

Agenda Item	8.1
Report No	PLN/050/26

HIGHLAND COUNCIL

Committee: North Planning Applications Committee

Date: 30 September 2026

Report Title: 25/00580/S36: Allt an Tuir Renewable Energy Park Limited
Land 2335M South of March Cottage, Rosehall

Report By: Area Planning Manager - North

Purpose/Executive Summary

Description: Allt an Tuir Renewable Energy Park - Erection and operation of a generating station for a period of 40 years, comprising 9 wind turbines with a maximum tip height of 200 metres, battery energy storage system, solar PV array and associated infrastructure.

Ward: 01 – North, West and Central Sutherland

Development category: National Development

Reason referred to Committee: National Development

All relevant matters have been taken into account when appraising this application. It is considered that the proposal accords with the principles and policies contained within the Development Plan and is acceptable in terms of applicable material considerations.

Recommendation

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

1. PROPOSED DEVELOPMENT

1.1 The Highland Council has been consulted by the Scottish Government's Energy Consents Unit (ECU) on an application made under Section 36 of the Electricity Act 1989 (as amended) for the construction and operation of Allt an Tuir Renewable Energy Park with a 59.4MW capacity wind farm, a 12MW capacity solar photovoltaic array, and a 12MW capacity battery energy storage system (BESS), along with associated infrastructure. The indicative generating capacity of the combined energy park is 83.4MW.

1.2 The proposed development comprises:

- 9 turbines: Ts 1 - 7 at 200m to blade tip height, T8 at 180m blade tip height, and T9 at 167.5m to blade tip height (as amended). Three turbines, Ts 1, 5, and 9, would be fitted with visible aviation safety lighting. It is yet to be decided whether the transformer for each turbine will be internal or external 3m x 3m x 5.5m transformer houses;
- permanent turbine hardstanding areas each measuring 77m x 28m with 5.5m wide access track, two temporary blade finger laydown areas measuring 20m x 4m and two temporary crane pad hardstanding areas;
- up to 18ha of solar photovoltaic panels comprising 30,000 panels measuring 2.5m x 1.1m, with central or string inverters (to turn DC power produced by the panels to grid compatible AC power), which is not yet decided.
- battery energy storage system (BESS) facility compound measuring 75m x 51m with battery units, inverter transformers, and onsite storage containers;
- onsite substation compound measuring 44m x 36m with control building measuring 22m x 9m x 6.3m;
- reconfiguration of an existing access junction between the A837 and a forestry track at Rosehall (south of the large agricultural sheds);
- 7.7km of access track, of which 6.8km would be new, and 0.9km upgraded. Areas of track over deeper peat would be floated, while the track would have a general running width of 5.5m although with localised widening for passing places, laydown areas and turning heads for articulated vehicles;
- three on-site borrow pit search areas;
- electrical and communication underground cables running along sections of the access track;
- a temporary mobilisation compound (70m x 30m) and a temporary construction compound (110m x 75m);
- up to 6.58ha of felling within mixed and commercial woodland, of which 3.87ha would be permanently lost, to accommodate the substation, BESS facility, access track, borrow pits, and the temporary construction compound; and,

- off-site accommodation measures including vegetation clearance to accommodate abnormal indivisible load turbine component delivery.

- 1.3 The applicant has also provided high-level details of an intended grid connection via 33kV underground cable (UGC) with Shin Substation 13.4km to the east of the onsite substation. The applicant advises that the design is based on that of a previous 2021 grid connection offer.
- 1.4 A micrositing allowance of 50m is requested for turbines, BESS, and ancillary infrastructure, which would be used to avoid or minimise environmental, or engineering constraints identified during pre-construction ground investigation or construction phase excavation works. These constraints may include any areas of deeper peat, higher elevations of ground, watercourse buffers, Ground Water Dependent Terrestrial Ecosystems and cultural heritage assets.
- 1.5 The 15 to 18ha solar array would be wholly contained within the 23.8ha solar array search area. The submission advises that the array would be laid out in pairs (oriented in portrait) in east-west rows to face the south at approximately 15 to 25 degrees from the horizontal in order to maximise energy generation. The arrays are spaced to optimise any shadowing effects from one table to another with topography dictating exact row spacing, which is anticipated to be between 2.5m and 10m. The photovoltaic panels themselves would be expected to include mitigation to reduce glint and glare.
- 1.6 The applicant anticipates that the colour finish of the turbines would be matt grey to reduce visibility of turbines, particularly in low visibility conditions. The final colour and finish of the turbines, along with infrared aviation lighting, ancillary electrical equipment, landscaping and fencing etc. would also be agreed with the Planning Authority at the time of project procurement, which can be secured by condition. While indicative drawings for these elements are set out in the application, turbine manufacturers regularly update the designs that are available, thereby necessitating the need for some flexibility in the approved design details.
- 1.7 Permission is sought to operate the energy park for 40 years; a further application would be necessary to determine any future retention or re-powering proposal. If the decision is made to decommission the energy park, all components and above ground infrastructure would be removed. It is proposed that cables would be cut and remain in situ and turbine foundations would be removed to a depth of 0.5m below ground level. Any such turbine foundation retention would however need to be agreed via a decommissioning method statement. Solar panel frames are proposed to be pile driven into the ground to avoid the need for foundations. Any new tracks would be expected to be removed from the site and existing tracks returned to their pre-development state, however, the retention of tracks would require separate planning application at the time of decommissioning. In the event that there is a future

application to retain tracks and related infrastructure; this would be determined in line with the Development Plan in place at that time.

- 1.8 Whilst public consultation for Section 36 applications is not mandatory, the applicant has held two rounds of public consultation events at Rosehall Village Hall in February and August of 2024, with materials also being made available online through a dedicated webpage. Feedback including the applicant's response to the feedback provided through the consultation period is contained within the submitted Statement of Community Consultation Report.
- 1.9 The applicant did not use the Council's Pre-application Advice Service for Major Developments in this instance. The applicant did however seek Scoping opinions from statutory consultees through the ECU, to which the Council responded with technical advice of what officers considered should be included within the scope of the EIAR that supports the application. This process is non-statutory.
- 1.10 The EIAR contains the following technical environmental chapters:
- Chapter 5 – Landscape and Visual Impact Assessment;
 - Chapter 6 – Ecology;
 - Chapter 7 – Ornithology;
 - Chapter 8 – Hydrology, Hydrogeology, Geology and Peat;
 - Chapter 9 – Archaeology and Cultural Heritage;
 - Chapter 10 – Traffic and Movement;
 - Chapter 11 – Noise and Vibration;
 - Chapter 12 – Aviation and Radar;
 - Chapter 13 – Climate Change Mitigation; and,
 - Chapter 14 – Shadow Flicker.
- 1.11 The EIAR is accompanied by Figures and Visualisations, Technical Appendices, and a Non-Technical Summary (NTS). The application is further supplemented by a Statement of Community Consultation Report, a Design and Access Statement, a Planning and Energy Policy Statement, and a Socio-economic Statement.
- 1.12 To comply with the Raeshaw Farms Ltd. Vs Scottish Ministers [2026] CSIH 10 Judicial Review decision, the applicant has provided Additional Information, dated July 2026, to identify any significant effects associated with the intended grid connection and advise where significant effects are not identifiable at this stage. The Additional Information also considers the development's offsite impact on trees and woodland through the AIL delivery of turbine components.

- 1.13 Since the initial submission of the application in December 2025, the applicant has amended the design slightly to reduce the maximum heights of T8 from 200m to 180m, and T9 from 180m to 167.5m.

2. SITE DESCRIPTION

- 2.1 The 792.5ha application site, is located northwest of Rosehall, 13km west of Lairg, west of the River Cassley, which defines its eastern boundary, and north of the River Oykel and Tutim Burn, with the Allt an Tuir defining a part of its southern boundary towards the southeast. The site primarily covers undifferentiated wet heather moorland and blanket bog on its upper slopes and summits but encompasses commercial forestry and mixed broad-leaf woodland in its eastern section on the lower slopes above the River Cassley.
- 2.2 The topography of the site rises relatively steeply from 20m Above Ordnance Datum (AOD) on the western slopes of Glen Cassley to a little over 300m at its northwest boundary on the slopes of Beinn Rosail, with the site itself containing the named lower summit of Beinn an Rosail Beag (260m AOD). Beyond this ridgeline in the southern portion of the site, ground levels drop again towards the Tutim Burn watercourse. The turbines themselves would be sited between 205m and 301m AOD.
- 2.3 The Tutim Burn is south of the site boundary however some of its unnamed tributaries, as well as those of the Allt an Tuir, are within it, with all watercourses ultimately draining to the Kyle of Sutherland and into the North Sea via the Dornoch Firth.
- 2.4 The nearest settlement is Rosehall with the closest turbine located approximately 2.8km northwest. There are dispersed communities along Strath Oykel to the south of the proposal site extending eastward along the Kyle of Sutherland including Altass and Achnahanat although Glen Cassley to the north of the turbines is very sparsely populated.
- 2.5 The site would be accessed from the A837 at Rosehall, which runs west to east south of the site along Strath Oykel and onwards along the Kyle of Sutherland. The A839 forks from the A837 near North Lodge in the hills above and north of the Kyle. The unclassified Glencassley Road (U2117) that runs north of the site boundary is single track and extends as far as the property Duchally, approximately 12.5km NNW of the turbines.
- 2.6 Core Path SU21.03 (Allt an Tuir Burn Walk) is located approximately 160m north of the proposed site access with a further three Core Paths located off the A837 to the north of site access point; namely, SU21.09 (Achness Waterfall – 400m north of the proposed Site access point), SU21.08 (Rosehall Estate – 460m north of the proposed Site access point), and SU21.05 (Rosehall Forest Walks, Cassley Trail –

470m north of the proposed Site access point). The Cape Wrath Trail is over 5km west of the site boundary, the An Turas Mor Cycle Route runs south of the site along the River Oykel and wraps around the site to follow the River Cassley. The Sika Cycle Trail is a local mountain biking trail within Rosehall Forest.

2.7 Along with walking and cycling, other key recreational and tourist activities in the wider area include, but are not limited to, bird watching / birding / twitching, stalking / hunting / fishing, and horse riding.

2.8 The indicative UGC grid connection route runs from the onsite substation along the access track for 900m before diverting east through woodland and crossing beneath the River Cassley and beneath the A837. The route would then divert to an unnamed track south of the A837 running past Mansion House, Cone House, an unnamed lochan, and through forestry to join the A837 at Mid Altass where it continues eastward for 12km up to the Shin Substation.

Landscape Designations, Wild Land, and Landscape Character

2.9 The host landscape character type (LCT) is LCT135 – Rounded Hills - Caithness and Sutherland, which would be directly affected by the development. Surrounding LCTs with views of the turbines include:

- LCT134 – Sweeping Moorland and Flows;
- LCT139 – Rugged Mountain Massif – Caithness and Sutherland;
- LCT142 - Strath - Caithness and Sutherland, which would also host the indicative UGC grid connection;
- LCT329 – Rounded Mountain Massif;
- LCT330 – Rounded Hills and Moorland Slopes - Ross & Cromarty; and,
- LCT332 – High Rocky Moorland and Plateau - Ross & Cromarty

2.10 The site is located away from landscapes designated for their scenic and special qualities however turbines 1 to 7 are sited within the southern lobe of Wild Land Area (WLA) 34 Reay – Cassley with T8 sited close to its boundary. Landscape designations within 45km are tabled below.

Designated Landscape	Distance and Direction from the Proposed Development
National Scenic Area (NSA)	
Assynt - Coigach	11.2km northwest
Dornoch Firth	20km southeast
Wester Ross	37km southwest

North-West Sutherland	37km north-northwest
Kyle of Tongue	39km north
Special Landscape Area (SLA)	
Fannichs, Beinn Dearg and Glencalvie	10.3km
Ben Klibreck and Loch Choire	22.7km
Loch Fleet, Loch Brora and Glen Loth	31.1km
Ben Wyvis	29km
Ben Griam and Loch nan Clar	40km
Landscape Policy Areas	Distance and Direction from the Proposed Development
Wild Land Areas (WLA)	
WLA34 Reay – Cassley	0km
WLA29 Rhiddoroch – Beinn Dearg – Ben Wyvis	9km
WLA37 Foinaven – Ben Hee	17.5km
WLA32 Inverpolly – Glencanisp	22km
WLA35 Ben Klibreck – Armine Forest	22km
WLA33 Quinag	28km
WLA38 Ben Hope – Ben Loyal	34km
WLA28 Fisherfield – Letterewe – Fannichs	36km

Environmental Designations and Habitats

2.11 Sites designated for natural heritage within 10km are tabled below.

Designation	Distance to Site Boundary	Qualifying Interests
River Oykel Special Area of Conservation	0m	Freshwater pearl mussel Atlantic salmon

Caithness and Sutherland Peatlands Special Area of Conservation, Special Protection Area, and RAMSAR site. Corresponding with – Grudie Peatlands (3.5km southwest) and Strath an Loin Site of Special Scientific Interest (6.2km northwest)	3.5km northeast And 9.5km east-northeast	Blanket bog; Depressions on peat substrates; Otter; Acid, peat-stained lakes and ponds; Wet heathland with cross-leaved heath; Clear-water lakes or lochs with aquatic vegetation and poor to moderate nutrient levels; Marsh saxifrage; and Very wet mires often identified by an unstable `quaking` surface; Black-throated diver; Red-throated diver; Common scoter; Wigeon; Hen harrier; Merlin; Short-eared owl; Dunlin; Golden eagle; Golden plover; Greenshank; and Wood sandpiper
Kyle of Sutherland Marshes Site of Special Scientific Interest	4.3km east	Flood-plain fen; Wet woodland; and Vascular plant assemblage

2.12 The majority of the site comprises upland habitats including wet dwarf shrub heath, blanket bog, wet modified bog, acid/neutral flush, fen – alley more, grassland, and bracken with commercial plantation interspersed with semi-natural mixed broadleaved woodland also occupying a substantial portion of the site. The habitats surveyed on site are summarised in EIAR Table 6.7: Summary of Baseline Habitats

Including Approximate Area and Relative Percentage Coverage within the Site (EIAR Volume 1, Chapter 6: Ecology, page 6-21).

- 2.13 Much of the upland habitats are categorised as Classes 1 and 2 priority peatlands, which are defined as nationally important carbon rich soils, deep peat, and priority peatland habitat of high conservation value, with class 2 soils being the most represented. Class 5 non-priority peatland is also well represented and covers the majority of the wooded section of the site at its north. The EIAR report identifies that 312ha of priority peatland within the Site is of 'possible national interest'. Peat depth surveys across the site recorded varying depths of less than 0.5m to up to 4.5m, with 87% of the probes recording peat depths below 1m. Offsite, the indicative grid connection route would pass through areas recorded on the Ancient Woodland Inventory, particularly where it runs along the unnamed track south of the A837.
- 2.14 The site was surveyed as having suitable habitat for badger, bats, pine marten, otter, and red squirrel, potential suitable habitat for Scottish wild cat, and limited habitat for water vole, with surveys showing evidence of pine marten and water vole, while bat activity surveys recorded Common pipistrelle, soprano pipistrelle, brown long-eared bat and myotis species of bats (not distinguished within the EIAR). The fish habitat survey advises that watercourses within the site are steep and fast flowing but lack vegetation and bank cover so only the riverbed itself would provide suitable habitat for sheltering fish.
- 2.15 Additionally, the site and surrounds have been surveyed for ornithological interests with several sensitive species recorded during flight activity surveys including curlew, dunlin, golden eagle, golden plover, greenshank, greylag goose, hen harrier, hobby, merlin, osprey, pink-footed goose, red kite, white-tailed eagle, and whooper swan. The upland open habitats within the survey area were found to support breeding common sandpiper, curlew, dunlin, golden plover, greenshank, snipe, teal, and red grouse. Several black grouse lekking sites for black grouse were recorded along with breeding raptor sites for golden and white-tailed eagle, as well as osprey, and a non-breeding pair of black-throated diver were surveyed in the wider study area.

Built and Cultural Heritage

- 2.16 There are no designated cultural heritage assets within the application site however there are two Category A Listed Buildings (Shin Viaduct and Strathcarron Croick Parish Church) beyond 10km from the proposal, and four Category B Listed Buildings within 5km of the site, specifically the Rosehall Cassley Bridge, the Rosehall House and Walled Garden that is close to the indicative grid connection route, and Invernauld Bridge, and Brae Doune Footbridge. One Scheduled Monument, SM5302 'Langwell, fort and dun 500m WSW of', is within 5km of the Energy Park site and no other Scheduled Monuments within 10km. There are three non-designated assets within the site boundary and several more close to the

indicative grid connection route, most of which are associated with the Rosehall Estate.

Cumulative Development

- 2.17 Appendix 2 of this report provides details of operational, under construction, consented, and in planning wind farm projects within the 45km landscape and visual assessment study area. The cutoff date for the applicant's LVIA was 28 August 2024 (EIAR Volume 1 Chapter 5: Landscape and Visual Impact Assessment, paragraph 5.5.34), which has since been updated through the Additional Information Appendix 5: Updated Cumulative Schemes with a cutoff date of 06 July 2026. The table included in Appendix 2 of this report is up to date as of the writing of this report.
- 2.18 Unsurprisingly, the status of several schemes in the cumulative study area has changed since the initial LVIA was submitted, Strathrory Wind Farm is now operational, Lairg II Wind Farm is under construction, and Garvary Wind Farm has since been approved by Scottish Ministers. Several more energy developments are now submitted for application; specifically, Achany Extension Redesign, Balblair, Carn Fearna, Ceislein, Coille Beith, Coille Linne (formerly Fiag), Invercassley, Inveroykel, and Sallachy Extension Wind Farms. Several newer schemes are at the pre-application Scoping stage.

3. PLANNING HISTORY

- | | | | |
|-----|------------------|--|-------------------------|
| 3.1 | 21 February 2024 | 23/06043/SCOP: Allt an Tuir Wind Farm - Scoping Erection and operation of a wind farm, comprising approximately 9 wind turbines with a maximum blade tip height of 200m, battery energy storage system, photovoltaic array and ancillary infrastructure. | Scoping decision issued |
| 3.2 | 22 January 2022 | 24/00030/FUL: Erection of 100M met mast | Permission granted |

4. PUBLIC PARTICIPATION

- 4.1 Advertised: EIA development
- Environmental Impact Assessment (EIA) Report advertisements:
- The Northern Times on Friday 14 February and Friday 21 February 2025.
 - The Herald on Friday 14 February 2025.
 - The Edinburgh Gazette on Friday 14 February 2025
- Representation deadline: 18 March 2026
- 4.2 Additional Information advertisements:

- The Northern Times on Friday 21 August 2021.
- The Edinburgh Gazette on Friday 21 August 2021.

4.3

- Representations received by THC: 260 objections
- Representations received by ECU: 400 objections

N.B/ no new representations submitted against the Additional Information.

4.4

Material considerations raised are summarised as follows:

- a) Conformity with national energy and planning policy and legislation including the Electricity Act (1989), the Development Plan, and related guidance documents.
- b) Contribution to national and international renewable energy targets.
- c) Whether the EIA has assessed the project as a whole or if the project has been split between the Energy Park and the grid connection, which is not assessed as part of the EIA ('salami slicing').
- d) Concern with the EIA assessment process including the robustness of the data, including visualisations, the methodology, and considerations omitted from the assessment such as environmental effects in the event there is a fire at the BESS facility and turbine amplitude modulation effects in the noise assessment, for example.
- e) Concern that cumulative effects have not been fully considered.
- f) Socio-economic impacts including employment opportunities, and effects on businesses, tourism, and recreational interests including public access and angling, and concern that turbine development in the area is making it an unattractive place for development and investment thereby contributing to its Fragile Area status.
- g) Residential and community amenity, health, and safety impacts during the construction and operational phases including from noise, shadow flicker, and pollution events.
- h) Siting, layout, and design considerations including proximity to communities and distance from grid transmission OHL, the effectiveness of solar photovoltaic technology at the location, along with concerns regarding the location of borrow pits, land take (in particular in relation to the solar array and access), and the scale of the proposed turbines.
- i) Impacts on agriculture.
- j) Landscape and visual impacts including cumulative impacts and effects on WLAs, landscape character, the character and amenity of views, effects from specific viewpoints, lack or inadequacy of natural or proposed physical screening, and concerns with red aviation safety lighting extending detrimental effects into the hours of darkness.
- k) Impacts on the historic and cultural environment.
- l) Ecological effects, including cumulative effects, on sites designated for natural heritage, on protected species and ornithological interests, biodiversity,

habitats including riverine and native woodland habitats, peat and peatland habitats, including the vulnerability of habitats to pollution, and concerns regarding restoration and habitat management.

- m) Geological effects, in particular that borrow pit blasting is proposed by inactive geological faults.
- n) Impacts on the water environment.
- o) Traffic, transport, and access impacts including impacts on road safety and the condition and structural integrity of the public road network including specific bridge structures at Rosehall.
- p) Reuse of materials used in the development once the site is decommissioned.
- q) Cyber and/or national security.

4.5 Non-material considerations raised are summarised as follows:

- a) The need for the development and particularly in relation to the predicted supply of energy generated from renewable sources outstripping electricity demand in Scotland and the UK.
- b) The profile of the applicant/developer.
- c) The profile of the contributor submitting a representation.
- d) Procedural matters such as public consultation where this has met minimum statutory requirements.
- e) Disagreement with national planning and energy policy including the lack of a national scale allocation plan for renewable generating stations.
- f) Capacity of the national grid.
- g) Community benefit funding.
- h) Accidents and incidences not related to the application scheme.
- i) Curtailment payments.
- j) Preference for other sites to be developed.
- k) Preference for other types of energy generation.
- l) Developer profits.
- m) Energy bills
- n) Impacts on private views where this is not a residential visual amenity affect.
- o) Impacts on property values and stated concern that the development will cause or contribute to planning blight as planning blight is a legal issue.
- p) Speculation that large scale renewable energy developments lead to depopulation of rural areas.
- q) Attributing designations on an undesignated receiving landscape whether for their scenic qualities, for example, an Area of Outstanding Natural Beauty, or for having Dark Sky status.
- r) Fire safety management where this does not affect the layout and design and drainage arrangements of the proposal.
- s) Speculation regarding the capacity and capability of the Scottish Fire and Rescue Service.

- t) Assertion that consulting the Joint Radio Company regarding potential impacts on its radio network is a conflict of interest because it is an actor within the energy industry.
- u) Stated mistrust in the planning process including speculation that there is a “risk of fraud” in the decision-making process.
- v) Stated mistrust of experts.
- w) NIMBYism.
- x) Assertion that the application represents a breach of Human Rights.
- y) Claims that the development will negatively impact individuals’ mental health and claims made on behalf of the mental health of others.

4.6 All letters of representation are available for inspection via the Council's eplanning portal which can be accessed through the internet at the following link: <https://www.highland.gov.uk/planning/view-comment-planning-applications>.

4.7 All letters of representation made directly to the ECU are available for inspection on the ECU's website at the following link: <https://www.energyconsents.scot/ApplicationDetails.aspx?cr=ECU00004597andT=4>.

5. CONSULTATIONS

Community Councils

5.1 **Creich Community Council (host) objects** to the application on landscape and visual grounds including cumulative impacts; economic impacts including on the tourism industry; private and community amenity impacts; health and safety impacts including from equipment failure and potential fire at the BESS facility; ecological impacts including species; and, impacts on road including delays due to construction traffic and road infrastructure.

5.2 **Ardgay and District Community Council objects** to the application on landscape and visual grounds including the industrialising effect on landscape character, effects during the hours of darkness, and cumulative impacts; scale, siting and land take concerns; impacts on the water environment including on private water supplies and water bodies and aquatic habitats; economic impacts including on the tourism industry; private and community amenity impacts including from noise; health and safety impacts including from potential fire at the BESS facility; and ecological impacts including species and ornithological interests. The response notes current grid infrastructure capacity constraints.

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

Highland Council Consultees

- 5.4 **Access Officer** does not object subject to a condition to secure that Core Paths SU21.03 Allt an Tuir Burn, SU21.09 Cassley Falls, and SU21.08 Rosehall Estate remain accessible to the public during construction and operational phases of the Energy Park and grid connection, and to secure its approval of a Recreational Access Management Plan prior to development works commencing on site.
- 5.5 **Archaeology Officer (Historic Environment Team)** does not object subject to a condition to secure its approval of a Written Scheme of Investigation for implementation during construction works to include a programme of archaeological works to cover any requirement for a post-excavation research design. The Archaeology Officer also requests that the Construction Environmental Management Plan includes measures to mitigate construction impacts on known and unknown archaeological interests.
- 5.6 **Conservation Officer (Historic Environment Team)** does not object and advises that the proposal, while visible from Listed Buildings, would not significantly affect their settings due to distances from turbines and intervening buildings, landscaping, and topography.
- 5.7 **Ecology Team** does not object subject to conditions to secure a finalised Habitat Management Plan, and to ensure that species protection is considered throughout the construction phase of development including that works should be carried out under the supervision of a suitably qualified Environmental Clerk of Works. The Ecology Team has provided advise on the information that would be required to accompany any future application for a grid connection.
- 5.8 **Environmental Health Officer** does not object subject to conditions to secure limits on the noise output from turbines, and combined noise output from the energy park as a whole (turbines, solar array, BESS facility, and substation) during the operational phase of development, as well as for the Council's approval of schemes to manage construction noise and dust through the Construction Environmental Management Plan prior to development commencing on site.
- 5.9 **Flood Risk Management Team** does not object and has no specific comments.
- 5.10 **Forestry Officer** has withdrawn an objection following the submission of the Additional Information Report appraising the offsite impact on trees and woodland as a result of the delivery of turbine components via abnormal indivisible loads, and subject to a condition to secure adequate compensatory planting.
- 5.11 **Landscape Officer** does not object on landscape and visual impact grounds following the applicant agreeing to reduce the heights of Ts 8 and 9 (see paragraph 1.12) to improve the overall composition of the array when experienced from nearby

settlements and residential properties, particularly around Rosehall, Invercassley, Altass and Achnahamat. The amendment is required to mitigate the assessed significant visual effects of the scheme appearing visually dominant from nearby residential areas.

- 5.12 **Transport Planning Team** does not object subject to conditions to secure its prior approval of a Road Mitigation Schedule of Works and a finalised Construction Traffic Management Plan (CTMP) to include details of operational traffic management for turbine maintenance, establishment of a Community Liaison Group, completion of a S96 Wear and Tear Agreement, along with details of site access (barring access to the site from the U2117 Glen Cassley Road).

