak on their behalf. If that is not the case, the number of individual speakers proposed by any group must be confirmed via email by **1 September 2026**. Names of persons who will speak and submit community hearing statements will require to be confirmed by **6 November 2026**.

45. Views were sought on potential locations for community hearings and the reporters noted the comments expressed. The community councils were asked to discuss this matter among themselves and that a representative provide the DPEA casework team via email with suggested venues.

46. All parties wishing to speak at a community hearing must provide, in advance, a written statement, based on the matters included in their original representation. The intention is that statements should not exceed 1,500 words and each speaker will be allocated around 5 to 10 minutes each. The reporters would not expect to hear the same evidence from a number of parties representing a single group. The arrangements will, however, be confirmed in due course. The final number of speakers will be decided by the reporters.

47. Once we are in a position to confirm dates and arrangements a guidance note will be issued for those participating. The number, dates and locations of community hearings will therefore be finalised once the opt-in form responses have been received and suitable/available venues are secured. Any suggestions for community hearing venues should be submitted by email by **1 September 2026**.

Item 6 – Timelines

48. The reporters noted that a number of parties were unhappy with the inquiry proceeding on 23 November 2026. After the discussion at the meeting, and after considering comments provided in the meeting ‘chat,’ as well as submissions on behalf of a number of parties after the meeting, the reporters have reviewed the timeline for the completion of the PLI. The intended scheduling for oral sessions is as follows:

W/b 23 Nov. (in person) venue TBC

24 Nov. Landscape and visual impact hearing

25-27 Nov. Cultural heritage hearing (council related matters on first day)

W/b 30 Nov. (in person) venues TBC

30 Nov. to 3 Dec. – provisional Community Hearings, anticipated to be afternoon, and/ or evenings (provisionally 6:30pm to 8:30pm), however this will be confirmed

3 Dec. – Traffic and Transport hearing (with 4 December kept if additional time needed for hearing and if any site inspections are required by reporters)

W/b 14 Dec. (fully virtual)

14-15 Dec. Ecology hearing (if required)

16 Dec. Agriculture hearing (if required)

17 Dec. Conditions hearing (or earlier this week if other hearings this week are not required)

49. The overall timeline, with the relevant deadlines, is set out in Appendix 3. It reflects the Scottish Government guidance on priority applications for transmission infrastructure guidance and Reporters Guidance Note 29 in terms of the timelines for inquiries. The priority applications for transmission infrastructure guidance sets out a period of 13 weeks from a pre-inquiry meeting to the close of oral sessions as a guide for the reporters. However, a longer period of 18 weeks is provided in this instance. The timescales in this case are also in keeping with those currently underway in relation to the Kintore to Tealing and Beaully to Peterhead PLIs.

50. The timeline accommodates community hearings earlier in the process and provides more time for closing submissions due to the Christmas break and the later oral sessions in the week beginning 14 December. It also includes that the oral sessions in the week beginning 14 December will be virtual sessions to reduce the need to travel (for all parties) at that time of year. It also sets out the staggered approach to seeking further written submissions and inviting comments on the Additional Information on agriculture and ecology.

51. Hearing and any inquiry sessions will start at 09:30, concluding no later than 17:00pm. There will be short breaks in the morning and afternoon and a break for lunch of about an hour starting at a convenient time between 12:00 and 13:00.

52. Hearing Agendas will not be issued in draft. However, the scope for the hearings is set out in Appendix 2. There will be no allowance within the timeline for rebuttal statements.

53. Closing submissions are to be made by those participating in the inquiry procedures after the close of oral procedures. These will provide a summary of a parties' case on the evidence heard at any hearing or inquiry sessions. They should not contain any new evidence. A template prepared by the DPEA will be issued at a later date with any necessary explanation. The template will ask for a succinct summary of case suitable for inclusion in the reporter's report to Scottish Ministers.

54. Appendix 3 sets out the dates for the closing submissions. Participating parties, except the applicant, will make their submissions first. The applicant will then submit a short period after that. Each submission should be sent to those parties who are preparing closing submissions, and they will also be posted on the DPEA website. The timeline for this is set out in Appendix 3.

55. Towards the end of the meeting, the reporters indicated that due to the changes in dates discussed at the meeting they would ask parties to confirm availability for the revised schedule of the inquiry sessions. While the order of proceedings can be altered, the inquiry period will remain the same. Parties should email the casework team to confirm their availability by **Tuesday 1 September 2026**.

56. **It is crucially important that all parties adhere to the inquiry timetable set out in Appendix 3.**

Item 7 - Document management

57. A schedule for documents to be submitted is integrated into the PLI timeline as set out in Appendix 3. This ties in with procedures required and reflects DPEA [guidance note 29](#).

Additional guidance on specific matters

58. Parties are requested to use the file sharing platform called Objective Connect. This allows uploading of large file sizes, avoids email exchanges and will assist in the timeous ability to view documents. Parties who confirm participation in any of the oral sessions will be sent instructions on how to use Objective Connect for uploading, sharing, and viewing documents. Use of the platform reduces the burden on the DPEA casework team and helps ensure that we are all looking at the same version of a document.

59. Foundation Documents - the DPEA case officer will provide the applicant with a list of all application documents. The applicant must populate the rest of the list with any documents (and their hyperlinks) from the DPEA document libraries which it considers are clearly material to the consideration of the case. The applicant must liaise with the council to finalise the hyperlinked list of Foundation Documents by the deadline set. All other documents can be submitted later as Supporting Documents.

60. Supporting Documents - are any additional documents which parties intend to refer to or rely on in evidence. Parties should provide a list of such documents as part of their inquiry or hearing statements. However, no supporting documents should accompany community hearing statements.

61. Only documents which are critical to understanding or substantiating parties' positions should be provided and should be directly referred to in parties' statements. It is unhelpful to submit non-essential documents as it overburdens everyone involved. If only part of a document is to be relied on then just that part can be submitted. This allows for clarity and avoids unnecessary reading.

62. Because submission deadlines will be strictly applied, the default position will be that late documents will not be accepted, unless exceptional circumstances apply.

63. The applicant and council are to liaise regarding the public display of documents and advise DPEA of arrangements agreed and the relevant newspapers that the PLI advert should be placed within.

64. Specific guidance regarding conditions: reporters request that the Energy Consent Unit 'Section 37' standard conditions, available on the ECU website, should be used by the applicant as a basis for draft conditions, in the event that Ministers wished to consent the application. A written statement on conditions, prepared by the applicant, should set out agreed proposed conditions and highlight any points of disagreement and any alternative suggestions from the relevant parties. The statement should clarify whether and how matters raised in consultation responses are addressed by the proposed conditions, with reasoning given if any condition

requested by a consultee has been excluded or altered. No separate hearing statements on conditions will be required by other participating parties for the hearing on conditions.

Item 8 - DPEA contact information

65. Multiple case officers are providing administrative support on this case. A dedicated email address has been set up, which is being regularly monitored throughout the working day. All correspondence relating to the case should be sent to:

DPEA-Spittal-to-Beaully400kVOHL@gov.scot

The postal address is:

DPEA

Scottish Government

Hadrian House

Callendar Business Park

Falkirk

FK1 1XR

Telephone: 0300 244 6668

Item 9 - Any other business

66. A number of parties wished the PLI to be delayed until the council concluded its consideration of the application. The council representative at the meeting expected that the council's further consideration of the application on 10 September 2026 will not have implications for the procedural arrangements for the PLI. There was also no indication that the council would raise new topic areas.

Item 10 - Note of the meeting

67. This note of the pre-inquiry meeting (including its appendices) sets out the reporters' conclusions on the procedures required. The reporters do not seek comments on the note. It should now be treated as if it is a formal procedure notice and is a key reference for all parties.

68. The note will be issued to all parties who have previously opted in to the inquiry, whether or not they have participated in the meeting.

69. **Those parties who responded to the DPEA letter of 19 June 2026, opting into the inquiry and who wish to now go on to actively participate in the inquiry proceedings must respond using the form provided (see link in letter accompanying this note) by 1 September 2026 confirming their intentions. (Please see agenda items 4c and 5 above).**

APPENDIX 1 – PRE-INQUIRY MEETING PARTICIPANTS

Applicant: Mr Marcus MacKay KC

Highland Council: Mr James Findlay KC, Rhoda Banfro (THC)

NatureScot: Jennifer Heatley (NS), Jacqueline Cook & Anna Crisp (Harper McLeod)

HES: Ruth Crawford KC, Jennifer Jack (Harper McLeod)

RSPB: Esme Clelland

NFU Scotland: Lorna Scott

Mr Ian Kelly on behalf of:

Creich Community Council (& Shona Patterson)

Dunbeath and Berriedale Group

Halkirk and District Community Council

Kilmorack Community Council

Better Cable Route

Strathpeffer and Contin Communities Before Power Companies (CB4PC)

Ms Kathrin Haltiner

Dunbeath & Berriedale Group

Mr John Heathcote on behalf of:

Brora Community Council

Contin Community Council

Golspie Community Council

Strathpeffer Community Council (& Mr Ron MacAuley)

Marybank, Scatwell and Strathconon Community Council (& Christine MacIntosh)

Other Community Councils:

Ardross: Emma Chisholm

Brora: Diana Royce

Kiltarlity: Susan Ogston

Golspie: Lydia Martens

Helmsdale & District: John Whitfied

Organised groups:

Pylon the Pressure to Stop SSN: Jean Sargent

Timespan Heritage Group: Carol Aldred

Loth Residents: Diana Royce

Individuals:

Tina Marshall

Chloe Hardy

APPENDIX 2: INQUIRY PROCEDURES

Main issues and scope	Procedures	Dates	Location
Landscape and visual impact 1) Methodological matters regarding the applicant's LVIA & RVA. 2) Impact assessment (including cumulative) regarding the Dornoch Firth NSA, The Flow Country and Berriedale Coast SLA, the Loch Fleet, Loch Brora, and Glen Loth SLA, and the Causeymire – Knockin Flows WLA. 3) development plan policy interpretation for the NSA, SLA, and WLA. 4) Other landscape and visual impacts. 5) Residential visual amenity (RVA).	Hearing to cover only matters 1-3 FWS (batch 1). A/c site inspections (SI) for RVA. Un/ac site inspections for other L&V impacts (matters 1-5)	Hearing W/c 23 Nov A/c SI w/c 26 Oct	Hearing in person, location TBC Schedule of RVA A/c SI to be arranged by applicant after FWS and direction given by reporters
Cultural heritage assets Hearing to consider development plan policy and other guidance interpretation for cultural heritage setting impacts. Hearing will consider setting impacts on the 25 scheduled monuments that HES object to and additional cultural heritage assets - to be finalised by reporters after FWS.	Hearing FWS (batch 1) A/c SI	Hearing w/c 23 Nov A/c SI w/c 26 Oct	Hearing in person, location TBC Schedule of A/c SI to be arranged by applicant after FWS and direction given by reporters
Traffic and transport Construction traffic routing and volumes, abnormal loads, road safety, driver delay/network capacity, impacts on structures, public road improvements, junction enhancement. Hearing can discuss the need for site inspections. (Scope may be narrowed by reporters through FWS)	Hearing FWS (batch 1)	Hearing w/c 30 Nov	Hearing in person, location TBC SI, if required by reporters, will be arranged at the end of hearing
Ecology & nature conservation (1) Effects on Flow Country World Heritage Site, the Shielton Peatlands SSSI and the Caithness and Sutherland Peatlands Special Area of Conservation (SAC) and Ramsar site. (Effects on blanket bog and peatland habitat) Effects on the Novar and Morangie Forest Special Protection Areas (SPAs) (effects on capercaillie) Hearing expected to address relevant NPF4 and LDP policies and Highland Council guidance and relevant NatureScot and UNESCO guidance.	Additional Information & hearing	Hearing w/c 14 Dec	Virtual

Ecology & nature conservation (2) Effects on the Caithness & Sutherland Peatlands SPA and Strath Carnaig and Strath Fleet Moors SPA (effects on ornithological interests) Other effects on ornithology (including effects of disturbance, displacement, and collision risk). Mitigation and use of planning conditions. Biodiversity net gain.	FWS (batch 2) & potential hearing	See appendix 4 (if hearing required it will be w/c 14 Dec)	Virtual
Agricultural operations Effects on agriculture, including use of farm machinery and farm operations under/around the proposal.	Additional Information & hearing	Hearing, if required, will be w/c 14 Dec	Virtual
Community hearing(s)	Hearing(s)	w/c 30 Nov	In person, timing, exact dates & locations TBC
Conditions	FWS & hearing	Hearing w/c 14 Dec	Virtual
All other matters Further Written Submissions	See Appendix 4		

APPENDIX 3 –TIMELINE FOR INQUIRY PROCESS AND SUBMISSION DEADLINES

Date	Action	Who
11 August 2026	Pre-inquiry meeting held	Invited opted-in parties
18 August	Circulate note of meeting	DPEA
1 September	Parties must confirm participation in inquiry procedures, including community hearings	All opted-in parties who wish to participate in further procedures
1 September	Suggestions of potential venues to DPEA	Applicant, council & community councils
4 September	Responses due to FWS (batch 1)	Relevant parties
11 September	Foundation documents list finalised	Applicant in liaison with participating parties
11 September	Additional Information on Ecology (1) and shadow derogation case submitted	Applicant
11 September	Additional Information on Agriculture submitted	Applicant
11 September	Additional Information on cumulative baseline submitted	Applicant
w/c 15 September	Issue request for comments on Additional information on ecology (1). (FWS batch 2)	DPEA to relevant parties including NatureScot, the council and RSPB
w/c 15 September	Issue request for comments on Additional information on agriculture. (FWS batch 2)	DPEA to relevant parties including the NFU
w/c 15 September	Issue request for comments on Additional information on cumulative baseline. (FWS batch 2)	DPEA to relevant parties
w/c 15 September	Issue request for comments on draft derogation case (FWS batch 2)	DPEA to relevant parties
21 September	Issue request for FWS (batch 3) (see appendix 4 for topics)	DPEA to relevant parties
25 September	Comments due on FWS responses (batch 1)	Relevant parties
2 October	FWS responses due (batch 2) Ecology (1) (Additional Information)	Relevant parties
2 October	FWS responses due (batch 2) Agriculture (Additional Information)	Relevant parties
2 October	FWS responses due (batch 2) Cumulative baseline (Additional Information)	Relevant parties

5 October	Responses due on FWS request (batch 3)	Relevant parties
5 October	Community Hearing dates and venues confirmed	DPEA
16 October	Comments due on FWS responses due (batch 3)	Relevant parties, including NatureScot and RSPB
16 October	Hearing statements for cultural heritage and LVIA due and supporting documents uploaded	Participating parties
w/c 26 October	Accompanied site inspections cultural heritage & RVA	TBA
26 October	Hearing Statements Ecology (1), agriculture and traffic & transportation due and supporting documents uploaded	Participating parties
4 November	Hearing agendas issued cultural heritage & LVIA	DPEA
6 November	Foundation & supporting documents lists finalised.	Applicant and DPEA
6 November	Names of persons who will speak and submit community hearing statements	Confirmed participating Community councils/ groups
6 November	Conditions statement submitted	Applicant
13 November	Community Hearing statements due	Parties speaking at community hearings
16 November	Community Hearing agendas & timetable published, and traffic & transport agenda issued	DPEA
23 November	Hearing agendas issued for ecology, agriculture, and conditions	DPEA
24-26 November	Hearings: LVIA & cultural heritage	Participating parties
30 Nov- 3 Dec	Community Hearings and traffic & transport hearing	Participating parties
w/c 14 December	Hearings: ecology, agriculture, and conditions	Participating parties
15 January 2027	Closing submissions and case summaries due	Hearing/inquiry parties, except applicant
29 January 2027	Closing submissions and case summaries due	Applicant
End April 2027	Report submitted to Scottish Government Energy Consents Unit	Reporters
Dates 'due' are cut off dates for submission to DPEA and to be strictly adhered to.		

APPENDIX 4: SUMMARY OF FURTHER WRITTEN SUBMISSIONS BATCHES

Batch 1 Topics
1. Raeshaw Farms court case judgement
2. Cultural heritage
3. Landscape and visual impact
4. Aviation
5. Communications infrastructure
6. Traffic & transport
7. Private water supplies

Batch 2 Topics	Scope
Agriculture	Comments invited on Additional Information
Ecology	Comments invited on Additional Information
SAC, SPAs, and FCWHS	Comments invited on draft derogation case
Cumulative baseline	Comments invited on Additional Information

Batch 3 Topics	Scope
Ecology (2)	Effects on the Caithness & Sutherland Peatlands SPA and Strath Carnaig and Strath Fleet Moors SPA (effects on ornithological interests). Other effects on ornithology (including effects of disturbance, displacement, and collision risk). Biodiversity net gain.
Construction noise, vibration, dust & operational noise	Clarifying with the council whether conditions can address concerns previously raised by the council and also matters with regard to air quality. Specific clarification from the applicant on air quality matters and need for 7 day working week.
Access, cycling routes & core paths	Any routes lost after construction, draft outdoor management plan, and specific matters raised in representations around Contin/Strathpeffer.
Woodlands & Forestry	Comments will be requested of applicant in relation to compensatory planting, natural regeneration habitat management, policy interpretation, and planning conditions. Comments will be invited on their response of the council and relevant parties
Need	Updated positions on 'need,' including reference to recent Ministerial decisions (ECU00005167 and ECU00005168) and comments on Beyond 2030 - Electricity Transmission Update June 2026
Specific matters	A number of specific matters to various parties including (but not limited to): EMF and public exposure guidelines, workers camps, tourism literature, impact on tourism accommodation, impacts on local services, and corona discharge.