Consultation Undertaken by the ECU

- 5.13 **British Telecom** has not objected to the application as the proposal is not anticipated to interfere with its current or proposed radio network.
- 5.14 **Defence Infrastructure Organisation (MOD)** does not object subject to conditions for Aviation Safety Lighting and Aviation Charting and Safety Management.
- 5.15 **Fisheries Management Scotland** does not object and advises that the proposal, including its grid connection, falls within the district of the Kyle of Sutherland District Salmon Fishery Board.
- 5.16 **Historic Environment Scotland** does not object having identified that the proposal is not likely to result in significant direct- or setting- effects on historic assets within its remit.
- 5.17 **Highlands and Islands Airports Ltd.** does not object as the Energy Park and its grid connection would not infringe on its safeguarding criteria for Inverness Airport.
- 5.18 **Joint Radio Company** does not object as the Energy Park and its grid connection have cleared, subject to a 50m micro-siting limit, with respect to radio link infrastructure operated by local energy networks.
- 5.19 **Kyle of Sutherland District Salmon Fishery Board objects** on the grounds that construction activities including peat extraction and the formation of compounds and turbine hardstanding areas risk the health and wellbeing of the aquatic environment.
- 5.20 **National Air Traffic Services** does not object as development does not conflict with its safeguarding criteria.
- 5.21 **NatureScot objects** on the grounds of effects on Wild Land Quality of Wild Land Area Reay-Cassley. It does not object on the grounds of landscape or visual effects, including effects on the Special Qualities of the Assynt Coigach National Scenic Area, nor on the grounds of sites designated for their natural heritage interests

although it does require the design of the BESS facility to include measures to protect the River Oykel SAC from fire suppressant or polluted water runoff entering watercourses. NatureScot's response to the AI had not been submitted to the ECU at the time of writing and is expected to be reported to Members at the Committee meeting.

- 5.22 **Office for Nuclear Regulation** does not object and has no specific comments on the application or Additional Information.
- 5.23 **Royal Society for the Protection of Birds** does not object to the proposal.
- 5.24 **Scottish Environmental Protection Agency** does not object to the Energy Park subject to conditions to secure its approval of a finalised peat management plan and a borrow pit management plan, along with the inclusion of peat and water environment protection measures in other environmental management plans. SEPA is satisfied that further detailed assessment of the grid connection can be addressed through any future application for that component of the project.
- 5.25 **Scottish Forestry** does not object but advises that the value of the native woodland is considered in the planning balance and that a detailed compensatory planting plan should be approved prior to the felling of any trees.
- 5.26 **Scottish Water** does not object and advises that there are no Drinking Water Protected Areas that would be affected by the proposal.
- 5.27 **Scotways** does not object and has no specific comments to make on the proposal.
- 5.28 **The British Horse Society** does not object but notes that equestrian interests should be included in the CTMP.
- 5.29 **Transport Scotland** does not object to the Energy Park or its grid connection subject to conditions to secure its prior approval of the scheme for delivery of abnormal indivisible loads including the route and, along with any accommodation measures, additional signage, and temporary traffic control measures required on the trunk road network for AIL delivery and general construction traffic.

6. DEVELOPMENT PLAN POLICY AND OTHER MATERIAL POLICY CONSIDERATIONS

- 6.1 Appendix 3 of this report provides details of the documents which comprise the adopted Development Plan, including details of pertinent planning policies as well as adopted supplementary guidance, and other material policy considerations which are relevant to the assessment of the application.

7. PLANNING APPRAISAL

- 7.1 This application has been submitted to the Scottish Government under Section 36 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). Although not a planning application, the Council processes Section 36 applications in a similar manner given that planning permission may be deemed to be granted.
- 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 that Scottish Ministers, and by extension the developer, are 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 submitted under the Electricity Act 1989 that the Development Plan is just one of several considerations, and therefore Section 25 of the Town and Country Planning (Scotland) Act 1997, which requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise, is not engaged. That said, the application still requires to be assessed against all policies of the Development Plan relevant to the application, all national and local policy guidance, and all other material considerations relevant to the application.

Planning Considerations

- 7.4 The key considerations in this case are:
- a) Compliance with the Development Plan / Other Planning Policy
 - b) Energy and Economic Benefits
 - c) Construction Impacts
 - d) Siting, Layout, and Design
 - e) Landscape and Visual Impacts
 - f) Natural Heritage (including ornithology)
 - g) Built and Cultural Heritage
 - h) Roads, Transport and Access

- i) Water, Flood Risk, Drainage and Peat
- j) Noise and Shadow Flicker
- k) Aviation and Radar
- l) Decommissioning and Aftercare
- m) Planning Compliance and Monitoring, and,
- n) Other Material Considerations.

Compliance with the Development Plan and Other Government Policy

- 7.5 Appendix 4 of this report provides an assessment of compliance with the Development Plan / Other Material Policy Considerations. In summary, the Development Plan comprises National Planning Framework 4 (NPF4), the adopted Highland-wide Local Development Plan (HwLDP), The Caithness and Sutherland Local Development Plan (CaSPlan), and all statutorily adopted supplementary guidance, including the Onshore Wind Energy Supplementary Guidance (OWESG).
- 7.6 The principle of renewable energy development is established in national policy, with the proposed development being of national importance for the delivery of the national Spatial Strategy. NPF4 considers that Strategic Renewable Electricity Generation and Transmission Infrastructure will assist in the delivery of the Spatial Strategy and Spatial Priorities for the north of Scotland, and that Highland can continue to make a strong contribution toward meeting Scotland's ambition for net zero.
- 7.7 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 The above is also reflected within other material policy considerations, with Government policy giving significant weight to the importance of achieving net zero through the deployment of onshore wind at pace. Government legislation and policy maintain the commitment to attaining net zero by 2045, with the Onshore Wind Policy Statement requirement for 20GW of onshore wind to be deployed by 2030, and the Climate Change Committee Report to UK Parliament (July 2024) explaining that onshore wind installations will need to double by 2030. The UK Government Clean Power Action Plan has also recently set a more ambitious target of 27-29 GW of onshore wind by 2030. When determining renewable energy proposals, the ability to meet these targets therefore demands substantial weight when undertaking the planning balance exercise.
- 7.9 At the regional level, HwLDP also offers support for renewable development proposals where they are located, sited and designed such as they will not be

significantly detrimental overall, individually or cumulatively with other developments. To inform this assessment, the OWESG provides a methodology for a judgement to be made on the likely impact of a development on assessed “thresholds” listed in its 10 criterion, which are designed to assist the application of HwLDP policy in judging the final balance of benefits versus disbenefits of any given scheme. Appendix 7 provides an assessment against the ten Landscape and Visual Assessment Criteria contained within Section 4 of the Onshore Wind Energy Supplementary Guidance.

Energy and Economic Benefits

- 7.10 THC continues to respond positively to the Government’s renewable energy agenda. Installed onshore wind energy developments in Highland account for more generating capacity than any other single local authority in Scotland, with a substantial number of onshore wind farm applications pending consideration at present. It is noted here though that there are currently no operational commercial scale solar farms within THC area and there are far fewer applications for the deployment of this specific technology in Highland when compared with onshore wind. In that sense, commercial scale solar farms is an emergent development type within THC area.
- 7.11 Notwithstanding any impacts that this proposal may have upon the landscape resource, amenity and heritage of the area, the development is compatible with Scottish Government policy and guidance for net zero and renewable energy generation in terms of its contribution to the Scottish and UK Governments’ and European renewable energy targets. The proposed development would provide 59.4MW of installed capacity from turbines, 12MW of installed capacity from the solar photovoltaic array, and an additional 12MW of battery energy storage capacity, totalling 83.4MW of total installed capacity.
- 7.12 Wind turbines and solar arrays provide an important mechanism for the reduction of carbon dioxide (CO₂), and other greenhouse gas (GHG) emissions into the atmosphere by reducing the consumption of fossil fuel generated mains electricity. However, during their manufacture, construction and decommissioning, renewable generating stations can result in the emissions of GHGs, particularly where natural carbon stores, such as forestry or peat, are present and potentially impacted by the development, often termed “carbon balance”.
- 7.13 The applicant’s assessment of the carbon losses and gains estimates a total loss of between 202,805 tonnes of CO₂e (Table 13.2, EIAR Vol 1 Chapter 13), this is mainly due to lifecycle emissions of the turbines, batteries, and the solar array including embodied losses from the manufacture and decommissioning of the components and provision of backup power during construction. Ecological carbon losses during the construction phase of development are predicted to represent 2% of these total losses. The scheme is estimated to produce annual carbon savings of nearly 56,000 tonnes of CO₂e per year if the grid is supplied from mix of renewable and fossil fuel

sources, and up to over 99,000 tonnes of CO₂e per year compared to a grid wholly supplied by fossil fuels. The maximum estimated payback time of the proposed development, is estimated at 6.3 years for a mix supply grid and 3.5 years against a fossil fuel supplied grid (Table 13.6, EIAR Vol 1 Chapter 13).

- 7.14 The above calculations have not taken the grid connection into account, nor has the Additional Information (AI) provided information on carbon losses.
- 7.15 The proposed development anticipates a construction period of approximately 21 months and an operational period of 40 years. Such projects can offer investment / opportunities to the local, Highland, and Scottish economy, including businesses ranging across the construction, haulage, electrical and service sectors.
- 7.16 As detailed in the Socio-economic Statement, the applicant has estimated the total construction cost of the energy park at £105.2m, including £4.5m on grid connection. £2.2m of this capital expenditure would be spent locally (Caithness and Sutherland), £11.5m regionally (Highland), and £38.4m nationally (Scotland) (Table 5.2, Socio-economic Statement). During the operational phase of the development, the applicant anticipates expenditures of £0.6m per year for Caithness and Sutherland, £1.6m for Highland per year, and £2.3m per year for Scotland (Table 5.2, Socio-economic Statement). The statement calculates that the development will result in the following socioeconomic benefits:
- Construction Phase:
 - £1.1 million GVA and 18.9 job years in Caithness and Sutherland;
 - £7.2 million GVA and 110.9 job years in the Highlands; and
 - £23.6 million Gross Valued Added (GVA) and 326.2 job years in Scotland.
 - Operational Phase:
 - £15.3 million GVA and 206.3 job years in Caithness and Sutherland;
 - £41.6 million GVA and 565.3 job years in the Highlands; and
 - £57.8 million GVA and 803.4 job years in Scotland.
- 7.17 As with most onshore renewable energy developments, the economic benefits, while not significant, are positive and beneficial noting that Reporters on appeal decisions have clarified that there are considerable supply chain benefits associated with the development type.
- 7.18 The Council published the Social Value Charter for Renewables Investment in June 2024, which has been brought to the applicant's attention. The Council's Community Wealth Building Team has been notified of the proposal who will liaise with the applicant directly to maximise community wealth building opportunities as established under NPF4 Policy 25, as well as the community benefits as per the applicant's stated commitment within the submission (see Paragraph 3.3.2, Planning

and Energy Policy Statement), however, as Members are aware, community benefits are not material to this assessment.

Construction Impacts

- 7.19 There are likely to be some adverse impacts during the 21-month construction period for the Energy Park as well as works to install the grid connection, which are assumed to take place over 8 - 10 months. It is noted here that the AI assumes that the applicant would deliver the grid connection and transfer ownership and operation of the connection to the grid owner on completion. Disruption would largely be caused by construction traffic and disruption, particularly when abnormal loads are being delivered to site and any requirements for traffic management. A Construction Traffic Management Plan (CTMP) can be secured by condition to manage the impacts upon the local road network throughout the construction period. EIAR Chapter 11: Traffic and Movement and the associated Technical Appendix 10.2: Outline Construction Traffic Management Plan outline the mitigation measures that would be included with the finalised CTMP.
- 7.20 Furthermore, it is anticipated that the works would entail temporary closures of the A837 requiring the diversion of the bulk of general traffic from the A837 to the A839 between The Mound and the War Memorial at Rosehall where the roads meet. In that scenario, the AI advises that local traffic, including residents of around 70 properties, would still be able to access the A837 depending on where works are being carried out at any given time. The diversions are expected to increase journey times between the two points by around eight minutes.
- 7.21 The finalised CTMP should be secured by conditions prior to construction works commencing on site and reviewed throughout the construction programme. The CTMP will be a working document that is informed by knowledge of large-scale construction projects in the wider area using the same road network, including knowledge of any works to install its grid connection. The applicant will also be obliged to take onboard any feedback from ongoing engagement with the community through a Community Liaison Group to ensure that Community Councils and other stakeholders are kept up to date and consulted before and during the construction period.
- 7.22 Pre-construction road and structure upgrades for Council maintained roads would also be required to the carriageway, verges, and structures, in particular along the U2117 Cassley Bridge-Duchally Road, which must be agreed with the Council prior to commencement of development. A completed management plan for the delivery of turbine components (from Invergordon or Nigg) and any other Abnormal Indivisible Load (AIL) will also be required. It will be important to ensure that AIL deliveries do not clash with any partial and full road closures and diversions as have been indicatively identified as being required to install the grid connection (see Table 2.1: Summary and Sections of the Proposed Grid Connection Route, as shown in AI

Figure 2.1, of AI Appendix 1: Proposed Grid Connection Assessment. These matters are considered in more detail in the Roads, Transport and Access section below.

- 7.23 A finalised Construction and Environment Management Plan (CEMP) would be in place during the construction phase; an outline CEMP has been provided for construction of the Energy Park (EIAR Volume 3, Technical Appendix 2.1). However, SSEN Transmission would also be expected to prepare a CEMP for the installation of the grid connection. The CEMP would control potentially polluting activities and prevent adverse impacts on river catchments and the environment during construction.
- 7.24 Within and alongside the CEMP, construction must also comply with finalised and agreed plans and strategies for pollution prevention; construction methods; peat and soil management; site waste management; construction dust management; water quality management and fish monitoring; species protection; breeding bird protection; construction traffic management; biodiversity enhancement and habitat management; historic environment enhancement; and site restoration and aftercare. These plans will be updated and amended to incorporate information obtained during detailed ground investigations with the finalised versions approved by THC officers in consultation with the relevant consultees.
- 7.25 The principal contractor would then implement the measures outlined within the CEMP, including the Schedule of Commitments included with the EIAR (EIAR Volume 3 Technical Appendix 2.2). Compliance with the environmental management plans and strategies will be overseen by a suitably qualified and experienced Environmental Clerk of Works (EnvCoW) and any other qualified Clerks of Work or consultants as required, which should be secured by condition.
- 7.26 The anticipated construction hours for the Energy Park are 07:00 - 19:00 Monday to Friday and Saturday 08:00 to 13:00. No working is proposed on Sundays and public holidays although the applicant proposes exceptions for works that would not result in noise at sensitive properties while delivery of ALL may require flexibility due to logistical factors outwith the applicant's control (scheduling controls imposed by Police Scotland and weather constraints for example). The Council also acknowledges that foundation pours and turbine erection, where both activities need to be continuous, may also be required to be undertaken outwith normal construction hours.
- 7.27 The Council's Environmental Health Officer (EHO) has advised that the separation distance between turbines / solar array and noise sensitive receptors means that works to install the turbines are unlikely to cause significant noise issues. However, the proximity of the proposed access track to noise sensitive properties (NSPs) has potential to cause significant disturbance, particularly at Rose Cottage, with the applicant proposing to install noise barriers amongst other mitigation to reduce construction noise impacts. The EHO agrees with this mitigation and suggests that

noise barriers remain in place during the duration of construction, which should be secured through the CEMP condition as part of a scheme for the best practicable means to reduce the impact of construction noise at all times, with the scheme required to be submitted for the EHO's approval.

- 7.28 There are several NSRs along the anticipated grid connection route with the nearest being 10m from the proposed UGC works. Additionally, there would be two NSRs within 40m and 70m of the horizontal directional drilling (HDD) works, which would be required to install the cable beneath the River Cassley. The AI advises that these and several other NSRs would be within the threshold for significant effects from construction noise but that effects from vibration would not be significant.
- 7.29 Generally, the Council does not seek to control working hours in order to control the impact of construction noise as works that are inaudible at NSRs may take place at any time while other powers are available to the Council under Section 60 of the Control of Pollution Act 1974 for Statutory Nuisance. This legislation sets restrictions in terms of hours of operation, plant and equipment used, and noise levels etc. and is enforceable via Environmental Health and not Planning. However, there will also likely be noise disturbance at NSRs from HGV movements at locations on the road network, which the EHO has no powers to control.
- 7.30 On the above basis, the EHO advises the applicant to not undertake noise generating construction work, including access and egress of HGVs, that would be audible at NSRS before 08:00 Monday to Saturday. This is because 08:00 – 19:00 Monday to Friday, and 08:00 – 13:00 are the hours where construction noise is understood to be most tolerated. If the applicant is able to gain the agreement of those residents that would most likely be impacted, then noise generating works could be undertaken. In the event that the Environmental Health Service receives complaints about working hours or construction noise issues, they would be required to investigate in accordance with the Control of Pollution Act 1974. The EHO has not objected to the proposal on the grounds of construction noise subject to a condition to secure the EHO's prior agreement of a construction noise mitigation scheme. The scheme must demonstrate how the developer / contractors will implement the best practicable measures throughout the construction period to reduce the construction noise impacts on NSRs.
- 7.31 The EHO also advises that the proximity of the access track to residential properties raises concerns regarding dust during construction of the track and throughout the construction phase from construction traffic. The outline CEMP has laid bare several good practice measures that should be included within the final CEMP, which should be secured by condition, and implemented in full.
- 7.32 The EIAR advises that no new watercourse crossings would be required for the construction of the access track and associated hardstanding works, but that four crossings require upgrading with bridges and bottomless culverts to be used for main

watercourses such as the Allt an Tuir burn and suggests closed culverts for minor drainage channels. Final details of crossings should be controlled through the CEMP.

- 7.33 In addition to the cabling beneath the River Cassley, the AI advises that the anticipated grid connection route would also entail crossing 16 further watercourses and eight minor watercourses. While the means and methods of these crossings would be decided by SSEN, the AI anticipates that either or a combination of HDD, damming and fluming, or damming and pumping methods could be employed. Nevertheless, details of each crossing cannot be known at this stage and are anticipated to be submitted with any future application.
- 7.34 With the exception of the southern section of the temporary mobilisation compound, the layout of the proposal maintains standard 50m development free buffers from water bodies. Any activities impacting water bodies would be regulated by SEPA under the Environmental Authorisations (Scotland) Regulations 2018 (EASR). SEPA has not objected to the proposal or its grid connection, nor has it commented on the location of the construction compound.
- 7.35 The applicant has requested a micro-siting allowance of up to 50m for wind turbines and associated infrastructure including tracks and other hardstanding. Micro-siting is acceptable within reason to address unforeseen onsite constraints. To that end, the requested 50m limit is standard for turbines to ensure that the final installation does not deviate substantially to what has been assessed, in particular with regard to landscape and visual impacts, meaning that turbines should also not be micro-sited onto noticeably higher elevations of ground (no more than 5m AOD).
- 7.36 However, there may be more flexibility for ground-based infrastructure provided it avoids moving infrastructure into watercourse buffers, Ground Water Dependent Terrestrial Ecosystems (GWDTE), and does not disturb additional peat resources to that shown in the EIAR or increase impacts on natural or cultural heritage assets including unknown archaeology. All of these limits should be controlled through condition along with a requirement to ensure that any movement from the consented locations are subject to approval by the Environmental Clerk of Works (EnvCoW).
- 7.37 Once the turbines have been installed, the access tracks, substation and hardstanding areas around the turbines would remain in place for the operational lifetime of the development. Restoration of the temporary construction compound areas, verges, turbine base edges and the site borrow pit areas should also be secured through the CEMP.
- 7.38 Similarly, it is anticipated that the works to install the applicant's proposed UGC would entail open trench cutting, which would be completed in discrete sections with all ground disturbance to be reinstated and remediated.

- 7.39 Should the development be granted consent, a Community Liaison Group (CLG) should be set up to ensure that the community council and other stakeholders are kept up to date and consulted before and during the construction period.

Siting, Layout and Design

- 7.40 Chapter 2 of the EIAR describes the proposed development's evolution through five design iterations including 12 turbines at 200m to blade tip at the pre-application stage (Design Layout A), through to nine turbines at the Scoping stage and up to the EIAR Final layout also for nine turbines following further tweaks (eight at 200m and one at 180m to blade tip) (Design Layout E). This scheme has since been amended during the application stage with the number of turbines remaining at nine but the tip height of T8 reduced from 200m to 180m, and the tip height of T9 from 180m to 167.5m to address the landscape officer's concerns regarding the 'dominant' visual effect of these turbines on the communities of Rosehall and Invercassley.
- 7.41 The reasons for the site's selection are reported in Volume 1: EIA Report, Chapter 2, paragraphs 2.5.1-2) which more specifically states that,
- "[a]n essential element of the search for potential sites is the interest of landowners in onshore wind energy development. In that regard, and taking the criteria above into account, the Site initially became a viable development proposition for the Applicant following discussions with the landowners, who were interested in exploring the possibility of harnessing such a development on their estate."
- 7.42 The design of the energy park has followed a constraints-based approach in order that mitigation on environmental effects is embedded within the design, with key constraints including landscape and visual, good wind speed, cumulative impacts, grid connection feasibility, topography, watercourses, land use, aviation interests, access for abnormal indivisible loads and policy. The proposed development has undergone several iterations in response to emerging environmental and engineering considerations, including:
- "Environmental constraints information based on desktop studies, followed by ongoing detailed site investigations;
 - Feedback received through the Council's pre-application service, the preapplication consultation pack and EIA scoping responses from statutory and non-statutory consultees;
 - Detailed Zone of Theoretical Visibility (ZTV) analysis from key viewpoints, including the settlement of Rosehall (using both standard and reverse ZTV analysis);
 - Detailed feedback received from technical specialists assessing the anticipated effects of the proposed development;

- Feedback received through the first round of public consultations undertaken in February 2024; and
- Technical design constraints relating to the infrastructure requirements for the proposed development.”

7.43 The Design and Access Statement (DAS) lists five overarching principles influencing the proposed development whilst maximising the amount of renewable energy generation including:

- “minimising land take to construct infrastructure as far as possible;
- minimising potential impacts on the natural and cultural environment through careful siting and design;
- siting and designing to avoid or minimise significant landscape and visual impacts;
- minimising the number of watercourse crossings required, as far as practicable; and
- identifying potential opportunities for environmental enhancement.”

7.44 More specifically, landscape and visual considerations was one of the driving factors on the design of the proposed development. The LVIA and the DAS considered six design objectives as follows:

- “Create a discrete and compact turbine layout, which avoids outlying turbines and provides a coherent turbine layout in key design views.
- Maximise offset of turbines from the nearest settlement of Rosehall. The design also uses a range of turbine heights, with Turbine 9 (the closest turbine to the settlement) utilising a smaller turbine height.
- Select a turbine scale which responds to the underlying vertical scale of the landscape and the more immediate cumulative context. A range of turbine heights (between 180 m and 200 m to tip) have been used to help achieve this aim.
- Avoid overly adverse effects on the nearest residential properties through consideration of an appropriate offset from the nearest properties, and through selection of an appropriate turbine scale).
- A reduced lighting scheme has also been achieved. This avoids the use of intermediate light on the turbine towers and hub lights on the minimum possible number of hubs.
- The siting of the Solar PV Array, Substation and BESS components has also been carefully selected to minimise visibility of these features, particularly in potential views from the community of Rosehall.”

7.45 The design of the proposed development appears to have followed good practice guidance including the NatureScot Guidance ‘Siting and Designing Wind farms in the Landscape’ Version 3a (2017) and considered the Council’s OWESG (2016) Criteria. There is no specific guidance in relation to siting and design of solar farms, however,

the NatureScot pre-application guidance for solar farms, June 2025, provides pre-application advice on natural heritage considerations and outlines the survey and assessment work that is likely to be required to support an application. The design of the proposed development meets many of the design objectives as noted above with the exception of the following:

- The proposal is not discrete given its scale and prominence visible along the majority of Glen Cassley, and parts of the Kyle of Sutherland and Strath Oykel. However, it does present a coherent layout in key design views and avoids outlying turbines;
- Whilst the turbine array has tried to maximise the offset from Rosehall and used a range of turbine heights, the scale of the turbines at the southern end do not respond to the underlying vertical scale of the landscape and the immediate cumulative context. The landscape officer raised concern on the 'dominant' visual effect of the turbines (T8 and T9) on the communities of Rosehall and Invercassley, as seen in Viewpoint 2: Rosehall; and
- The solar PV array and other lower-lying components of the proposed development are relatively discrete except from elevated locations as seen in Viewpoints 10, 11 and 14 (Achnahanat, Glen Einig and Carn a Choin Deirg) where there would be some limited significant effects particularly on the landscape fabric of the 'host' LCT and views from Achnahanat, in particular.

- 7.46 As result of the concerns raised by the landscape officer, further dialogue was undertaken with the applicant who agreed to seek additional mitigation which includes the reduction of the tip height of T8 from 200m to 180m and T9 from 180m to 167.5m, with a rotor diameter of 158m consistent amongst all nine turbines.
- 7.47 On review of the additional visualisation material produced by the applicant (Viewpoints 2, 7, and 10 from Rosehall, Altass and Achnahanat respectively) (AI Appendix 3: Turbine T8 and T9 Height Reductions) reflecting the agreed additional mitigation, it is agreed that the design of the turbine array presents a more balanced composition, particularly in terms of the vertical scale when viewed from Rosehall.
- 7.48 The turbines relate reasonably well with the underlying landform with minimal turbine overlap or stacking. Whilst the turbines would appear prominent, and the effect would remain significant from this settlement and neighbouring communities, the additional mitigation has gone a step further to address the landscape officer's concerns. It is therefore not considered that there would be any breach to residential visual amenity at Rosehall or Invercassley.
- 7.49 The EIAR sets out that the size and scale of the overall proposed development has also been carefully considered to ensure it is appropriate for its location by fitting into the receiving landscape without overwhelming it. The applicant has also sought to

maintain favourable buffer distances from sensitive environmental and people receptors such as Rosehall.

- 7.50 The proposed development generally is viewed as a compact and coherent group of turbines largely seen as a simple, linear layout contained within an area lower lying simple moorland cover (albeit towards the edge of the Rounded Hills LCT and close to the Strath LCT). This attribute is particularly evident from some key viewpoints including Viewpoint 2 (Rosehall), Viewpoint 3 (Glencassley Castle), Viewpoint 6 (Beinn an Eoin) and Viewpoint 10 (Achnahanat). More specifically from the Assynt – Coigach NSA located beyond 11km, the turbines would be visible below the long-distance horizon, and it utilises a turbine scale which mostly responds to the nearby cumulative context, when seen in long distance views outside the NSA.
- 7.51 The proposed development is located on the very edge of Reay-Cassley Wild Land Area (WLA), the boundaries of which are not definitive lines in the landscape. Whilst it has not been possible for the applicant to avoid some localised and direct effects on the WLA, the affected part of the WLA is where the influence of nearby wind farms, through outward views of the existing Achany and Rosehall Wind Farms, is felt. Furthermore, the design has sought to create a compact and coherent group of turbines, when seen in wider views from the WLA. It also uses a range of turbine scales to respond to the underlying vertical scale of the landscape.
- 7.52 The proposed development has also sought to minimise effects during the hours of darkness through a reduced lighting scheme (Technical Appendix 5.2, Volume 4), whereby it has been agreed with the Civil Aviation Authority that only three of the nine turbines would be lit on the hub, as well as avoiding the need for the use of intermediate lighting on the turbine towers.
- 7.53 In addition, it is equally important that siting, layout, and design principles consider the cumulative effects arising from a proposal's relationships with other wind energy developments in its wider context given the ever-increasing presence of turbines in the landscape. The design of the generating station should take into account the baseline and potential additional changes to the current baseline.
- 7.54 As such, factors such as the degree to which nearby developments follow similar 'development patterns' in terms of siting, layout, and design can determine the degree to which schemes sit harmoniously or discordantly together in the landscape. Therefore, similarities and differences between receiving landscapes and Landscape Character Types; the degree to which the size and scale differences between the schemes and individual components, especially turbine proportions such as relative tip and hub heights, rotor diameters, and direction of rotor spin, are experienced by receptors and what effects these have such as the enjoyment of the view qualities, amongst others, are key in the assessment of landscape and visual effects.

- 7.55 Indeed, NatureScot's Siting and Designing Wind Farms in the Landscape Guidance (2017) notes that it can be particularly challenging to accommodate multiple wind farms in an area and so advances wind farm design objectives of limiting visual confusion and reinforcing the appropriateness of each development for its location. The guidance does not however extend to generating stations that include solar photo-voltaic technology as noted previously.
- 7.56 The 'host' Rounded Hills – Caithness and Sutherland LCT includes several wind farms, notably the existing Rosehall and Achany (19 turbines each at 90/102m to blade tip), and consented Achany Extension (18 turbines at 149.9m to blade tip) wind farms to the east / north-east on the eastern side of Glen Cassley. The consented Sallachy Wind Farm (9 turbines at 149.9m to blade tip) is located further north within the LCT above the south-western slopes of Loch Shin. The consented Meall Buidhe Wind Farm (8 turbines at 149.9m to blade tip) is located to the south of Strath Oykel within this LCT.
- 7.57 Further afield and within the same LCT, the existing Lairg I (3 turbines at 99.5m to blade tip) and consented Lairg II (10 turbines at 200m to blade tip) and Garvary (25 turbines at 180m to blade tip) wind farms are located to the east of the A836 / Achany Glen. The turbines of the existing Creag Riabhach Wind Farm (22 turbines at 125m to blade tip) to the north, and those of the consented Chleansaid (16 turbines at 200m to blade tip) and Strath Tirry (4 turbines at 135m to blade tip) wind farms would straddle the boundary of the 'host' LCT and the neighbouring Sweeping Moorland and Flows LCT
- 7.58 The proposed development would bring turbine development to the western side of Glen Cassley, close to the Strath LCT in comparison to other existing and consented wind farms in the eastern / north-eastern and southern parts of the LCT. However, the proposed development would not be a new development type in wider views.
- 7.59 Many of the existing and consented wind farms sited within the Rounded Hills – Caithness and Sutherland LCT are generally set back well within their moorland settings. The advantages of these locations are that the moorland provides expansive backdrops to the large-scale structures and that the undulating rounded hills provide natural screening that reduces the full exposure of the turbines and exposure of the of the lower ground level infrastructure, particularly from public locations such as roads and settlements.
- 7.60 These locations are generally more remote and separate from settled areas. There are exceptions to this such as Sallachy and Strath Tirry wind farms. Whilst the proposed development would not be located within the more remote interior of the Rounded Hills, the design of the wind farm element has taken account of more local landscape features to reduce the effects on the adjacent Strath LCT. Some of the embedded mitigation include containing the turbines behind the ridge to the south-

west of Glen Cassley (Viewpoint 3: Glencassley Castle) and using the ridge north of Strath Oykel to minimise views from the valley (Viewpoint 4: A837 near Tuiteam Tarbhach).

- 7.61 The proposed turbines would still appear as part of the Rounded Hills LCT in many views and would generally read as a distinct wind farm, separated by straths from the existing Rosehall, Achany and consented Achany Extension and Sallachy Wind Farms in the east / north-east and the consented Meall Buidhe Wind Farm to the south. There are also a number of views where the proposed development would be seen behind existing or consented wind farms (Viewpoint 5: Sika Cycle Trail, Part of Rosehall Trails and Viewpoint 8: Beinn Sgeireach) or seen in the context/may even read as part of existing and consented wind farm groups (Viewpoint 11: Glen Einig, Viewpoint 14: Carn a Choin Dearg, Viewpoint 17: Cul Mor and Viewpoint 19: Ben Klibreck).
- 7.62 In addition to the above, proposals for new and repowering schemes in the study area continue to come forward and are at various stages of pre-application and application stages, including the now in-planning stage Achany Extension Variation to the north-east (18 turbines at 200m to blade tip), and Strath Oykel (11 turbines at 200m to blade tip), Coille Beith (11 turbines at 200m to blade tip) and Inveroykel (20 turbines at 230/200m to blade tip) to the south, and several more at in-planning and scoping stage within the 45km study area. As such, the future cumulative baseline scenario remains uncertain at this stage, with each proposal to be determined on its own merit.
- 7.63 For the purposes of this assessment, a consideration of the total cumulative effects of the proposed development with wider future in-planning and scoping schemes is avoided in favour of the additional cumulative effects of the proposed development, that is those effects attributable to the scheme, so that that this scheme's contribution to cumulative landscape and visual effects can be better understood and to avoid making undue judgements on schemes yet to be determined.
- 7.64 Not only is consideration of how the siting and design of multiple developments relate to each other and the cohesiveness of their relationship to their surroundings from fixed viewpoints important, but also how wind farms relate to each other in terms of their frequency when moving through the landscape. Such consideration includes understanding the visual separation between schemes, which is important in order to allow receptors to experience and appreciate the character of the landscape and any special natural, architectural, cultural, and historic features in between. Care and attention are therefore required regarding design, siting and location to avoid detrimental sequential effects on important routes in the wider area.
- 7.65 As with all large-scale wind turbine development, there remains potential for significant residual landscape and visual effects that require further consideration even though mitigation is, or should be, embedded into the design. Any assessment

must pay particular attention to the specific hosting and neighbouring LCTs of the receiving landscape along with the landscape composition they engender, as well as any landscape designations in the wider area, susceptible receptors, as well as public views and the amenity of residents, recreational, and road user receptors. The implications of the proposed development on the physical and perceptual experience of the landscape and the visual experience of the receptor are considered in the respective Landscape and Visual Effect sections below. These assessments set out that the mitigation through design, including subsequent amendments, has ensured that despite identified residual significant landscape and visual effects, the proposed development is able to be accommodated in its receiving landscape and wider context.

Ancillary Infrastructure

- 7.66 In terms of design of the infrastructure on the site including the solar PV array, BESS facility, control building, substation, and tracks, these appear to have been located to reduce landscape, visual, and other environmental effects. The final design of ancillary components requires to be conditioned as details of final design are not all shown within the EIAR. The applicant is aware of the Council's requirement for associated buildings to be designed in a manner that reflects the Highland vernacular. The applicant has not yet committed to house transformers within the turbines themselves or externally as noted in paragraph 2.8.23 of Chapter 2 of the EIAR. Housing them internally is the Council's preferred option in order to reduce the visual clutter of additional infrastructure and could be secured by condition.
- 7.67 The solar PV array component of the proposed development is relatively discrete and visible from a small number of locations including Viewpoint 7 (Altass), 10 (Achnahanat), 11 (Glen Einig - Cape Wrath Trail, Scottish National Trail and An Turas Mor Cycle Route) and 14 (Carn a Choin Deirg). It would have less of an effect than the proposed turbines where significant effects are assessed at these locations. The officer agrees with the effects of the solar PV array set out in the LVIA and that it has been appropriately sited to minimise visibility from close range receptors such as Rosehall and other dispersed communities. This also applies to other lower-lying components of the proposed development including the substation compound, control building and BESS.
- 7.68 To further mitigate landscape and visual effects, the design of the proposed development includes additional woodland planting around the BESS and substation compound. The proposed planting areas are shown in Figure 6.11 of the EIAR. The photomontage visualisation from Viewpoint 2: Rosehall illustrates this planting at construction stage, and after 10 years, as the proposed planting around the BESS and substation compound becomes established. This visualisation highlights how the planting would help screen these components from views in the settlement.

- 7.69 Proposals for BESS facilities included with wind farm developments are effectively given planning permission in principle through wind farm consents. As such, conditions would be imposed to secure the proposal is reasonably sited as proposed, and details of the layout, access (for maintenance and emergency service vehicles), the design of all external components including compound and structure finishes, and grid connection. In providing these details, the applicant should also demonstrate how the BESS layout satisfies the Scottish Government's Battery Energy Storage Systems: Planning Guidance (March 2026), which captures previously published technical guidance on BESS; namely, Health and Safety Guidance for Grid Scale Electrical Energy Storage Systems, National Fire Chiefs Council's Guidance - Guidance on Grid Scale Battery Energy Storage System Planning, and Draft Guidance National Fire Chiefs Council on Grid Scale Battery Energy Storage Systems and/or any or any superseding guidance prevailing at the time.
- 7.70 It should be noted that fire safety and fire risk management are covered by other legislation and therefore are not matters for the planning authority. However, along with landscape and visual impacts, water supply, drainage including segregation, containment, and safe disposal of expended fire suppression agent and / or water from the water environment are relevant to the consideration of the BESS facilities and as such, details of these matters should also be secured by condition.
- 7.71 Members are reminded that the siting and the design of the grid connection as proposed through the AI is not confirmed. SSEN would own and operate the infrastructure while it has not been confirmed that the applicant would lead on its construction as assumed in the AI. The proposed grid connection is therefore based on assumption at this stage. Nevertheless, the AI advises that the design is based on information provided to the applicant by the grid operator as part of a 2021 grid connection offer, in which case the siting and design assumptions of the grid connection may be considered reasonable for the purposes of the EIA assessment.
- 7.72 The construction corridor for the UGC is assumed to be around 5m in width over a distance of around 13.6km, with the majority of works taking place within road carriageways and verges as well as forestry and unnamed tracks. The works would be carried out in discrete progressive sections between the onsite substation and the point of connection at Shin Substation and would require an anticipated four temporary storage and compound areas measuring 30m x 20m. Temporary access arrangements would also likely be required where works are not within the existing roads or tracks.
- 7.73 The works as described would require the removal of vegetation, which would then be reinstated. Some works would take place within LCT135 – Rounded Hills - Caithness and Sutherland at the application site with the majority being within LCT142 – Strath – Caithness and Sutherland and there are several residential, , and

road user visual receptors along the grid connection route identified in AI Appendix 1 at Paragraph 4.1.4, and Figure 2.2. However, it is considered that the larger part of landscape and visual effects would occur during the construction phase of development, which would be temporary and reversible with limited effects on landscape character and visual amenity. These effects would be highly localised to the discrete progressive working sites and immediate surrounds. As such, the UGC is not considered to result in significant landscape and visual effects and therefore it is not considered in the following landscape and visual impact sections.

Landscape Character Effects

- 7.74 There are several aspects to consider in determining whether the proposed development represents an acceptable degree of effect on landscape character, including:
- effects on the Landscape Character Type (LCT) as a unit, (Landscape Character Area (LCA)) as a whole, and on neighbouring LCTs;
 - effects on the local landscape composition closer to the proposed development; and
 - direct and indirect effects on landscape designations.
- 7.75 The main part of the site, in which the proposed turbines and solar PV array area are located is within the Rounded Hills – Caithness and Sutherland LCT. The lower lying eastern part of the site, in which the proposed site access is located is within the Strath – Caithness and Sutherland LCT. Both LCTs are considered in the applicant's assessment. Whilst there are several other LCTs within the surrounding area, these have been scoped out of the assessment due to relative visibility, distance, and other mitigating factors such as existing development including wind farms meaning the proposed development would have limited to no effect on these landscape resources.
- 7.76 The proposed development's specific effects on landscape character will result from the imposition of 9 x 167.5/180/200m tall, large-scale, rotating human artefacts into the landscape and, to a lesser degree, the solar PV array, BESS, the associated tracks and other infrastructure, contrasting with the existing colour and texture of the 'host' Rounded Hills - Caithness and Sutherland LCT and its interaction with the colour and texture of the wider landscapes that the proposed development is experienced within.
- 7.77 The proposed development's lower lying infrastructure components will have greater influence where they are more visible; i.e., mostly from within the 'host' and adjacent LCTs close to the boundary of the 'host' LCT. Whilst being a locally prominent presence, the size and scale of the proposed development will decrease relative to the landscape as one moves away from it and crosses different landscape features,

and therefore its influence on landscape character will decrease relative to distance and intervening landscape.

- 7.78 In this instance, the site of the proposed development forms part of the lower lying south-eastern ridge of Beinn Rosail (421 m AOD) within the rounded hills located to the north-west. The north-west to south-east ridge of land through the site forms the higher ground separating Glen Cassley, to the northeast, from Strath Oykel to the south-west. Therefore, the influence of the proposed development on landscape character will vary across a wide geographic extent given the undulating nature of the landscape. Where the proposed development is highly screened or not visible, it will have negligible to zero influence on landscape character.
- 7.79 The site has an upland character with some attributes of being remote and wild. Coniferous forestry contributes to human influences on the site. There are also views of wind farms in the surrounding uplands (including Rosehall and Achany Wind Farms to the north), and views of settled straths to the east, from the open higher moorland to the west of the site. The landcover across the open and higher western part of the site is characterised by upland open moorland. Lower lying ground to the north-east and east of the site is characterised by coniferous forestry which is subject to the long-term management. The site access passes through areas of lower lying pastoral farmland, coniferous forestry on the mid slopes and open moorland on the higher ground, linking into the site.
- 7.80 The applicant's assessment assigns a Medium-high value given parts of this LCT area within the Reay-Cassley WLA, the Assynt-Coigach NSA and the Fannichs, Beinn Dearg and Glencalvie SLA indicating a higher value. The applicant concludes the LCT has a Medium susceptibility to change stating that parts of this LCT display strong qualities of wildness, reflected by the WLA designations across the area. The topography is also complex in places. However, the overall landscape pattern is simple and the edges of the LCT are influenced by existing wind farms and coniferous forestry.
- 7.81 Taken together, the conclusion is that the LCT has a Medium-high sensitivity to the proposed development which is agreed.
- 7.82 The assessment judges that the proposed development will have the greatest, high, magnitude of change on the LCT at the application site and within approximately 5km, reducing to medium within approximately 12km to the south of Strath Oykel and east of Glen Cassley (north of Glencassley Castle) and low elsewhere. The introduction of the proposed development would locally alter some of the key characteristics including the "rolling hill" and "dense heather ground cover" within the site. In terms of wider effects, the convex landform of the rounded hills restricts wider visibility of the proposed development. This is noted in the key characteristics of the LCT – "Convex character of hill slopes limiting distant visibility and views of the hill

tops when travelling through the landscape” and “Views into the interior of the hills very restricted.”

- 7.83 The existing Rosehall and Achany Wind Farms are also located in this LCT. From the more open elevated ground, views of these existing wind farms would also be available and is described in the key characteristics of the LCT (“Wind farms located in more accessible and generally lower rolling hills”). As such, the proposed development would result in indirect effects on certain perceptual characteristics of the LCT, from these areas, such as the more “remote” or “wild” characteristics. However, it is recognised that these characteristics are more strongly felt from within the interior of the LCT, and less so around the edges.
- 7.84 The level of effect assessed by the applicant concludes Major adverse and significant effects on this LCT up to 5km and Moderate adverse and significant up to 12km to the south of Strath Oykel and east of Glen Cassley which is agreed. However, it is not considered that the turbines would form a discrete wind farm on this LCT owning the extent of significant effects out to 12km on the LCT. Nevertheless, significant effects on this LCT are to be expected given the size and scale of the proposal’s wind farm component, and it is not considered that the turbines would wholly alter all the key characteristics of this LCT.
- 7.85 It is further noted that the solar PV array would be a notable change to the landscape fabric at the site location by virtue of introducing a modern, glazed element of contrasting colour, texture, and character to the hosting moorland ground cover. However, the change would be most discernible at the site itself and at locations on higher ground in the wider area. From these locations, the solar PV array would be contained on a single hillside whereby moorland ground cover would remain the dominant ground cover feature. As such, this aspect of the development would not result in any notable loss of the valued natural features of the hosting LCT nor result in a significant landscape effect overall within the Rounded Hills – Caithness and Sutherland LCT.
- 7.86 The level of effect assessed by the applicant concludes Major adverse and significant effects on this LCT up to 5km and Moderate adverse and significant up to 12km to the south of Strath Oykel and east of Glen Cassley which is agreed. However, officers do not consider the Allt an Tuir Energy Park turbines would be a discrete wind farm on this LCT. Significant effects out to 12km on a LCT does not constitute a discrete wind farm in the Council’s opinion. Nevertheless, the significant effects on this LCT are expected of wind turbines of this size and scale, and the proposed development would not completely alter all the key characteristics of this LCT.
- 7.87 In terms of effects on the adjacent Strath – Caithness and Sutherland LCT (Glen Cassley unit), the applicant assesses Major adverse and significant effects within 5km and Moderate adverse and significant effects from the northern upper extent of Glen Cassley within 12km and parts of Strath Oykel and the Kyle of Sutherland, with

open views, within approximately 8 km to the west and 12 km to the east. As noted in the key characteristics, “coniferous plantations covering lower side slopes” and “woodland generally further up the straths” and settlement in the more settled parts of the valleys would limit actual visibility in places.

- 7.88 The applicant’s assessment further goes on to state that where visible, the proposed development would generally be seen on enclosing horizons to the west of Glen Cassley (Viewpoints 1: Glenrossal Estate Lodge House and 3: Glencassley Castle), north of Strath Oykel (Viewpoint 4: A837 near Tuiteam Tarbhach) and in more direct views looking north-west up the Kyle of Sutherland (Viewpoints 7: Altass and 10: Achnahanat). The existing Rosehall and Achany Wind Farms have altered enclosing horizons in certain views from these glens. Nevertheless, the proposed development would intensify the influence of wind farms on the following characteristics of the host LCT: “Rounded Hills often forming prominent edges to the straths with shapely well-defined hills, providing a distinctive skyline and scenic backdrop.”
- 7.89 Given the location of the proposed development, near the confluence and more settled part of Glen Cassley and Strath Oykel, views towards the mountains, from the upper reaches of the straths, would generally remain unaltered. Whilst this assessment is agreed, the officer concurs with the landscape officer that the proposed development would alter the key characteristic of the “hills forming prominent edges to the strath” when viewed from the north (Viewpoint 13: Glen Cassley: Duchally Lodge and 3: Glencassley Castle for example) but would not notably alter other key characteristics of distinctive skyline and scenic backdrop.
- 7.90 Outwith the significant effects described on specific areas of the Rounded Hills – Caithness and Sutherland LCT, and the Strath – Caithness and Sutherland LCT, the proposed development is not considered to result in significant changes to other landscape character areas or types.

Designated Landscapes and Wild Land Areas

- 7.91 The applicant has included assessments of the effects of the proposed development on the Assynt-Coigach NSA, the Fannichs, Beinn Dearg and Glencalvie SLA and Reay-Cassley WLA.

Assynt-Coigach NSA

- 7.92 The applicant has undertaken a detailed assessment of the effects on the special landscape qualities (SLQs) of the Assynt-Coigach NSA reported in Technical Appendix 5.4, Volume 3 and broadly follows the four-step process outlined by NatureScot in their 2025 guidance. However, the applicant has undertaken the assessment based on the ‘draft’ NatureScot 2024 guidance which was the published guidance at the time of writing their assessment.

- 7.93 The NSA is located approximately 11km north-west of the proposed development. The applicant has included an assessment on four of the SLQs of the NSA, as agreed with NatureScot. These include:
- SLQ 1: Spectacular scenery of lone mountains;
 - SLQ 7: A landscape of vast open space and exposure;
 - SLQ 8: Significant tracts of wild land; and
 - SLQ 10: A still, quiet landscape under a constantly changing sky.
- 7.94 The assessment has concluded that “adverse effects on the SLQs of the NSA identified within the assessment are judged to be no greater than Minor (Not Significant) and in consequence the integrity of the NSA and the objectives of designation would not be compromised by the introduction of the Proposed Development when considered alone or in the context of cumulative developments”.
- 7.95 NatureScot responded to the application stating “There would be a significant adverse effect both daytime and at dawn, dusk, dark and during periods of low light on SLQ 8 - Significant tracts of wild land of the Assynt Coigach NSA. However, whilst these effects are significant, we consider that they would not affect the integrity of the NSA.” They further state that “We are generally in agreement with the Applicant with regard to effects on SLQs 1, 7 and 10.
- 7.96 However, the siting and vertical scale of proposed turbines would result in the proposal appearing closer and larger than existing turbines in the landscape, particularly Achany and Rosehall, from some of the isolated summits within the Ben More Assynt massif. Consequently, the expansive views to the south-east over the rounded hills would be influenced by the proposal. Whilst we are in agreement that the integrity of the designation will not be compromised, we consider that there is an underestimation of significant effects.”
- 7.97 This appraisal agrees with NatureScot’s assessment that there would be significant adverse effects on SLQ 8 – Significant tracts of wild land. The proposed development would physically encroach into an area of wild character of the extensive peatland slopes of the Rounded Hills LCT to the south-east of the NSA which contribute to the openness experienced from within the NSA. The proposed development would extend the influence of modern artefacts, reducing the sense of openness, remoteness and wildness which is currently experienced across these Rounded Hills. Whilst there would be significant adverse effects on one SLQ, it is agreed that the proposed development would not compromise the overall integrity and objectives of the NSA.

Reay-Cassley WLA

- 7.98 The applicant has undertaken a detailed assessment of the effects on the wild land qualities (WLQs) of WLA 34 Reay-Cassley reported in Technical Appendix 5.3,

Volume 3. Much of the proposed development would be located within the southern part of the western limb of the WLA. The applicant's Wild Land Impact Assessment (WLIA) has concluded that "Localised significant effects have been identified for the WLQ relating to "extensive, elevated peatland slopes whose simplicity and openness contribute to a perception of awe, whilst highlighting the qualities of adjacent mountains."

7.99 The applicant's assessment notes that this quality is widely experienced across (and outside) the WLA, with the EIAR concluding that WLA 34 Reay – Cassley is of sufficient scale that localised effects on the perceptual aspects of one WLQ would not result in a material change to the wild land qualities as they are expressed across the wider WLA (see Paragraph A5.3.8.10 of EIAR Technical Appendix 5-3: Wild Land Impact Assessment).

7.100 Notwithstanding the applicant's conclusion, NatureScot has objected to the application on the grounds that:

"The Proposed Development would result in significant adverse individual and cumulative daytime and night-time effects on WLQ4 - Extensive, elevated peatland slopes whose simplicity and openness contribute to a perception of awe, whilst highlighting the qualities of adjacent mountains of the south-eastern segment of the western limb of the Reay-Cassley Wild Land Area (WLA 34).

Contrary to the EIAR Wild Land Assessment, NatureScot considers that the turbines would constitute a material change in the experience of WLQ4 to such a degree that this area would no longer contribute to the wider WLA and would be considered lost. These effects would result from the siting of the proposal within WLA 34, compounded by the vertical scale of the turbines and visible aviation lighting, and are not considered to be easily overcome by siting, design or other mitigation."

7.101 Resultantly, it is NatureScot's contention that the applicant has not demonstrated sufficient mitigation through siting and design to ensure that the proposal would minimise significant effects on the wild land qualities of the WLA as required under NPF4 Policy 4g). NatureScot also considers these effects to be significant landscape, visual, and cumulative effects and therefore non-compliant with NPF4 Policy 11(e) ii and xiii.

7.102 WLAs are a landscape policy that were given significant protection in the now superseded Scottish Planning Policy, whereby NPF4 now sets out that only certain types of development will be supported within them, including developments that 'support meeting renewable energy targets'. It will, therefore, be for Scottish Ministers to decide if the proposal's support for meeting renewable energy targets outweighs the reduction of the effective extent of the WLA, with NatureScot being the technical advisor on WLA matters to the government. As such, it is not the Officer

recommendation to Raise Objection on the proposal on the grounds of effects on the WLA.

Fannichs, Beinn Dearg and Glencalvie SLA:

- 7.103 The Fannichs, Beinn Dearg and Glencalvie SLA is located approximately 10km to the south-west (and south of Glen Oykel) of the proposed development. Table 5.12 of Chapter 5 of the EIAR, Volume 1, includes an assessment of the proposed development on the special qualities of the SLA.
- 7.104 The applicant assesses the sensitivity of the SLA as high, taking account of a higher value and higher susceptibility to change which is agreed. In relation to the magnitude of change, the assessment states that “Given the indirect nature of effects; limited change to the majority of the SLQ special qualities; viewing distance (approximately 10 km or longer); limited nature of visibility across the overall SLA; lack of visibility from lower lying glens throughout the SLA; and presence of existing wind farms in outward views to the north-east of the SLA, this is not judged to result in a scale of change greater than small on the limited list of special qualities which may be affected....The geographical extent of the effect, in the context of the overall SLA, is also small.”
- 7.105 In relation to the special qualities, the sense of ‘wildness’, ‘isolation’, ‘remoteness’ or ‘exposure’ would be less affected by a wind farm located outside of the SLA, and in a landscape where views of existing wind farms already contribute to character. Furthermore, the special quality relating to the ‘surrounding foothills’ is more likely to relate to the surrounding foothills within the SLA. The surrounding foothills outside the SLA (in which the proposed development is situated) would also contribute to character, but to a lesser degree which is agreed.
- 7.106 The assessment concludes that there would be no significant effects on the SLQs of the SLA and the overall integrity of the SLA would not be compromised. This is agreed, and it is acknowledged that there would be significant visual effects from the northern edge of the SLA at 12km distance.