Appendix 5 - Further Written Submissions (FWS) requests - Batch 1

Matter 1: Implications of 'Raeshaw Farms' court case judgment

The applicant has submitted comments on the implications of the Raeshaw judgement in Annex C of its position statement and can be found [here](#). The council has submitted comment on what the applicant has said [here](#). The documents referred to by the applicant and the council in their submissions are also available:

Applicant documents

[Supporting Document 1](#), [Supporting Document 2](#)
[Supporting Document 3](#), [Supporting Document 4](#)
[Supporting Document 5](#), [Supporting Document 6](#)
[Supporting Document 7](#), [Supporting Document 8](#)
[Supporting Document 9](#), [Supporting Document 10](#)
[Supporting Document 11](#), [Supporting Document 12](#)

Council documents

[THC001.001 - Beaully to Peterhead Applicant Written Submission - Matter 001](#)
[THC001.002 - Applicant Response on Raeshaw-Fanellan](#)
[THC001.003 - Applicant Response of Raeshaw for Carnaig Substation](#)
[THC001.004 - THC Raeshaw Response for Fanellan Substation](#)
[THC001.005 - THC Response on Raeshaw for Beaully to Peterhead](#)
[THC001.006 - THC Response on Raeshaw for Carnaig Substation](#)

Who: parties opting in who made comments on Raeshaw

1.(a) Opportunity to comment on submissions of applicant and council (above).

Who: Parties opting in who made comments on Raeshaw, the council and applicant

1.(b) Provide your view on whether the proposed permanent diversion of approximately 1.7km of 400 kV OHL adjacent to Fanellan 400 Kv Hub, 5Km South-West of Beaully (DPEA ref TRL -270-3) forms part of the same project, for EIA purposes, as the Spittal to Beaully OHL.

1.(c) Two accommodation camps have been mentioned in the representations made on this application. Are those the temporary compound areas identified in the description of the development in section 3 of the EIA Report and referred to in the applicant's position statement response of 20 May 2026 on Raeshaw Farms? If not, and these are different 'workers camps,' as referred to in Chapter 16 of the EIA Report (para. 16.1.9 - Port of Nigg and Golspie), provide comments on these 'workers camps' as far as the Raeshaw judgement is concerned. For example, do these 'workers camps' form part of the overall single project and are all the likely significant effects of such 'workers camps' identifiable at this stage? The reporters also note that Chapter 16 of the EIA Report suggests that more than two worker camps would be constructed.

Comments on responses received on Matter 1, and any concluding comments on Raeshaw Farms matters will then be requested from the applicant only.

Matter 2: Cultural heritage

Who: Historic Environment Scotland (HES)

2.(a) HES said the applicant must carry out an exercise to ensure no additional scheduled monument would be impacted by access tracks which would then require redesigned. What would this mean practice and how can it be addressed?

2.(b) Indicate which of the 25 monuments, forming the HES objection, would require an 'accompanied' site inspection before the hearing. Provide an explanation of how HES see a programme of site visits working in practice.

Who: The applicant

2.(c) HES said in relation to Fairburn Garden and Designed Landscape (GDL) that the applicant will adopt appropriate mitigation measures and consult with HES. Confirm the mitigation measures and how they could be captured/secured if consent were to be granted by Ministers.

2.(d) Provide commentary on additional issues raised by HES on the applicant's Additional Information. First, that specific visualisations do not accurately depict the scale and proximity of pylons in relation to monuments, artificially showing a reduced impact. In HES's view, they should be regarded as indicative only. Second, HES said that the depiction of new access tracks on visualisations does not appear accurate. Tracks are shown as 2D grey strips that do not reflect the wider land-take involved in track construction, or the associated cut and fill required to create a level surface.

2.(e) The applicant has said in its position statement (in relation to cultural heritage impacts) that a full suite of compensation/offsetting and enhancement measures will also be delivered. Is that to be found in EIAR Volume 5, Appendix 12.7: mitigation summary or elsewhere within the documentation?

Who: parties opting in who made comments on culture heritage matters

2. (f) The applicant has set out its approach to unrecorded archaeology in terms of its mitigation strategy in Volume 5, Appendix 12.7: [Mitigation Summary](#). The council has not objected on the grounds of impact on unrecorded archaeology. Clarify your view on whether unrecorded archaeology can be managed by the use of appropriate planning conditions. If not, state your reasons why not.

Comments on responses received on Matter 2, are requested from the applicant, HES, and the Council. When making comments the council is asked to include in its response the following specific matters to allow the reporters to finalise the scope for the planned hearing and need for site inspections:

HES updated its position (on 15 April 2026) with regard to impact on scheduled ancient monuments, GDL and Grade A listed buildings. Does the council align with the position of HES on these matters and, in particular, with regard to impacts on the Fairburn Gardens and Designed Landscape and in respect of Grade A listed

buildings across the route (including Fairburn Tower, Coul House Hotel, and Ardross Castle). If not, provide the detailed reasoning.

Does impact on the setting of the Ardross Castle GDL form part of the council's objection to the proposal? If that is the case, provide the detailed reasoning.

Provide the building name, description and extent/location of any Grade B or C listed building, if there are any, that form part of the council's reasons for objection to the proposal. Provide reasoning if the council considers that the proposal will detrimentally affect the character of its setting or its special architectural or historic interest in relation to grade B or C listed buildings.

Matter 3: Landscape and visual

Who: Applicant

3.(a) Clarify that a viewpoint-based assessment has not been undertaken (as set out in a para 7.3.5 of the EIAR) and explain why that has not been done.

3.(b) The council has said that Achorn Road (unclassified) does not appear to be assessed as a transport route receptor in the LVIA, and the road is mentioned in the Special Qualities for Flows and Berriedale Coast SLA. Provide a response on that.

3.(c) The council has been critical of the lack of visualisations which show the cumulative effects of the proposed Fanellan sub-station and interactions with OHL's. Provide your response to that and explain why visual material was not prepared.

3.(d) Provide details of the heights (in general terms) of the existing 132 kV and 275 kV towers in the area around the proposed route of the line.

3.(e) In the council's view, overhead lines, wind farms or other planned transmission infrastructure, would give rise to significantly detrimental cumulative landscape and visual effects. Has the applicant been able to clarify with the council which infrastructure this concerns and the specific nature of the cumulative effects.

3.(f) The council has said previously that there were a number of inconsistencies and errors across the LVIA and RVAA including, misattributing areas within the Flow County and Berriedale Coast SLA; stated measurements; labelling of receptor properties between the assessment and the wirelines; and incorrect Grid References attributed to properties. Does the applicant consider a need for the production of an Errata for Chapter 7 of the EIAR (in consultation with the council)?

3.(g) The reporters propose site inspections for residential visual amenity (RVA) purposes to properties and their garden ground. The applicant is to comment on the range of the initial list of 21 properties proposed for a visit below. If suggesting deletions from the list, provide reasoning for that.

- Lanergill Farm (SA-01)
- Lydias House, Toftingall Farm (SA-02)
- Farmstead at Halsary (SA-03)

- Achavanich Farm (SA-04)
- Achavanich School House on junction of A9 and Lybster Road (SA04)
- Single-storey cottage (Braehungie) & mobile home (Mountain View) (SA-05)
- Keepers Cottage (SA-12)
- Killin (SB-02)
- Carroll Cottage (SB-03)
- Creide (SC-06)
- Sonnycroft (SD-01)
- Cnoc Cluaran (SD-03)
- Culeave Cottage (SD-07)
- Cairn View (SD-08)
- Glaik Croft (SD-04)
- Fannyfield (SD-05)
- Bridgepark Cottage (SE-01)
- Mid Lodge (SE-02)
- Heights of Kinnahaird (SE-03)
- Bruaich Cottages (SE-04)
- Ben View (SE-05)

The applicant is to provide a view on whether the mobile home (Mountain View) (SA-05) is regarded as a receptor for the purposes of residential visual amenity.

Has the council provided the applicant any clarification/reasoning for any specific properties (including address and location) or groups of properties (if any) which are considered by the council to be unacceptably impacted in terms of the residential visual amenity threshold. If so, please provide details.

That said, council has previously provided the ECU with a list of properties (below) which it says should potentially have been included in the LVIA and/or the RVAA but do not appear to have been included. Provide your response to the council's list:

- Kinloch Lodge Boath Alness IV17 0XJ
- The Croft House Ardgay IV24 3BW
- Lodge Muirton Mains Fairburn Estate Muir of Ord IV6 7UR
- Fishermans Cottage Muirton Mains Muir of Ord IV6 7UR
- Bridgepark Cottage Aultgowrie Muir of Ord IV6 7XA
- Fergs Cottage Bridge Park Muir of Ord IV6 7XA
- Caravan At Riverview Aigas Beaully IV4 7AE
- Dun Fionn Beaully IV4 7AE
- Easter Newton Fairburn Muir of Ord IV6 7QD

Table 3.1 in the EIAR provides a summary of the Line of Deviation (LoD) and the reporters have two initial queries on that for residential amenity purposes:

- Item 2 shows the LoD reduced on western side of alignment at tower N11/12. However, the maps show it is reduced on the eastern side of the alignment. Clarify this matter.
- Why is the LoD not reduced for Achavanich Farm (SA-04)?

The reporters will ask the applicant to arrange a programme of accompanied (or potentially unaccompanied, if access were permitted) site visits during week commencing 26 October 2026. Provide the applicant's view on how best to arrange for that and a list of properties to be visited (based on answers to the above questions).

Comments on responses received on Matter 3, are requested from the Council and any opted in party who made comments on landscape and visual impacts/residential visual amenity. When making their response the council is asked to include in its response the following specific matter:

Clarify whether the council considers that the Dornoch First NSA objectives or overall integrity would be compromised by the proposal and if that forms part of the council's objection. If that is the case, provide the council's reasoning.

Matter 4: Aviation

Who: applicant

An aviation risk assessment by Pagerpower (August 2025) was submitted with the application (in two parts) but does not form part of the EIA report. It recommended consultation with the safeguarding team at Inverness Airport, the MOD with regard to the likely requirement for lighting in low flying zones, Eskdale Airfield, Knockbain Farm Airfield and Rogart Microlights Airfield. It identifies the risk as medium for these interests.

4. (a) Provide an update on the recommended consultations highlighted in the aviation risk assessment by Pagerpower (August 2025) with regard to Eskdale Airfield, Knockbain Farm Airfield and Rogart Microlights Airfield.

4 (b) Provide an update on progress with HIAL with regard to concerns with infringements for Inverness Airport.

No comment is required by any party on information provided for Matter 4.

Matter 5: Communications infrastructure

Who: applicant

5. The Joint Radio Company (JRC) object to the proposal. What are the applicant's plans to address this objection and is there an update on the JRC objection?

No comment is required by any party on information provided for Matter 5.

Matter 6: Traffic and transport

Who: applicant

6.(a) Regarding what is said by the applicant in table 14.35 in the EIAR, the reporters consider that the published Beaulay to Blackhillock to New Deer to Peterhead 400kV OHL EIA Report may have implications for the applicant's transportation assessment as it was not published at the time of the applicant's assessment for this proposal. That may also be the case for the 1.7km of 400 kV OHL adjacent to Fanellan 400 Kv Hub, 5Km South-West of Beaulay (DPEA ref TRL-270-3). If this is the case, explain in what ways the applicant's transport assessments for this proposal may need to be reconsidered by the applicant? Although the applicant says it will seek to reduce overlap in peak traffic numbers where practicable, explain why the proposed construction of Fanellan, Banniskirk and Carnaig Substations, when being constructed at the same time, have not been considered further in your assessment of cumulative transportation impacts?

6.(b) Community councils (and others) raise concerns about cumulative impact upon the road network (including the A9) with other projects planned over the expected construction period. This is also raised in general terms in the council's original submission. Clarify the applicant's position on how this should be managed when overlaps in peak traffic numbers are unavoidable or avoidance not practicable?

6.(c) In paragraph 14.5.9 of the EIAR Report it states that "...the impacts of construction traffic will be fully assessed in the Transport Assessment, which will be finalised post-consent." What factors restrict further assessment at this time and why is appendix 14.6 regarded as an 'initial draft' Transport Assessment?

6.(d) The EIA Report says that "As indicated in Table 14.36, the addition of all construction traffic from the identified cumulative developments will result in the exceedance of IEMA 2023 Guidelines Rule 1 and Rule 2, with higher impact recorded on links with lower baseline flows and therefore further assessment is required." Where is that further assessment located?

6.(e) Given the % increase in HGVs on parts of the road network, how in practical terms within a consent, for a project of this scale/duration, would ongoing 'wear and tear' of the roads be monitored and addressed during construction rather than at end/start of construction?

6.(f) The Contin Community Council, Strathpeffer Community Council, and Marybank, Scatwell and Strathconon Community Council submissions (and others) highlight concern regarding forecast HGV vehicle movements. A number of representations are concerned about the road networks' capacity to deal with volume of construction traffic. Has the council provided the applicant with a view on the ability of the road network to absorb additional forecast vehicle numbers in terms of capacity? And what measures will be put in place to ensure emergency services access would be maintained in any traffic congestion as part of the project construction?

6.(g) Representations raise the issue of bridges not being capable for construction traffic. Has any assessment been carried out on the capability of bridges and other structures to manage construction traffic and how should the replacement of any bridges/structures be considered in the context of any consent for this project if it were to be granted by Ministers. Is this a matter to be addressed by conditions,

separate consents or is it a matter that requires further assessment at this point in time.

6.(h) The applicant's EIAR Appendix 14.6: Transport Assessment does not appear to contain the quantification, strategy, or assessment of estimated material usage in the predicted traffic increases in each section of the OHL. It is said that estimates have been provided by the OHL contractors, but it is not clear what assumptions that has been based on in terms of materials needed and HGV movements. Provide an explanation for this.

Comments on responses received on Matter 6, are requested from the Council and any opted in party who made comments on traffic and transport impacts.

Matter 7: Private water supplies (PWS)

Who: applicant

7.(a) As noted in the applicant's letter dated 4 May 2026 to the Energy Consents Unit, Table 2 of EIAR Volume 5, Appendix 10.2: Private Water Supply Risk Assessment contains an error in relation to private water supplies which are hydrologically connected and require mitigation. Please provide a revised version of that table and confirm whether any update is also required to Table 19.1 Schedule of Environmental Mitigation. If so, please provide a revised version of that table.

7.(b) Does the applicant intend to provide an updated EIAR Figure 10.6 (Private Water Supplies), showing those PWS identified as being within the 1km study area of the Proposed Development, including existing access tracks?

Who: SEPA

7.(c) The applicant's letter dated 4 May 2026 to the Energy Consents Unit, responds to SEPA's consultation response on the Additional Information. Is SEPA content that detailed construction designs and the requirements regarding the submission of a PWS Monitoring Plan can be secured by means of an appropriately worded planning condition?

7.(d) Does SEPA have any other comments to make on the applicant's aforementioned letter to the Energy Consents Unit?

Comments on responses received on Matter 7 are requested from the Applicant and SEPA only.