Visual Effects

- 7.107 Tables 5.13 to 5.31 of Chapter 5 of the EIAR includes a visual assessment from each of the 19 viewpoints, including an assessment of what the applicant considers the significance of the visual effect would be for receptors at each viewpoint.
- 7.108 Unsurprisingly, there is some difference between the applicant’s assessment and the appraisal undertaken by Council’s Landscape Officer and Planning Officer, which is to be expected when such assessments are dependent on the application of professional judgement. Differences in judgement on the specific viewpoints are set out in Appendix 6 and in the main text below.

- 7.109 There is disagreement with the applicant only on the significance of effect at Viewpoint 4 (A837 near Tuiteam Tarbhach), which the officer considers to be significant when the forestry is felled. Officers also consider that the applicant has under-assessed the sensitivity at several viewpoints including Viewpoint 1 (Glenrossal Estate Lodge House), 2 (Rosehall), 3 (Glencassley Castle), 6 (Beinn an Eoin), 7 (Altass), 8 (Beinn Sgeireach), 10 (Achnahanat), 11 (Glen Einig), 13 (Glen Cassley – Duchally Lodge) and 14 (Carn a Choin Deirg).
- 7.110 The difference is part explained by the applicant having applied a different susceptibility / value to the same types of receptors at different locations / viewpoints, most likely due to the specifics of the view's context. However, the officer's appraisal considers the value higher at Viewpoint 1 (Glenrossal Estate Lodge House), 2 (Rosehall), 3 (Glencassley Castle), 7 (Altass), 10 (Achnahanat) and 13 (Glen Cassley – Duchally Lodge) as the views appear to be of reasonable scenic quality and is the main view of residents and visitors (and walkers at Viewpoints 3 and 13).
- 7.111 The officer appraisal also considers a high susceptibility for hillwalkers at Viewpoints 6 (Beinn an Eoin), 8 (Beinn Sgeireach), 11 (Glen Einig on Cape Wrath Trail) and 14 (Carn a Choin Deirg). Hillwalkers / recreational receptors are one of the receptors most susceptible to change as noted by GLVIA 3 (paragraph 6.33) as their attention or interest is likely to be focused on the surrounding landscape.
- 7.112 As noted previously, there is only one difference in judgement of magnitude of change between the assessment and appraisal at Viewpoint 4 (A837 near Tuiteam Tarbhach) whereby the appraisal considers that once the forestry on the horizon is felled, there would be greater visibility of the turbines resulting in an increased scale and magnitude of change resulting in a significant visual effect. Further, the judgement of higher visual receptor sensitivity in the appraisal has led the appraisal to a higher judgement of the level of effect at several locations including Viewpoint 1 (Glenrossal Estate Lodge House), 2 (Rosehall), 3 (Glencassley Castle), 6 (Beinn an Eoin), 7 (Altass), 8 (Beinn Sgeireach), 10 (Achnahanat), 11 (Glen Einig), 13 (Glen Cassley – Duchally Lodge) and 14 (Carn a Choin Deirg). All these viewpoints are assessed as significant by the applicant which is agreed.
- 7.113 In addition to the above, the EIAR considered future baseline cumulative effects in relation to several wind farms within the LVIA study area, which has been assessed with Scenario 1 corresponding to operational, under construction, and consented developments. Scenarios 2 corresponds to Scenario 1 plus application wind farms pending decision (and wind farms at Scoping stage where relevant). Members should note however that several wind farms have since changed status or could not be considered in the cumulative assessment as they had not yet been submitted for Scoping. The up-to-date cumulative picture is set out in Appendix 2 of this report.

- 7.114 For the EIAR, the applicant's future baseline cumulative analysis largely concludes that the proposal would result in no additional cumulative effects, where the proposal is not experienced with other wind farms, or the same level and significance of effects as per the LVIA at each of the viewpoints and receptors. The officer appraisal is in broad agreement with the applicant's conclusions.
- 7.115 The above means that there is agreement that significant effects on the visual amenity of receptors as a consequence of the proposed development will generally occur at 12 of 19 viewpoints including:
- Viewpoint 1 (Glenrossal Estate Lodge House);
 - 2 (Rosehall),
 - 3 (Glencassley Castle),
 - 5 (Sika Cycle Trail), 6 (Beinn an Eoin),
 - 7 (Altass),
 - 8 (Beinn Sgeireach),
 - 9 (A839 Rosehall to Lairg),
 - 10 (Achnahanat), 11 (Glen Einig),
 - 13 (Glen Cassley – Duchally Lodge) and
 - 14 (Carn a Choin Deirg).
- 7.116 The only exception to the above is Viewpoint 4 (A837 near Tuiteam Tarbhach) whereby officers consider that the proposal would result in significant visual effect when forestry is felled. The geographical extent of significant visual effects is also agreed with the applicant's assessment at 12.2km.
- 7.117 The significant visual effects are generally a result of the proposed development introducing, or increasing the prominence of, large scale turbines of contrasting scale, colour, texture, and character to its receiving landscape of traditional rural activities and wilder moorland backdrop into sections of views currently free or with limited influence of wind farm development. Based on the assessment, the larger and significant part of these effects are predicted to be experienced by visual receptors up to around 12km from the turbines where there is visibility.
- 7.118 It is noted here that the appraisal has focussed more on the visual effects as would be experienced by receptors viewing the turbines and less on the visual effects of the proposed solar PV array. This is because as a low lying contained horizontal feature, the visual effects would be far less widespread and impactful than the turbines themselves, despite being a notable change of different colour, texture, and character to the hosting moorland ground cover within several views as set out in Appendix 6.
- 7.119 The solar PV array would be most visible at Viewpoints 7 (Altass), 10 (Achnahanat), 11 (Glen Einig - Cape Wrath Trail, Scottish National Trail and An Turas Mor Cycle

Route) and 14 (Carn a Choin Deirg). The appraisal has considered that the larger change to visual amenity would be experienced at Viewpoint 10 (Achnahanat). At this location, the significant visual effect experienced by receptors would result from viewing the solar PV array in combination with the turbines whereby the turbines would represent by far the larger contributing feature. As such, it is considered that the effects of this component of the proposal would not be unacceptably significantly detrimental to the visual amenity of receptors, and as stated, particularly close-range receptors such as Rosehall and nearby dispersed communities.

Residential Receptors

- 7.120 In terms of visual receptors within settlements, the applicant's assessment has concluded significant visual effects for residents in Rosehall (Major adverse), and at Inveroykel and dispersed communities to the west (Moderate adverse). Effects on residents at other settlements (Lairg, Invershin and Bonar Bridge / Ardgay) have been scoped out due to either no visibility or the presence of buildings and vegetation limiting views of the proposed development from within settlements. There is no specific assessment undertaken on residents within the dispersed communities at Altass and Achnahanat, however, these have been covered in the assessment of Viewpoints 7 (Altass) and 10 (Achnahanat) where the officer appraisal assesses higher sensitivity of residents within these settlements and a change to the level of effect at Viewpoint 10 (Achnahanat) as noted previously. The EIAR findings on visual effects on the amenity of residential receptors are generally agreed.
- 7.121 In addition to the above, the EIAR has assessed the proposed development's likely effect on the Residential Visual Amenity (Technical Appendix 5.5, Volume 3) of eight properties within a study area of 2.5km – the properties or property groups taken forward into the assessment include Glencassley Castle, Glencassley Keepers Cottage, March Cottage, Glenrossal House, and a group comprising Rowan Cottage, Birch Cottage and Glenrossal Keepers Cottage. All properties are located within Glen Cassley. The closest property to the proposed development is March Cottage, located approximately 1.7km to the nearest proposed turbine (T2). Tutim Cottage located in Strath Oykel has been excluded from the applicant's assessment due to extensive screening from roadside vegetation and intervening landform.
- 7.122 The RVAA does not assess the significance of effects at any of the properties, however, it assesses a 'high' magnitude of change for Glencassley Castle, Glencassley Keepers Cottage, March Cottage and Glenrossal House, and a 'medium' magnitude for Rowan Cottage, Birch Cottage and Glenrossal Keepers Cottage. It goes on to conclude that there is potential for these properties to experience a significant effect on visual amenity. Furthermore, the RVAA concludes that there are no locations where the proposed development would affect the 'living conditions', or residential amenity experienced by the residents, either in isolation or cumulatively, during daytime and during the hours of darkness.

- 7.123 The applicant's assessment considers such factors as the orientation of primary and secondary views from each property and grouping, the proportion of views occupied by turbines along with the remaining open skyline once turbines are erected, as well as intervening topography, and the presence of intervening features such as fields, woodland/forestry, and structures such as outbuildings.
- 7.124 Members are reminded that the threshold for assessing a breach of residential visual amenity is higher than that of the threshold of significance for general visual effects. As such, and while it is acknowledged that the nearest properties and groupings will largely experience the proposed development as a high or medium magnitude of change, these factors, as listed, are considered in the RVAA to provide sufficient visual separation and screening for residents to ensure that the proposal would not impinge the amenity of residents as they go about their daily lives within their properties. These findings are agreed.

Recreational Receptors

- 7.125 The applicant's assessment has concluded significant visual effects for receptors along the Cape Wrath Trail / Scottish National Trail (Moderate adverse through Glen Einig) and along the An Turas Mor Cycle Route (Major to Moderate between Glen Einig, through Rosehall and along Glen Cassley). Core Paths within 5km have also been assessed as significant (Major adverse) which would be similar in nature to those represented by Viewpoint 2 (Rosehall). Effects on other recreational routes including the NCN 1 have been scoped out for similar reasons as set out above for excluded settlements.
- 7.126 The applicant has also assessed the effects of the proposed development on the visual amenity of receptors at several key visitor attractions / recreational destinations with theoretical visibility through the viewpoint analysis including:
- Viewpoint 5: Sika Cycle Route – part of Rosehall Trails (Moderate adverse and significant);
 - Viewpoint 6: Beinn an Eoin (Moderate adverse and significant);
 - Viewpoint 8: Beinn Sgeireach (Moderate adverse and significant);
 - Viewpoint 14: Carn a Choin Deirg (Moderate adverse and significant);
 - Viewpoint 16: Ben More Assynt (Minor and not significant);
 - Viewpoint 17: Cul Mor (Minor and not significant);
 - Viewpoint 18: Cadha Mor, Struie Viewpoint (Minor and not significant); and
 - Viewpoint 19: Ben Klibreck (Minor and not significant).
- 7.127 The above judgements are agreed with the exception of Viewpoints 6 (Beinn an Eoin), 8 (Beinn Sgeireach), and 14 (Carn a Choin Deirg) where the officer appraisal considers a higher sensitivity at these hill summits resulting in a higher level of effect at Viewpoints 6 (Beinn an Eoin) and 8 (Beinn Sgeireach), with effects at both viewpoints having been appraised as being Major to Moderate adverse and

significant. The effect at Viewpoint 14 (Carn a Choin Deirg) is agreed as Moderate adverse and significant largely due to the increased distance.

Transport Receptors

- 7.128 For similar reasons as above for excluded settlements and recreational routes, the A836, A838, A839 and Far North Railway Line have been scoped out of the assessment. As such the transport route assessment is focussed on the A837 which runs broadly northwest to southeast from Lochinver in the west to the A836 at Invershin in the east. It is represented by Viewpoints 2 (Rosehall), 4 (A837 near Tuiteam Tarbhach), 12 (A837 near Loch Craggie) and 15 (A837 north of Invershin).
- 7.129 The applicant assesses Major adverse and significant visual effects from the A837, where open views are available through Rosehall. Views are more intermittent/restricted by forest cover from wider sections of the road. Where glimpsed and open views are available, the level of effect is judged to be no greater than Moderate adverse (significant) within approximately 8km and generally for westbound travellers. Beyond approximately 8km, visibility is limited and longer distance, and effects would be not significant. This assessment is agreed.

Hours of Darkness Assessment

- 7.130 The hours of darkness assessment is presented in Technical Appendix 5.2, Volume 3 of the EIAR and generally follows the NatureScot 2024 Guidance on Aviation Lighting Impact Assessment. The lighting strategy (detail set out in Chapter 12 of the EIAR) has been agreed with the CAA which proposes medium intensity 'steady' lights (2000cd) at three cardinal turbines (T1, T5 and T9) with no tower lights. The lighting strategy also includes implementation of intensity reduction mitigation and vertical directional intensity mitigation.
- 7.131 The applicant assesses significant effects on the 'host' Rounded Hills – Caithness and Sutherland LCT when the three aviation warning lights are illuminated at their maximum intensity (2000cd) for 4% of the time, and this would reduce to non-significant levels when the lights are dimmed to 200cd which would account for 96% of the time.
- 7.132 The applicant also assesses no significant effects on any other LCTs due to either the lack of or limited theoretical visibility from within these areas, the greater distance from where the lights would be seen which would substantially reduce their perceived brightness, and in some cases the reduced luminous intensity at which the lights would be emitted relative to viewing angle. The EIAR also concludes that there would be no significant effects on the SLQs of the Fannichs, Beinn Dearg and Glencalvie SLA, and the Ben Klibreck and Loch Choire SLA. All of these judgements are agreed.

- 7.133 In terms of visual effects during the hours of darkness, the applicant assesses significant effects at Viewpoint 2 (Rosehall) for the 2000cd scenario reducing to not significant during the 200cd scenario. Viewpoint 6 (Beinn an Eoin) is assessed as significant at both 2000cd and 200cd scenarios. These judgements are agreed.
- 7.134 The officer appraisal, however, disagrees with the assessment at Viewpoints 10 (Achnahanat) and 13 (Glen Cassley – Duchally Lodge). For Viewpoint 10 (Achnahanat) – The officer appraisal considers significant effects at 2000cd from this elevated viewpoint. Using the applicant's methodology, the officer considers the scale of change to be medium resulting in a Moderate and significant effect. The three aviation warning lights would be clearly visible on the skyline at 8.5km distance. Other limited artificial lights are visible lower down in the strath with the aviation warning lights visible above all the other lights. The officer acknowledges that for distances between 5-10km, the lights would tend to be a little bit fainter than the brightest star in the sky, nevertheless, they would still be noticeable on the skyline. There is agreement, however, that during the 200cd scenario, the effects would reduce to being not significant.
- 7.135 For Viewpoint 13 (Glen Cassley – Duchally Lodge), officers assess significant effects at 2000cd towards the aviation warning lights. From the photomontage (Figure 5.24i), whilst only one aviation warning light would be visible, it would appear in a channelled view where the one light would be even more visible and draw the eye towards it against the dark skies. Using the applicant's methodology, the officer considers the scale of change to be medium resulting in a Moderate and significant effect. There is agreement, however, that during the 200cd, the effects would reduce to being not significant.

Landscape and Visual

- 7.136 In overall terms, the proposed development has been suitably designed in the rolling uplands landscape to create a cohesive layout with a reasonable offset from the communities of Rosehall and Invercassley and responds reasonably to the underlying vertical scale of the landscape and the more cumulative context. Mitigation planting has also been proposed to minimise the effects on the access track on the hillside as seen from Rosehall. Additional mitigation committed by the applicant in relation to the reduction of height of T8 and T9 reduces the 'dominant' visual effect of these turbines on Rosehall and Invercassley and presents a more balanced composition when viewed from these communities. A reduced lighting scheme has also been agreed with the CAA which has resulted in reduced significant effects during the hours of darkness.

Natural Heritage (including ornithology)

- 7.137 The applicant's assessment in relation to ecology and ornithology are set out in EIAR Chapters 6 (including for peatland and freshwater habitats) and 7 respectively.

Chapter 9 for Hydrology, Geology and Hydrogeology sets out the assessment of peat impacts when considered as a material that requires to be avoided and managed appropriately if extracted rather than as a habitat. Chapters 6 and 7 are supported by several technical appendices, including surveys on habitats and vegetation, protected species, birds, and freshwater habitat. An Outline Biodiversity Enhancement Management Plan (OBEMP) is also submitted (EIR Volume 3 Technical Appendix 6.6) along with a Schedule of Environmental Commitments (EIAR Volume 3 Technical Appendix 2.1). The AI has considered the effects of the anticipated UGC grid connection on both ecology and ornithology interests.

- 7.138 Overall, the EIAR submission, and indeed the AI submission, concludes that subject to the recommended mitigation measures there will be no significant residual effects during the construction, operation, or decommissioning phases of the development, either individually or cumulatively with other developments. The applicant has committed to ensuring that construction practices will be in line with best practise guidance. Site specific environmental protection measures will also be fully detailed in the final CEMP, Peat Management Plan (PMP), with pre-construction surveys expected to contain mitigation measures for species protection, while biodiversity and habitat enhancement measures to be detailed through the finalised OBEMP. A condition should be used to ensure that all works are overseen by an Environmental Clerk of Works (EnvCoW).

Designated Sites

- 7.139 As detailed in Section 2 above, there are several designations within 10km of the site including Natura2000 Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). The status of the sites means that the requirements of the Conservation (Natural Habitats, and c.) Regulations 1994 as amended (the 'Habitats Regulations') (the Habitat Regs) apply. Consequently, Scottish Ministers are required to consider the effect of the proposal on SACs and SPAs, through Appropriate Assessments where required, before the proposal can be consented.
- 7.140 The River Oykel SAC runs along the Energy Park site's northeast boundary and is protected for its Freshwater pearl mussel and Atlantic salmon. NatureScot advises that the proposal has potential for likely significant effects on these qualifying interests, but that these effects can be mitigated sufficiently to the qualifying interests and integrity of the site subject to works being undertaken in strict adherence of the following mitigation measures:
- production and implementation of a pollution prevention plan;
 - a species protection plan for freshwater pearl mussel;
 - measures detailed within the CEMP to ensure that drainage derived from the proposal site will be treated in a scheme that is able to treat drainage during a 1:200- year event; and,

- the design of the BESS facility to include measures to contain and safely dispose of fire suppressant or polluted water to ensure it does not enter watercourses in the event of battery fire at the facility.

- 7.141 With regards the anticipated grid connection, the AI advises that there is potential disturbance to the qualifying features of the River Oykel SAC from a number of sources. Firstly, construction activities could result in pollution from silt and run off discharging to the river, while construction activities could result in visual and noise intrusion, and thirdly, as a result of vibration from HDD to install the cable beneath the River Cassley. The AI also advises that standard mitigation such as offsetting works from the sensitive receptor and installing noise barriers would be applied during construction works. The applicant has also submitted a shadow Appropriate Assessments under the Habitat Regs.
- 7.142 NatureScot's consultation response to the AI had not been submitted to the ECU at the time of writing. It is anticipated that the response will advise that there is insufficient information within the AI to conclude that the anticipated UGC grid connection will not result in additional and / or new significant effects on the SAC; and, that further detail and assessment would be required to be provided as part of any future application for the grid connection. A verbal update will be provided at the Committee meeting.
- 7.143 Similarly, NatureScot advises that the Energy Park has potential to likely have a significant effect on the otter qualifying interest of the Caithness and Sutherland Peatlands SAC but that the proposal can proceed provided pre-construction surveys are conducted for otter prior to works starting on site, and that all works are undertaken under the supervision of an Ecological Clerk of Works (noting that THC would request an Environmental Clerk of Works with a remit for wider environmental oversight). The AI has not assessed for potential significant effects on the qualifying interests of the Caithness and Sutherland Peatlands SAC from the grid connection due to separation distances and lack of connectivity with its qualifying interests, which has not yet been confirmed by NatureScot.
- 7.144 NatureScot also advises that the proposal has potential to likely to have a significant effect on golden eagle, hen harrier, golden plover, greenshank, and dunlin of the Caithness and Sutherland SPA. However, due to surveys recording low 'at risk' flight activity and the modelling predicting the development to result in low annual mortality rates, the proposal is not anticipated to adversely affect the integrity of the site. The AI has discounted significant effects on the qualifying interests of the SPA, to be confirmed by NatureScot.
- 7.145 The AI also notes potential for the grid connection to impact the Kyle of Sutherland Marshes SSSI, protected for its floodplain fen, wet woodland and vascular plant assemblage (estuarine habitats), due to its proximity at the A837. Given that the works are anticipated to be within the road carriageway with limited ecological value,

along with the expectation that contractors would employ good practice pollution and runoff prevention mitigation measures, the AI does not predict Significant effects on the protected features of the SSSI.

- 7.146 All mitigation measures should be secured by condition whereby any mitigation for the grid connection would be secured by condition through a future application for that part of the project.

Other Ornithology Impacts (Wider Countryside Birds)

- 7.147 Target ornithological surveys for flight activity, territory, and breeding sites were conducted over 2 years in 2021 and 2022 for golden eagle, hen harrier, hobby, merlin, osprey, red kite, white-tailed eagle, black and red -throat divers, black grouse, common sandpiper, crossbill, curlew, dunlin, golden plover, greenshank, greylag good, pink footed goose, red grouse, snipe, teal, and whooper swan, with an additional black grouse survey conducted in 2024. No to low numbers of 'at risk' flights, territories and breeding sites were recorded for several species, with golden eagle, hen harrier white-tailed eagle, black grouse, dunlin, curlew, golden plover and greenshank scoped into detailed assessment.
- 7.148 15 black grouse leks were identified during the survey periods with the EIAR stating that no leks were identified within 750m of any proposed element of the application. The proposal is not considered to pose a significant risk to any of the listed species through collision risk or displacement, which is agreed by NatureScot and the Council's Ecology Officer. The EIAR notes that pre-construction nesting bird checks will be conducted, which should be overseen by an Environmental Clerk of Works, both of which should be secured by condition.
- 7.149 A similar assemblage of bird species as those surveyed for the Energy Park site are anticipated to be present along the proposed grid connection route. Again, no significant effects are predicted due to the works requiring limited and temporary land take followed by habitat reinstatement and the expectation that contractors would implement good practice protocols including pre-construction surveys to inform bird protection plans.

Species Protection

- 7.150 Targeted non-avian protected species surveys were undertaken for bats, badger, otter, pine marten red squirrel, Scottish wild cat, and water vole, which recorded bats during flight activity surveys and evidence of pine marten and water vole. Habitats on site are not considered suitable to support the remaining species. A fish habitat survey was conducted in 2022 on all suitable watercourses within the site boundary, including the River Cassley, which is part of the River Okel SAC, with the results returning suitable habitat for migrating species.

- 7.151 There is embedded mitigation in the design of the energy park including elements maintaining minimum suitable buffers from watercourses and trees with potential for bat roosts, which, along with a requirement for pre-construction surveys to inform species protection plans, should be conditioned for species protection during the construction and operational phases of the development. Neither NatureScot nor THC's Ecologist have objected to the proposal on the grounds of impacts on protected species.
- 7.152 The AI highlights the habitat potential for otter and water vole using nearby watercourses, badger, pine marten and red squirrel within and alongside woodland and forestry, as well as bats using watercourses for foraging and commuting routes as well as roosting in trees. Consequently, there is potential for protected species to be disturbed and / or displaced by the grid connection works requiring project specific species protection plans to be implemented, and any NatureScot licensing protocols to be followed. With the correct mitigation measures in place, the AI predicts no additional or new significant effects resulting from the grid connection works.

Habitat Loss and Biodiversity Enhancement

- 7.153 The layout of the energy park is designed to avoid sensitive habitats in the first instance and minimise losses where impacts are unavoidable. EIAR Table 6.10: Summary of Habitat Losses on Scoped in Habitats sets out the anticipated direct and indirect losses of different habitat communities as a result of the development in terms of area and percentage of habitat within the site. The development is predicted to result in the loss of up to 25.25ha of potential priority peatland and a further 8ha of other habitat including non-priority peatland, woodland, and plantation communities.
- 7.154 The EIAR has identified 21 Peatland Restoration Search Areas, which combined total 463ha, along with search areas for riparian woodland planting totalling 7.19km along the River Cassley, the Allt an Tuir, Allt an Rasail, Allt na Criche, and the Glen Rossal Burn, as well as for 2.71ha of plantation woodland planting and restocking.
- 7.155 Further biodiversity enhancement measures are proposed including enhancement of fish habitats along the River Cassley and the deployment of bird and bat boxes within the site boundary.
- 7.156 NatureScot has advised that there should be no planting on peat depths greater than 50cm, or on sites that would compromise the hydrology of adjacent bog or wetland habitats, meaning that there should be a buffer of between 50 and 100m applied to areas adjacent to peatlands. It also advises that there should be no planting on 500m of the northern section of the riparian planting search area at the Allt an Rasail burn in order to avoid impacts on golden plover and dunlin. These limits to the OBEMP should be secured by condition.

- 7.157 Along with the biodiversity enhancement and habitat management objectives of the OBEMP, there will be a series of monitoring objectives to evaluate the effectiveness of the habitat management measures and also to evaluate the effects of the energy park on key receptors.
- 7.158 Neither NatureScot, nor THC's Ecology Officer have objected on the grounds of habitat loss or mitigation and enhancement measures. However, the Ecology Officer has requested that wet heath habitats are included in the peatland restoration efforts, which can also be secured by condition.
- 7.159 The indicative grid connection would run through or close by moorland, woodland and forestry, the habitats described for the River Oykel SAC and Kyle of Sutherland Marshes SSSI, and agricultural pasture with the larger part running along or alongside tracks and the public road network. The AI predicts no new or additionally significant effects on these habitats provided that the mitigation already outlined in this section is appropriately implemented. It is noted however that the AI does not quantify effects on habitats and therefore provides no information on compensation to offset any losses or enhancements in line with NPF4 Policy 4b), which is expected to be detailed in any future application for the grid connection.

Forestry

- 7.160 EIAR Technical Appendix 2.3 provides an assessment of the Energy Park on woodland and forestry, with AI Appendix 2, Annex B: Preliminary Arboricultural Impact Assessment providing detail on the anticipated offsite impacts on forestry as a result of turbine delivery using AIL, which is submitted following a request from THC's forestry officer.
- 7.161 As set out in this report, much of the site is open moorland however the Energy Park access would be through an area of mixed woodlands that includes two areas recorded on the Ancient Woodland Inventory, and areas of Native Woodland. The EIAR advises that 6.58ha are required to be felled to install the upgraded and new sections of track, 2.71ha of which are to be restocked, meaning that a minimum of 3.87ha of new compensatory woodland is required to be planted to offset the woodland losses.
- 7.162 Both THC's forestry officer and Scottish Forestry responses advise that there is a lack of detail regarding the location and hectareage of compensatory planting within the submission for the Energy Parl. While the EIAR does consider that compensatory planting could be provided through riparian planting, which can be secured by condition, THC's forestry officer contends that the applicant should make a firm commitment to the proposal.
- 7.163 For the grid connection, the AI advises that there are areas of regenerating woodland, scrub and scattered trees along the proposed UGC route, particularly

along the roadside verges. Additionally, a tree and vegetation maintenance corridor would be required to be maintained along the connection route during the operational lifetime of the grid connection. Otherwise, the AI advises that the siting and design has been chosen to avoid significant areas of woodland and commercial forestry, that tree protection measures would be implemented during construction, and that unavoidable tree losses would be addressed through replacement compensatory planting. Consequently, the AI assumes that there will be no new or additional significant effects as a result of the grid connections.