Appendix 2 – Planning History

Owing to the geographical extent of the proposed development, details of the planning history for the site given below is not comprehensive, focusing only on recent pertinent planning application activity:

Date	Description	Outcome
Pertinent Project Specific Activity		
13.11.2023	23/04004/PREMAJ - New Spittal area 400kV substation and HVDC converter station	Response issued
09.05.2024	24/00833/SCOP - Loch Buidhe 400kV Substation -EIA Scoping Request	Scoping response issued
18.12.2024	24/04588/SCOP - Construct and operate a 400 kilovolt (kV) overhead transmission line (OHL) supported by steel lattice towers over a distance of approximately 167 km, between proposed substations at Spittal (Banniskirk), Loch Buidhe (Carnaig) and Beaully (Fanellan), rationalisation and crossing of existing transmission infrastructure.	Scoping response issued
06.02.2024	23/05829/SCOP - Spittal Substation and HVDC Converter Station - New 400kv Substation and HVDC Converter Station to connect to the proposed new 400kv Overhead Line between Spittal and Beaully, the new Spittal to Peterhead HVDC Link, and the existing Spittal 275/132kv Substation	Scoping response issued
09.04.2026	24/04898/FUL - Banniskirk Substation - Erection and operation of an Air Insulated Switchgear 400kV substation and HVDC converter station with associated buildings, installation of new platforms, drainage infrastructure, temporary construction compound, landscaping, mounding and other ancillary works	Planning permission granted
20.02.2026	25/00826/FUL - Fanellan Substation - construction and operation of a 400 kV substation and converter station and associated infrastructure, site access, landscaping and demolition works	Application refused, appeal in progress
09.01.2026	24/05062/FUL - Carnaig Substation - Construction and operation of a 400kV substation and associated infrastructure, site access, and landscaping	Application refused, appeal in progress
23.09.2025	25/02993/S37 - Beaully - Denny Overhead Line Diversion - The temporary and permanent diversion of approximately 1.7km section of the existing 275/400kV Beaully Denny overhead line (OHL)	Raise objection
Other Electricity Transmission Related Activity		

09.05.2022	22/00972/SCOP - West of Orkney Wind Farm - EIA Scoping Request for Onshore infrastructure associated with the Onshore Wind Farm, including cable landfall, substation, cable route, tracks and associated infrastructure	Scoping response issued
23.10.2023	23/04332/PNO - Application under Regulation 62 of The Conservation (Natural Habitats, and c.) Regulations 1994 for ground investigation works	Prior approval granted
02.05.2024	24/00290/PAN - The construction and operation of a 400kV substation, access, construction compound, landscaping and ancillary infrastructure.	Reported to committee
02.05.2024	24/00291/PAN - The construction and operation of a 400kV substation, HVDC converter, access, construction compound, landscaping and ancillary infrastructure	Response issued
25.02.2025	25/00171/PNO - Prior Notification under Reg. 62 for ground investigation works - Connagill Cluster - Carnaig Substation	Prior approval not required
21.03.2025	25/00761/PNO - Proposed GI works between the proposed Garvary Wind Farm Substation (NC 62030 00315) and the existing Loch Buidhe 132/275kV Substation (NH 65488 97819)	Prior approval not required
13.08.2025	25/02750/PNO - Application under regulation 62 - Proposed Forestry works and Ground Investigation (GI) work associated with the proposed Spittal - Loch Buidhe - Beaully (SLBB) 400kV OHL	Prior approval not required
08.09.2025	25/02997/PNO - Application under Reg 62 of the Conservation (Natural Habitats, and C.) Regulations 1994 - Fanellan to Dundonnell Underground Cable	Prior approval granted
30.09.2025	25/03304/PNO - Regulation 62 prior notification for ground investigation works to be undertaken as Permitted Development within the provisions of Part 13 - Class 40 (1)(c) of The Town and Country Planning (General Permitted Development) (Scotland) Order 1992	Prior approval required
20.11.2025	25/03629/SCRE - EIA Screening Opinion Request for the construction and operation of a new 132kV overhead line (OHL) connection between Shin Substation and a proposed cable sealing end (CSE) compound approximately 2 km west of Loch Buidhe Substation, and the dismantling of the existing 132kV OHL connection between Shin Substation and Loch Buidhe Substation	Screening - EIA required
Electricity Generation Activity		
13.02.2025	21/01921/S36 - Garvary Wind Farm - Erection and operation of wind farm for a period of 30 years, comprising of 25 (as amended) wind turbines with maximum blade tip height of up to 180m, access tracks,	Approved by Scottish Ministers

	up to 6 borrow pits, substation, battery storage compound, control building, 4 meteorological masts, and ancillary infrastructure	
09.06.2022	22/01589/SCOP - West of Orkney Wind Farm - Erection and Operation of an Offshore Wind Farm comprising up to 125 wind turbines with a maximum blade tip height of 370m, up to 5 offshore substation platforms, up to 750km of inter -array cables, up to 10 export cables including up to 5 cables making landfall in Caithness and ancillary infrastructure	Scoping response issued
01.10.2025	23/02754/S36 - Abhainn Dubh Wind Farm - Erection and operation of a wind farm for a period of 30 years, comprising of 9 wind turbines (as amended) with a maximum blade tip height of 149.9m, energy storage facility, access tracks, borrow pits, substation, anemometer mast, control building, and ancillary infrastructure.	Raise objection no
27.01.2026	23/04113/S36 - Watten Wind Farm - Erection and operation of a wind farm for a period of 35 years, comprising of 7 wind turbines with a maximum blade tip height of 220m, access tracks, borrow pits, substation, control building, battery storage and ancillary infrastructure.	Withdrawn
10.06.2024	24/00902/SCOP - Ouglassy Wind Farm - The Proposed Development will comprise up to eight wind turbines, with a blade tip height of up to 180m, Battery Energy Storage System (BESS) technology, associated infrastructure and ancillary development	Scoping response issued
23.09.2024	24/03524/SCOP - Ceislein Wind Farm - Erection and operation of a wind farm comprising up to 20 turbines with a maximum blade tip height of 250m, potential Battery Energy Storage System (BESS) and associated infrastructure, with a combined generating capacity exceeding 50 MW	Scoping response issued
16.10.2024	24/03825/SCOP - Creachan Wind Farm - Erection and Operation of a Wind Farm, comprising up to 21 Turbines with a maximum blade tip height 220m, battery energy storage system (BESS) facility, access tracks, borrow pits, substation, control building, and ancillary infrastructure	Scoping response issued
12.11.2024	24/04326/SCOP - Inveroykel Wind Farm - Scoping request for the erection and operation of a wind farm comprising 29 turbines with a maximum blade tip height of 230m, battery energy storage system (BESS) facility and associated infrastructure	Scoping response issued
12.02.2025	24/04752/SCOP - Braelangwell Wind Farm - Erection and operation of a wind farm comprising of up to 17 wind turbines with a maximum blade tip height of 220m and associated infrastructure.	Scoping response issued

24.04.2025	25/00539/SCOP - Novar Wind Farm repowering - Decommissioning of the existing 34 turbines with a maximum blade tip height of 60m, erection and operation of a wind farm for a period of 50 years, comprising up to 10 turbines with a maximum blade tip height of up to 180m , control building, substation, access tracks, borrow pits, underground cabling, construction compounds, laydown areas, meteorological mast and ancillary infrastructure	Scoping response issued
22.04.2025	25/00553/SCOP - Golticlay Wind Farm extension - Erection and operation of a wind farm for a period of 40 years, comprising up to 11 turbines with a maximum blade tip height of 200m, control building, substation (including transformer and Battery Energy Storage System), upgraded access, access tracks, watercourse crossings, borrow pits, underground cabling, construction compounds, laydown areas, anemometer mast and ancillary infrastructure	Scoping response issued
	25/01153/S36 - Balblair Wind Farm - erection and operation of a wind farm for a period of 30 years, comprising 8 turbines, 2 with maximum blade tip heights of 200m and 6 of 180m along with battery energy storage system (BESS) facility with combined generating capacity of 66MW, access tracks, borrow pits, substation, control building, and ancillary infrastructure	Pending consideration
01.07.2025	25/01352/SCOP - Beinn Tharsuinn Repowered and Extended Wind Farm - Decommissioning and removal of 17 existing turbines with a maximum blade tip height of 80m and related infrastructure, erection and Operation of up to 31 turbines with a maximum blade tip height 180m, Battery Energy Storage System (BESS) and ancillary infrastructure	Scoping response issued
07.08.2025	25/02111/PAN - Proposal of Application Notice for Novar Wind Farm repowering - Decommissioning of the existing 34 turbines with a maximum blade tip height of 60m, erection and operation of a wind farm for a period of 50 years, comprising up to 10 turbines with a maximum blade tip height of up to 180m , control building, substation, access tracks, borrow pits, underground cabling, construction compounds, laydown areas, meteorological mast and ancillary infrastructure	Closed
24.06.2025	25/02189/SCRE - Battery Energy Storage System (Other Generating Station) – screening response issued	Screening response issued
24.07.2025	25/02372/SCOP - Abhainn Dubh Wind Farm Connection - Construction and operation of a 132 kiloVolt (kV) single circuit overhead line (OHL) of approximately 4.8 km and approximately 1 km of underground cable (UGC) to connect the proposed	Scoping response issued

	Abhainn Dubh Wind Farm to the existing Fyrish Substation	
26.03.2026	25/02964/PIP - Ayre Offshore Wind Farm - construction of onshore transmission infrastructure comprising cable landfall, substation, cable circuits, temporary construction areas, access, drainage, landscaping and associated infrastructure	Planning permission granted
	25/04675/S36 - Golticlay Extension Wind Farm - Erection and operation of a wind farm for a period of 40 years, comprising 6 wind turbines with a maximum blade tip height of up to 180 metres, Battery Energy Storage System (BESS) and associated infrastructure.	Pending consideration
	26/00531/S36 - Creachan Wind Farm - Erection and Operation of a Wind Farm for up to 40 years comprising up to 13 wind turbines, 9 with a maximum blade tip height of 200m and 4 with a maximum blade tip height of 180m, battery energy storage system (BESS), and associated infrastructure. This case will be determined by the Energy Consents Unit. Please visit Energy Consents Unit at https://www.energyconsents.scot/ApplicationSearch.aspx?T=2 using reference number ECU00005211	Pending consideration
	26/00601/S36 - Inveroykel Wind Farm - Erection and Operation of a Wind Farm for a period of 40 years, comprising of 20 Wind Turbines with a maximum blade tip height 230m, battery energy storage system (BESS), access tracks, borrow pits, substation, control building, and ancillary infrastructure.	Pending consideration
	26/01226/S36 - Ceislein Wind Farm - Erection and operation of a wind farm for a period of 40 years, comprising up to 11 wind turbines with a maximum blade tip height of 250m, (8 turbines at 250m Nos. T3 through to T10, and 3 turbines at 200m, Nos T1, T2 and T11), Battery Energy Storage System, access tracks, borrow pits, substation, control building, and ancillary infrastructure.	Pending consideration
Other Planning Activity		
23.08.2022	22/01129/PIP - Erection of dwelling and detached garage, installation of sewage treatment plant and soakaway, as well as the formation of a private access	Planning permission granted
29.01.2025	23/01468/MSC - Erection of 19 affordable residential units (Phase 1A of 16/01842/PIP) to satisfy matters specified in conditions 1, 2, and 4 – 25	Permission granted
06.07.2023	23/02224/FUL - Change of use and extension of garage to form self-contained ancillary accommodation	Planning permission granted

17.12.2024	23/02702/MSC - MSC application for phase 1 private housing to satisfy matters specified in conditions 1, 2 and 4-25 (16/01842/PIP)	Permission granted
23.08.2023	23/02928/TPNO - Installation of 25m lattice telecommunications tower, 3no antennas, 4no dishes, 1no gps module and associated works	Prior approval not required
19.07.2024	24/00138/FUL - Partial demolition and erection of extension	Planning permission granted
21.05.2024	24/00454/FUL - Installation of residential shepherd's hut. Formation of access and hardstanding and erection of shed (in retrospect)	Planning permission granted
14.10.2024	24/01824/PIP - Erection of house	Planning permission granted
07.08.2026	24/02832/CLE - Dwelling House Constructed to Enable The Running of an Existing Croft	Granted

Appendix 3 – Development Plan Policy Documents and Other Material Policy Considerations

DEVELOPMENT PLAN

The following policies are relevant to the assessment of the application.

A3.1 National Planning Framework 4

National Development 3 – Strategic Renewable Electricity generation and Transmission Infrastructure

Policies:

- 1 Tackling the climate and nature crises
- 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

A3.2 Highland Wide Local Development Plan 2012

- 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
- 53 Minerals
- 55 Peat and Soils
- 56 Travel
- 57 Natural, Built and Cultural Heritage
- 58 Protected Species
- 59 Other important Species
- 60 Other Importance Habitats
- 61 Landscape
- 63 Water Environment
- 66 Surface Water Drainage
- 69 Electricity Transmission Infrastructure
- 72 Pollution
- 73 Air Quality
- 74 Green Networks

A3.3 Caithness and Sutherland Local Development Plan (CaSPlan) (2018)

No policies or allocations relevant to the proposals are included. It does, however, confirm the boundaries of Special Landscape Areas within the plan's boundary.

A3.4 Inner Moray Firth Local Development Plan 2 (IMFLDP2) (2024)

No specific policies or land use allocations apply; however, the following general policies are considered applicable.

1 Low Carbon Development

2 Nature Protection, Preservation and Enhancement

9 Delivering Development and Infrastructure

A3.5 Other Highland Council Supplementary Guidance

- Developer Contributions (March 2018)
- Flood Risk and Drainage Impact Assessment (Jan 2013)
- Green Networks (Jan 2013)
- Highland Historic Environment Strategy (Jan 2013)
- Highland's Statutorily Protected Species (March 2013)
- Physical Constraints (March 2013)
- Special Landscape Area Citations (June 2011)
- Standards for Archaeological Work (March 2012)
- Trees, Woodlands and Development (Jan 2013)
- Biodiversity Enhancement Planning Guidance (May 2024)

OTHER MATERIAL POLICY CONSIDERATIONS

- A3.6**
- 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)
 - The Draft Energy Strategy and Just Transition Plan (2023)
 - Scottish Energy Strategy (2017)
 - 2020 Routemap for Renewable Energy (2011)
 - Energy Efficient Scotland Route Map, Scottish Government (2018)
 - Advising on peatland, carbon-rich soils and priority peatland habitats in development (NatureScot, Feb 2024)
 - Developing with Nature Guidance (NatureScot 2023)
 - Biodiversity: Planning Guidance (December 2025)
 - Historic Environment Policy for Scotland (2019)
 - Scheduled Monuments Consents Policy (2019)
 - Managing Change in the Historic Environment: Setting (HES) (June 2016)
 - PAN 1/2011 - Planning and Noise (2011)
 - Community Benefits for Electricity Transmission Network Infrastructure: Government Response, UK Department for Energy and Security and Net Zero (2023).

- Construction Environmental Management Process for Large Scale Projects (THC, 2010)
- Landscape Institute (2019) Residential Visual Amenity Assessment. LI Technical Guidance Note 2/19
- Guidelines for Landscape and Visual Impact Assessment (GLVIA3)
- The Highland Council – Visualisation Standards for Wind Energy Developments (THC, 2016)

Appendix 4 - Assessment of Compliance with the Development Plan / Other Planning Policy.

National Planning Framework 4

- A4.1 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. This includes a vision and spatial principles.
 - 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. It is clear that this part of the document should be taken as a whole, and all relevant policies should be applied to each application.
 - Part 3 – contains a series of annexes which sets out how the document should be used, statements of need for national development, spatial planning priorities, qualities of successful places and other matters.
- A4.2 The Spatial Strategy sets out that we are facing unprecedented challenges and that we need to reduce greenhouse gas emissions and adapt to future impacts of climate change. It sets out that Scotland's environment is a national asset which supports our economy, identity, health and wellbeing. It sets out that choices need to be made about how we can make sustainable use of our natural assets in a way which benefits communities. The spatial strategy reflects legislation in setting out that decisions require to reflect the long term public interest. However, in doing so it is clear that we will need to make the right choices about where development should be located ensuring clarity is provided over the types of infrastructure that needs to be provided and the assets that should be protected to ensure they continue to benefit future generations. The Spatial Priorities support the planning and delivery of sustainable places, where we reduce emissions, restore and better connect biodiversity; liveable places, where we can all live better, healthier lives; and productive places, where we have a greener, fairer and more inclusive wellbeing economy.
- A4.3 The proposed development is of national importance for the delivery of the national Spatial Strategy. It is of a type and scale that constitutes NPF4 National Development 3 - Strategic Renewable Electricity Generation and Transmission Infrastructure. NPF4 describes this national development and states that the electricity transmission grid will need substantial reinforcement including the addition of new infrastructure to connect and transmit the output from new on and offshore capacity to consumers in Scotland, the rest of the UK and beyond. Additional electricity generation from renewables and electricity transmission capacity of scale is fundamental to achieving a net zero economy and supports improved network resilience in rural and island areas. The Spatial Strategy considers that Highland can continue to make a strong contribution toward meeting our ambition for net zero. It considers that the strategy for Highland aims to protect environmental assets as well as to stimulate investment in natural and engineered solutions to climate change. This aim, which will clearly require a balancing exercise, is not new and is reflected throughout the document.

Furthermore, any project identified as a national development requires to be considered at a project level to ensure all statutory tests are met, as set out in Annex 1 of the NPF4. This includes consideration against the provisions of the Development Plan, of which NPF4 is a part.

A4.4 Specific to this proposal, as well as the support in Policy 1 (significant weight will be given to the global climate and nature crisis when considering development), Policy 11 of NPF4 supports all forms of proposals for renewable, low-carbon and zero emission technologies including wind farms, as well as associated transmission and distribution grid infrastructure. This should not be considered as an unqualified support as 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. Policy 11 also requires proposals that impact on international or national designations will be assessed in relation to Policy 4 and that project design and mitigation will demonstrate how the following impacts are addressed:

- i. impacts on communities and individual dwellings, including, residential amenity, visual impact, noise and shadow flicker;
- ii. significant landscape and visual impacts, recognising that such impacts are to be expected for some forms of renewable energy. Where impacts are localised and/ or appropriate design mitigation has been applied, they will generally be considered to be acceptable;
- iii. public access, including impact on long distance walking and cycling routes and scenic routes;
- iv. impacts on aviation and defence interests including seismological recording;
- v. impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised;
- vi. impacts on road traffic and on adjacent trunk roads, including during construction;
- vii. impacts on historic environment;
- viii. effects on hydrology, the water environment and flood risk; ix. biodiversity including impacts on birds;
- ix. impacts on trees, woods and forests;
- x. proposals for the decommissioning of developments, including ancillary infrastructure, and site restoration;
- xi. the quality of site restoration plans including the measures in place to safeguard or guarantee availability of finances to effectively implement those plans; and
- xii. cumulative impacts.

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.

A4.5 NPF4 Policy 4 (Natural places) sets out that development proposals that will have an unacceptable impact on the natural environment will not be supported. This policy, amongst other requirements, sets out that proposals with likely significant effects on European sites (SACs and SPAs) require an Appropriate Assessment, as required per the Habitats Regulations. The Chief Planner's letter, dated 9th July 2025, sets

out that Ramsar sites are to be treated the same as European sites for the purposes of land use change decision-making; therefore, where development proposals will have a likely significant effect on the interest features of a Ramsar site, an Appropriate Assessment would be required under the Habitats Regulations. NPF4 Policy 4 sets out development proposals that will affect an NSA or SSSI will only be supported where i) the objectives of designation and the overall integrity of the areas will not be compromised; or ii) any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance. Such policy tests are also set out for SLAs, albeit that any significant adverse effects on the integrity of the area are to be clearly outweighed by social, environmental or economic benefits of at least local importance. These are important considerations given the location of the development and sections of the line crossing, and / or being near to these designations. In relation to wild land, NPF4 Policy 4 Part g) now makes clear that development proposals in wild land areas will be supported where the proposal supports meeting renewable energy targets.