- 7.164 In addition to the above, the applicant was requested to consider the offsite impacts on trees and woodland from the delivery of AIL. To that end, Appendix 2, Annex B: Preliminary Arboricultural Impact Assessment of the AI provides a desktop constraints analysis of roadside tree and woodland constraints along the AIL route from the preferred turbine port of entry at Nigg Harbour to the Energy Park Site at Rosehall. The report highlights that works have already been undertaken along much of this route for the delivery of wind farm components for another under construction wind farm, that is between Invergordon Harbour using the A9(T), A839 and A836 to its site entrance at Achinduich off the A836, and that no further works would be required along this section of the route.
- 7.165 The applicant's assessment within Appendix 2, Annex B has identified 5 pinch points numbered 36, 52, 55, 58 and 60 where turbine delivery may conflict with existing trees with the applicant considering that there would likely be some impact to trees but not to the overall amenity value of the area to which they contribute. In addition, two individual mature Scots pine trees have been assessed due to concerns raised at a public consultation, referred to as Tree A, located at the right turn from the A839 to the A837, and Tree B, located on an S-bend on the A837, within the AI. The AI confirms that both trees are in good condition and are within a Strategic Timber Extraction route with good crown clearance and so will not be felled as a result of the proposed AIL works, save for potentially undergoing very low risk minor pruning works. The AI has concluded that no significant trees will be adversely affected by AI works.
- 7.166 The applicant has confirmed that the exact tree work schedule, if required, would be prepared and provided to THC in advance of AIL delivery works to prevent unnecessary tree pruning at this earlier stage, which should be secured by condition.

Ground Water Dependent Terrestrial Ecosystems

- 7.167 The applicant's assessment of impacts on ground water dependent terrestrial ecosystems (GWDTE) within the Energy Park site is provided in EIAR Volume 3 Technical Appendix 8.4. Six of the vegetation communities surveyed within the site were identified as being potential GWDTE; namely, M6 mire, M15 wet heath, M23 rush-pasture, M25 mire, MG9 grassland, and W4 woodland. However, due to various factors related to topography, bedrock, and soils and clays found on site, the

conclusion is that the vegetation communities listed above are reliant on surface water, surface runoff, and shallow groundwater associated with watercourses. SEPA has not disputed these findings subject to the CEMP and other environmental management plans including measures to protect the water environment. Full habitat surveys of the anticipated grid connection route have not been undertaken at this stage and therefore likely impacts on GWDTEs have not been assessed within the AI. Habitat surveys are therefore expected to be undertaken once the route of the UGC has been finalised to inform its application.

Built and Cultural Heritage

- 7.168 EIAR Chapter 9 considers the archaeological and historic environment value of the site and assesses the potential for both direct and setting effects on archaeological features and heritage assets. The chapter is supported by two technical appendices covering the cultural heritage baseline with a Stage 1 Setting Assessment, along with a cultural heritage gazetteer as supported by desktop and walkover surveys, wireframes, and visualisations.
- 7.169 There are no designated assets within the site so no direct impacts are predicted, while no indirect setting effects are anticipated on Scheduled Monuments with setting effects on listed buildings surrounding within the Rosehall area are not predicted to be significant despite visibility from these assets due to separation distances and intervening buildings, landscaping, and topography.
- 7.170 The submission does advise however that the AIL delivery of turbine components would be required to cross the narrow carriageway of the Category B Listed Cassley Bridge (A837) at Rosehall, which would likely result in direct impacts on the asset. The swept path analysis assessment assumes that the 3.8m wide carriageway will accommodate the wheels of both the blade and tower vehicles but that the up to 5m wide chassis and turbine component loads could impact the structure's parapets (see AI Appendix 2, Annex A at Section 3). Moreover, the structural capacity of the stone arch construction bridge to accommodate the loads associated with AIL turbine delivery has not been assessed.
- 7.171 Similar potential effects are advised for two undesignated stone arch bridges along the A839, the first crossing the Grudie Burn (ref. MHG121192) and the second crossing the Allt Mor, while the blade oversail at the War Memorial at Rosehall (MHG60405) is anticipated to impact the site rather than the structure itself.
- 7.172 The submission advises that the AIL route will be further informed by impacts on heritage structures once the vertical clearance of AIL delivery vehicle chassis and loads are understood. The submission contends that in the worst-case scenario heritage structures would be recorded, dismantled, and re-constructed according to the pre-dismantling survey using the same construction materials and techniques as originally found once AIL deliveries to the Energy Park site are completed. Any such

works would require planning permission and in the case of the Cassley Bridge, Listed Building Consent. Given this mitigation, the AI concludes that there would be no long-term significant effects on the historic environment. However, without the aforementioned vertical profile checks and structural assessments, it is considered that significant effects on these historic assets cannot be identified at this stage.

- 7.173 The Council's conservation officer has not objected to the Energy Park on the grounds of these impacts subject to a multi-stage condition requiring all permissions for offsite works related to heritage assets to be in place prior to commencement of construction works on site. Specifically, for the Cassley Bridge, the application must be supported by a full Heritage Impact Assessment as well as a full Structural Report to be undertaken by an Institute of Historic Building Conservation accredited structural engineer. In the event such an application is supported, any financial guarantee to secure full costs of the bridge's reinstatement as may be required by that permission, would be required to be in place prior to works commencing on the bridge.
- 7.174 With regards archaeology, known non-designated assets are avoided by the development but there is potential for unknown/unrecorded assets such as buried features and deposits to be directly impacted. As such, THC's Archaeologist advises that all groundworks require to be monitored, which should be secured through the CEMP condition. Additionally, a separate condition to secure its approval, prior to works commencing on site, of a Written Scheme of Investigation to include a Programme of Archaeological Works. This condition should include provision for a Post-Excavation Research Design for the analysis, publication and dissemination of results and archive deposition if required. Subject to these conditions, there are no other issues in terms of the development's impacts on the historic environment.
- 7.175 The AI advises that there are no designated or non-designated heritage assets within the anticipated grid connection construction corridor with the exception of Laundry Cottage on the Rosehall Estate that fronts the private track where a section of the UGC is anticipated to be installed. The AI advises that direct impacts on the cottage would be avoided through use of the minimum construction corridor necessary at that section. There is also potential for unknown archaeology along the route, which would require the same mitigation measures to be implemented as those for the Energy Park. No significant effects are predicted on the historic environment from the grid connection subject to mitigation measures being properly implemented which could be conditioned for that forthcoming application.

Roads, Transport and Access

- 7.176 EIAR Chapter 10: Traffic and Movement assesses the anticipated traffic impacts of the development, most pertinently during the 21-month construction period. The assessment is supported by an Abnormal Load Route Assessment (EIAR Volume 3

Technical Appendix 10.1) and an Outline Construction Traffic Management Plan Assessment (EIAR Volume 3 Technical Appendix 10.1).

- 7.177 The construction traffic forecast assumes that 50% of aggregate would be sourced from on-site borrow pits and has identified two off-site quarries, one at Ardchronie near Ardgay and the other at Dornoch Bridge west of Dornoch, for the remainder. The assessment also assumes that concrete would be imported to site along with all the components for turbines, the solar array, the BESS facility and temporary construction compounds.
- 7.178 The EIAR identifies that construction traffic would use the A9(T), A836, A837, A839 and A949, and the B9174 public roads. EIAR Table 10.10 predicts that the maximum construction generated traffic movements will be over months 11 and 12 of construction with a total daily generation of 210 two-way vehicle movements, of which 120 will be HGVs, equating to 4,597 general traffic movements per month of which 2,617 would be HGVs.
- 7.179 For the grid connection, the AI predicts that construction traffic would use the same road network as identified in the EIAR with works generating a maximum of 52 daily two-way movements, although HGV movements are not specified. The temporary A837 road closures would increase traffic on the A839 with the AI predicting a total number of 53 two-way HGV movements using that road during that period and an additional 26 two-way HGV movements if works on the Energy Park and grid connection run concurrently.
- 7.180 Transport Scotland is satisfied that the proposal will not have a significant impact on its trunk road network; i.e. the A9(T), subject to securing conditions to secure its prior approval of the scheme for any accommodation measures, additional signage, and temporary traffic control measures required on the trunk road network for construction traffic. This information can be secured through a Construction Traffic Management Plan (CTMP) condition, which should apply to the relevant sections of the public road network as a whole (trunk and Council maintained Road).
- 7.181 Additionally, Transport Planning advises of the following issues on the Council maintained road network:
- A836:
 - There are verge overrun issues in areas between the A9 at Meikle Ferry roundabout and Lairg.
 - A837:
 - THC would not approve the use of the A837 between its junctions with the A836 and A839 due to the road's very fragile structure and the vulnerability of the humpback bridge over the Allt Mor;
 - Between the A839 and the site access in Rosehall, the road is substandard twin tracked due to construction with the bridge over the

River Cassley potentially being vulnerable to HGV traffic, while the geometry of this section of road may not be suitable for larger vehicles.

- A839:
 - There are verge overrun and edge deterioration issues in areas between Pittenrail and Lairg;
 - Between Loch Dubh (southwest of Braemar) and the junction with the A837 the road is of substandard construction while the geometry of this section of road may not be suitable for larger vehicles.

7.182 Transport Planning's response highlights that large sections of the Council maintained public road network is not designed or constructed to modern day standards to be able to accommodate large numbers of daily HGV movements, in particular along single-tracked sections. As such, Transport Planning requests an additional condition to secure its approval of a Roads Mitigation Schedule of Works, prior to works commencing on site, with the schedule to include several measures, as informed by survey work, to mitigate construction traffic impacts and maintain the integrity and safety of the network.

7.183 In terms of the transport of turbine components and any other abnormal indivisible load (AIL), the EIAR advises that either Invergordon (option A) or Nigg (option B) would be used for the port of entry. The route from Invergordon would access the A9(T) using the B817 from the port and the C1063 Academy Road. From Nigg, the route would use the B9175 to the Nigg Roundabout where both routes combine. Once on the A9(T), turbines will be transported north to the junction with the A839, at which point they will travel westward to Lairg where they will join the A836 southbound for the short section to the junction with the A839 at Black Bridge, at which point turbines would be transported westward along the A839 to its junction with the A837, which would take the components through Invercassley over the Cassley Bridge to the site entrance at Rosehall.

7.184 Transport Scotland and Transport Planning have acknowledged that the route requires the removal of street furniture, overrun surfaces, and the use of third-party land, which will need the authorisation of landowners. Transport Planning's response advises that there are several structures on Council maintained roads that would require structural assessment for their capability to facilitate AIL:

- bridge at Braemore, A839;
- north of Braemore Wood, A839;
- bridge at Badfluich Wood, A839;
- culvert at Auchurigill, A839; and
- bridge over River Cassley, A837.

7.185 The structural assessment should form a part of a finalised Abnormal Indivisible Load Route Assessment Report, which should be secured by condition and approved by both Roads Authorities with input and agreement from Police Scotland and local

residents informed through a community liaison group, which should be secured by condition.

- 7.186 Should structural assessments show that works for the strengthening or replacement of any offsite bridge are required for the purposes of HGV movements and/or AIL deliveries, the applicant would be obliged to ensure that the correct permissions are in place prior to commencing any such works. As mentioned, there are no permitted development rights for works to the Category B Listed Cassley Bridge, with any works also requiring Listed Building Consent. Given that the extent of works required to structures and the extent of potential likely significant effects resulting from these works, as required for the construction of the Energy Park, are not identified at this time, it is considered that these matters can be secured through a multi-stage condition.
- 7.187 The applicant will be required to finalise a legal Section 96 Agreement under the Roads (Scotland) Act 1984 (as amended) to adequately compensate the public purse in the event of addition damage to Council maintained roads that can be attributable to the associated construction traffic.
- 7.188 A condition for the upgrading of the junction between the site access and the A837 at Rosehall is also required. The design of the access must be as per the Council guidance document 'Roads and Transport Guidelines for New Developments' and include suitable drainage measures, geometry and construction, and the provision and maintenance of appropriate visibility splays.
- 7.189 In terms of wider public access, the Council's Access Officer notes that that Core Path SU21.03 Allt an Tuir Burn should remain accessible for the duration of construction works and the operational phase of the development, and that a Recreational Access Management Plan is submitted for its approval prior to development works commencing on site. Both requirements should be secured by condition. Any future application for the grid connection would also be required to include a Recreational Access Management Plan to consider impacts on Core Paths SU21.09 Cassley Falls and SU21.08 Rosehall Estate in order to maintain favourable public access along those routes.

Water, Flood Risk, Drainage and Peat

- 7.190 EIAR Chapter 8: Hydrology, Hydrogeology, Geology and Peat sets out the applicant's assessments of the proposal's impacts on the water environment including flood risk and drainage, with peat excavation, reuse, and landslide hazard risk having been considered under the Construction section of this report. Further information is provided in the Appendix 1 of the AI for the grid connection.
- 7.191 The Energy Park site and is mostly within the River Cassley catchment although Ts 4 and 5 in the northwest of the site are within the Tutim Burn / River Oykel catchment,

both rivers drain to the Kyle of Sutherland and ultimately to the North Sea via the Dornoch Firth. The grid connection would be within the River Cassley and Kyle of Sutherland catchment.

- 7.192 Scottish Water has confirmed that the Energy Park site does not lie within a Drinking Water Protected Area (DWPA). Table 8.11 of EIAR Chapter 8: Private Water Supplies (PWS) Within 2km of the Energy Park site boundary (2021), identifies four properties with PWS, all of which are outwith the site boundary and on the opposite bank of the River Cassley with no linkage to the site. The AI does not identify additional PWS that would be affected by the UGC.
- 7.193 There are areas of known fluvial flood risk from the River Cassley within the site along its eastern boundary, as well as the Allt an Tuir, over which the access track crosses at the site's southeast. The EIAR advises that this crossing will be upgraded either with by a new bridge or bottomless culvert, which require to be designed to accommodate a 1 in 200-year flow event plus climate change allowance and freeboard, in line with SEPA guidance. These structures would also be required to allow fish migration and otter passage and will be subject to SEPA licensing. Should the application be granted consent, these details can be controlled by condition. All other site infrastructure would avoid pockets of known surface water flood risk. Neither SEPA, nor the Council's Flood Risk Management Team have raised any concerns regarding flooding at the site.
- 7.194 Additionally, the AI advises of flood risk from river and surface water sources close to the western and central sections of the UGC route, and coastal flooding at parts of the southeastern sections.
- 7.195 With the exception of watercourse crossings and the southern section of the temporary mobilisation compound, all infrastructure has been designed to maintain a minimum 50m development free buffer zone around watercourses and water bodies.
- 7.196 As mentioned, a CEMP would be implemented by the contractor during the construction phase to control potentially polluting activities and prevent adverse impacts on river catchments, properties, and the environment from construction activities. Specifically, the CEMP would include site specific drainage and pollution prevention plans as also required by for the construction licence required through the EASR process.
- 7.197 In terms of peat disturbance, the EIAR advises that the layout is designed to avoid areas of deep peat and minimise impacts where this is not avoidable. The outline Peat Management Plan (EIAR Volume 3, Technical Appendix 8.2) sets out that a total of 29,393m³ of peat is anticipated to be excavated overall (Table 8.2.4: Summary of Estimated Peat Excavation Volumes, Technical Appendix 8.2), with the development having potential to reuse a larger volume, 29,600m³ for reinstatement

works (Table 8.2.5: Estimated Soil and Peat Volumes for Different Reuse Options, Technical Appendix 8.2), indicating that none of the excavated soils on the Energy Park site will become waste. Peat probing has not been undertaken for the grid connection at this stage however the NatureScot Carbon and Peatland 2016 Map indicates that only a small section of the route has potential for Class 2 carbon-rich soils.

- 7.198 The outline plan sets out the best practice measures for excavation, re-use, storage, transport and handling of excavated peat onsite to reduce the likelihood of it releasing embodied carbon and becoming waste. SEPA's has not objected on the grounds of peat disturbance in terms of compliance with the mitigation hierarchy subject to securing a finalised peat management plan by condition, with its response providing advice directly to the applicant regarding its regulatory control of waste.
- 7.199 The applicant has also undertaken a Peat Slide Risk Assessment for the Energy Park site, which concludes that the majority of the Site has a negligible or low risk of natural or induced peat landslide. Five areas within the site boundary and one within the wider study area were identified as potentially having a moderate risk of peat instability, while no areas were identified as having a high risk. The moderate risk areas have been assessed in greater detail, with the assessment taking account of ground condition surveys. There are no comments from Ironside Farrar (the Scottish Ministers' advisor on peat landslide hazard risk) on the adequacy of the Peat Slide Risk Assessment; however, mitigation measures are included within the document to control peat landslide hazard through good construction practices and micro-siting.

Noise and Shadow Flicker

- 7.200 EIAR chapter 11 outlines the applicant's assessment in relation to the potential construction and operational noise on nearby residential receptors. The EHO advises that the applicant's assessment demonstrates that noise from the complete development (turbines, BESS, substation, and solar array) as a standalone development will meet the simplified ETSU standard of 35dB at all NSRs except for marginal exceedances of less than 1dB at two properties. It also shows that levels will be below 30dB at all but 4 properties. Of these, three have high background levels due to the proximity of the river and the assessment states that the property Glenrossal House is financially involved and a higher limit would be applicable. For the avoidance of doubt, any claim of financial involvement is something for Scottish Ministers as decision maker to confirm and should only apply to the occupant and not the owner, if different. It is recommended that the developer has arrangements in place to maintain a financial involvement in the event of a change in occupancy.
- 7.201 The EHO also advises that the worst case cumulative assessment, which assumes all NSRs are downwind of all turbines, demonstrates that noise levels would be a maximum of 41dB at NSRs and would generally meet the acceptable limits, although

the daytime target limits at seven properties would be exceeded by small margins (2dB or less in the worst case scenario, 1dB or less when directional propagation is accounted for) at certain wind speeds; namely, Tigh-a-Rhos, River House, Oape, Ghillies View, Donackgill, Wester Doune Cottage, and Langwell Cottage. At these properties, the maximum predicted level from the wind farm component of the Allt an Tuir Energy Park alone is 29dB with the greater impact being from the proposed Strath Oykel development. For nighttime, the predicted levels meet the recommended limits.

- 7.202 Given that there would be NSRs between generating stations, the location of Allt an Tuir Energy Park may increase the incidences and duration of renewable development noise exposure at several NSR should these be downwind of the proposal. The EHO however, has advised that the predicted levels from Allt an Tuir alone are at least 5dB below background at all receptors, so while still potentially audible, turbine noise is not expected to contribute significantly to an increase in the incidences and duration of noise exposure.
- 7.203 Similarly, electrical equipment in use at the solar array, BESS, and substation has potential to give rise to tonal noise at 100Hz, which may cause nuisance at NSR. However, the EHO advises that due to separation distances and low predicted noise levels overall from these elements of the development, tonal noise nuisance is unlikely to be a significant issue. Nevertheless, a condition is suggested to limit noise levels in the 100Hz range to within 30dB at the curtilage of NSRs.
- 7.204 EIAR Chapter 14: Shadow Flicker has assessed the likely impact on the single property within a distance equivalent to 11 rotor diameters of the nearest candidate turbine, that is March Cottage within Glen Cassley. The property is 24° of north of the nearest turbine, which is within the 130° threshold for shadow flicker to occur, with the EIAR advising that the shadow flicker effects can occur at dusk during autumn and winter as the sun sets in the west.
- 7.205 Shadow flicker is likely to be most intense in close proximity to turbines as shown on EIAR Figure 14.2: Figure 14.2 Shadow Flicker Assessment Results - Worst-case Scenario, with effects reducing with distance. The sensitive receptor in this instance is near the 11-rotor diameter limit at 1.7km from the nearest turbine with the assessment predicting that the worst-case scenario of shadow flicker occurring would be for less than 30mins per day and 36hrs per year. These occurrences are within the threshold of significance set out in the EIAR, which is not disputed.

Aviation and Radar

- 7.206 There are no unresolved objections from aviation interests, with no outstanding concerns raised. The MOD requests a condition which secures submission of an aviation safety lighting scheme detailing how the development would be lit throughout its operational life to maintain civil and military aviation safety; and

aviation charting and safety management measures which request specified information is submitted to the MOD 14 days prior to commencement of works.

- 7.207 It is also noted that the revised Edition 7 of the CAA Policy and Guidelines on Wind Turbines, CAP 764, was published by the CAA in December 2025. The revised guidelines formally introduce Aviation Detection Lighting Systems (ADLS), which would only activate red aviation safety lighting at turbines when aircraft are detected within a defined volume of airspace subject to location-specific constraints and appropriate system design. As such, ADLS may not work in every location, particularly in proximity to licensed aerodrome. The introduction of ADLS is part of a more general move away from the need to light every turbine as a means of reducing the visual impact of night-time aviation obstacle lighting at the same time as making sure everyone is kept safe.
- 7.208 Given that ADLS as a technology now derives policy support and is a credible mitigation option for projects where night-time visual effects are of concern, it is appropriate to request a condition to oblige the developer to update its aviation safety lighting scheme once the technology becomes readily available.

Decommissioning and Aftercare

- 7.209 The applicant has sought permission to operate the windfarm for 40 years. At the end of its operational life, usual decommissioning and restoration requirements should therefore be secured. If the decision is made to decommission the Energy Park, all components, track access and associated infrastructure require to be removed from the site. The Planning Authority also requires that any foundations remain on site; the exposed concrete plinths would also be removed to a depth of 1m below the surface, graded with soil and replanted. Cables also require to be cut away below ground level and sealed. It would be expected that any new tracks or areas used for constructing the Energy Park would be reinstated to the pre-development condition, unless otherwise agreed with the Planning Authority.
- 7.210 The requirements to decommission at its end of life is relatively standard and straight forward, with any request for re-powering to be considered through the submission of a future application. It is important to ensure that any approval of this project secures by condition a requirement to deliver a draft Decommissioning and Restoration Plan (DRP) for approval prior to the commencement of any development and ensure an appropriate financial bond is put in place to secure these works.
- 7.211 The finalised DRP would be expected to be submitted to and approved in writing by the Planning Authority in consultation with SEPA no later than 12 months prior to the final decommissioning of the site. The detailed DRP would then be implemented within 18 months of the final decommissioning of the development unless otherwise agreed in writing with the Planning Authority.

Planning Compliance and Monitoring

- 7.212 As with any large-scale renewable energy development, the Planning Authority would request that any forthcoming permission includes a clear description of development which specifies the precise number of turbines to be developed, the maximum blade tip height, the rotor diameter and includes details of all associated ancillary infrastructure. THC requests this detail in the description so that it conveys the scope and substance of the development and so that such matters are not left to planning conditions, which could lead to scope for further redesign or re-powering without requiring a full fresh consent (which could also require substantial additional Council resource that would not be reflected in the fee). In this regard the description of development requires to be reflect the maximum turbine heights, including the specific amendments to Turbines T8 and T9 (180m blade tip and 167.5m blade tip respectively), as well as the number of turbines (nine), should the scheme be consented.
- 7.213 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 permission (or any superseding or related permissions) and shall include the provision of a bi-monthly compliance report to the Planning Authority.
- 7.214 Given proposed associated BESS on site, a fire safety management plan, along with finalised design, materials, access along with details of water supply and contaminated water storage could be secured by condition should the application be granted consent.

Other Material Considerations

- 7.215 The extent of offsite works associated with HGV movements and AIL delivery to structures on Council maintained roads, along with the extent of likely significant environmental effects, are also not yet known. These works are not within the description of development and are not within the site boundary. Moreover, the Council has no plans to undertake such works and so they would not be undertaken but for the Energy Park. Consequently, it is considered that an additional multi-stage condition to ensure that all appropriate permissions are in place prior to construction commencing on site can reasonably be applied. Suggested wording of the condition is given below.
- 7.216 **Multi-stage Consent**
- (1) No development shall commence until:

- a. Details of any offsite works required to structures on Council maintained roads, together with any environmental information assessing whether the works are likely to give rise to any significant environmental effects, along with details of any mitigation proposed, have been submitted to, and approved by, the Highland Council, including, but not be limited to, the following environmental matters:
 - i. landscape and visual impacts;
 - ii. impacts on built, cultural, and heritage assets including archaeology;
 - iii. impacts on natural heritage designations including the River Cassley Special Area of Conservation;
 - iv. impacts on habitats, protected species, and ornithology;
 - v. impacts on trees and woodland;
 - vi. impacts on the water environment;
 - vii. road, transport, traffic, and access including public access impacts;
 - viii. impacts on noise sensitive receptors; and,
 - ix. impacts on any other sensitive receptor as identified during the course of design and survey works.
 - b. the necessary planning permissions and consents including Roads Authority consents have been granted under the Town and Country Planning (Scotland) Act 1997, the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997, and / or Roads (Scotland) Act 1984.
- (2) Thereafter, all works shall be carried out in accordance with the necessary permissions, consents, and approved details unless otherwise approved in writing by the Council.

Reason: to ensure that the environmental effects of offsite works to structures on Council maintained roads, as necessary for the construction of the project, are identified, appropriately assessed, and approved with the appropriate mitigation secured prior to works commencing on site.

- 7.217 Furthermore, the applicant has submitted AI to supplement the original EIA by capturing the environmental effects of the Allt an Tuir Energy Park as a whole project. As stated, the AI appraises an assumed grid connection, and although it is stated that the proposed grid connection is based on a design previously agreed by the grid operator, the final siting and design is not confirmed. The assumption that the applicant would deliver the grid connection before transferring ownership to the grid operator is similarly not confirmed.
- 7.218 It is considered that there is sufficient information within the AI to determine the range of sensitive receptors that could potentially be impacted by likely Significant effects as a result of the grid connection forwarded by the AI. However, there is insufficient information to conclude on the extent of likely significant effects. This is because the AI is generally limited to desktop studies in lieu of appropriate survey work, which

would be undertaken in the event that the application is consented by Scottish Ministers, and the project offered a Gate 2 connection by NESO.

7.219 On the above basis, it is considered that a multi-stage condition may reasonably be applied to a consent for the Wind Farm pursuant to Regulation 4 at Paragraph 6 of the EIA Regulations. This condition would allow Scottish Ministers to consent the Wind Farm if so minded, but prevent construction works commencing on the project until such a time as the grid connection is consented following a full appraisal of its environmental effects.

7.220 The suggested wording for the condition is provided below with the wording considered to ensure that environmental effects are appropriately assessed no matter the consenting route (i.e., whether through the Town and Country Planning (Scotland) Act 1997 (as amended), or the Electricity Act 1989), and, in the event that all or part of the eventual grid connection is progressed through permitted development. This is important as the condition requires to cover any eventuality including that the siting, design, and means of connection change during the next design stage.

7.221 **Multi-stage Condition**

(1) No development shall commence until:

- a. Details of the grid connection for the development, together with any environmental information, as informed by appropriate survey work, and assessing whether the grid connection is likely to give rise to any significant environmental effects, along with details of any mitigation proposed, have been submitted to, and approved by, the Highland Council or Scottish Ministers, including, but not be limited to, the following environmental matters:
 - i. landscape and visual effects;
 - ii. River Oykel Special Area of Conservation, Caithness and Sutherlands Special Area of Conservation, Caithness and Sutherlands Special Protected Area, Caithness and Sutherlands Special Ramsar Site, and Kyle of Sutherland Marshes Site of Special Scientific Interest;
 - iii. ornithology and protected species;
 - iv. impacts on the water environment including means and methods of all water crossings;
 - v. designated cultural heritage assets and archaeology;
 - vi. habitats including peatland habitats and groundwater dependent terrestrial ecosystems;
 - vii. impacts on trees and woodland;
 - viii. private water supplies;
 - ix. road, transport, traffic and access including public access impacts;
 - x. impacts on noise sensitive receptors; and,

- xi. impacts on any other sensitive receptor as identified during the course of design and survey works.
 - b. the necessary planning permission, deemed planning permission and consent required for the grid connection has been granted under the Town and Country Planning (Scotland) Act 1997 and/or the Electricity Act 1989.
- (2) No part of the generating station shall be connected to the grid connection unless works on the grid connection are carried out in accordance with any necessary consents and the approved details.

Reason: Since the proposed generating station and its grid connection have been found to comprise a single project, this condition ensures that likely significant effects of the grid connection itself and in combination with the generating station are identified, assessed and taken into account before the Highland Council or Scottish Ministers gives consent for any part of the project to proceed.

- 7.222 Members are asked to note that the suggested conditions may be refined following discussions with the ECU, the applicant, consultees, and the grid operator.
- 7.223 In addition to the above, it is also noted that Telecommunication issues were scoped out of the EIAR as an assessment was undertaken at the Scoping stage, which identified no telecommunication links within, or in close proximity to, the application site.

Non-Material Considerations

- 7.224 A significant number of objections submitted against the application make specific appeals to Human Rights and mention of mental health effects, such that it is considered appropriate to address these issues in more detail here for the benefit of Members.
- 7.225 In terms of Human Rights, Members are reminded that planning legislation and policy in Scotland must take account of provisions within the Scotland Act 1998, the Human Rights Act 1998, and the European Convention on Human Rights (ECHR), along with other legislations including for equality etc.
- 7.226 Scottish planning legislation states that the purpose of planning is “to manage the use and development of land in the long-term public interest”. It is section 36 of the Electricity Act 1989 that sets out the statutory process of determining applications for generating stations with capacity above 50MW. The process is designed to facilitate sound decisions that are fair and legal.
- 7.227 To that end, the legislation sets out the rights of applicants and third parties alike within the process of determining applications, which includes the right to notification, consultation, and engagement. Officers are satisfied that these statutory rights have been applied in the processing of this application in so far as the process is managed on behalf of Scottish Ministers by the ECU, including this consultation made to the

Council as the Local Planning Authority. Members are advised that the large number of representations that have appealed to Human Rights have, unfortunately, not specified which Human Rights the development, whether at application stage or once operational, would be in breach of, nor have they explained how the development would breach them.

- 7.228 Further information and advice on the rights of applicants and third parties within the Scottish planning system is available on the Planning Aid Scotland website at the following link: <https://www.pas.org.uk/wp-content/uploads/2023/04/7.-Rights-and-Challenges-in-the-Scottish-Planning-System-04-2023.pdf>.
- 7.229 Mental health as a material planning consideration is specifically mentioned in NPF4 Policies 14 Design, quality and place, and 21 for Play, recreation and sport, while consideration of the issue is implied under Policy 23 Health and Safety, which seeks to improve outcomes for health and wellbeing in addition to protecting people and places from environmental and physical harm.
- 7.230 The former policies advocate for improved opportunities for play, socialising, relaxation, and physical activity in line with the designing for healthy outcomes quality of the 6 qualities of Successful Places. These healthy outcomes are listed as 1) lifelong wellbeing, 1) healthy and active lifestyles, 3) accessibility and inclusion, 4) social connectivity, and, 5) environmentally positive places (see NPF4 Annex D).
- 7.231 The purpose of planning for these outcomes is to improve the collective physical and mental health of our communities. The current proposal for a renewable energy generating station would not be detrimental to any of these healthy outcomes and, indeed, is also supported under the designing for sustainable outcomes quality of Successful Places. On that basis, individual claims against mental health impacts as a result of a development (whether at application stage through to its eventual construction) are private matters for the individuals concerned rather than strategic land use matters of public interest, which again, is the proper remit of the planning system.
- 7.232 Other non-material considerations raised in public representations have been summarised in Paragraph 4.4 above.

8. Matters to be secured by Legal Agreement / Upfront Payment

- 8.1 A decommissioning and restoration financial guarantee and a Section 96 Roads Agreement can be secured by condition. The Habitat Management Plan Area is within the developer's control. No legal agreement is required should consent be granted.

9. CONCLUSION

- 9.1 The Scottish Government gives considerable commitment to renewable energy and encourages planning authorities to support the development of wind farms where they can be situated in appropriate locations to operate successfully. The project has the potential to contribute up to 71.4MW of renewable energy capacity (59.4MW capacity wind farm and 12MW capacity solar photovoltaic array) and provide 12MW in battery energy storage towards Scottish Government targets and play a role in the route to a net zero Scotland. In addition, the development has potential to bring economic benefits to the area and to create new jobs.
- 9.2 However, as with all applications, the benefits of the proposal must be weighed against potential drawbacks and then considered in the round, taking account of the relevant policies of the Development Plan. As an application submitted under Section 36 of the Electricity Act 1989, it will be for the Scottish Ministers to decide whether the applicant has had sufficient regard to the preservation of amenity and the desirability of preserving the natural beauty, of conserving flora, fauna and geographic or physiographical features of special interest and of protecting site, buildings, and objects of architectural, historic or archaeological interest, to the extent that any such impacts are reasonably mitigated as required under Schedule 9 of the Act.
- 9.3 As noted in this report, the siting, layout and design of the Energy Park is considered to have been successful in responding to the underlying vertical scale of the rolling uplands landscape to create a cohesive layout, such that general collective landscape effects on the local landscape composition are within acceptable limits. In that way, the report has set out that the proposal will not be significantly detrimental to the integrity of nearby landscape designations including the Assynt-Coigach National Scenic Area, or the Fannichs, Beinn Dearg and Glencalvie Special Landscape Area.
- 9.4 NatureScot's objection on the grounds of the proposal's significant impacts on the wild land qualities of Wild Land Area 34 Reay-Cassley is noted and understood. In this instance, the nature and extent of significant effects on Wild Land Areas resulting from renewable energy developments that would be acceptable to Scottish Ministers remains to be tested following the publication of NPF4, specifically as it relates to NPF4 Policy 4 at part g). Given that NatureScot is the technical advisor on Wild Land Areas to Scottish Ministers, it is not the recommendation of the report to Raise Objection to the proposal on the grounds of NatureScot's objection.
- 9.5 Additionally, it is considered that the Energy Park retains a suitable setback from the communities of Rosehall and Invercassley, while the reduction in height of Turbines T8 and T9 ensures that, while unavoidably prominent, the turbines will present a reasonably balanced composition overall and not result in a dominant visual effect

when viewed by these communities and others in the surrounding area. Similarly, visual impacts are considered to be within acceptable limits including when experienced in combination and sequentially with other wind energy development in the wider landscape and during the hours of darkness.

- 9.6 The extent of offsite impacts, on Council maintained structures due to HGV movements and AIL deliveries cannot not fully identified at this stage, including on the Category B Listed Cassley Bridge. Resultantly, the extent of the project's potential likely significant effects on these assets cannot be identified. Depending on the works required, the applicant is, in any case, obliged to seek the relevant permissions and consents from the Council as Planning Authority and Roads Authority. In this scenario, Regulation 4 at Paragraph 6 of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations includes provision to apply a multi-stage condition to any consent for an Environmental Impact Assessment project if the decision maker is minded to consent the project. Moreover, the suggested multi-stage condition ensures that the environmental effects of these works would be required to be assessed in full, including on the Cassley Bridge. In that way, the suggested condition ensures that works on the Energy Park may not commence until such a times as all necessary permissions and consents are in place following full appraisals of environmental effects.
- 9.7 The report has also set out that, otherwise, the impacts and effects of the Energy Park as they relate to construction, other built and cultural heritage matters, the water environment and peat, access, amenity as it relates to noise and shadow flicker, telecommunications, aviation and radar, as well as decommissioning and aftercare, would be within acceptable limits subject to the developer's compliance with the conditions requested by the Council and consultees.
- 9.8 In addition to the Energy Park, the applicant has provided an appraisal of a potential grid connection through Additional Information. As the report highlights, the siting, design and means of the grid connection is assumed at this stage and not confirmed. Consequently, it is considered that while the range of sensitive receptors that could potentially be impacted by likely Significant effects can be understood, the extent of likely significant effects cannot be known at the stage. Again, the application of a multi-stage condition provides comfort that construction works on the project must not commence until such a time as the grid connection is consented following a full appraisal of its environmental effects.
- 9.9 Significant weight has been given to the global climate and nature crises in this assessment with the application having been assessed against the policies set out in NPF4 and the Local Development Plan. These policies include NPF4 Policy 1 for Tackling the climate and nature crises, NPF4 Policy 11 for Energy with its 13 considerations for project design and mitigation, along with the equivalent parallel HwLDP policy, Policy 67 for Renewable Energy, itself describing eleven tests as

expanded upon within the OWESG. The proposal has also been assessed against other policies in the Development Plan related to cultural heritage, natural heritage, protected species and biodiversity, as well as the policy tests set out in HwLDP policies, for example Policy 28 Sustainable Design.

9.10 Officers are satisfied that environmental effects of this development can be addressed by way of mitigation. The Council will request that Scottish Ministers incorporate the requirement for a schedule of environmental commitments within the conditions of this permission along with the monitoring of construction and operational phase compliance.

911 All relevant matters have been taken into account when appraising this application. It is considered that it will be for Scottish Ministers to decide the proposal's compliance with NPF4 Policy 4 part g) taking consideration of the advice from NatureScot. Otherwise, it is considered that the proposal accords with the principles and policies contained within the Development Plan and is acceptable in terms of all other applicable material considerations.

10. IMPLICATIONS

10.1 Resource: if the recommendation is not upheld, the applicant would have the option to appeal the Council's decision through the DPEA.

10.2 Legal: Not applicable

10.3 Community (Equality, Poverty and Rural): Not applicable

10.4 Climate Change/Carbon Clever: if permitted the development would produce renewable energy.

10.5 Risk: Not applicable

10.6 Gaelic: Not applicable

11. RECOMMENDATION

Action required before decision issued to Scottish Ministers: No

Conclusion of Section 75 Obligation No

Recommended to **RAISE NO OBJECTION** to the application subject to:

- A. Members grant delegated authority to the Area Planning Manager – North to agree the finalised condition prior to issuing to the ECU. The condition wording will be based on the Standard Section 36 Conditions for Wind Farms, with any substantive amendments to the proposal to be subject to prior consultation with the Chair of the North Planning Applications Committee.

REASON FOR DECISION

All relevant matters have been taken into account when appraising this application. It is considered that it will be for Scottish Ministers to decide the proposal's compliance with NPF4 Policy 4 part g) taking consideration of the advice from NatureScot. Otherwise, it is considered that the proposal accords with the principles and policies contained within the Development Plan and is acceptable in terms of all other applicable material considerations.

Signature:	Bob Robertson
Designation:	pp Area Planning Manager – North
Author:	Mark Fitzpatrick
Background Papers:	Documents referred to in report and in case file.
Relevant Plans:	Plan 1 - Figure 1 Site Location Plan 2 - Figure 3 Proposed Site Layout Plan 3 - Figure 2.6 Indicative Turbine Elevations
Appendices:	Appendix 1 - Letters of Representation Appendix 2 - Cumulative Wind Farm Developments Appendix 3 - Development Plan and Other Material Policy Considerations Appendix 4 - Compliance with the Development Plan / Other Material Policy Considerations Appendix 5 - LVIA Methodology Appendix 6 - Viewpoint Visual Assessment Appraisal (operational only) Appendix 7 - Assessment against Landscape and Visual Assessment Criteria contained within Section 4 of the Onshore Wind Energy Supplementary Guidance Appendix 8 – Conditions as requested by the Highland Council

Appendix 2 – Cumulative Wind Farm Developments

Name	Distance from Proposed Development (km)	No. of Turbines	Blade Height (m)	Tip
Existing and under construction wind energy development within 45 km				
Rosehall	3.6km	19	90m	
Achany	4.4km	19	102m	
Lairg II	15.5km	10	150m, 190m, 200m	
Lairg I	16km	3	99.5m	
Creag Riabhach	23.3km	22	125m	
Coire na Cloiche	26.8km	13	99.5m	
Beinn nan Oighrean	26.9km	2	99.5m	
Beinn Tharsuinn	27.3km	17	99.5m	
Strathrory	31.4km	7	160m, 180m	
Novar Phase 1	31.7km	34	55.5m	
Novar Phase 2	33.1km	16	106m	
Kilbraur Extension	33.1km	8	125m	
Kilbraur	33.2km	19	115m	
Corriemoillie	37km	17	125m	
Lochluichart Extension	37.5km	6	125m	

Name	Distance from Proposed Development (km)	No. of Turbines	Blade Height (m) Tip
Lochluichart	38.6km	17	125m
Gordonbush Extension	40.7km	11	149.9m
Gordonbush	41.9km	35	110m
Consented wind energy development within 45 km			
Achany Extension	3.5km	18	149.9m
Meall Buidhe	7.1km	8	149.9m
Sallachy	13.8km	9	149.9m
Garvary*	15km	24	180m
Strath Tirry	16.7km	4	135m
Chleansaid	20.8km	16	180m, 200m
Creag Riabhach Extension	24.4km	2	149.9m
Kirkan	36.3km	17	175m
Lochluichart Extension II	36.6km	5	149.9m
Application / Appeal wind energy development within 45 km			
Invercassley	1.1km	20	200m, 230m
Achany Extension Redesign	3.5km	18	200m
Strath Oykel*	4.5km	33	200m
Coille Beith	5km	11	200m

Name	Distance from Proposed Development (km)	No. of Turbines	Blade Height (m) Tip
Shinness	15.1km	16	200m
Inveroykel	15.1km	20	200m
Sallachy Extension	15.1km	1	149.9m
Coille Linne (Fiag)	16.3km	15	250m
Balblair	17.1km	8	180m, 200m
Acheilidh (Lairg III)	19km	12	200m
Creachan	22.7km	13	200n
Ceislein	34.2km	20	250m
Abhainn Dubh	37.6km	13	149.9m
Carn Fearna	40km	9	180m, 200m
Scoping wind energy development within 10 km <i>(included on viewpoint wirelines only)</i>			
Fionn	4km	29	250m
Braelangwell	10.2km	17	220m
Ruith Cnoc	11km	42	220m
Garvary II	14.8km	16	200m
Glasa	18km	27	250m
Creag Dhubh	20km	27	200m

Name	Distance from Proposed Development (km)	No. of Turbines	Blade Height (m) Tip
Beinn Tharsuinn Repowered and Extended	27km	31	180m
Novar Repowering	31km	10	180m
Pollie Hill	34km	13	200m

* the decision of the Scottish Ministers to grant S36 consent to Strath Oykel Wind Farm was quashed by the Edinburgh Court of Sessions however the applicant is anticipated to resubmit a new application for the proposal.

Note/ those wind farms highlighted in **bold** have either changed status or were not submitted for Scoping and could not be included in the applicant's cumulative list.

Appendix 3 – Development Plan and Other Material Policy Considerations

DEVELOPMENT PLAN

National Planning Framework 4 (2023)

A3.1 The NPF4 policies of most relevance to this proposal include:

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

Policy 1 – Tackling the climate and nature crisis

Policy 2 – Climate mitigation and adaptation

Policy 3 – Biodiversity

Policy 4 – Natural places

Policy 5 – Soils

Policy 6 – Forestry, woodland and trees

Policy 7 – Historic assets and places

Policy 11 – Energy

Policy 13 – Sustainable transport

Policy 18 – Infrastructure first

Policy 22 – Flood risk and water management

Policy 23 – Health and safety

Policy 25 – Community wealth benefits

Policy 33 – Minerals

Highland Wide Local Development Plan 2012

A3.2 28 - Sustainable Design

29 - Design Quality and Place-making

30 - Physical Constraints

31 - Developer Contributions

36 – Wider Countryside

51 – Trees and Development

53 - Minerals

55 - Peat and Soils

56 - Travel

57 - Natural, Built and Cultural Heritage

- 58 - Protected Species
- 59 - Other important Species
- 60 - Other Importance Habitats
- 61 - Landscape
- 62 - Geodiversity
- 63 - Water Environment
- 64 - Flood Risk
- 66 - Surface Water Drainage
- 67 - Renewable Energy Developments
- 69 - Electricity Transmission Infrastructure
- 72 - Pollution
- 73 - Air Quality
- 74 - Green Networks
- 77 - Public Access
- 78 - Long Distance Routes

Caithness and Sutherland Local Development (CaSLDP)

- A3.3 There are no site-specific policies covering the application site. Local area Development Plans identify Special Landscape Areas (SLA) within the plan area therefore the application requires to be assessed against the general policies of the Development Plan (NPF4 and HwLDP) referred to above. As noted in the report, there are SLAs within the LVIA study area that would be impacted by the development.

Onshore Wind Energy Supplementary Guidance (OWESG) (2016)

- A3.4 The Onshore Wind Energy Supplementary Guidance (OWESG) provides additional guidance on the principles set out in HwLDP Policy 67 for renewable energy developments. The Guidance sets out the Council's agreed position on onshore wind energy matters, and, although reflective of Scottish Planning Policy at the time of its adoption prior to the adoption of NPF4, the document remains an extant part of the Development Plan and is therefore a material consideration in the determination of onshore wind energy planning applications. Nevertheless, the Spatial Framework included in the document is no longer relevant to the assessment of applications as in effect, the policies of NPF4 (specifically Policy 11, Energy) removes Group 2 Areas of significant protection from consideration by effectively making all land in Scotland either Group 1 Areas where wind farms

will not be acceptable (National Parks and National Scenic Areas), or Group 3, Areas with potential for wind farm development

A3.5 The OWESG also contains the Loch Ness mark Study, the Black Isle, Surrounding Hills and Moray Firth Coast Sensitivity Study, and the Caithness Sensitivity Study. The Energy Park site does not fall within an area covered by a Landscape Sensitivity Study at this time. The proposed site sits within the Landscape Character Type (LCT) of Rounded Hills – Caithness and Sutherland (NatureScot LCT135) as noted in section 2 of this report.

A3.6 **Other Highland Council Supplementary Guidance**

- Biodiversity Enhancement Planning Guidance (May 2024)
- Construction Environmental Management Process for Large Scale Projects (August 2010)
- Developer Contributions (Mar 2018)
- Flood Risk and Drainage Impact Assessment (Jan 2013)
- Green Networks (Jan 2013)
- Highland Historic Environment Strategy (Jan 2013)
- Highland's Statutorily Protected Species (Mar 2013)
- Highland Renewable Energy Strategy and Planning Guidelines (May 2006)
- Physical Constraints (Mar 2013)
- Roads and Transport Guidelines for New Developments (May 2013)
- Special Landscape Area Citations (Jun 2011)
- Sustainable Design Guide (Jan 2013)
- Trees, woodland and development (Jan 2013)
- Visualisation Standards for Wind Energy Developments Construction Environmental Management Process for Large Scale Projects (2010)

OTHER MATERIAL POLICY CONSIDERATIONS

Emerging Highland Council Development Plan Documents and Planning Guidance

A3.7 The Highland Local Development Plan is currently under review and with the Evidence Report having now been presented to Full Council in June 2026. It is anticipated the Proposed Plan will be published following publication of secondary legislation post NPF4.

A3.8 There is no Local Place Plan registered with the Council covering the application site or surrounding communities.

Other International and National Legislation, Policy, and Guidance

- A3.9
- Biodiversity: Planning Guidance, Scottish Government (2025)
 - Battery Energy Storage Systems: Planning Guidance, Scottish Government (2026)
 - CAA Policy and Guidelines on Wind Turbines, CAP 764 (2026)
 - Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 – interim and annual targets replaced by Climate Change (Emissions Reduction Targets) (Scotland) Bill in November 2024
 - Climate Change Committee Report to UK Parliament (July 2024)
 - UK Government Clean Power Action Plan (Dec 2024)
 - Draft Energy Strategy and Just Transition Plan (2023)
 - Onshore Wind Energy Policy Statement (2022)
 - Scottish Biodiversity strategy to 2045: tackling the nature emergency (2024)
 - Scottish Energy Strategy (2017)
 - Renewable heat target and action: 2020 update (2020)
 - Energy Efficient Scotland Route Map, Scottish Government (2018)
 - Siting and Designing Wind Farms in the Landscape, SNH (2017)
 - Assessing Impacts on Wild Land Areas, Technical Guidance, NatureScot (2020)
 - Assessing the cumulative landscape and visual impact of onshore wind energy developments, NatureScot (2021)
 - Special Landscape Qualities - Guidance on assessing effects, NatureScot (updated 2025)
 - Historic Environment Policy for Scotland, HES (2019)
 - PAN 1/2011 - Planning and Noise (2011)
 - Circular 4/1998 – The use of Conditions in Planning Permissions – this states that planning conditions should only be imposed when they meet all of the following six tests: 1) Necessary, 2) Relevant to planning, 3) Relevant to the development to be permitted, 4) Enforceable, 5) Precise; and Reasonable in all other respects.

- Circular 1/2017: Environmental Impact Assessment Regulations (2017)
- NatureScot: Guidance on Aviation Lighting Impact Assessment (2024)
- Residential Visual Amenity Assessment (RVAA), Landscape Institute (2019)
- Scottish Forestry Woodland Creation Application Guidance (2017)
- The Scottish Government's Policy on Control of Woodland Removal (2009)

Appendix 4 - Compliance with the Development Plan / Other Material Policy Considerations

National Policy

- 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 spatial principles, national and regional spatial priorities, and action areas;
 - Part 2 – sets out policies for the development and use of land to be applied in the preparation of local development plans; local place plans; masterplans and briefs; and for determining the range of planning consents. This part of the document should be taken as a whole in that all relevant policies should be applied to each application; and
 - Part 3 – provides a series of annexes that give the rationale for the strategies and policies of NPF4, it outlines how the document should be used, and sets out how the Scottish Government will implement the strategies and policies.
- A4.2 **Part 1 - 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 At the national level, NPF4 considers that Strategic Renewable Electricity Generation and Transmission Infrastructure will assist in the delivery of the Spatial Strategy and Spatial Priorities for the north of Scotland, and that Highland can continue to make a strong contribution toward meeting Scotland's ambition for net zero. Alongside these ambitions, the strategy for Highland aims to protect environmental assets as well as to stimulate investment in natural and engineered solutions to address climate change. This aim is not new and will clearly require a balancing exercise to be undertaken, which is reflected throughout NPF4.

A4.4 The proposed development is of national importance for the delivery of the national Spatial Strategy, whereby in principle support for the development is established. As the proposed development would be capable of generating over 50 MW, it is of a type and scale that constitutes NPF4 National Development 3 - Strategic Renewable Electricity Generation and Transmission Infrastructure.

A4.5 **Part 2 – Policies: NPF4 Policies 1, 2, and 3** now apply to all development proposals Scotland-wide, which means that significant weight must be given to the global climate and nature crises when considering all development proposals, as required by NPF4 Policy 1. To that end, development proposals are to be sited and designed to minimise lifecycle greenhouse gas emissions, as far as is practicably possible, in accordance with NPF4 Policy 2, while contributing to the enhancement of biodiversity, as required by NPF4 Policy 3.

A4.6 Complementing those policies is NPF4 Policy 4 Natural Places, which sets out that development proposals by virtue of type, location, or scale that have an unacceptable impact on the natural environment will not be supported. The policy goes on to clarify what that means for different designations. It sets out that proposals with likely significant effects on European sites (SACs or SPAs) require appropriate assessment, and that development proposals that will affect a National Park, NSA or SSSI will only be supported where:

- i) the objectives of designation and the overall integrity of the areas will not be compromised; or
- ii) any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental, or economic benefits of national importance.

This is an important consideration given the proximity of the development natural heritage designations. However, the Energy Park's impacts on designated sites are likely to be within the limits deemed acceptable by Scottish Ministers, subject to conditions. The offsite environmental impacts of the grid connection and works required for HGV movements and the delivery of abnormal indivisible loads (AIL) are unidentifiable at this time and require to be assessed separately. As such, multi-stage conditions are suggested to ensure that any environmental effects are fully identified, assessed, and approved with appropriate mitigation prior to construction works commencing on the Energy Park.

A4.7 Similarly, sites designated in Development Plans for local nature conservation or Special Landscape Areas (SLAs) are protected in NPF4 Policy 4 unless the development will not result in significantly adverse effects on its qualities or its integrity, or, these effects are clearly outweighed by social, environmental, or economic benefits of at least local importance. In this instance, the proposal is not considered to significantly affect the special qualities of nearby SLAs or their integrity.