- A4.6 NPF4 Policy 7 (Historic assets and places) part (I) sets out development proposals affecting a WHS or its setting will only be supported where the Outstanding Universal Value (OUV) of the WHS is protected and preserved. The Flow Country UNESCO World Heritage Site (WHS) was inscribed in July 2024, in recognition of the most outstanding example of an actively accumulating blanket bog landscape. Inscription as a WHS signifies the blanket bog is of such natural significance as to transcend national boundaries, and to be of common importance for present and future generations of all humanity. The WHS is underpinned by three international designations (SPA/SAC/Ramsar) and one national designation (SSSI) for species and habitats.

Highland wide Local Development Plan

- A4.7 HwLDP was adopted in 2012 and sets out a range of planning policies applicable for the whole Highland Council area. HwLDP continues to be used alongside NPF4, until it is replaced by a new-style LDP. The Council notes that legislation indicates that if there is incompatibility between the LDP and the NPF, whichever is the more recent shall prevail. That requirement does not take away from the fact that the HwLDP must, whilst still part of the adopted Development Plan, be part of the consideration and a number of policies could be relevant.
- A4.8 The Development Plan supports the broad principle of energy development. 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.” “It will support proposals which are assessed as not having unacceptable impact on the environment including natural, built and cultural heritage features.” Where development is assessed as not having unacceptable significant impact on the environment, then the proposal would accord with the Development Plan.
- A4.9 The Council began a review of HwLDP, with the publication of the Main Issues Report in September 2015 and subsequent consideration of comments in 2016. In December 2017 the Scottish Government published a Planning Bill outlining potential changes to the Scottish planning system. The Council took the decision to

halt the HwLDP Review until more was known about the changes. The Planning (Scotland) Act 2019 was subsequently made and details of the new arrangements in the Act for Development Plans were finalised in 2023. For the first time, the NPF is part of the Development Plan. This will likely lead to a reduction in the number and range of policies that we require in our Local Development Plan.

- A4.10 We are gathering the evidence we believe is relevant and necessary to write the Highland Local Development Plan (HLDP). We have drafted part of our formal Evidence Report, which when complete, will be submitted to Scottish Ministers in 2026.

Area Local Development Plans

- A4.11 The Caithness and Sutherland Local Development Plan (CaSPlan) covers the Spittal and Buidhe locations and the northern sections of overhead line (roughly aligning with Sections A, B, and C), and the Inner Moray Firth Local Development Plan (IMFLDP) covers the southern sections of overhead line (roughly aligning with sections D and E). The Highland Council Area Local Development Plans' focus is on the regional and settlement strategies for their respective areas and identify specific site allocations and as such, much of their content is not directly relevant to an energy transmission proposal, particularly one that is proposed to be located in the countryside, outwith towns and villages. However, certain aspects of the strategies for the local area and settlements may highlight priorities for the local area that should be taken into consideration when designing the development or help to inform plans for community engagement and/or community benefit.
- A4.12 The Area Local Development Plans confirm boundaries (including any refinements) of the Special Landscape Areas (SLAs) within their plan areas. The SLA citations webpage provides the most up to date information on SLAs:
- www.highland.gov.uk/downloads/file/2937/assessment_of_highland_special_landscape_areas
- Highland wide Local Development Plan (HwLDP) Policies 28, 57, 61 and 67 seek to safeguard these regionally important landscapes. The impact of this development on landscape is primarily assessed in the Design, Landscape and Visual Impact section of this report.
- A4.13 The IMFLDP2 supports the area to maximise local and Scotland-wide benefits from investment in renewable energy and place the Highlands at the heart of the drive towards net-zero. While this primarily relates to the Cromarty Firth Green Freeport, the plan acknowledges the ScotWind offshore projects, which will inevitably require upgraded transmission infrastructure. As above, his support is also shown through development allocations rather than any specific policy relating to renewable energy developments. The Plan does contain a small number of policies including Policy 2 Nature Protection, Preservation and Enhancement. This sets out that major development will only be supported where it is demonstrated that the proposal will conserve and enhance biodiversity within and adjacent to a site. This is similar to the approach taken in NPF4 and will be considered in the relevant sections of this report. The IMFLDP2 also sets out that developers will be required to demonstrate that adequate capacity to serve the proposal exists or can be created by a programmed

improvement or via direct developer provision or funding. Where this is appropriate, the need for enhancements to infrastructure will be highlighted in this report.

Onshore Wind Energy Policy Statement (2022) and Draft Energy Strategy and Just Transition Plan (2023)

- A4.14 The Onshore Wind Policy Statement was published in 2022 and supersedes the previously adopted Onshore Wind Energy Policy Statement which was published in 2017. The document sets out a clear ambition for onshore wind in Scotland and for the first time sets a national target for a minimum level of installed capacity for onshore wind energy being 20 Gigawatts (GW). This is set against a currently installed capacity of 8.7 GW. Therefore, a further 11.3 GW of onshore wind requires to be installed to meet the target. It is however acknowledged that targets are not caps. In delivering such a target Scotland would play a significant role in meeting the requirement of 25-30 GW of installed capacity across the UK identified by the Climate Change Committee.
- A4.15 To deliver the ambition, the industry body, Scottish Renewables have produced an Onshore Wind Sector Deal with the Scottish Government, published in 2023. This document sets out commitments between Scottish Government and industry to deliver upon the ambition of 20 GW of onshore wind in Scotland by 2030 and deliver maximum benefit for Scotland. The sector deal for onshore wind energy is being progressed. The document recognises that balance is required and that no one technology can allow Scotland to reach its net zero targets. The document is clear that in achieving a balance, environmental and economic benefits to Scotland must be maximised. In taking this approach, this echoes Scotland's Third Land Use Strategy. Benefits to rural areas, such as provision of jobs and opportunities to restore and protect natural habitats, are also highlighted in the document.
- A4.16 The Draft Energy Strategy and Just Transition Plan was published for consultation in 2023. Ministers will likely consider this document in their decision on the application, however limited weight can be applied to the document given its draft status. Unsurprisingly, the material in the document reflects in large part that contained in NPF4 and the Onshore Wind Energy Policy Statement (OWPS) 2022. A fundamental part of the Strategy is expanding the energy generation sector. The draft Strategy specifically addresses energy networks (page 36) and states "significant infrastructure investment in Scotland's transmission system is needed to ameliorate constraints and enable more renewable power to flow to centres of demand." It states that National Grid has identified the requirement for over £21 billion of investment in GB electricity transmission infrastructure to meet 2030 targets and that over half of this investment will involve Scottish transmission owners SPEN and SSEN. Overall, the draft Energy Strategy forms part of the new policy approach alongside the OWPS and NPF4 and confirms the Scottish Government's policy objectives and related targets reaffirming the crucial role that onshore wind and enabling transmission infrastructure will play in response to the climate crisis which is at the heart of all these policies.

Appendix 5 Officer's Visual Effects Appraisal

- Where the EIAR's reported Level of Effects and Significance (APP) are disputed by THC, this is noted under Level of Effects and Significance (THC) and underlined (shaded orange).
- Significant effects are indicated as **bold** (shaded red as identified by the applicant (APP))
- PD – proposed development

Section A: Spittal to Brora

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
SA-01 – Lanergill Farm	VPs 1, 2, 3, 5, 6	Major Adverse (Significant) (during construction and operation)	Agree with applicant's assessment.
SA-02 – Toftingall Farm	VPs 1, 2, 3, 5, 6	Major Adverse (Significant) (during construction and operation)	Agree with applicant's assessment. Not included in the RVAA. Officers assume this property exceeds the 225m distance criterion for the RVAA. There is a house at Lanergill Farm to the northwest of SA-02 that is not included in the assessment, despite appearing to be at a similar distance from the PD (well under 500m) and likely to have Significant effects.
SA-03 – Farmsteads at Halsary	VP 10 and 11	Major Adverse (Significant) (during construction and operation)	Agree with applicant's assessment. Not included in the RVAA. Officers assume this property exceeds the 225m distance criterion for the RVAA.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
SA-04 – Farmsteads and cottages along the A9	VP12	Major Adverse (Significant) (during construction and operation).	Agree with applicant's assessment but Officers consider the magnitude of change should be higher. Several properties lie in this area either side of the A9. Three properties are included in the RVAA due to their proximity to the PD. Officers note the assessment of Achavanich Farm appears contradictory, in that the main views are clearly to the east (towards the PD) but the assessment of effects states otherwise. Officers disagree that magnitude of change would only be Medium. Furthermore, there would be cumulative effects with the existing 132kV OHL.
Cumulative effects at Lanergill, Toftingall (SA-01 and -02), Halsary (SA-03) and A9/properties at Loch Rangag (SA-04)	VPs 6, 10, 11 and 12	SA-01: Major Adverse (Significant) (Scenario 2) SA-02: Major Adverse (Significant) (Scenario 2) SA-03: No cumulative effect SA-04: Major-moderate Adverse (Significant) (Scenario 2)	<u>Disagree with applicant's assessment in relation to Scenario 1.</u> Agreed on Scenario 2. All nearby dwellings are assessed in the LVIA as having little or no Scenario 1 cumulative effects: • Minor and none for SA-01 and SA-02 in scenario 1 due to restricted views of Banniskirk substation, assessed as Major for Scenario 2 due to Ouglassy wind farm. • Halsary (SA-03) assessed as no effect in Scenarios 1 and 2. • Several dwellings on the A9 nr Rangag (SA-04) the same. <u>This is because the LVIA does not consider <i>existing</i> similar developments including Bad a Cheo wind farm and the existing 132kv OHL. If these are considered, then Officers assess all these properties to experience Significant cumulative effects.</u> e.g. Halsary has the existing OHL 500m to the west and wind turbines within a few hundred metres N and W. The PD would be 256m at closest and with Major effects to the S and SE (see VPs 10 and 11 for general environs). The assessment also refers to Scenario 2 developments being screened by topography. As these are proposed wind farms located within a few km in an open, almost flat landscape this seems unlikely.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
			<u>From the A9 and properties at Rangag the PD would be seen close to the road, side by side with the existing OHL (see VP12), so Officers consider there may be Major cumulative effects.</u>
SA-05 – Single storey cottage and mobile shed west of the A9	VP13	Major Adverse (Significant) (during construction and operation)	Agree with applicant's assessment. Properties at SA-05 are assessed as having a High magnitude of change. In this case neither has the closest part of the proposed development in its principal view and there is some degree of screening by vegetation and/or topography. Officers contrast this with the assessment of Medium at Achnavaich Farm.
SA-06 – Croft township at Smerral	The closest VP is VP14 and is taken from northwest side of proposed OHL at Houstry.	Moderate-Minor Adverse (Not Significant) (south) to Major Adverse (Significant) (north) (during construction and operation)	Agree with applicant's assessment. SA-06 Smerral crofting township assessed as having Significant effects of Medium-Low magnitude/ Moderate in south, but Moderate/Major in north closest to the PD, which seems reasonable given the extent of the area with some properties within 500m. The houses around Houstry are not assessed, presumably as none are within 500m. However, they would have comprehensive visibility of the PD across the open landscape as VP14 shows and effects would be similar to much of Smerral.
SA-07 – Scattered properties at Badragie	No nearby/ attributable viewpoints	Moderate-minor adverse (Not Significant) to Major adverse Significant (Significant) depending on proximity and proportion of	Agree with applicant's assessment. Not included in RVAA.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
		view occupied (during both construction and operation)	
SA-08 – Achorn House	VP 16	Major Adverse (Significant) (during construction and operation)	Agree with applicant's assessment.
SA-09 – Borgue	N/A	Major-Moderate adverse effect (Significant) during construction and operation	Agree with applicant's assessment.
SA-10 Badrinsary	N/A	Moderate Adverse (Significant) during construction and operation	Agree with applicant's assessment. <u>However, the effect would be greater when commercial forestry is harvested as this would remove some screening.</u>
SA-11 Langwell Gardens, Langwell Kennels	VP 20	Moderate Adverse (Significant)	Agree with applicant's assessment.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
and Keepers House		during construction and operation	
SA-12 The Bungalow, Ousdale and Keepers Cottage	VP 23	Moderate Adverse (Significant) during construction and operation	<u>Disagree with assessment on SA-12.</u> L VIA assessment of Low magnitude /Moderate Adverse at Ousdale (SA-12) is too low. Keeper's cottage at 187m distance from PD with an open rear view would be High magnitude/ Major and the other two properties Medium magnitude/ Moderate-Major. RVAA suggests Medium/ Moderate-Major for Keepers Cottage but Officers consider this too low as the proposed angle tower higher on the hill to the north would dominate the property seen from the rear or from the approaches. The wireline in Appendix 5, Figure 1.7b indicates the tower would require some form of modular extension or plinth which would increase the effect. Officers consider effects on this property may well exceed the residential amenity threshold.
SA-13 – Marrel and scattered cottages along the A897	VPs 25, 26, 27	Major-Moderate Adverse (Significant) during construction and operation	Broadly agree with applicant's assessment. Officers broadly agree with LVIA assessment of Medium magnitude/ Major-moderate effect for closest receptors including the SA-13 properties (<u>except Caen which is closer than 470m and would be higher magnitude</u>).
OA-1 Dunbeath Castle	N/A	None, due to natural screening,	Agree with applicant's assessment. Views likely to be restricted due to bunding and mature vegetation. Open aspect towards the sea unaffected. However, this receptor has not been covered by a VP

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
		spatial separation and intervening landforms	so this conclusion of no effects could differ, nevertheless, it is unlikely to be Significant.
OA-2 Hill walk location at East Scaraben	VP 17	Minor Adverse (Not Significant) (during construction and operation)	Agree with applicant's assessment. Officers agree effects are Not Significant (LVIA Low magnitude/ Moderate-Minor effect). An extensive length of OHL is visible crossing moorland and coastal hills. However, it lies to the east and at a minimum of 4.5km distant, is only intermittently skylined against the sea, and seen in the context of scattered transport routes and development in this direction, including onshore and offshore wind farms.
OA-3 – Berriedale Braes	VP 18	Moderate Adverse (Significant) during construction and operation	Agree with applicant's assessment. Views would be Significantly affected due to the much greater prominence of the PD which is larger and higher in the landscape due to the existing line taking the least impactful route.
OA-4 – Badbea Historic Clearance Village	VP21 and 22	None/Moderate- minor Adverse (Not Significant) during construction and operation based on proximity and proportion of view occupied.	<u>Disagree with the applicant's assessment.</u> Officers consider effects on path to Badbea (OA-4) would be Significant as visitor sensitivity would be Medium/High and change to view Medium magnitude (not Medium sensitivity and Medium/Low magnitude as LVIA assessed).

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
OA-5 – Hill walk location at Creag Thoraraidh	VP24	Moderate Adverse (Significant) during construction and operation	Broadly agree with applicant's assessment. Though Officers agree with the applicant's assessment that the effect would be Significant, it could be greater than assessed. The applicant describes views from the hilltop of construction works and steel lattice towers would be "intermittent" – officer disagrees with this description. Creag Thoraraidh is a sub 2000 ft hill, that is rounded and undefined. Views from the summit of the interior landscape (of higher peaks (SLA hills)) is largely uninterrupted and undeveloped (except existing distribution wooden poles as shown in VP24).
OA-6 – Helmsdale Memorials (emigrants)	VP 28	Moderate-minor Adverse (Not Significant) (during construction and operation)	Agree with applicant's assessment.
A Roads	Various	Major Adverse (Significant) during construction and operation within 500m Minor Adverse (Not Significant) across wider location during	Agree with applicant's assessment. Agree with LVIA magnitude assessment of Medium relating to users of A9 section RA1-4 (Roads A9, A882, A99). <u>However, given the expansive views across the Flow Country and Berriedale Coast SLA to the mountains, Officers consider receptors would be at least Medium sensitivity (not Low-Medium) and effects Moderate Adverse and Significant.</u> VPs 18-19 demonstrate sections of the A9 between Rumster and Brora (RA1-5) where views are affected, although much of this is screened by topography and/or trees, giving an overall assessment of negligible/minor adverse and Not Significant.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
		construction and operation	
B Roads	Various	Major- Moderate Adverse (Significant) effect within 750m during construction and operation Minor Adverse (Not Significant) effect across wider location during construction and operation	Agree with applicant's assessment.
Railway Lines – Far North Railway Line	VP26 covers Marrel area VP27	Major adverse (Significant) within 500m of the PD at Marrel during construction and operation Minor Adverse (Not Significant)	Agree with applicant's assessment.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
		across the wider route. No effects between Scotscalder and Wick via Georgemas junction	
RA-10 – CA06.08 The old quarry	None	Moderate Adverse (Significant) effect during construction and operation	Agree with applicant's assessment. <u>Not covered by a VP so cannot verify assessment. It is unclear if this Core Path has been cumulatively assessed, as other renewable infrastructure would also be within the landscape (e.g Banniskirk substation).</u>
RA-11 – CA06.04 Causeymire Wind Farm	VP 10 or 11 would be closest	Moderate Adverse (Significant) effect during construction and operation	Agree with applicant's assessment.
RA-12 – CA10.11 Achavanich and Munsary	VP 12 would be closest	Major-Moderate Adverse (Significant) during construction	Agree with applicant's assessment.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
		and Moderate Adverse (Significant) during operation	
RA-13 – CA10.03 Rumster Mast Loop, CA10.04 Rumster, and CA10.07 Rumster to A99	None	Minor Adverse (Not Significant) effect during construction and operation	Agree with applicant's assessment. – forest/tree cover currently provides sufficient screening. Distance of recreational area to OHL is approx. 1.1km
RA-14 – CA04.01 Dunbeath Strath, CA04.02 Coopers Path, CA04.04 Achnaclyth track by Touthagoul, CA04.06 Footbridge link to, CA04.13 Old Road by the driveway to Dunbeath Castle, and CA04.16 Clashvalley track to CA04.19 Balintra Wood	VP 16	Major- Moderate Adverse (Significant) within 500m; Minor Adverse (Not Significant) in wider locations during construction and operation	Agree with applicant's assessment.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
RA-15: Core Paths CA04.14 and CA04.15. A collection of gravel paths stretching from Berriedale to Langwell	VP18, 19 and 20	Minor Adverse (Not Significant) during construction and operation	Agree with applicant's assessment.
RA-16: Core Path CA04.03. A gravel track off the A9(T) that leads to Badbea	VP21	Moderate Adverse (Significant) effects during construction Minor Adverse (Not Significant) effects during operation	Agree with applicant's assessment. Core Path direction towards A9(T) would have views of proposed development. Clearance village itself is downslope and faces coast/cliffs which would be away from the PD, so would be screened.
RA-17: Core Paths SU13.01, SU13., SU13.03, SU13.04, SU13.05, SU13.05, SU13.06, SU13.07, and SU13.09. A	VP28	Moderate-Minor Adverse (Not Significant) during construction Minor Adverse (Not Significant) during operation	Agree with applicant's assessment – eastern group of paths out with ZTV. <u>However, for path sections towards Strath Ullie, Officers disagree and consider the effect as Moderate Adverse and Not Significant.</u>

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
collection of tracks at Helmsdale			
RA-18: Core Path CU13.08. A hill walk winding through rolling hills at Gartymore	None	Minor Adverse (Not Significant) during construction and operation	Agree with applicant's assessment.
RA-19 North Coast 500	Various	Minor Adverse (Not Significant) effect during construction and operation	Agree effects are Not Significant <u>however Officers consider the sensitivity should be high resulting in effects greater than Minor adverse.</u> The NC 500 is a nationally promoted tourist route. The PD would be visible on the NC 500 approaching Helmsdale, towers would be visible as they drop down into Strath Ullie. Vehicles would be slowing approaching the 30mph speed zone, so views for passengers would be sustained for longer than if travelling at higher speeds. View of Strath Ullie when crossing bridge over River Helmsdale would have views of approx. 3 towers and associated cables. This is estimated as the bridge itself is not covered by a VP.