- A4.8 The most significant policy change for Natural Places introduced by NPF4 Policy 4g) is with regard to Wild Land Areas (WLA). This policy now states that renewable energy developments that support national targets will be supported in WLAs and that buffer zones around WLAs will not be applied, so that effects of development outwith WLAs will not be a significant consideration. The site itself is located within WLA 34 Reay - Cassley.
- A4.9 NatureScot has objected to the Energy Park on the grounds that the Energy Park would result in significant adverse individual and cumulative daytime and night-time effects on Wild Land Quality (WLA) WLQ4 of WLA 34 Reay – Cassley. NatureScot considers that the turbines would constitute a material change in the experience of WLQ4 to such a degree that the WLA area surrounding the Energy Park would no longer contribute to the wider WLA and would be considered lost, which would not be easily overcome by siting, design or other mitigation. As such, NatureScot considers that the applicant has not demonstrated sufficient mitigation through siting and design to ensure that the proposal would minimise significant effects on the wild land qualities of the WLA as required under NPF4 Policy 4g). To date, the nature and extent of significant effects on WLAs resulting from renewable energy developments that would be acceptable to Scottish Ministers remains to be tested following the publication of NPF4. It will, therefore, be for Scottish Ministers to decide if the proposal's support for meeting renewable energy targets outweighs the reduction of the effective extent of the WLA, with NatureScot being the technical advisor on WLA matters to the government.
- A4.10 Policy 11 intent is to “encourage, promote and facilitate all forms of renewable energy development onshore and offshore. This includes energy generation, storage, new and replacement transmission and distribution infrastructure and emerging low-carbon and zero emissions technologies including hydrogen and carbon capture utilisation and storage (CCUS)”. It specifies that the principle of all forms of renewable, low-carbon, and zero emission technologies is supported (with the exception of wind farm proposals located in National Parks or National Scenic Areas) including ‘enabling works, such as grid transmission and distribution infrastructure’ which encompasses this application.
- A4.11 It states that development proposals should only be supported where they maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities. The policy goes on to say that significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets, while identifying impacts, including cumulative impacts, that must be suitably addressed and mitigated against. Policy 11 e) i to xiii) sets out the criteria against which applications must be assessed.

- A4.12 This includes a broad range of matters similar those to be assessed under HwLDP Policy 67 including landscape and visual impacts. It advises that where impacts are localised and / or appropriate design mitigation has been applied such effects will generally be considered acceptable. While the adopted NPF4 reflects a stronger presumption in favour of all national scale energy developments, judgment is still required at the project level to ensure proposals do not have unacceptable landscape and visual impacts even if the contribution to national renewable energy targets is considerable.
- A4.13 On that point it is noted that both legislation and planning law indicate that where there may be incompatibility between NPF4 and the Local Development Plan (LDP) (HwLDP, CaSPlan, and Highland Council Supplementary Guidance) published prior to NPF4, then the more recent document shall prevail. Notwithstanding however, in instances of incompatibility, this requirement may not eliminate the provisions of the LDP in their entirety whilst these documents remain an extant part of the adopted Development Plan. That means that the Council may wish to give more weight to the provisions of its LDP over national policies where there is strong justification for doing so, such as where it feels that LDP policy is better equipped to respond to local conditions for example. However, this matter is yet to be tested through the planning system.
- A4.14 Notwithstanding the impact on WLA 34 Reay – Cassley, which may be considered and outstanding matter for Scottish Ministers to decide, It is considered the Energy Park is otherwise in general conformity with NPF4 Policy 11, particularly with regards to 11 e) ii. which requires the proposed development project design and mitigation to demonstrate how the following impacts are addressed: Significant landscape and visual impacts, recognising that significant 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.
- A4.15 The current proposal will have significant adverse landscape and visual impacts on:
- LCT135 Rounded Hills – Caithness and Sutherland with Major adverse and significant effects up to 5km and Moderate adverse and significant up to 12km to the south of Strath Oykel and east of Glen Cassley being agreed with the applicant;
 - LCT142 Strath – Caithness and Sutherland Major adverse and significant effects within 5km and Moderate adverse and significant effects from the northern upper extent of Glen Cassley within 12km and parts of Strath Oykel and the Kyle of Sutherland, with open views, within approximately 8 km to the west and 12 km to the east agreed with the applicant;

- Assynt-Coigach NSA with significant adverse effects on SLQ 8 – Significant tracts of wild land but without compromising the overall integrity and objectives of the NSA; and,
- visual receptors up to 12.2km from the turbines including:
- residents of Rosehall, and Inveroykel and dispersed communities to the west
- recreational users of Sika Cycle Route – part of Rosehall Trails, Beinn an Eoin, Beinn Sgeireach, and Carn a Choin Deirg;

as well as transport receptors using the westbound carriageway of the A837 for up to 8km.

- A4.16 It is considered that the mitigation to reduce the heights of T8 and T9 reduces the ‘dominant’ visual effect of these turbines on Rosehall and Invercassley and presents a more balanced composition when viewed from these communities. A reduced lighting scheme has also been agreed with the CAA which has resulted in reduced significant effects during the hours of darkness. the threshold of the ‘appropriate design mitigation’ policy test is considered met.
- A4.17 Additionally, whilst the generality of HwLDP’s topic policies are superseded by those in NPF4, HwLDP policies that offer greater detail than NPF4 or that are tailored to Highland circumstance (and are not wholly incompatible with NPF4) are still relevant and applicable. In particular, Policy 67 Renewable Energy and its related Onshore Wind Energy Supplementary Guidance is relevant. Also, Policy 57 Natural, Built and Cultural Heritage in terms of protection of the setting of scheduled monuments.
- A4.18 It is considered the proposal is in overall conformity with Policy 57, 61 and 67 of HwLDP. Policy 57 requires all development proposals be assessed taking into account the level of importance and type of heritage features, the form and scale of the development, and any impact on the feature and its setting. The following criteria will also apply:
- For features of local/regional importance development will be allowed if it can be satisfactorily demonstrated that they will not have an unacceptable impact on the natural environment, amenity and heritage resource; and,
 - For features of national importance development will be allowed if it can be shown not to compromise the natural environment, amenity and heritage resource. Where there may be any significant adverse effects, these must be clearly outweighed by social or economic benefits of national importance. It must also be shown that the development will support communities in fragile areas who are having difficulties in keeping their population and services.

Historic Environment Scotland considers impacts on the settings of nearby scheduled monuments to be significant, but not to the level that it reaches national interests. Offsite impacts on heritage features should be addressed and mitigation secured through future subsequent applications for the grid connection and works relating to structures along the A837 and A839 on Council maintained roads. Multi-stage conditions should therefore be imposed on any permission for the Energy Park.

A5.19 In terms of HwLDP Policy 67, whilst the proposed development would contribute towards meeting renewable energy generation targets and generally have a positive effect on the local and national economy the Council has to be satisfied that it is located, sited and designed not to be significantly detrimental overall, either individually or cumulatively with other developments, having regard in particular to any significant effects on the following:

- Natural, built and cultural heritage features;
- Visual impact and impact on the landscape character of the surrounding area (the design and location of the proposal should reflect the scale and character of the landscape and seek to minimise landscape and visual impact, subject to any other considerations);
- Amenity at sensitive locations, including residential properties, work places and recognised visitor sites (in or outwith a settlement boundary); and
- The amenity of users of any Core Path or other established public access for walking, cycling or horse riding.

The assessment considers the impacts on these matters to result in disbenefits that do not outweigh the overall socio-economic and environmental benefits of the proposal.

A4.20 **Part 3: Annex B – National Developments Statements of Need.** National developments are significant developments of national importance. Appendix B identifies 18 types of national development which will support the delivery of the spatial strategy. The statements of need set out in the Appendix are a requirement of the Town and Country Planning (Scotland) Act 1997). Any project identified as national development is required to be considered at a project level to ensure all statutory tests are met. This project is classified as National Development under Annex B Section 3 which states National Development for renewable energy includes “Strategic Renewable Electricity Generation and Transmission Infrastructure” including: a) On and off shore electricity generation, including electricity storage, from renewables exceeding 50 megawatts capacity;

A4.21 This brings the application under the environmental considerations set out in NPF4 Policy 11e) that require to be sufficiently mitigated against and which largely correspond to their HwLDP Policy 67 equivalents. As has already been set out,

in-solus and cumulative landscape and visual effects are significant and adverse but are generally judged to not within acceptable limits following mitigation and subject to the Scottish Ministers' decision on WLA 34. Ecology, built and cultural heritage resources, roads, and proposals for decommissioning, restoration and aftercare can adequately be dealt with by condition, including multi-stage conditions however.

Highland wide Local Development Plan (HwLDP)

- A4.22 The HwLDP identifies the site as “wider countryside” under Policy 36. It sets out a range of parameters against which development will be assessed. It states that development proposals may be supported if they are judged to be not significantly detrimental under the terms of the policy noting “Renewable energy development proposals will be assessed against Renewable Energy Policies, the non-statutory Highland Renewable Energy Strategy and where appropriate the Onshore Wind Energy Supplementary Guidance”.
- A4.23 HwLDP Policy 67 - Renewable Energy sets out that ‘renewable energy development should be well related to the source of the primary renewable resource needed for operation’. It states that ‘The Council will consider the contribution of the proposed development in meeting renewable energy targets and positive/negative effects on the local and national economy as well as all other relevant policies of the Development Plan and other relevant guidance.’ The Council will support proposals where it is satisfied they are located, sited and designed such as they will not be significantly detrimental overall, individually or cumulatively with other developments against eleven specified criteria (as listed in HwLDP Policy 67). Such an approach is consistent with the concept of Sustainable Design (HwLDP Policy 28) and the concept of supporting the right development in the right place at the right time.
- A4.24 Policy 69 – Electricity Transmission Infrastructure states that ‘proposals for overground, underground or sub-sea electricity transmission infrastructure (including lines and cables, pylons/ poles and vaults, transformers, switches and other plant) will be considered having regard to their level of strategic significance in transmitting electricity from areas of generation to areas of consumption’. Subject to balancing with this consideration, and taking into account any proposed mitigation measures, the Council will support proposals which are assessed as not having an unacceptable significant impact on the environment, including natural, built and cultural heritage features. The grid connection has been considered within the Additional Information submitted with the application but requires further environmental appraisal before the development should go ahead, which should be secured through a multi-stage condition.
- A4.25 Although HwLDP Policy 67 and Policy 69 are considered compatible with NPF4 Policy 11, NPF4 expresses greater support for renewable energy projects outwith

National Parks and NSAs and requires greater weight to be attributed to the twin climate and biodiversity crises in the decision-making process, whilst still recognising that a balancing exercise must still be carried out.

- A4.26 As for NPF4 Policy 11e) considerations, residual in-solus and cumulative landscape and visual effects are within acceptable limits despite residual significant effects, with visual effects considered to be effectively mitigated.

Caithness and Sutherland Local Development Plan (CaSPlan)

- A4.27 No specific policies apply however, that the CaSPlan does identify Special Landscape Areas (SLA) within the plan.
- A4.28 As has been set out in the report, there are no residual significant effects on the Special Qualities of the Fannichs, Beinn Dearg and Glencalvie SLA, and therefore the proposal is compliant with the CaSPlan.

Onshore Wind Energy Supplementary Guidance (OWESG)

- A4.29 The Council's OWESG is a material consideration in the determination of planning applications. The supplementary guidance does not provide additional tests in respect of the consideration of development proposals against Development Plan policy. However, it provides a clear indication of the approach the Council towards the assessment of proposals, and thereby aid consideration of applications for onshore wind energy proposals
- A4.30 The OWESG approach and methodology to the assessment of proposals is applicable and is set out in the OWESG Para 4.16 - 4.17. It provides a methodology for a judgement to be made on the likely impact of a development on assessed "thresholds" in order to assist the application of HwLDP Policy 67. The 10 criteria are particularly useful in considering visual impacts, including cumulative impacts. An appraisal of whether the proposal meets with the thresholds set out in the criteria is included in Appendix 7 of this report.

Landscape Sensitivity Study

- A4.31 The OWESG also provides strategic considerations that identify sensitivities and potential capacity for wind farm development. These are called the Landscape Sensitivity Appraisals (LSA) and form part of the statutorily adopted Onshore Wind Energy Supplementary Guidance. The Appraisals identify Key Views, Key Routes and Gateways as well as Landscape Character Area sensitivities and guidance. The site is not currently located within an appraisal area.

Other Material Policy Considerations - Onshore Wind Energy Policy Statement (2022) and Draft Energy Strategy and Just Transition Plan (2023)

- A4.32 The Onshore Wind Energy Policy Statement 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 GW. This is set against a currently installed capacity of 9.4 GW (June 2023). Therefore, a further 10.6 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.
- A4.33 Like the previous iteration of the Onshore Wind Energy Policy Statement, 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 socio-economic benefits to Scotland must be maximised. In taking this approach, this echoes Scotland's Third Land Use Strategy.
- A4.34 The document recognises that there may be a need to develop onshore wind energy development on peat. Priority peatland is present on the site, and it is considered that a Peat Management Plan and the Habitat Management Plan, which shows adequate compensation, can be secured by condition.
- A4.35 Additionally, the document acknowledges that in order for Scotland to achieve its climate targets and the ambition for the minimum installed capacity of 20 GW by 2030, the landscape will change. However, the OWEPS also sets out that the right development should happen in the right place. Echoing NPF4, the document sets out that significant landscape and visual impacts are to be expected and that where the impacts are localised and / or appropriate mitigation has been applied the effects will be considered acceptable.
- A4.36 Benefits to rural areas, such as provision of jobs and opportunities to restore and protect natural habitats, are also highlighted in the document. It considers some of the wider benefits and challenges faced by in delivery of ambition and vision for onshore wind energy in Scotland. These include shared ownership, community benefit, supply chain benefits, skills development and financial mechanisms for delivery. The proposed development does lead to such benefits being delivered, however, in relation to maximising socio-economic benefits, there is no current guidance on what that should look like and evidence of a significant shift of requirements is yet to emerge, which Members may expect to see, from what was likely to be offered pre-adoption of NPF4.

- A4.37 Finally, the document also highlights technical considerations, those relevant to this application have been considered and mitigation, where required has been secured by condition.
- A4.38 The Draft Energy Strategy and Just Transition Plan has been published for consultation. Ministers will likely give consideration to this document in their decision on the application; however, limited weight can be applied to the document given its draft status. Unsurprisingly, the material on onshore wind in the document reflects in large part that contained in NPF4 and the Onshore Wind Energy Policy Statement 2022. A fundamental part of the Strategy is expanding the energy generation sector. Overall, the draft Energy Strategy forms part of the new policy approach alongside the OWEPS 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.
- A4.39 To deliver the ambition for onshore wind, the Onshore Wind Sector Deal for Scotland was introduced in September 2023. The document focuses on necessary high-level actions by Government and the Sector to support onshore wind delivery. Jointly, Government and the Sector are committed to working together to ensure a balance is struck between onshore wind and the impacts on land use and the environment. The document looks to expediate decision making and consent implementation to achieve 20 GW of installation by 2030, meaning we should be seeing faster decisions on applications that are already in the system, with more consents being build out. Again, the sector deal does not detail what the socio-economic commitments should be.

Appendix 5 - LVIA Methodology

- A5.1 The applicant has presented a number of figures and visualisations to illustrate the landscape and visual effects of the proposed development both singularly and cumulatively with existing, consented and other proposed wind farm developments, although some of the cumulative information included with the submission is now out of date. Following a review of the LVIA in Volume 1 Chapter 5 of the EIAR, sufficient information has been provided to enable an assessment and overall, the photomontages are considered to have been produced to a good standard.
- A5.2 The EIAR includes a description of the design process, along with assessments against several LCTs, Assynt-Coigach National Scenic Area (NSA) (Technical Appendix 5.4, Volume 3), Fannichs, Beinn Dearg and Glencalvie Special Landscape Area (SLA) (Table 5.12 of Chapter 5) and Reay- Cassley Wild Land Area Assessment (Technical Appendix 5.3, Volume 3). Assessments against all other NSAs, SLAs and WLAs have been scoped out of the EIAR.
- A5.3 In terms of visual amenity assessments of settlements, only Rosehall, Inveroykel and dispersed communities to the west are scoped into the EIAR due to likely extensive visibility across these areas. Routes included are the A837, Cape Wrath Trail / Scottish National Trail and the An Turas Mor Cycle Route.
- A5.4 A total of 19 viewpoints across a study area of 45km have also been assessed. These viewpoints are representative of a range of receptors including settlements, dispersed communities, outdoor recreational users, and road users. A bare earth visibility of the proposed development can be appreciated from the ZTV to Blade Tip with Viewpoint locations (Figure 5.2A/B) and ZTV to hub height with viewpoint locations (Figure 5.3A/B). Other ZTV figures include Landscape Designations and Visibility (Figure 5.6A/B), Landscape Character Types (Figure 5.5A/B) and Cumulative ZTVs (Figures 5.8-5.11). A ZTV has also been produced specifically for the proposed solar PV array (Figure 5.4).
- A5.5 Additional Visualisations for Viewpoints 2: Rosehall, Viewpoint 7: Altass and Viewpoint 10: Achnahanat (add references for these) have also been reproduced following additional mitigation agreed with the applicant. A Residential Visual Amenity Assessment (Technical Appendix 5.5, Volume 3), Hours of Darkness Assessment (Technical Appendix 5.2, Volume 3) and Wild Land Assessment (Technical Appendix 5.3, Volume 3) have also been undertaken by the applicant. The information submitted is considered sufficient to allow the Council to come to a reasoned conclusion on the likely landscape and visual effects of the proposed development.
- A5.6 The methodology for the LVIA generally follows that set out in Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3). 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 assessed significant effects following the combination of judgements based on the sensitivity of the receptor against the magnitude of change.

- A5.7 The sensitivity of the receptor (landscape or visual) is defined by the receptor’s susceptibility to the change brought about by the proposed development against the importance (value) of the landscape resource / view. For landscape, ‘susceptibility’ is the “ability of the landscape receptor...to accommodate the development without undue consequences for the maintenance of the baseline situation and/or the achievement of landscape planning policies and strategies” (GLVIA3, Page 88).
- A5.8 For visual receptors, higher susceptibility to the proposed change are those whose attention or interest is focussed on their surroundings whereby the Council considers recreational users moving through the landscape at slower speeds such as cyclists as well as passengers in vehicles to also have a higher susceptibility to change. Receptor susceptibility is judged to be high, medium, or low with some receptors falling into intermediate brackets within the applicant’s assessment.
- A5.9 The value of a landscape receptor, given as high, medium, low is based on a review of landscape designations and application of judgement based on criteria relating to scenic value, rarity, recreational value, representativeness, conservation interest, and association. Similar criteria are applied for views such as designations for specific views and views with recognised scenic value, whether they are specifically mentioned in special qualities of a designated landscape, their importance to heritage assets, and value attached to views by visitors as may be indicated by inclusion in tourism literature or references in literature and art.
- A5.10 Judgement of magnitude of change is based on an assessment of factors including: size and scale of effect; geographical extent of the effect, described as large, medium, small; duration, long-term, medium-term, or short-term; and, reversibility of the effect, reversible, partially reversible, irreversible (i.e. permanent).
- A5.11 For landscape, judgements of size and scale of effect require consideration of the degree to which the loss of, or change to, landscape elements effect the character of a landscape and its key characteristics. For visual, this judgement requires a consideration of the scale of the loss or addition of features (turbines) within the view including portion of the view effected, degree of contrast or integration of the new elements within the view setting in terms of scale and mass, line, height, colour, and texture, and, how the view is experienced by the

receptor (e.g., full, partial, or glimpsed). Scale of effects are described using the large, medium, small, barely perceptible.

- A5.12 Geographic extent of landscape effects is a judgement on the extent of the effect relative to the scale of the landscape character type or character area, whether it affects several landscape types or character areas, or if it is limited to immediate surrounds or is a site level effect. Judgement on geographic extent of visual effects requires consideration of whether the viewpoint represents a similar visual effect for the receptor over an extensive or limited geographical area. In reality, this judgement will likely reflect the activity of the receptor (stationary or moving), the distance of the receptor from the proposed development, and the angle of view towards the proposed development in relation to the receptor's main activity. The judgement of geographic extent of effects is described using 'large', 'medium', 'small'.
- A5.13 In concluding the level and significance of an effect, the appraisal assumes a long-term duration and partially reversibility of effect following the potential decommissioning of a site, although Policy 11 (f) of NPF4 states that wind farm sites should be suitable in perpetuity. Moreover, it is generally agreed that the landscape and visual effects arising from wind farm developments should be assumed to be adverse.
- A5.14 It is important to note that the consideration of existing turbines in the baseline view for landscape effects is a consideration for the susceptibility of the landscape receptor in the methodology rather than of the Magnitude of Effect. That means that it is the sensitivity to the development that is reduced in the applicant's assessment where wind farm developments already exist. Conversely, the presence of existing and under construction turbines in views reduces the size and scale of the effect of the application wind farm and therefore the magnitude of change for the in-solus visual assessment is itself a judgement of cumulative effects.
- A5.15 Following on, the cumulative landscape and visual assessment (CLVIA) are also a function of sensitivity and magnitude of change but with a focus on the additional effects occasioned by the development when considered together with two scenarios of existing, consented, or proposed wind farms. Scenario 1 includes existing, under construction, and consented wind farm schemes (existing and under-construction are also considered as part of the main LVIA), while Scenario 2 considers Scenario 1 plus application stage, and some scoping stage (where requested), wind farm schemes.
- A5.16 Additional effects in these future scenarios are taken to be those effects that result from the interaction of the proposed development with the future baseline

schemes. The total or combined effects are also considered under these scenarios where the assessor considers it relevant to do so.

- A5.17 More significant cumulative landscape effects are considered to arise from changes to the landscape character of the study area whether through effects on key characteristics/features or whether the landscape is transformed into a different type, as set out in GLVIA3 at Paragraph 7.28. The methodology sets out that such effects occur where the proposed development extends or intensifies a landscape effect, or it fills an area such that it alters the landscape resource, or, where the interaction between the proposed development and other wind farms is such that the effect is greater than it should otherwise be.
- A5.18 Similarly, more significant cumulative visual effects are considered to occur where the proposed development would extend or intensify a visual effect, where the proposed development fills an area such that it alters the character of the view/visual amenity, and / or, where the interaction between the proposed development and other wind farms is such that the effect is greater than it should otherwise be. Sequentially, more significant cumulative visual effects are considered to occur where the proposed development lengthens the time over which an effect is experienced for receptors moving through the landscape.
- A5.19 It is noted here that it would be perfectly reasonable to expect a development of the type, size, scale, and texture of a wind farm to result in significant landscape and visual effects, bearing in mind that significant effects are not relative to the size and scale of the proposed development, and do not necessarily equate to unacceptable effects.
- A5.20 Diagram 1 of Technical Appendix 5.1 (Volume 3): Judging levels of effect – Landscape or Visual (and cumulative) sets out the diagram the applicant has used in the judgement of Significance of Effects whereby effects of Major and Moderate correspond to Significant Effects, and Minor and Negligible correspond to Not Significant Effects.
- A5.21 The Methodology advises that a rigid matrix-type approach is not applied by the assessor in order to take account of professional judgement and experience (EIAR Technical Appendix 5.1, Volume 3). While a matrix approach generally makes the assessor's logic easier to follow and ensure consistent results, the matrix is there to inform the textual assessment, which should set out the reasoning of the assessor's conclusions on the overall significance of effect, which provides for some flexibility.
- A5.22 As stated, Tables 5.13-5.31 of EIAR Volume 1 Chapter 5, set out the assessor's visual assessment of each viewpoint whereby the applicant has come to a judgement as to whether the effect is significant or not on a viewpoint-by-viewpoint basis. In assessing visual effects in particular, it is important to

consider that the viewpoint is representative of particular receptors i.e., people who would be at location and experiencing that view of the landscape not just in that single view but in taking in their entire surroundings.

- A5.23 In the submission, the applicant has applied different sensitivities to the same types of receptor at different locations / viewpoints and although the explanation in the viewpoint analysis does not explain the inconsistency, it is likely due to the specifics of the view's context.
- A5.24 The summary of the applicant's assessment and officer appraisal of this assessment, which highlights the differences and any concerns with regard to visual effect, can be found in Appendix X of this report.
- A5.25 A key part of the of the Council's assessment of landscape and visual effects is a consideration of the proposed development against the Criteria set out in Section 4 of the Onshore Wind Energy Supplementary Guidance (OWESG), with the assessment against each relevant criterion with a view as to whether the threshold set out in the guidance is met or not, contained in Appendix X to this report.

Appendix 6 - Viewpoint Visual Assessment Appraisal

Cumulative Scenario 1 = consented wind farms.

Cumulative Scenario 2 = in planning wind farms (application stage or scoping stage when specifically requested).