Section B: Brora to Loch Buidhe

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
SB-1 Gordonbush/Old Town	VP36 (Loch Brora is closest) which is around 1km to the south	Moderate Adverse (Significant) during operation	Agree with applicant's assessment. Not included in RVAA
SB-2 Killin	VP35	Major- moderate Adverse (Significant) during operation	<u>Disagree with applicant's assessment.</u> Officers consider the effect would be Major Adverse (Significant) during operation. The applicant has assessed the Magnitude of Change as Large/Medium Adverse; however, it is considered that there would be a higher magnitude of change experienced at this receptor. The receptor would be dominated by the closest tower and has very little tree screening except to the northeast. Residents would also obliquely see the OHL crossing Loch Brora and hills beyond from its front elevation and wider curtilage. Given the proximity of the receptor to (147/126m) and span of the OHL in the wider view from house and curtilage, consider effects to not be greatly mitigated by sparse trees to the northeast of cottage. There is potential of exceeding the residential amenity threshold. Note that the assessment for both this and Carroll Cottage (SB-3) below implies that there would be reduced screening in winter due to leaf-fall. This appears to be a generic cut-and-paste as could only apply to the NE side of Killin (mainly evergreen) and Carroll Cottage has no nearby screening. The RVAA incorrectly lists this as SB-1.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
SB3 – Caroll Cottage	Volume 3 Figure 7.14 (RVAA)	Major- Moderate Adverse (Significant) during operation.	<u>Disagree with applicant's assessment.</u> Officers consider the effect would be Major Adverse (Significant) during operation. While SB-3 was not visited directly, Officers consider effects there likely to be of a similar nature and magnitude to SB-2.
SB – 4	None	Not Assessed	Shown as a receptor in Figure 7.4 – 5 but not mentioned or assessed except as a reference in the assessment of Core Paths around Ben Bhraggie and Loch Lunndaidh. Very likely would get a view of the OHL, at about 1.2km distant, cutting perpendicularly across another of the glens that characterise the SLA. At this distance, <u>the effects would likely be Significant</u> (see SB-1 above at ca.1.7km)
SB-5 Morvich	VP40 (approx. 2.5km to the north)	Moderate Adverse (Significant) during operation	Agree with applicant's assessment. There will be some skylining of towers and visibility of the OHL as it crosses the valley floor. However, due to the separation distance and the landscape appearing to have capacity to largely absorb the effects, without the towers forming the predominant focus, it is not considered a Major Adverse Effect. Not in RVAA.
SB-6 East Kinnauld	VP40	Moderate Adverse (Significant)	Agree with applicant's assessment. Similar effects to SB-5.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
		during operation	It is worth noting that in this instance the proposed OHL is also parallel to the existing OHL, separated by a few hundred metres, which would lead to cumulative effects.
SB-7 West Kinnauld	VP40	Minor Adverse, (Not Significant) during operation	<u>Disagree with applicant's assessment.</u> Officers consider the effect as Moderate Adverse (Significant) during operation as per SB-5 and SB-6. There would be clear views of the OHL as it cuts across the flat-bottomed strath and containing slopes typically of 150 – 250m, then skylining the surrounding hills in a similar manner to glens within the SLA further north. The proposed OHL is also parallel to the existing OHL, separated by a few hundred metres, which would lead to cumulative effects.
SB- 8/12/13 and 14 Pittentrail and Rogart	VP40	Minor Adverse (Not Significant) during operation.	Agree with applicant's assessment.
SB - 9	None	Not Assessed	Minor Adverse (Not Significant) Due to separation distance, intervening vegetation and landform, very limited and restricted views.
SB - 10	None	Not Assessed	Not Shown on ZTV.
SB-11 Eiden Group of residential	VP40	Major- Moderate Adverse	Agree with applicant's assessment. Not in RVAA.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
properties and farm buildings		(Significant) during operation	
SB-15 Dalnamain	Volume 3 Figure 7.15 RVAA	Major- Moderate Adverse (Significant) during operation Up to 1km distance	Agree with applicant's assessment. The OHL would be located 196m to the west (Tower N275) and would not appear in principal views from the south. No effect to views to east, southeast and south. Visible more distantly to the north at a distance of 270m. Will not dominate principal views from property.
SB-16 Brae Cottage	None	Moderate Adverse (Significant) during operation.	Agree with applicant's assessment. Not in RVAA.
RB-1 A9(T)	VPs 31, 33, 34, 43	Negligible Adverse (Not Significant) during operation.	Agree with applicant's assessment. Views will be side on to travellers on the A9 for the most part and set back at a distance. The A9 has very limited visibility of the OHL for most of this section of the route. Whilst there will be some skylining and cumulative views in line with the existing OHL, Not Significant given views will be transient in nature and distant. Worst case scenario is VP 43 Loch Fleet which could be Significant if assessed as a standalone viewpoint.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
RB -2 A839	VP40	Moderate Adverse (Significant) within 2km during operation, Minor Adverse (Not Significant) across wider route.	Agree with applicant's assessment. Within closer views, the OHL would be visible alongside the existing OHL, with the valley landscape allowing the OHL to be a visible man-made element.
RB-3 Gordonbush Road	VPs 36 Loch Brora, 37 Balnacoll and 35 South of Killin	Moderate Adverse (Significant) within 3km during operation	Generally agree with applicant's assessment, however, the effect would be closer to High Magnitude of Change within 500m of the OHL.
RB-4 Dunrobin Glen Road	None	Moderate Adverse (Significant) within 3km during operation.	Agree with applicant's assessment.
RB-5 Lochbuie Road	VPs 42 Little Torboll and 54 Clashcoig Lochbuidhe Road	Moderate Adverse (Significant) within 2km during operation	Agree with applicant's assessment for Section B. However, there <u>would be cumulative effects</u> for this receptor involving Section C and Carnaig Substation. RB-5 is assessed as Negligible for Section C in Table 7.7

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
			of the Section B LVIA despite there being no assessment of this receptor for Section C and Significant effects that would result as it passes under the OHL.
RB-6 Far North Railway line	VP 43	Moderate Adverse (Significant) within 2km, Minor Adverse (Not Significant) across wider route.	Agree with applicant's assessment. The railway line would pass under the OHL as it cuts across the flat-bottomed strath and containing slopes typically of 150 – 250m, then skylining the surrounding hills in a similar manner to glens within the SLA further north. In this instance the proposed OHL is also parallel to the existing OHL, separated by a few hundred metres, which would lead to cumulative effects. This receptor is excluded from cumulative assessment, despite being recorded in Table 7.7 as affected in sections A, B and C, the first two significantly.
RB-7 Core Path SU06.03 Drove Rd	VP36	Major- Moderate Adverse (Significant) within 500m and negligible (Not Significant) at lower elevations during operation	Agree with applicant's assessment. The PD crosses the route and will be clearly visible in close proximity however intervening landform will obscure lower elevation views of the Core Path.
RB-8 Core Path SU06.14 Doll Bridge – Loch Brora	VP35	Moderate Adverse (Significant) within 2km and Minor Adverse (Not Significant)	Agree with applicant's assessment.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
		across the wider route effects during operation.	
RB-9 Core Path SU06.02 Loch Brora	VPs 35 and 36	Moderate Adverse (Significant) within 2km, Minor Adverse (Not Significant) across the wider route during operation.	Generally agree with applicant's assessment, however, the effect would be closer to High Magnitude of Change within 500m of the OHL, particularly as the OHL crosses the route.
RB10 – Core Path SU12.13, SU12.14 (Golspie Tower – Ben Bhraggie) and SU12.19	VP39	Moderate-Minor Adverse (Not Significant) during operation.	Agree with applicant's assessment.
RB-11 Core Path SU12.24 Loch Lunndaigh Path	None	Moderate-Minor Adverse (Not Significant) across the elevated sections route during operation	Agree with applicant's assessment. Sufficient separation distance of 4km from the proposed OHL, some views partially restricted across distant moorland by peaks.
RB-12 Core Path SU20.10 Torboll - Eiden	VP41	Major Adverse (Significant)	Agree with applicant's assessment.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
		within 500m for operation Minor Adverse effects (Not Significant) across wider route.	The visual effect will be Significant as the path intersects with the OHL in close proximity.
RB-13 Core Path SU20.02 and SU20.01	VP41	Moderate Adverse (Significant) within 500m, Minor Adverse (Not Significant) across the wider route.	Agree with applicant's assessment.
RB-14 Core Path SU09.19	None	Moderate Adverse (Significant) during operation	Agree with applicant's assessment. Disappointing to not have a VP near this location however the route will intersect as the OHL passes above, viewed on approach to Carnaig substation as well as existing OHL and Section C, cumulative effects. RB-14 is not mentioned in cumulative table 7.7 despite likely Significant effects on Section C. Point to note that RB-14 is also listed as NC500 in the table.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
RB-15 NCN Route 01 (National Cycle Route)	VP59	Negligible (Not Significant) during operation.	Agree with applicant's assessment.
RB16 – NC500	VPs 31, 33, 34 and 43	Negligible Adverse (Not Significant) across the wider route during operation.	Agree with applicant's assessment. Views will be side on to travellers on the A9 for the most part and set back at a distance. There will be some skylining and in many views the OHL will be seen in conjunction with the existing line, its towers dwarfing this, as shown in VPs 33 and 34. Worst case scenario, VP 43 Loch Fleet which could be Significant if assessed as a standalone viewpoint.
(Outdoor Location) OB-01 Duke of Sutherland Monument	VP 39 Ben Bhraggie	Moderate Adverse (Significant) during operation	Agree with applicant's assessment. The new towers would snake across landscape to the north of the monument but only part of wider panorama available from this location, seaward views would be unchanged. Point to note that this VP is included within the cumulative assessment despite not being affected by sections A and C according to Table 7.7. In Table 7.8(8) this appears to be contradicted. However, there are several errors: the assessment refers to 'the SLA' and then subsequently to 'the WLA'. Furthermore, it is wrongly reported in Table 7.7 that the section B assessment of OB-1 as Minor-Moderate Adverse (Not Significant) whereas in Table B.4 the detailed assessment reports Moderate Adverse (Significant) effect.

Section C: Loch Buidhe to Dounie

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
SC – 01: Culrain	VPs 52 & 53	Moderate Adverse (Significant) during operation	<u>Disagree with applicant's assessment.</u> Officers consider the effect as Major-Moderate Adverse (Significant) during operation. As illustrated by VP 52, the OHL will become the tallest feature in the view, particularly to the west and northwest, skylining along the top of the existing hillside, worsened by the proposed felling. The OHL will become the dominant feature across the hillside. Views to the northeast of the village, show the rise of the towers as it rises over the hillside, however the OHL will not be the dominant feature given the expansive view. Views of the OHL to the north are relatively contained by intervening landform and tree cover within Carbisdale Wood.
SC – 02 – Lower Gledfield	No close VPs, closest 56, 57 and 59.	Moderate-Minor Adverse (Not Significant) during operation	Agree with applicant's assessment.
SC – 03: Ardgay	No close VPs, closest 56, 57 and 59	Moderate-Minor Adverse (Not Significant) during operation.	Agree with applicant's assessment. It is clear from the ZTV that views of the OHL would be very restricted and distant.
SC – 04: Kincardine	VP59	Moderate-Minor Adverse (Not Significant)	Agree with applicant's assessment.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
		during operation.	Separation distance vast particularly to the north and the surrounding topography and woodland cover acts as a screen to the west/northwest.
SC – 05: Bonar Bridge	VP56	Moderate-Minor Adverse (Not Significant) during operation.	Agree with applicant's assessment. Limited views due to separation distance, intervening landform and woodland cover. When operational, the PD would be visible to the north/northwest in the distance in the context of the open valley view with surrounding forestry and hillside. The separation distance and the combination of varying factors in the view reduces perceived effect. View would be limited to residencies along the northern and western edges of the village. It is considered that Bonar Bridge would have been a better Settlement receptor to be assessed within the cumulative assessment in Section C in comparison to Ardgay, given visibility of Sections C and D of the PD, as demonstrated by the ZTVs and VP56, in comparison to the views from Ardgay (only settlement receptor assessed).
SC – 06: Creide	VP49 RVAA 1.11a/b & Fig	Major Adverse (Significant) during operation, based on proximity and angle of view occupied in winter months.	Agree with applicant's assessment. Tower S24 will appear directly to the south of the property and whilst views may be filtered slightly by woodland, still appears in centre of view, close to property curtilage, with peripheral views across Kyle of Sutherland and as the line rises over the hillside. Tower S23 will appear in the centre of the Kyle when viewed to the east, whilst some screening will be present. High degree of the skylining on hills to the northeast side of the Kyle of Sutherland in context of the property, and some show stringing across the Kyle.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
SC – 07: Oak Bank	VP49	Major-Moderate Adverse (Significant) during operation, based on proximity and angle of view occupied in winter months.	Agree with applicant's assessment. Slight area of woodland to curtilage of property may filter views to the east however the line of towers will dominate views peripherally, particularly to the southeast as the line runs down the valley, with Tower S23 in direct view. S24 will be set against the background sky at close distance. As per above, in regard to skylining and effects across the Kyle. Further cumulative effects with existing 132kV OHL passing under the PD and would create a complex wirescape as shown in VP 49.
SC – 08: Invershin Farm	VP48	Major-Moderate Adverse (Significant) during operation, based on proximity and angle of view occupied in winter months.	Agree with applicant's assessment. The PD would be visible at close range. Tower S23 will be located in the centre of the view to the south, down the Kyle. Views of the development stringing across the Kyle. Cumulative effects with existing 132kV OHL passing under the PD and creation of a complex wirescape.
SC – 09 – The Bungalow, Invershin	VP48	Moderate Adverse (Significant)	Agree with applicant's assessment. Slightly further distant and more filtered views that SC-08 above.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
		during operation.	Given the curtilage tree screening and orientation of the property with main views looking east and west. Nearest Tower (S22) located directly to the south, will be partially screened.
RC – 1: A836	VPs 52, 56, 59	Major- Moderate Adverse (Significant) within 700m. Moderate-Minor Adverse (Not Significant) across wider route.	Agree with applicant's assessment. Road will run under the OHL, with close proximity to Towers S21 and S22 however this view regards a small snapshot of the A836 where Road Users will be constantly moving so views will be intermittent and for the majority of the route at a significant distance. Further north, screened from woodland. No assessment of cumulative effects undertaken by applicant.
RC – 2: Far North Rail Line	VPs 48, 50, 59.	Major- Moderate Adverse (Significant) within 300- 400m during operation, Moderate-Minor Adverse (Not Significant) across the wider route.	Agree with applicant's assessment. In close proximity to the OHL from the railway there will be a more significant effect however given existing screening (forestry and landform), and being a passenger on a transport route, any adverse views will likely be intermittent in the worst affected areas. The worst effect sections are around Inveran and Invershin, near the towers (Tower S22 for example) where the railway line runs under the route. Visible views crossing the Viaduct when looking north/northwest, likely to be positioned across the primary view looking up the Kyle of Sutherland, directly in the middle.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
RC – 3: A837	VPs 47, 48, 50.	Major- Moderate Adverse (Significant) within 700- 800m, based on proximity and angle of view occupied in winter months. Minor Adverse (Not Significant) across wider locations, during operation.	<u>Disagree with applicant's assessment in relation to extent.</u> Officers consider that views as demonstrated by VP47 would still be Significant with views of the OHL as it comes down the valley slope and stretches across the Kyle. Furthermore, tower S24 when viewed appears in the centre of the view down the Kyle which detracts the viewer. The effects would extend Major-Moderate Adverse (Significant) effects to a distance of approximately 1.6km from the OHL.
RC – 4: B864	None	Minor Adverse (Not Significant) during operation.	Agree with applicant's assessment. Very limited view given the very enclosed transport route due to tree cover and intervening landform. Only view would be travelling south given orientation of road directed away from the OHL.
RC – 5: A949 (Dornoch Road)	VPs 57 and 58	Moderate-Minor Adverse (Not Significant) during operation.	Agree with applicant's assessment.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
RC – 6: Cadh an Tartair	VP60	Moderate-Minor Adverse (Not Significant) during operation.	Agree with applicant's assessment.
RC – 7: Culrain – Inveroykel Minor Road	VP49	Major- Moderate Adverse (Significant) within 700m. Negligible (Not Significant) for wider route, both during operation.	Agree with applicant's assessment. In proximity of Tower S24, the proposed towers and OHL route will appear in proximity with views across the Kyle also visible. The stringing of the line across the Kyle will be clear at closer distances in addition to the rise on the eastern side of the valley. Wider views at a distance from the OHL will be intermittent and screened given woodland, intervening landform and roadside vegetation.
RC – 8: Inverness to John O'Groats National Cycle Trail	None on the identified stretch (however VPs 48, 50 show views earlier along the route)	Major Adverse (Significant) within 700m. Moderate Minor (Not Significant) for wider location during operation.	Agree with applicant's assessment. Closer views around Invershin particularly Towers S21, S22 and S23 where the route is in close proximity. To the northern extents of the route, views would be at a greater distance although elevated in some locations, with intervening landform and woodland screening.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
RC – 9: Core Path SU08.02: Carbisdale	VP 51	Major Adverse (Significant) within 600-700m, based on proximity and proportion of the view occupied. Moderate-Minor Adverse (Not Significant) across the wider locations, during operation.	Partially agree with the applicant's assessment. Officers agree in close proximity to the OHL Major Adverse (Significant). The path intersects the overhead line alignment on two occasions, with the felling works to create a wayleave, opening views particularly to the west. Views towards the PD would be concentrated on western sections of path at higher elevation, however views of the OHL will span west/northeast, albeit intermittently due to tree cover. Potential for views, even distant of the alignment as it crosses over the Kyle of Sutherland. Given level of sensitivity and magnitude of change, Officers consider this effect is Significant. <u>Officers consider the effect is Moderate Adverse (Significant) across the wider locations.</u>
RC – 10: Core Path SU03.01: Cornhill – Culrain	None	Major Adverse (Significant) within 800m, based on proximity and location with forest management zone. Moderate-Minor Adverse (Not Significant) across the wider	Agree with applicant's assessment. Agree in terms of the effect closer to the OHL. The path intersects with the alignment between Towers S27 and S28. Once operational at the same distance the lattice towers will be experienced in close proximity to the path, closest distances of 90m and 130m. The clearest views of the alignment will appear back dropped by landscape with some areas of skylining.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
		route during operation.	
RC – 11: Core Path SU08.03: Lochcoire	VP 53	Major Adverse (Significant) within 500- 600m. Moderate-Minor Adverse (Not Significant) across the wider route, during operation.	<u>Disagree with applicant's assessment in relation to extent.</u> Major Adverse (Significant) up to 1km from the infrastructure. View within this distance to the northeast steers attention within the view with some skylining. Close range of the proposed development on approach to the western end of the path.
RC – 12: Core Path SU08.01: Culrain to Invershin	None	Moderate Adverse (Significant) during operation.	Agree with applicant's assessment. Visible views crossing the Viaduct when looking north/northwest, likely to be positioned across the primary view looking up the Kyle of Sutherland, directly in the middle.
RC – 13: Core Path SU03.14: Cornhill Curling Pond	None	Major- Moderate Adverse (Significant) from western- most 250m section during operation.	Agree with applicant's assessment. Majority of the recreational route will be subject to screening from landform and forestry. Once operational, there would be views of the steel lattice towers to the west and north-west from the western 250m section of the path. Tower S37 would be the closest, at a distance of 925 m to the west. Potential views from other sections of the path would remain limited due to intervening forestry.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
		Moderate Adverse (Significant) across the wider route during operation.	
RC – 14: Core Path SU21.11: Shin Falls Forest Walk, and SU21.12: Shin Falls Circular	None	Moderate-Minor Adverse (Not Significant) during operation.	Agree with applicant's assessment. Distant and limited views given extents of forestry and woodland cover as well as the topography of intervening landform. Elevated location will have limited views subject to extents of screening offered.
RC – 15: Core Path SU03.06: River Carron	VP60	Moderate Adverse (Significant) during operation.	Agree with applicant's assessment. Closer views of the proposed infrastructure than RC-16. Once operational, views of the towers would be restricted to those at the southern end of Section C, which would be heavily filtered by tree cover within the valley and Strathcarron Wood. Potential views of the towers located further north would be contained by the enclosing landform along the strath side. Potential for distant views of wider sections of the route however limited to southern part of Section C and northern end of Section D. All distant views would be intermittent given amount of intervening landform with steeper sections of strath and areas of woodland.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
RC – 16: Core Path SU03.11: River Carron	None	Moderate-Minor Adverse (Not Significant) during operation.	Agree with applicant's assessment. Distant elements to the northwest and west, however, views will be limited by screening of intervening landform and surrounding woodland within the river corridor and across the intervening hillsides.
RC – 17: Core Path SU05.06: Balblair Wood – Invershin	None along route. VP 52 nearby.	Moderate-Minor Adverse (Not Significant) during operation.	Agree with applicant's assessment. The introduction of steel lattice towers would represent distant elements in the background landscape, viewed in snapshots where there are gaps in the woodland and forestry. Large sections of the route will screen the PD due to forestry. Views of the proposal route will be limited to forestry gaps looking to the west and south-west, with the infrastructure appearing in the distance.
RC – 18: Balblair Forest Walk (Bonar Bridge SU05.04)	None at the location, closest VP55.	Moderate-Minor Adverse (Not Significant) during operation.	Agree with applicant's assessment. Partial and distant views in small areas however majority of views would be screened by surrounding trees. Topography of land will limit views of the overhead line to the northeast.
RC – 19: Core Path SU16.08: Braemore – Achany	None	Moderate-Minor Adverse (Not Significant) during operation.	Agree with applicant's assessment. Partial and distant views given separation distance, intervening landform and tree cover.
RC – 20: Core Path SU05.01: Loch Migdale	None	Moderate-Minor Adverse (Not Significant)	Agree with applicant's assessment.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
		during operation.	Partial and distant views which would be screened to an extent by intervening tree cover and intermittent landform.
RC – 21: Core Path SU21.02: Sika Trail Cycle Route	None	Moderate-Minor Adverse (Not Significant) during operation.	Agree with applicant's assessment.
OC – 1: Carbisdale Castle	VP51	Major- Moderate Adverse (Significant) applicable to views near the Castle with most open outlook during operation.	<u>Disagree with applicant's assessment</u> Major Adverse (Significant) given the high sensitivity and high magnitude of change. Large proportion of the view is affected by the alignment, particularly when looking across the Kyle of Sutherland from the north to east. Skylining of the towers as they climb both sides of the valley and string across the Kyle. To the northeast, the PD would be partially visible against a combination of background sky and landscape and experienced in the context of existing plantation forestry. Whilst views to the west would be limited given mature woodland screening, panoramic views from the castle across the Kyle of Sutherland would be Significantly affected. Looking northeast to northwest, across the Kyle of Sutherland, the alignment will detract from the existing view experience and in some locations become the primary focal point such as S24 which will be located centrally across the Kyle and taken in when views of the Castle are experienced from the north. Whilst some tree and woodland screening exist around the castle, this is very limited northeastern direction with direct views of the alignment as it climbs the opposite side.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
			Existing 132kV OHL does not do this to same extent, with cumulative effects not taken into account, yet the existing 132kV OHL passes under the PD and would create a complex wirescape. Also, there are wind farm developments proposed which might act cumulatively.
OC - 2: The Scap (Angling)	VP49	Moderate Adverse (Significant) during operation. (receptor table wording not complete LVIA C)	Agree with applicant's assessment. 600m to the north-west of the PD. Officers recognise this as a Medium sensitivity and a Medium Magnitude of Change resulting in Moderate Adverse Significant Effects. Introduction of steel lattice towers and infrastructure in the views of the Kyle when looking southeast. Users main reason for presence is not the landscape with focus of view on angling.
OC – 3: Dounie Estate	None	Moderate Adverse (Significant) based on winter views during operation.	Agree with applicant's assessment. Due to closer proximity to the line than Gledfield (OC-7), to the north or northwest, less separation distance, intervening landform and tree cover. Given such there is potential for Significant effects particularly in winter months where surrounding tree cover screening is reduced.
OC – 4: Loch Laro	VP46	Moderate-Minor Adverse (Not Significant)	Agree with applicant's assessment.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
		during operation.	Significant separation distance and intervening landform will screen majority of development from this viewpoint. The new infrastructure will be seen in combination and as an addition to the existing OHL which runs parallel to the loch.
OC – 5: Loch an Lagain	None	Minor Adverse (Not Significant) during operation.	Agree with applicant's assessment.
OC – 6: Balblair Forest	None	Moderate-Minor Adverse (Not Significant) during operation.	Agree with applicant's assessment. Partial and distant views in small areas, however, majority of views would be screened by surrounding trees.
OC – 7: Gledfield House and Estate	None	Moderate-Minor Adverse (Not Significant) during operation.	Agree with applicant's assessment.
OC – 8: Falls of Shin and Shin Forest	None	No effect during operation.	Agree with applicant's assessment.

Section D: Dounie to Near Strathpeffer

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
SD-01: Sonnycroft	Volume 5 – Appendix 7.11 RVAA – Figure 1.12a & 1.12b	Major Adverse (Significant) based on proximity and angle of view occupied in winter months.	Agree with applicant's assessment. Given proximity of Tower S38 at approx. 210m distance, it will become a significant feature across the view to the west. The PD will be visible at close proximity across the view to the west along with views to the south and southwest. Some scrub vegetation and broadleaf trees may provide some filtered views to the base of S38, which stands at 61.52m but this will only provide limited screening, particularly in winter months.
SD-02: West End	Volume 5 – Appendix 7.11 RVAA – Figure 1.13a & 1.13b	Major Adverse (Significant) Major / Moderate (adverse) based on proximity and angle of view occupied in winter months.	Agree with applicant's assessment. Views of hills to the north/northwest will be visible mostly through the OHL with the tops of towers S112, S111 and S110 skylining the horizon. Broadleaf trees to the north may provide some filtered views to the base of S112, which stands at 64.52m but this will only provide limited screening, particularly in winter months.
SD-03: Cnoc Cluaran	Visible in V4b Figure 7-60c VP60 – Existing View	Major Adverse (Significant) based on proximity and angle of view occupied in winter months.	Agree with applicant's assessment. Given proximity of Tower S38, at approx. 290 m distance, it will become a significant feature in the view to the east. The PD will be visible at close proximity across the view to the west along with views to the south and southeast. Some scrub vegetation and broadleaf trees may provide some filtered views to the base of S38, which stands at 61.52m but this will only provide limited screening, particularly in winter months.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
SD-04: Glaik Croft	Property visible in V4b Figure 7- 65b(i) VP65	Major Adverse (Significant) based on proximity and angle of view	Agree with applicant's assessment. While there may be some partial screening, the elevated position and close proximity of the development may exacerbate skylining and adverse effects.
SD-05: Fannyfield	Property visible in V4b Figure 7- 70b(ii), 70b(iii) VP70	Major- Moderate Adverse (Significant) based on proximity and angle of view occupied in winter months.	Agree with applicant's assessment. While there may be some partial screening of Tower S123 by commercial forestry at 60.57m, any screening will be limited. The OHL will likely skyline in views to the north, with towers overlapping in a linear alignment to the southwest.
SD-06: Tighnacraig	Volume 5 – Appendix 7.11 RVAA – Figure 1.13a & 1.13b	Major- Moderate Adverse (Significant) based on proximity and angle of view occupied in winter months.	Agree with applicant's assessment. Where views to the east are not screened by plantation forestry, wayleaves within broadleaf trees will leave the development exposed.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
SD-07: Culeave Cottage	Likely visible in V4b Figure 7-60c VP60 - Existing View	Major Moderate Adverse (Significant) based on proximity	Agree with applicant's assessment. Given proximity of Tower S38, at approx. 375 m distance, it will become a significant feature in the view to the east. The OHL will be visible at close proximity across the view to the west along with views to the south and southeast. Some scrub vegetation and broadleaf trees may provide some filtered views to the base of S38, which stands at 61.52m but this will only provide limited screening, particularly in winter months.
SD-08: Cairn View	Likely visible in V4b Figure 7-60c VP60 - Existing View	Major- Moderate Adverse (Significant) based on proximity and angle of view occupied in winter months.	Agree with applicant's assessment. Given proximity of Tower S38, at approx. 290 m distance, it will become a significant feature in the view to the east. The OHL will be visible at close proximity across the view to the west along with views to the south and southeast. Some scrub vegetation and broadleaf trees may provide some filtered views to the base of S38, which stands at 61.52m but this will only provide limited screening, particularly in winter months.
SD-09: Leac Dubh Mor	Likely visible in V4b Figure 7-60c VP60 - Existing View	Major Moderate Adverse (Significant) based on proximity and angle of view occupied in winter months.	Agree with applicant's assessment. Given proximity of Tower S38, at approx. 460 m distance, it will become a significant feature in the view to the east. The OHL will be visible at close proximity across the view to the west along with views to the south and southeast. Some scrub vegetation and broadleaf trees may provide some filtered views to the base of S38, which stands at 61.52m but this will only provide limited screening, particularly in winter months.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
SD-10: Strathpeffer	VP76 Strathpeffer visible in V4a Figure 7-73a VPs 73 and 75	Moderate-Minor Adverse (Not Significant) during construction and operation.	Agree with applicant's assessment. Views likely from opposite side of strath at the east of the settlement but at distance and potentially filtered by landform and tree cover.
SD-11 Swordale	VP70	Moderate-Minor Adverse (Not Significant) during construction and operation.	Agree with applicant's assessment for the most part (east of Swordale Hill). <u>Disagree with applicant's assessment at western end.</u> Officers consider <u>Major-Moderate adverse effects</u> at the western end of Swordale at VP70. The development will extend across a large part of the view to the southwest with towers becoming increasingly concentrated as the recede, combined with skylining resulting in <u>Significant effects</u>. Views to the north indicate a tower as a prominent feature skylining in a natural dip in the topography. The main part of the settlement will primarily be screened by topography (Swordale Hill) and are likely to have Minor effects at most.
SD-12: Dingwall	Dingwall visible in VP71	Moderate-Minor Adverse (not significant) during construction and operation.	Agree with applicant's assessment.
SD-13: Ardgay	None	Moderate-Minor Adverse (Not Significant) during	Agree with applicant's assessment.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
		construction and operation.	Any views to the west and/or southwest at distance and potentially filtered by landform and tree cover.
SD-14: Evanton	VP69	Moderate-Minor Adverse (Not Significant) during construction and operation.	Agree with applicant's assessment.
SD-15: Jamestown	VP78	Moderate- Minor Adverse (Not Significant) during construction and operation.	Agree with applicant's assessment.
SD-16: Contin	None	No Effect during construction and operation.	Agree with applicant's assessment.
RD-01: Cadh an Tartair	None	Major-Moderate Adverse (Significant) within 700 m in winter months. Moderate-Minor Adverse (Not	<u>Disagree with applicant's assessment.</u> Road will run under OHL and while tower positioning has minimised some effect on road users, Officers would consider effects to be Major Adverse at close range. Views west become increasingly filtered by landform and tree cover after about 700m or so to the east of the OHL. However, views from the west looking east will

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
		Significant) across the wider locations (Construction and Operation)	be available up to at least 2.5km, particularly as these views will contain the OHL across the strath and rising to the south.
RD-02: Minor road to the south of River Carron	VP60	Major- Moderate Adverse (Significant) within 700 m based on view in winter months. Moderate-Minor Adverse (Not Significant) across the wider locations (Construction and Operation)	Agree with applicant's assessment. Officers consider that the greatest effect will be where the road runs under the OHL with T39 approximately 100m north of the road and no intervening screening.
RD-03: Dingwall to Kyle of Lochalsh Rail Link	None	Negligible (Not Significant) during construction and operation.	Agree with applicant's assessment.
RD-04: Smoogro Road	VPs 72 - 74	Minor Adverse (Not Significant)	<u>Disagree with applicant's assessment.</u>

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
		during construction and operation.	Officers consider that this should be Moderate-Minor Not Significant effect with Low magnitude. While some views may be screened by landform and tree cover, views northwest towards Ben Wyvis, a landmark feature in the landscape, are not (See VP72). VP74 looks southwest to Section E, not north to Section D.
RD-05: A834	VPs 79-80	Minor Adverse (Not Significant) during construction and operation.	Agree with applicant's assessment. Views from strath floor between Dingwall and Strathpeffer likely to be screened/ heavily filtered by landform, roadside settlement and tree cover. Unlikely to be any views west of Strathpeffer towards Contin. Viewpoints identified by LVIA relate to Section E (west of Strathpeffer) not Section D.
RD-06: Old Evanton Road	None	Minor Adverse (Not Significant) during construction and operation.	Agree with applicant's assessment. Key views from road are towards the Cromarty Firth. Views along much of the southern two thirds of the road outwith the ZTV and are likely to be screened by the landform and tree cover. Views from the northern quarter of the road possible at a distance and dependant on tree cover.
RD-07: A836	VPs 50, 52, 56, 59	Minor Adverse (Not Significant) during construction and operation.	Agree with applicant's assessment. Viewpoints identified in LVIA more relevant to Section C than Section D
RD-08: A835	VPs 81-82	Minor Adverse (Not Significant) during	Agree with applicant's assessment. Viewpoints identified in LVIA more relevant to Section E than Section D

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
		construction and operation.	
RD-09: A9	VP71	Minor Adverse (Not Significant) during construction and operation.	Mostly agree with applicant's assessment. Effects from VP70 potentially underplayed, while the OHL is at a distance it is high within the landscape and can be seen across a large proportion of the view, skylining in places. From the Ardullie Roundabout north, the effect is likely to be Minor.
RD-10: B817	None	Minor Adverse (Not Significant) during construction and operation.	Agree with applicant's assessment.
RD-11: A832	VP83	Minor Adverse (Not Significant) during construction and operation.	Agree with applicant's assessment. Any views will be distant or screened by landform and/or tree cover.
RD-12: River Carron SU03.06	VP60	Major Adverse (Significant) within 700 m based on view in winter months.	Agree with applicant's assessment. Tree cover and landform will filter wider views.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
		Moderate-Minor Adverse (not significant) across the wider locations (Construction and operation)	
RD-13: Strathpeffer Walking and Cycling Routes (Torrachilty Forest).	VP77	Moderate-Minor Adverse (Not Significant) during construction and operation.	Agree with applicant's assessment. VP77 more relevant to Section E.
RD-14: Strathpeffer Walking and Cycling Routes (North of Strathpeffer Golf Course)	None	Moderate-Minor Adverse (Not Significant) during construction and operation.	Agree with applicant's assessment.
RD-15: Mains of Coul (RC10.03)	None	Moderate-Minor Adverse (Not Significant) during construction and operation.	Agree with applicant's assessment. Proximity is to Section E not Section D.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
RD-16: Kinellan link path (RC10.07)		Moderate-Minor Adverse (Not Significant) during construction and operation.	Agree with applicant's assessment. Proximity is to Section E not Section D.
RD-17: Loch Kinellan circuit (RC45.01)	VP76	Moderate-Minor Adverse (Not Significant) during construction and operation.	Agree with applicant's assessment. Proximity is to Section E not Section D.
RD-18: View Rock (RC10.01)	VP77	Moderate-Minor Adverse (Not Significant) during construction and operation.	Agree with applicant's assessment. Proximity is to Section E not Section D.
RD-19: Swordale Hill RC16.01	VP70	Moderate Adverse (Significant) from short section in the west.	Agree with applicant's assessment.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
		Minor Adverse (Not Significant) from remainder of route	
RD-20: Strathpeffer - Jamestown (Blackmuir Woods) RC45.05	VP78	Moderate-Minor Adverse (Not Significant) during construction and operation.	Agree with applicant's assessment. Proximity is to Section E not Section D.
RD-21: Ord Wood west – Kinellan (RC45.03)	VP76	Moderate-Minor Adverse (Not Significant) during construction and operation.	Agree with applicant's assessment. Proximity is to Section E not Section D.
RD-22: Cornhill Curling Pond Circuit (SU03.14)	None	Moderate Adverse (Significant) during construction and operation.	Agree with applicant's assessment. Potentially mislabelled: SU03.04 Cornhill Curling Pond Circuit.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
RD-23: Contin to Strathgarve (RC10.06)	None	No Effect during construction and operation.	Agree with applicant's assessment. Proximity is to Section E not Section D.
RD-24: Torrachilty woods (RC10.04)	None	No Effect during construction and operation.	Agree with applicant's assessment. Proximity is to Section E not Section D.
RD-25: Golf course – Ord Wood east (RC45.07)	None	Moderate-Minor Adverse (Not Significant) during construction and operation.	Agree with applicant's assessment. Proximity is to Section E not Section D.
RD-26: Blackmuir Woods - maze circular RC45.04	None	Moderate-Minor Adverse (Not Significant)	Broadly agree with applicant's assessment. Towers high in the landscape and towards Ben Wyvis which is a key landmark feature in the landscape. Towers visible across a wide view and potentially skylining in places.
RD-27: Rogie Falls (RC10.02)	None	No Effect during construction and operation.	Agree with applicant's assessment. Proximity is to Section E not Section D.
RD-28: Eagle Stone Path (RC45.10)	None	Moderate-Minor Adverse (Not Significant) during	Agree with applicant's assessment.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
		construction and operation.	
RD-29: Badvoon Forest, Allt Eiteachan Path (SU03.05)	None	Moderate-Minor Adverse (Not Significant) during construction and operation.	Agree with applicant's assessment. Potential mislabelling: based on Figure 7.4-11 RD-29 is SU03.02 Badvoon Forest. SU03.05 Oakwood Place—Ardgayhill lies within Ardgay.
RD-30: Badvoon Forest, Forest Road (SU03.03)	None	Moderate-Minor Adverse (Not Significant) during construction and operation.	Agree with applicant's assessment. Potential mislabelling: based on Figure 7.4-11 RD-30 is SU03.02 Badvoon Forest SU03.03 Gledfield - Cona Creag is missing from the LVIA receptors
RD-31: Ardival - Catsback - Loch Ussie (RC45.09)	VP75	Moderate-Minor Adverse (Not Significant) during construction and operation.	Broadly agree with applicant's assessment. Development not low lying within landscape. Towers high in the landscape and towards Ben Wyvis which is a landmark feature in the landscape. Towers visible across a wide view and potentially skylining in places.
RD-32: Tollie to Lealty (RC05.02)	None	Moderate-Minor Adverse (Not Significant) during	Agree with applicant's assessment. Views to be filtered by tree cover.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
		construction and operation.	
RD-33: Culrain, via Invercharron Hill/Carbisdale (SU03.01)	None	Moderate-Minor Adverse (Not Significant) during construction and operation.	Agree with applicant's assessment.
RD-34: River Carron (SU03.11)	None	Moderate-Minor Adverse (Not Significant) during construction and operation.	Agree with applicant's assessment. Potential mislabelling: based on Figure 7.4-11 RD-34 is SU03.06 River Carron
RD-35: Carron Bridge (SU03.09)	None	Moderate-Minor Adverse (Not Significant) during construction and operation.	Agree with applicant's assessment.
RD-36: Knockfarrel (maze to hill) (RC45.02)	VP75	Moderate-Minor Adverse (Not Significant) during	Broadly agree with applicant's assessment. Development not low lying within landscape. Towers high in the landscape and towards Ben Wyvis which is a landmark feature in the landscape. Towers visible across a wide view and potentially skylining in places.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
		construction and operation.	
RD-37: Dam Wood (RC05.03)	VPs 62-63	Moderate-Minor Adverse (Not Significant) during construction and operation.	Agree with applicant's assessment. Views filtered by tree cover. Development set lower in the landscape with windfarm as backdrop.
RD-38: Ardgayhill (SU03.10)	None	Moderate-Minor Adverse (Not Significant) during construction and operation.	Agree with applicant's assessment.
RD-39: Oldtown – Badvoon (SU03.08)	None	Moderate-Minor Adverse (Not Significant) during construction and operation.	Agree with applicant's assessment.
RD-40: Badvoon Forest, Link Path (SU03.04)	None	Moderate-Minor Adverse (Not Significant) during	Agree with applicant's assessment. Potential mislabelling: based on Figure 7.4-11 RD-40 is SU03.02 Badvoon Forest. SU03.04 Cornhill Curling Pond Circuit.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
		construction and operation.	
RD-41: Knockfarrel to Fodderty (RC13.05)	VP75 Knockfarrel	Moderate-Minor Adverse (Not Significant) during construction and operation.	Broadly agree with applicant's assessment. Development not low lying within landscape. Towers high in the landscape and towards Ben Wyvis which is a landmark feature in the landscape. Towers visible across a wide view and potentially skylining in places.
RD-42: Black Rock Gorge (RC16.05)	None	Moderate-Minor Adverse (Not Significant) during construction and operation.	Agree with applicant's assessment.
RD-43: Dublin to Ardross Mains (RC05.04)	VPs 62-63	Moderate-Minor Adverse (Not Significant) during construction and operation.	Agree with applicant's assessment. Development set lower in the landscape with windfarm as backdrop.
RD-44: Evanton Woods RC16.06	None	Moderate-Minor Adverse (Not Significant) during	Agree with applicant's assessment.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
		construction and operation.	
RD-45: Tulloch Lane- Dingwall RC13.02	None	Moderate-Minor Adverse (Not Significant) during construction and operation.	Agree with applicant's assessment.
RD-46: Knockfarrel RC13.06	VP75	Moderate-Minor Adverse (Not Significant) during construction and operation.	Broadly agree with applicant's assessment. Development not low lying within landscape. Towers high in the landscape and towards Ben Wyvis which is a landmark feature in the landscape. Towers visible across a wide view and potentially skylining in places.
RD-47: Fyrish Path RC05.01	None	Moderate-Minor Adverse (Not Significant) during construction and operation.	Agree with applicant's assessment. When considering the path as a whole the assessment is reasonable. Effects from the top of the path at the monument will be greater than effects over the remainder of the path which will be minor due to screening.
RD-48: North Coast 500	None	Moderate-Minor Adverse (Not Significant) during	Agree with applicant's assessment. NC500 also includes Contin-Marybank-Muir of Ord but this is unlikely to affect the outcome of assessment of Section D.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
		construction and operation.	
RD-49: Inverness to John O'Groats National Cycle Trail	None	Moderate-Minor Adverse (Not Significant) during construction and operation.	Agree with applicant's assessment.
OD-01: Strathpeffer Golf Course	None	Moderate-Minor Adverse (Not Significant) during construction and operation.	Agree with applicant's assessment. Proximity is to Section E not Section D. Some northern parts of the course maybe outwith ZTV.
OD-02: Loch Morrie	None	Moderate-Minor Adverse (Not Significant) during construction and operation.	<u>Disagree with applicant's assessment.</u> Officers consider the effect to be slightly higher given sensitivity of receptor and magnitude of change should be medium. Nevertheless, Officers agree the effect as Not Significant. The development will cross the strath at the southeast end of the loch visually constraining the exit. Potential also for skylining across much of the views to the southeast.
OD-03: Dounie Estate	None	Moderate Adverse (Significant)	<u>Disagree with applicant's assessment.</u> Officers consider the effect to be Major-Moderate adverse and Significant. The development will run along a wide extent of views to the west (including northwest and southwest) in close proximity where not filtered or screened

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
			by tree cover. Given the height of towers S38-S41 and rising ground on either side of Strathcarron, skylining is likely.
OD-04: Gledfield House and Estate	None	Minor Adverse (Not Significant)	<u>Disagree with applicant's assessment.</u> Officers consider the effect to be Moderate-Minor Adverse and Not Significant. At slightly further distance than OD-03 but the development will run along a wide extent of views to the west (including northwest and southwest) in close proximity where not filtered or screened by tree cover. Given the height of towers S38-S41 and rising ground on either side of Strathcarron, skylining is likely.
OD-05: Neil Gunn Memorial	VP73	Moderate-Minor (Not Significant)	Agree with applicant's assessment. While there would be some skylining to the north it is likely that only the tips of the towers will be visible above the skyline.
OD-06: Loch Glass	VP66	Moderate-Minor (Not Significant)	Agree with applicant's assessment. Potential for some skylining of tips of towers across a part of the view southeast, this is likely to be screened by intervening forestry.
OD-07: Ardross Castle	VPs 64-65	Moderate-Minor Adverse (Not Significant)	<u>Disagree with applicant's assessment.</u> Officers consider magnitude low rather than negligible resulting in slightly greater but Not Significant effect. Development is relatively low in the mid ground looking to the southwest with a backdrop of hills and existing windfarm.
OD-08: Pink House (Loch Glass)	Pink House is visible in VP66 Loch Glass.	Moderate-Minor Adverse (Not Significant)	Agree with applicant's assessment. Potential for some skylining of tips of towers across a part of the view southeast, this is likely to be screened by intervening forestry.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
OD-09: Cnoc Fyrish Monument	None	Moderate-Minor Adverse (Not Significant)	Agree with applicant's assessment. The promoted views from the monument are to the south and east towards the Cromarty Firth and Black Isle. While views are 360 degree and the development will be visible, it will be at distance with some screening from intervening landform.

Section E: Near Strathpeffer to Beauly

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
SE-01: Bridgepark Cottage	Volume 5 - Appendix 7.11 RVAA - Figure 1.14b Residential Visual Amenity Location: SE- 01	Major Adverse (Significant)	Agree with applicant's assessment. While there may be some filtering of views by tree cover, the OHL will be visible across views to the west and southwest. The closest tower S193 sits on elevated land which will exacerbate any effect and reduce screening.
SE-02: Mid Lodge	Volume 5 - Appendix 7.11 RVAA - Figure 1.15b Residential Visual Amenity Location: SE- 02	Major- Moderate Adverse (Significant)	<u>Disagree with applicant's assessment.</u> Officers consider the effect to be Major Adverse and Significant. While there may be some filtering of views by woodland, the towers are at a higher elevation with potential for skylining across much of the view to the north, along with overlapping of towers heading in a northerly direction.
SE-03: Heights of Kinnahaird	Volume 5 - Appendix 7.11 RVAA - Figure 1.16b Residential Visual	Major Adverse (Significant)	Agree with applicant's assessment. The property is orientated south towards the view, with some screen planting which is not considered to be substantial. The development will be visible at close proximity and will stretch across much of the view to the southeast, skylining for much of it. The development will continue across south and southwestern view in the mid ground before looping back to the east along the distant hills.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
	Amenity Location: SE- 03 Property lies between VPs 79-80		
SE-04: Brauach Cottages	Volume 5 - Appendix 7.11 RVAA - Figure 1.17b Residential Visual Amenity Location: SE- 04 VP81	Major Adverse (significant)	Agree with applicant's assessment.
SE-05: Ben View	Volume 5 - Appendix 7.11 RVAA - Figure 1.18b Residential Visual Amenity Location: SE- 05	Major Adverse (Significant)	Agree with applicant's assessment. The development will be visible across the views to the east and southeast. While this may not be from the principal elevation, the development is prominent, at close proximity, and skylining across the view. Wider views of the development to the northeast and south/southwest.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
SE-06: Grieves Cottage	None	Major Adverse (Significant)	Agree with applicant's assessment. Given the proximity of the towers and the extent of the development in views to the north, northwest, west and southwest.
SE-07: Broompark	None	Moderate Adverse (Significant)	Agree with applicant's assessment. Dense tree cover surrounding the property will heavily filter views.
SE-08: Wester Newton	None	Major- Moderate Adverse (Significant)	Agree with applicant's assessment. Views to the northeast would be filtered by tree cover. Views to the east, southeast would be more open with views to the south at least partially filtered by landform.
SE-09: Kinnahaird	None	Major Adverse (Significant)	Agree with applicant's assessment. Views would be at close range and albeit there may be some filtering from curtilage vegetation. While the property faces east, key views will be to the west where the development will be closest to the property with the potential for skylining.
SE-10: Achnacoul	Approximately 204m west of SE-02: Mid Lodge	Moderate Adverse (Significant)	<u>Disagree with applicant's assessment.</u> Officers consider the effect to be Major-Moderate Adverse and Significant. While the depth of woodland cover to the north is deeper than Mid Lodge, the effects are not considered to be significantly less than that of the neighbouring property.
SE-11: Oakmor	Approx 140m west of SE-	Major- Moderate	<u>Disagree with applicant's assessment.</u> Officers consider the effect to be Major Adverse and Significant. While tree cover may screen views to the east, key views from the property are to the

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
	03: Heights of Kinnahaird	Adverse (Significant)	south. The development runs northeast – southwest across the southern aspect of the property. It is considered likely that the development will cross the extent of the primary view. The landform may lessen some of the effect of this but no visualisations have been provided to suggest this.
SE-12: Jacksons Cottage	None	Moderate Adverse (Significant)	Agree with applicant's assessment. The density of woodland between the would filter views of the development.
SE-13: Orrin Cottage	None	Major- Moderate Adverse (Significant)	Agree with applicant's assessment. The woodland between the would filter views of the development.
SE-14: Sawmill Cottage	None	Major- Moderate Adverse (Significant).	Agree with applicant's assessment. The woodland between the would filter views of the development.
SE-15: Coul Garden Cottage	None	Moderate Adverse (Significant).	Agree with applicant's assessment. Views of the development will be filtered by tree cover and landform.
SE-16: Auchederson Farmhouse	None	Major- Moderate Adverse (Significant)	<u>Disagree with applicant's assessment.</u> Officers consider the effect to be Major Adverse and Significant. The development crosses the access to the property. The primary direction of view from is east towards the development. Existing intervening woodland is thin in places and likely to be removed to create wayleaves thereby losing any filtering benefit. The extent of the development is such at least 4no towers

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
			will be visible with the development approaching from the north, passing the property to the east and continuing to extend south of the property.
SE-17: Gas Street Cottage	None	Moderate Adverse (Significant)	Agree with applicant's assessment.
SE-18: Wester Kinellan	None	Major-Moderate Adverse (Significant)	Agree with applicant's assessment. Some filtering by intervening woodland however development likely to still be visible at relatively close range across the extent of views to the west.
SE-19: Upper Weston Fanellan Croft	None	Moderate Adverse (Significant)	Agree with applicant's assessment. However cumulative effects with Fanellan substation will likely result in Major Adverse effects.
SE-20: Jamestown	VP78	Moderate Adverse (Significant) based on views from the southern settlement edge. Potential views from all other parts of the settlement	Agree with applicant's assessment. Views will be more limited from within the settlement, with views from the edge of the settlement. Views from the settlement are to the southwest with the bowl feature in the landscape creating interest and a contrast between the managed farmland and more wild receding hills beyond. The development will be visible across most of the wider landscape with a number of towers overlapping to the west of V4b Figure 7-78b VP78 and V4b Figure 7-78d VP78 - Wireline Overlay with contrast to the backdrop of hills and skylining to the east. Again, looking to the west from V4b Figure 7-78b(i) VP78 and V4b Figure 7-78d(i) VP78 - Wireline Overlay the development will be visible across around half of the view while being screened by tree cover.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
		would be well-screened due to the concentration of intervening tree cover, resulting in Moderate-Minor Adverse (not Significant) effects.	Given that the development will mostly be viewed in the mid-ground or beyond, agree, otherwise given the extent of the view suggest Major-Moderate effects.
SE-21: Contin	VPs 79 - 83	Moderate Adverse (Significant), based on views from the south-eastern settlement edge , Moderate-Minor-Adverse (Not Significant) from other of the parts settlement	Agree with applicant's assessment. There would be limited views from the settlement and the LVIA assesses Low magnitude/ Moderate Adverse for the southeast end but otherwise not significant, which is reasonable. However, road approaches to and from the east (A835T and A834) have expansive views across Strathconon with many PD towers showing in the open landscape then climbing up to the backdrop hills to its southwest (VPs 79-81).
SE-22: Strathpeffer	VPs 73-79	Moderate Adverse (Significant), based on the most open	Agree with applicant's assessment. VPs 73-75 show the PD with setting of Strathpeffer, but it's mainly VP75 where it becomes easily noticeable. VP76 is the only view adjacent to Strathpeffer and there is a significant effect on views across the lochan. We suspect there would be limited visibility from the town itself as ZTV shows, plus screening by buildings and trees.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
		views from the edge of the settlement.	However, there are views for receptors exiting the town to the SW on the A834 (RE-01) and on higher ground on valley sides to the NW and SE, including the golf course (OE-05). Views north to town from VPs 78 and 79 are screened by topography and trees. LVIA assessment of Moderate and Significant effects of section E on Strathpeffer is reasonable.
SE-23: Kiltarlity	VP91	Moderate-Minor Adverse (Not Significant)	Agree with applicant's assessment. The development will be heavily filtered by tree cover and landform from within the core of the settlement but will be visible at distance from the wider dispersed community. VP91 – the PD would be barely visible from the village due to intereving trees; only the primary school area on higher ground above the village would have a view, as would the northwest edge of the dispersed settlement of Camault Moor. Effects on settlement assessed as Negligible magnitude, which seems reasonable for most of it. VPs 93 and 94 show strategic overviews from distant high ground to the south, so effects either not significant or Moderate at most. <u>None of the VPs show the proposed Fanellan substation which would interact cumulatively with the PD. This in in contrast to Spittal substation which is shown at the northern end (see comments above) and Carnaig between sections B and C.</u>
SE-24: Marybank	Viewpoint 83 Marybank Road & Viewpoint 84 Achonochie	Moderate Adverse (Significant), based on the most open views from the	Agree with applicant's assessment. Views of the development will be from the edges of the settlement and at distance.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
	Road (east of Marybank)	edge of the settlement. Potential views from all other parts of the settlement would be limited, resulting in Moderate-Minor Adverse effects (Not Significant)	
SE-25: Muir of Ord	VP88	Moderate-Minor Adverse (Not Significant)	Agree with applicant's assessment. Assessed as Negligible magnitude as 4km distant and mainly screened by trees and buildings. VP88 shows worst case scenario for a few properties on west side of town.
SE-26: Beaully	None	Moderate-Minor Adverse (Not Significant)	Agree with applicant's assessment.
SE-27: Dingwall	None	Moderate-Minor Adverse (Not Significant)	Agree with applicant's assessment.
RE-01: A834	VPs 79-80	Major-Moderate Adverse	<u>Disagree with applicant's assessment on some aspects.</u> A834 has expansive views across Strathconon with many PD towers showing in the open landscape then climbing up to the backdrop hills to its southwest

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
		(Significant) within 400 m. Minor Adverse (Not Significant) across wider locations.	(VPs 79-81). LVIA correctly assesses High magnitude/ Major-Moderate Adverse effects within 400/500m. While the most significant effects will be within about 400m either side of the PD, between an intermediate distance of 500m – 2km depending on visibility should be medium sensitivity with Moderate effects due to wider views of the development which cover a large extent of the landscape (see VP84 at 1.7km and VP83 at 1.8km which some may consider Medium). Between the west of Strathpeffer and Dingwall agreed as Minor although the tops of the towers may be visible above the skyline of the Heights.
RE-02: Achonachie Road	VP84	Major-Moderate Adverse (Significant) within 400 m. Moderate-Minor-Adverse (Not Significant) across wider locations.	Agree with applicant's assessment.
RE-03: A835	VP81	Major-Moderate Adverse (Significant) within 500 m, Minor Adverse (Not Significant)	<u>Disagree with applicant's assessment on some aspects.</u> The A835T has expansive views across Strathconon with many towers showing in the open landscape then climbing up to the backdrop hills to its southwest (VPs 79-81). LVIA correctly assesses High magnitude/ Major-Moderate Adverse effects within 400/500m. However, Officers consider an intermediate assessment of Medium sensitivity (or moderate effects) at 500m-2km depending on visibility would be appropriate (see VP84 at 1.7km and VP83 at 1.8km which some may consider Medium). The development will be

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
		across the wider route.	visible across a wider area between Achilty and near the A832 junction with large extents of the development visible at distance in discrete sections filtered by tree cover and landform. Wider extents of the A835 towards Tore and Ullapool would be Negligible.
RE-04: A831	VP90	Major Adverse (Significant) within 300-m, Moderate-Minor Adverse (Not Significant) across the wider route.	Agree with applicant's assessment. The development crosses the road at a point that isn't particularly open.
RE-05: Dingwall to Kyle of Lochalsh Rail Link	None	Major-Moderate Adverse (Significant) within 500 m, Moderate-Minor Adverse (Not Significant)	Agree with applicant's assessment.
RE-06: Minor road between Marybank and Muir of Ord	VPs 87-88	Moderate Adverse (Significant) subject to screening levels	Agree with applicant's assessment. Traffic speeds on this route are low, however views will be filtered along the route by woodland and landform. Key views south from Orrin Bridge and west leaving Muir of Ord.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
RE-07: Minor road between Blackbridge and Struy (A831)	None	Moderate Adverse (Significant) subject to screening levels	Agree with applicant's assessment. No apparent consideration of cumulative effects with the proposed Fanellan Substation.
RE-08: A832	VP83	Minor Adverse (Not Significant)	Partially agree with applicant's assessment. VP83 Marybank Road could be considered as a Moderate and Not Significant effect, but this is likely to represent the worst effects for this route. Views east of Marybank likely to be distant, although potentially skylining in places, views also screened or filtered by landform and tree cover. Moderate-Minor beyond the section of road between Marybank and the A835.
RE-09: A833	None	Minor Adverse (Not Significant)	Agree with applicant's assessment. Potential for filtered views at distance between Ardendrain and the A862 junction. No apparent consideration of cumulative effects with the proposed Fanellan Substation.
RE-10: A862	None	Minor Adverse (Not Significant)	Partially agree with applicant's assessment. The EIAR misrepresents the extent of the route which suggests it lies between the A833 junction and Inverness. The route actually connects Inverness, Beauly, Muir of Ord, Conon Bridge, Maryburgh, Dingwall and connects to the A9 at Ardullie. The ZTV indicates 35-51 Towers visible along part of the route between Muir of Ord and Conon Bridge (albeit at distance) with lower levels of visibility along the rest of the route within the study area.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
RE-11: Orrin Dam track RC30.01	None	Major Adverse (Significant) within 700 m. Moderate-Minor Adverse (Not Significant) across wider locations.	Agree with applicant's assessment. Development will cross the route resulting in Major adverse effects at close range. Views will likely be filtered by tree cover and landform.
RE-12: Mains of Coul (RC10.03)		Major Adverse (Significant) within 700 m, Moderate Adverse (Significant) across wider locations.	Agree with applicant's assessment. Some routes between Contin Trails and Strathpeffer (RE-12 to 14) pass close to or under the PD and these have been assessed as High magnitude/ Major within 500-700m but not significant for the wider trail beyond. As all routes pass through trees this seems reasonable.
RE-13: Kinellan link path (RC10.07)	VP76	Major Adverse (Significant) within 500 m, Moderate-Minor (Not Significant) across wider locations	Agree with applicant's assessment. Some routes between Contin Trails and Stratpeffer (RE-12 to 14) pass close to or under the PD and these have been assessed as High magnitude/ Major within 500-700m but not significant for the wider trail beyond. As all routes pass through trees this seems reasonable.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
RE-14: Loch Kinellan circuit (RC45.01)	VP76	Major Adverse (Significant) within 500 m, Moderate-Minor (Not Significant) across wider locations	Agree with applicant's assessment. Some routes between Contin Trails and Stratpeffer (RE-12 to 14) pass close to or under the PD and these have been assessed as High magnitude/ Major within 500-700m but not significant for the wider trail beyond. As all routes pass through trees this seems reasonable.
RE-15: Orrin circular- Fairburn RC30.02	VP87	Major Adverse (Significant) within 500 m, Moderate-Minor (Not Significant) across the wider locations.	Agree with applicant's assessment.
RE-16: View Rock RC10.01	VP77	Major- Moderate Adverse (Significant) based on close proximity views.	Agree with applicant's assessment. Major-Moderate effects based on V4b Figure 7-77b(i), V4b Figure 7-77b(ii), V4b Figure 7-77b(iii) which although the views may be filtered, when visible they are close proximity and towers are out of scale with the landscape with the skyline only part way up the tower. VP77 (View Rock) shows view from where the PD is seen close at hand but partially restricted by trees, this is probably the worst-case scenario for the trails as the slopes mainly face west, away from the PD. RE-16 is assessed as Medium magnitude, Major-Moderate effect and others less, which is reasonable.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
RE-17: Strathpeffer - Jamestown (Blackmuir Woods) RC45.05		Moderate Adverse (Significant)	Agree with applicant's assessment.
RE-18: Ord Wood west – Kinellan (RC45.03)		Moderate Adverse (Significant)	Agree with applicant's assessment.
RE-19: Contin Island RC10.05		Moderate Adverse (Significant) subject to screening levels	Agree with applicant's assessment.
RE-20: Home Farm to Hughton by Lonbuie IN20.11		Moderate-Minor Adverse (Not Aignificant)	Agree with applicant's assessment. There will be some screening/filtering of views by the landform and tree cover. Assessment should also include East Lodge to West Lodge, Beaufort Castle IN20.05 which appears to be missing from the assessment but joins to the eastern extent of the route.
RE-21: Contin to Strathgarve (RC10.06)	VP77	Moderate-Minor Adverse (Not Significant)	Agree with applicant's assessment.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
			VP77 (View Rock) shows view from where the PD is seen close at hand but partially restricted by trees, this is probably the worst-case scenario for the trails as the slopes mainly face west, away from the PD. RE-16 is assessed as Medium magnitude, Major-Moderate effect and others less, which is reasonable. Some routes between Contin Trails and Strathpeffer (RE-12 to 14) pass close to or under the PD and these have been assessed as High magnitude/ Major within 500-700m but not significant for the wider trail beyond. As all routes pass through trees this seems reasonable.
RE-22: Ord Hill RC32.07	VP89	Moderate Adverse (Significant)	Agree with applicant's assessment. Views from the summit will be significant adverse, but views from elsewhere in the path will likely be partially screened.
RE-23: Torrachilty woods (RC10.04)	VP77	Moderate-Minor Adverse (Not Significant)	Agree with applicant's assessment. VP77 (View Rock) shows view from where the PD is seen close at hand but partially restricted by trees, this is probably the worst-case scenario for the trails as the slopes mainly face west, away from the PD. RE-16 is assessed as Medium magnitude, Major-Moderate effect and others less, which is reasonable. Some routes between Contin Trails and Strathpeffer (RE-12 to 14) pass close to or under the PD and these have been assessed as High magnitude/ Major within 500-700m but not significant for the wider trail beyond. As all routes pass through trees this seems reasonable.
RE-24: Golf course - Wood east (RC45.07)	None	Moderate Adverse (Significant)	Agree with applicant's assessment.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
RE-25: Blackmuir Woods - maze circular RC45.04	None	Moderate Adverse (Significant)	Agree with applicant's assessment. PD is likely to be heavily filtered by intervening tree cover/woodland. Where visible the PD will be seen at distance.
RE-26: Rogie Falls (RC10.02)	None	Moderate-Minor Adverse (Not Significant)	Agree with applicant's assessment.
RE-27: Eagle Stone Path (RC45.10)	None	Moderate-Minor Adverse (Not Significant)	Agree with applicant's assessment.
RE-28: Ardval - Catsback - Loch Ussie (RC45.09)	None	Moderate-Minor Adverse (Not Significant)	Agree with applicant's assessment. PD is likely to be heavily filtered by intervening tree cover/woodland. Where visible the PD will be seen at distance.
RE-29: Knockfarrel (maze to hill) (RC45.02)	VP75	Moderate-Minor Adverse (Not Significant)	Broadly agree with applicant's assessment. Notwithstanding distance to receptor, Officers consider that magnitude should be low due to more open views of the proposed development leading to a slightly greater but Not Significant effect. While a more distant element in the landscape, the development is panoramic and has a wide extent across views to the north and northwest with views west and southwest from the summit of Knockfarrel.
RE-30: Knockfarrel to Fodderty (RC13.05)	None	Moderate-Minor Adverse (Not Significant)	Broadly agree with applicant's assessment. Notwithstanding distance to receptor, Officers consider that magnitude should be low due to more open views of the proposed development leading to slightly greater but Not Significant effect. While a more distant element in the landscape, the

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
			development is panoramic and has a wide extent across views to the north and northwest with views west and southwest from the summit of Knockfarrel.
RE-31: Knockfarrel RC13.06	None	Minor Adverse (Not Significant)	Agree with applicant's assessment.
RE-32: Strathpeffer Walking and Cycling Routes (Torrachilty Forest)	VP77	Major Adverse (Significant) within 500 m, Moderate-Minor Adverse (Not Significant) across wider locations	Agree with applicant's assessment.
RE-33: Strathpeffer Walking and Cycling Routes (North of Strathpeffer Golf Course)	None	Major Adverse (Significant) within 500 m, Moderate-Minor Adverse (Not Significant) across wider locations	Agree with applicant's assessment.
RE-34: North Coast 500	Various	Minor Adverse (not significant)	<u>Disagree with applicant's assessment</u> The EIAR misrepresents the extent of the NC500. The NC500 also includes sections of the A835, A832 & A862 between Contin, Marybank, Muir of Ord,

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
			Beaully and Inverness. See assessments for each route and relevant settlement above. The OHL crosses over the NC500 where it forms part of the A835 at Kinnahaird to the east of Contin.
RE-35: Inverness to John O' Groats National Cycle Trail	None	Minor Adverse (Not Significant)	Agree with applicant's assessment.
OE-01: Coul House Hotel		Moderate Adverse (Significant) based on views from southern edge of the hotel grounds	Agree with applicant's assessment. Views of the development will be to the south and at distance filtered by landform and tree cover.
OE-02: Falls of Orrin		Moderate Adverse (Significant) subject to screening levels	Agree with applicant's assessment. Fairly well screened by trees and topography so given Low/Moderate Adverse which is probably a precautionary assessment.
OE-03: Fairburn Activity Centre	VPs 85-86	Moderate Adverse (Significant) applicable to	Agree with applicant's assessment. Views will be filtered by tree cover.

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
		views where there are gaps in the woodland with most open outlook	
OE-04: Fairburn Tower	None	Moderate Adverse (Significant)	Agree with applicant's assessment. Views to the south and southwest to be partially screened by tree cover. Views to the north would be screened by intervening farm buildings and at distance.
OE-05: Strathpeffer Golf Course	None	Moderate Adverse (Significant)	Agree with applicant's assessment.
OE-06: Torrachilty Forest. – Car Park and Picnic Area (Contin)	None	No effect	Agree with applicant's assessment.
OE-07: Riverside Chalets and Caravan Park	None	Moderate-Minor Adverse (not significant)	Agree with applicant's assessment.
OE-08: Neil Gunn Memorial	VP73	Minor Adverse (Not Significant)	<u>Disagree with applicant's assessment.</u>

Visual Receptor (Residents, Transport & Recreational Routes, Outdoor Recreational Locations)	Attributable / Nearby Viewpoint (VP)	Level of Effect and Significance (APP)	Level of Effect and Significance (THC)
			Officers consider magnitude should be low given the wide extent of views the development will be visible within, albeit at distance. Result is Moderate-Minor adverse (Not Significant).