Viewpoint	App / THC	Sensitivity of Receptor (Susceptibility of receptor to change / value of the view)	Proposed Development			Cumulative Assessment (Scenario 1 and 2)		
			Magnitude of change (Scale of change / geographic extent / duration / reversibility)	Level of Effect (Sensitivity of receptor / Magnitude of change)	Significance (Major & Moderate are Significant)	Magnitude of Change (Scale of Change / Geographic Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of receptor)	Significance
VP1 Glenrossal Estate Lodge House Distance 1.9 km Looking W / NW	App	Medium-high (residents and road users) – <i>High or Medium susceptibility and Medium value</i>	High	Major	Significant	High	Major	Significant
	THC	<u>Medium-high / High</u> - <i>High or Medium susceptibility and High value</i>	High	Major	Significant	High	Major	Significant
The view is as described in Table 5.13 of the LVIA, Chapter 5 of the EIAR. The proposed turbines (six hubs and three blades) would be seen on the skyline in this short-range view, the horizon formed by the southern side of Glen Cassley. The turbines would largely read as a linear, coherent layout with limited turbine overlapping (exception of T1 and T2). The intervening landform would screen views of the low-lying components of the proposed development. Scale of change is judged to be large. The geographical extent is assessed as medium. This represents more open views (between breaks in tree cover) from the lower lying eastern extents of Glen Cassley. Duration of effect: Long-term. The applicant's assessment of high magnitude of change is reasonable and the major and significant level of effect are agreed, however the officer agrees with the landscape officer that the sensitivity for residents and road users at this viewpoint should be higher as noted above. The cumulative assessment of major and significant level of effect for Scenarios 1 and 2 is also agreed. In terms of future baseline effects, evergreen trees along the river and the replanted Rossal Wood would partially screen some of the turbines as they mature overtime. Nevertheless, the effect would remain Major and significant.								
VP2	App	Medium-high (residents) - <i>High susceptibility and Medium value</i>	High	Major	Significant	High	Major	Significant

Viewpoint	App / THC	Sensitivity of Receptor (Susceptibility of receptor to change / value of the view)	Proposed Development			Cumulative Assessment (Scenario 1 and 2)		
			Magnitude of change (Scale of change / geographic extent / duration / reversibility)	Level of Effect (Sensitivity of receptor / Magnitude of change)	Significance (Major & Moderate are Significant)	Magnitude of Change (Scale of Change / Geographic Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of receptor)	Significance
Rosehall Distance 2.9km Looking NW	THC	<u>High</u> (residents) - <u>High susceptibility and High value</u>	High	Major	Significant	High	Major	Significant
The view is as described in Table 5.14 of the LVIA, Chapter 5 of the EIAR. The proposed turbines (all nine hubs and blades) would be seen on the skyline in this short-range view, the horizon formed by the ridge between the Glen Cassley and the valley of Tutim Burn to the west. Whilst the proposed development would read as a coherent layout following the landform with no turbine overlap, T8 and T9 would appear dominant and have an imposing effect on this view. At year 1 of operation, the proposed access tracks, the cutting to accommodate the BESS and substation compound, and parts of these buildings would also be visible on the slope below the site. Scale of change is judged to be large. The geographical extent is assessed as small. This represents more open views (between breaks in building and vegetation cover) from the settlement of Rosehall. Duration of effect: Long-term. The applicant's assessment of high magnitude of change is reasonable and the major and significant level of effect are agreed, however the officer agrees with the landscape officer that the sensitivity for residents at this viewpoint should be higher as noted above. The officer also assesses the geographical extent as medium rather than small as the extent of this view would affect a moderate part of the settlement. <u>Additional Mitigation:</u> The applicant has agreed to additional mitigation by reducing the turbine height of T8 from 200m to 180m, and T9 from 180m to 167.5m. Following these reductions, the officer agrees with the landscape officer that the design of the wind farm presents a more balanced composition, particularly in terms of the vertical scale of these turbines thereby reducing the 'dominant' effect at this location. The turbines, however, would remain prominent and the effect would also remain major and significant. The cumulative assessment of major and significant level of effect for Scenarios 1 and 2 is also agreed. <u>Future Baseline effects:</u> An additional visualisation (Figure 5.13g) illustrates the proposed planting along the access track/around the BESS and substation compound at year 10 of maturity. This shows how this planting would screen and limit views of parts of the proposed access track and the BESS and substation compound, on the lower eastern flank of Beinn an Rosail Beag. Whilst this would result in an improvement in the view, the scale of change (mainly associated with the proposed turbines) will remain high and the effect would also remain major and significant.								
VP3	App	Medium-high (walkers and residents) - <u>High susceptibility and Medium value</u>	High	Major	Significant	No visibility of cumulative schemes	N/A	N/A

			Proposed Development			Cumulative Assessment (Scenario 1 and 2)		
Viewpoint	App / THC	Sensitivity of Receptor (Susceptibility of receptor to change / value of the view)	Magnitude of change (Scale of change / geographic extent / duration / reversibility)	Level of Effect (Sensitivity of receptor / Magnitude of change)	Significance (Major & Moderate are Significant)	Magnitude of Change (Scale of Change / Geographic Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of receptor)	Significance
			The geographical extent is assessed as small. It represents more open views from a short section of the route, which passes through areas of coniferous forest cover. The level of screening this provides also changes with the management cycles of the forest. Duration of effect: Long-term. The applicant's assessment of medium magnitude of change is reasonable and the moderate and significant level of effect are agreed, however the officer agrees with the landscape officer that the sensitivity for recreational users at this viewpoint should be higher as noted above. In relation to cumulative effects, a number of schemes are visible in different parts of the view – these include the consented Meall Buidhe and Achany Extension to the south-west and north, and the proposed Strath Oykel Wind Farm to the south-west. Whilst the influence of wind farms would increase under both scenarios, the proposed development would continue to be seen as a distinct scheme beyond the existing Rosehall Wind Farm. The cumulative effects associated with the proposed development would continue to remain the same as the main assessment. No significant future baseline effects predicted from this VP.					
VP6 Beinn an Eoin Distance 5.1km Looking SE	App	Medium-high (recreational users) – <i>Medium-high susceptibility and High value</i>	Medium	Moderate	Significant	Medium	Moderate	Significant
	THC	<u>High</u> (recreational users) – <u>High susceptibility and High value</u>	Medium	<u>Major</u> to <u>Moderate</u>	Significant	Medium	<u>Major</u> to <u>Moderate</u>	Significant
			The view is as described in Table 5.18 of the LVIA, Chapter 5 of the EIAR. The proposed turbines (all nine hubs and blades) would be seen in the middle distance below the distant horizon in panoramic views from the summit. The turbines would largely read as a linear layout with minimal turbine overlapping. The low-lying components of the proposed development would be screened by intervening landform. Scale of change is judged to be medium. The geographical extent is assessed as medium. It represents open views from the summit of Beinn an Eoin to the north-west of the site at over 5km distance. Duration of effect: Long-term.					

			Proposed Development			Cumulative Assessment (Scenario 1 and 2)		
Viewpoint	App / THC	Sensitivity of Receptor (Susceptibility of receptor to change / value of the view)	Magnitude of change (Scale of change / geographic extent / duration / reversibility)	Level of Effect (Sensitivity of receptor / Magnitude of change)	Significance (Major & Moderate are Significant)	Magnitude of Change (Scale of Change / Geographic Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of receptor)	Significance
	consented Achany Extension. These additional cumulative interactions would contribute to the level of effect identified. However, given that the proposed development would be seen beyond the more prominent consented Achany Extension, the magnitude of change would be reduced to medium-low rather than low as assessed by the applicant (It is to be noted that the applicant has used the term 'small' for its magnitude of change however in its methodology the terminology is classed as low). It would still be a noticeable wind farm in the middle distance. The cumulative effect would be Moderate and significant rather than Minor and not significant as assessed by the applicant. No significant future baseline effects predicted from this VP.							
VP9 A839 Rosehall to Lairg Distance 7.6km Looking W/NW	App	Medium (road users) – <i>Medium-low susceptibility and Medium value</i>	Medium	Moderate	Significant	Medium	Moderate	Significant
	THC	Medium	Medium	Moderate	Significant	Medium	Moderate	Significant
	The view is as described in Table 5.21 of the LVIA, Chapter 5 of the EIAR. The proposed turbines (all nine hubs and blades) would be seen on the horizon above the ridge to the west of Glen Cassley. The turbines would be partially screened by forestry and appear as a simple, linear layout with some overlapping of turbines. The extent of visibility would change as road users move along the route. The low-lying components of the proposed development would be largely screened. Scale of change is judged to be medium. The geographical extent is assessed as medium. It represents the views from open stretches for westbound users of the A839 towards Rosehall. Duration of effect: Long-term. The applicant's assessment of medium magnitude of change is reasonable, and the level of effect as Moderate and significant is agreed. In relation to cumulative effects, a number of schemes are visible in the wider view – these include the consented Meall Buidhe, Lairg II and Garvary, and the proposed Strath Oykel and Acheilidh wind farms. Cumulative effects would therefore reflect those as identified in the main assessment, under both assessment scenarios and the effect would be Moderate and significant. In relation to the future baseline, the forestry in the foreground is likely to be felled and when felled, all the proposed turbines would be visible. However, the magnitude of change would remain medium, and the level of effect would also remain Moderate and significant.							
VP10 Achnahanat	App	Medium-high (residents and road users) – <i>High susceptibility and Medium value</i>	Medium	Moderate	Significant	Medium	Moderate	Significant

			Proposed Development			Cumulative Assessment (Scenario 1 and 2)		
Viewpoint	App / THC	Sensitivity of Receptor (Susceptibility of receptor to change / value of the view)	Magnitude of change (Scale of change / geographic extent / duration / reversibility)	Level of Effect (Sensitivity of receptor / Magnitude of change)	Significance (Major & Moderate are Significant)	Magnitude of Change (Scale of Change / Geographic Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of receptor)	Significance
Distance 8.5km Looking NW								
	THC	<u>High</u> (residents) – <u>High susceptibility and High value</u>	Medium	<u>Major</u> to <u>Moderate</u>	Significant	Medium	<u>Major</u> to <u>Moderate</u>	Significant
The view is as described in Table 5.22 of the LVIA, Chapter 5 of the EIAR. The visualisation for this viewpoint has been revised by the applicant in better weather conditions as requested by the landscape officer. The proposed turbines (all nine hubs and blades) would be seen on the horizon with the towers back clothed by rising moorland to the north-west. Views of Ben Moore Assynt would remain uninterrupted however the turbines would, to a degree, compete with the massif of the mountain. The turbines would appear as a coherent layout with some overlapping of turbines (T1, T3, T6). The solar PV array and some access tracks components of the proposed development would also be visible in these views. Scale of change is judged to be medium. The geographical extent is assessed as medium. It represents the views from within and around Achnahanat and to the south of the Kyle of Sutherland. Duration of effect: Long-term. The applicant's assessment of medium magnitude of change is reasonable, however, the officer agrees with the landscape officer that the sensitivity for residents should be high and therefore the level of effect would be Major to Moderate and significant. Significant effects at this location would be as a result of the turbines and solar PV array. In relation to cumulative effects, a number of schemes are visible in wider parts of the view – these include the consented Meall Buidhe and Achany Extension, and the proposed Strath Oykel Wind Farm. The proposed development would read as distinct scheme to the north of Strath Oykel. Cumulative effects would therefore reflect those as identified in the main assessment, under both assessment scenarios, however, the effect would be Major to Moderate and significant. No significant future baseline effects predicted from this VP.								
VP11 Glen Einig - Cape Wrath Trail, Scottish	App	Medium-high (recreational users) – <u>Medium-high susceptibility and Medium-high value</u>	Medium	Moderate	Significant	Medium	Moderate	Significant

			Proposed Development			Cumulative Assessment (Scenario 1 and 2)		
Viewpoint	App / THC	Sensitivity of Receptor (Susceptibility of receptor to change / value of the view)	Magnitude of change (Scale of change / geographic extent / duration / reversibility)	Level of Effect (Sensitivity of receptor / Magnitude of change)	Significance (Major & Moderate are Significant)	Magnitude of Change (Scale of Change / Geographic Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of receptor)	Significance
	would be seen beyond and distinct from the proposed Strath Oykel Wind Farm, in front of the consented Achany Extension. The proposed development would continue to contribute to the increased influence of wind farms in the view. The cumulative effect would be Moderate and significant. No significant future baseline effects predicted from this VP.							
VP15 A837 north of Invershin Distance 14.7km Looking NW	App	Medium (road users) – <i>Medium-Low susceptibility and Medium value</i>	Low	Minor	Not Significant	Low	Minor	Not Significant
	THC	Medium	Low	Minor	Not Significant	Low	Minor	Not Significant
	The view is as described in Table 5.27 of the LVIA, Chapter 5 of the EIAR. The proposed turbines (all nine hubs and blades) would be seen on the skyline as a single group with some turbine overlap (T1, T2, T5, T7) with the low-lying components of the proposed development screened by intervening landform. Scale of change is judged to be small. The geographical extent is assessed as small. This represents a transient view from this route as it travels north. Duration of effect: Long-term. The applicant's assessment of low magnitude of change is reasonable and the effect of minor and not significant is agreed. In relation to cumulative effects, some limited theoretical visibility of consented Garvary Wind Farm which would be largely screened by intervening vegetation. The cumulative effects associated with the proposed development would continue to remain the same as the main assessment as minor and not significant. No significant future baseline effects predicted from this VP.							
VP16 Ben Assynt Distance 18.5km Looking SE	App	High (recreational users) – <i>High susceptibility and High value</i>	Low	Minor	Not Significant	Low	Minor	Not Significant
	THC	High	Low	Minor	Not Significant	Low	Minor	Not Significant

			Proposed Development			Cumulative Assessment (Scenario 1 and 2)		
Viewpoint	App / THC	Sensitivity of Receptor (Susceptibility of receptor to change / value of the view)	Magnitude of change (Scale of change / geographic extent / duration / reversibility)	Level of Effect (Sensitivity of receptor / Magnitude of change)	Significance (Major & Moderate are Significant)	Magnitude of Change (Scale of Change / Geographic Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of receptor)	Significance
			The view is as described in Table 5.28 of the LVIA, Chapter 5 of the EIAR. The proposed turbines (all nine hubs and blades) would be seen in the middle distance below the distant horizon in panoramic views from the summit. The turbines would read as a single group with some turbine overlapping (T2/T5) and a slight gap in the centre, and would appear backclothed against the rounded hills. The low-lying components of the proposed development would be screened by intervening vegetation. Scale of change is judged to be small. The geographical extent is assessed as small. It represents open views from the summit for hill walkers. There is no visibility from the approach route to the summit. Duration of effect: Long-term. The applicant's assessment of low magnitude of change is reasonable and the minor and not significant level of effect are agreed. It is to be noted that the applicant has used the term 'small' for its magnitude of change however in its methodology the terminology is classed as low. In relation to cumulative effects, a number of schemes are visible in the same and different parts of the view which would increase the influence of wind farms to the east and south-east. In both scenarios, the proposed development would continue to read as a distinct scheme, seen in longer distance views to the south-east and seen below distant horizons. It would be seen between the Achany cluster and proposed Strath Oykel, with very distant existing schemes beyond. These additional cumulative interactions would contribute to the level of effect identified. The cumulative effect would remain Minor and not significant given the intervening distance and context of the views from the summit. No significant future baseline effects predicted from this VP.					
VP17 Cul Mor	App	High (recreational users) – <i>High susceptibility and High value</i>	Low	Minor	Not Significant	Low	Minor	Not Significant
	THC	High	Low	Minor	Not Significant	Low	Minor	Not Significant
			The view is as described in Table 5.29 of the LVIA, Chapter 5 of the EIAR. The proposed turbines (all nine hubs and blades) would be seen in the distance below the horizon in panoramic views from the summit. The turbines would read as a single group with some turbine overlapping and would be seen in the context of other existing wind farms. The low-lying components of the proposed development would not be visible at these distances. Scale of change is judged to be small.					

			Proposed Development			Cumulative Assessment (Scenario 1 and 2)		
Viewpoint	App / THC	Sensitivity of Receptor (Susceptibility of receptor to change / value of the view)	Magnitude of change (Scale of change / geographic extent / duration / reversibility)	Level of Effect (Sensitivity of receptor / Magnitude of change)	Significance (Major & Moderate are Significant)	Magnitude of Change (Scale of Change / Geographic Extent / Duration)	Level of Effect (Magnitude of change / Sensitivity of receptor)	Significance
			The geographical extent is assessed as medium. It represents open views from the summit and the eastern approach / descent for hill walkers. Duration of effect: Long-term. The applicant's assessment of low magnitude of change is reasonable and the minor and not significant level of effect are agreed. It is to be noted that the applicant has used the term 'small' for its magnitude of change however in its methodology the terminology is classed as low. In relation to cumulative effects, a number of schemes are visible in the same and different parts of the view which would increase the influence of wind farms to the east. In both scenarios, the proposed development is seen alongside the existing Rosehall and Achany wind farms, and then in front of more distant schemes. It would likely read as part of a larger wind farm. Given the intervening distance, and in this context, effects would reflect those as identified in the main assessment. The cumulative effect would remain Minor and not significant. No significant future baseline effects predicted from this VP.					
VP18 Cadha Mor, B9176	App	High (visitors) – <i>High susceptibility and High value</i>	Low	Minor	Not Significant	Low	Minor	Not Significant
	THC	High	Low	Minor	Not Significant	Low	Minor	Not Significant
Distance 27.3km Looking NW			The view is as described in Table 5.30 of the LVIA, Chapter 5 of the EIAR. The proposed turbines (seven blade tips) would be seen in the distance in wide views from this location. Scale of change is judged to be small / barely perceptible given the long distance. The geographical extent is assessed as small. It represents open views from a promoted viewpoint in the Dornoch Firth NSA. Duration of effect: Long-term. The applicant's assessment of low magnitude of change is reasonable and the minor and not significant level of effect are agreed. It is to be noted that the applicant has used the term 'small' for its magnitude of change however in its methodology the terminology is classed as low. In relation to cumulative effects, a number of consented and proposed schemes would increase the influence of wind farms in the view. Given the very limited visibility and intervening distance of the proposed development, effects would reflect those as identified in the main assessment. The cumulative effect would remain Minor and not significant.					

Appendix 7 - Assessment against Landscape and Visual Assessment Criteria contained within Section 4 of the Onshore Wind Energy Supplementary Guidance

1	Relationship between Settlements/Key locations and wider landscape respected.	Turbines are not visually prominent in the majority of views within or from settlements/Key Locations or from the majority of its access routes. ----- The turbines will be prominent from Rosehall and Inveroykel, as well as for dispersed communities to the west, south at Strath Oykel and east along the Kyle of Sutherland including Altass, from Achnahanat the significant visual effect is an in-combination effect with the solar PV array. The array is designed for its hosting rolling uplands landscape and presents a cohesive layout for its location. The applicant has worked with officers to reduce the tip heights of Turbines T8 and T9 to improve the overall composition, increasing the sense of separation from Rosehall, and reducing the sense of the array appearing dominant at closer range views. This mitigation brings the proposal within the threshold.
2	Key Gateway locations and routes are respected	Wind Turbines or other infrastructure do not overwhelm or otherwise detract from landscape characteristics which contribute the distinctive transitional experience found at key gateway locations and routes. ----- The site is not covered by a landscape sensitivity study that cites key gateway locations. The sense of moving from the settled west to the remoter east is generally quite gradual along the A839 whereby the turbines have limited and intermittent visibility as the road alternates between forestry, open moorland and woodland. Similarly, from the A837 heading northeast, roadside vegetation encloses the road and obscures the wider landscape. From the east travelling west along the A837, generally where turbines are visible, they are in sideways views behind the ridgeline. Threshold is met overall.
3	Valued natural and cultural landmarks are respected	The development does not, by its presence, diminish the prominence of the landmark or disrupt its relationship to its setting. ----- The turbines will compete with the distant peaks of Ben More Assynt for prominence at limited locations, most notably from Achnahanat, and Altass where visible. These effects are generally localised to these areas. From higher summits, the turbines generally appear lower in the landscape. Threshold is met.
4	The amenity of key recreational routes	Wind Turbines or other infrastructure do not overwhelm or otherwise significantly detract from the visual appeal of key routes and ways.

	and ways is respected.	---- Significant sequential effects are identified from sections of the Cape Wrath Trail and An Turas Mor Cyle Route however the overall amenity of the routes will remain intact. Threshold is met
5	The amenity of transport routes is respected	Wind Turbines or other infrastructure do not overwhelm or otherwise significantly detract from the visual appeal of transport routes ----- Generally, the threshold is met, the proposal will detract from the amenity of the A837 for localised sections, and largely as a result of sequential effects.
6	The existing pattern of Wind Energy Development is respected.	The degree to which the proposal fits with the existing pattern of nearby wind energy development, considerations include: • Turbine height and proportions, • density and spacing of turbines within developments, • density and spacing of developments, • typical relationship of development to the landscape, • previously instituted mitigation measures • Planning Authority stated aims for development of area ----- The proposal directly responds to its locational / landscape context and follows an established pattern of siting within the Rounded Hills – Caithness and Sutherland LCT, albeit in a part of the LCT not currently hosting turbines. For these reasons the threshold is considered met.
7	The need for separation between developments and/ or clusters is respected	The proposal maintains appropriate and effective separation between developments and/ or clusters ----- The development would be the first of its type within the area of Rounded Hills – Caithness and Sutherland enclosed by Strath Oykel and Glen Cassley and would be part of the drive to introduce turbines to more remote locations further west south of Loch Shin. In that way the proposal would be in its own landscape setting and context, although it would contribute to a sense of turbines bookending the Kyle of Sutherland in combination with the approved schemes south of Lairg. Should schemes be approved on the Rounded hills – Caithness and Sutherland south of Strath Oykel and the Kyle of Sutherland, then the proposal would contribute to a sense of turbines funnelling movements along Strath Oykel and encircling the Strath landscape of the Kyle of Sutherland, For now, the threshold is met.
8	The perception of landscape scale and distance is respected	The perception of landscape scale and distance is respected --- The Energy park proposes the newer generation of larger scaled turbines. There will be an inevitable effect of reducing the sense of

		landscape scale and distance, particularly given that are experienced against a more rolling hilly landscape than hugely scaled landscape such as sweeping moorland and flows. However, there are mitigating factors, firstly the location set back from the edges of the hosting Rounded Hills – Caithness and Sutherland, provides screening of lower towers and low-lying infrastructure from many areas. Secondly the modest number of towers wouldn't overwhelm hosting the landscape, thirdly the mitigation offered in reducing the heights of Ts 8 and 9 reduces their perceived dominance from nearby views. Taller turbines would have a more pronounced effect on reducing the perception of scale and distance in the hosting landscape. the threshold is met overall.
9	Landscape setting of nearby wind energy developments is respected	Proposal relates well to the existing landscape setting and does not increase the perceived visual prominence of surrounding wind turbines. --- As per comments for Criterion 7. For now, the threshold is met.
10	Distinctiveness of Landscape character is respected	Integrity and variety of Landscape Character Areas are maintained. ----- Turbines are readily associated with their hosting landscape character area without overtly dominating the wider landscape composition even if introducing a new background feature to parts of the containing Straths. Due to the set-back from the Rounded Hills edges and relative topographical screening of the turbines, the distinction and interactions between the Rounded Hills and Strath character types and character areas are generally favourably maintained. Threshold is considered to be met.

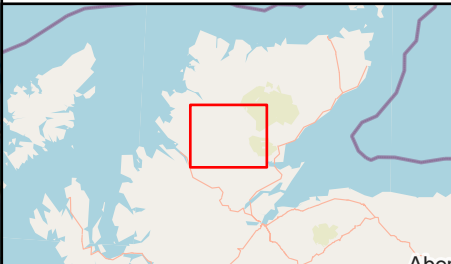
Appendix 8 – Conditions requested by the Highland Council

The Council's requested conditions are to be agreed with the Area Planning Manager – North prior to issuing to the ECU. The conditions will reflect the requirements of internal consultees based on the Standard Onshore Wind Conditions for Section 36 Applications. Any substantive amendments to the standard conditions will be subject to prior consultation with the Chair of the North Planning Applications Committee.



Legend:
 Site Boundary

Coordinate System: British National Grid
Projection: Transverse Mercator
Datum: OSGB 1936
Units: Meter



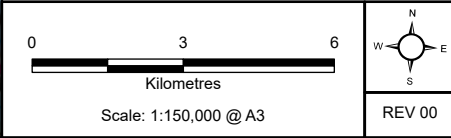
Rev	Date	Description	Drn	Chk	App
00	05/11/2024	First Draft	DL	SA	JS

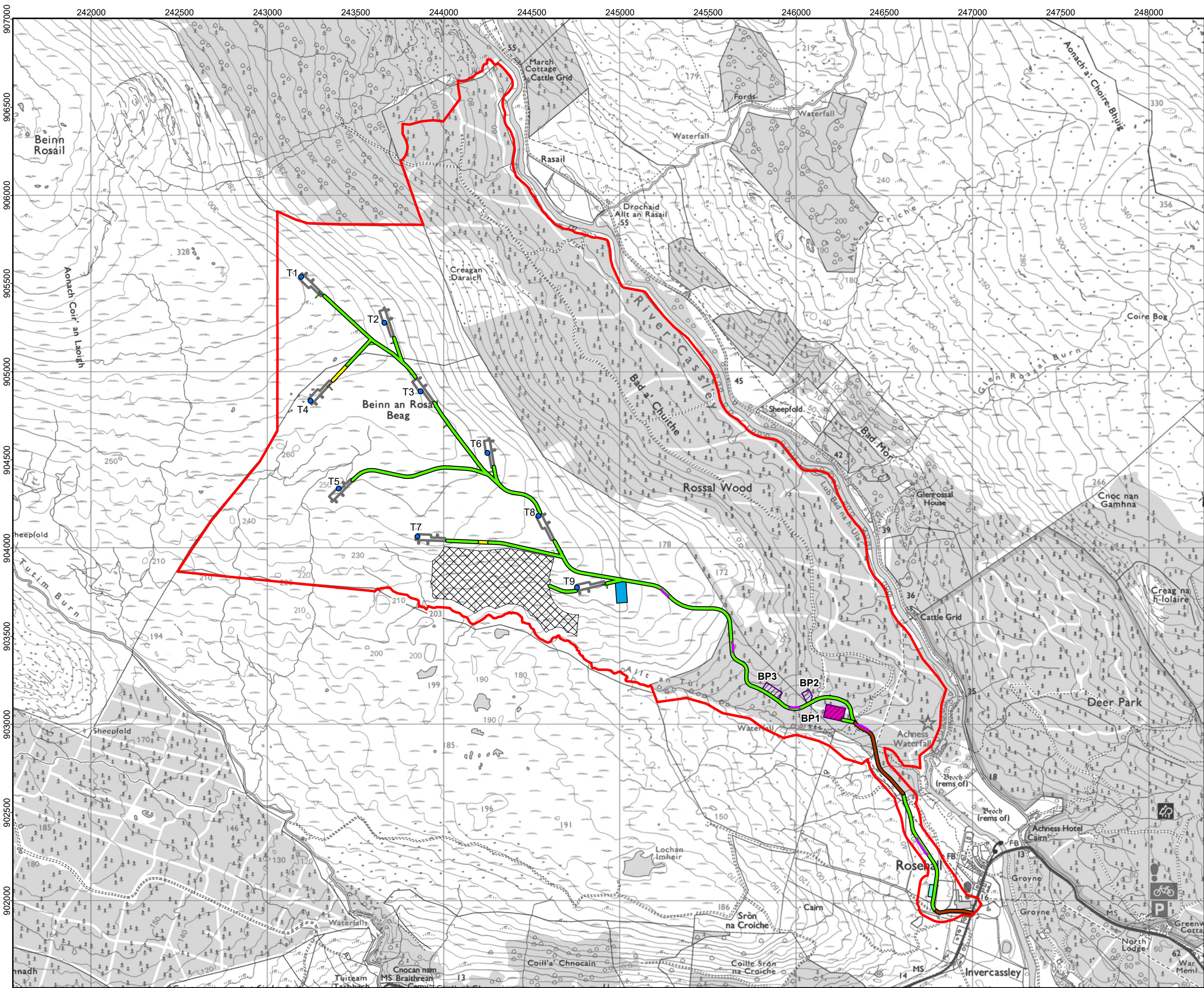
Allt an Tuir Renewable Energy Park



TITLE: Figure 1
Site Location

ID:663657 DAS_Site Location





- Legend:**
- Site Boundary
 - Proposed Turbine Locations
 - Passing Places
 - Floating Track
 - New Access Track
 - Upgraded Track
 - Junction or Turning Head
 - Turbine Hardstanding
 - Borrow Pit Search Area
 - Temporary Construction Compound
 - Temporary Mobilisation Compound
 - Substation and Battery Energy Storage Compound
 - Solar PV Array Search Area

Coordinate System: British National Grid
Projection: Transverse Mercator
Datum: OSGB 1936
Units: Meter



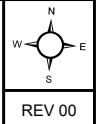
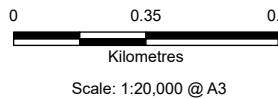
Rev	Date	Description	Drn	Chk	App
00	05/11/2024	Proposed Layout	DL	SA	JS

Allt an Tuir Renewable Energy Park

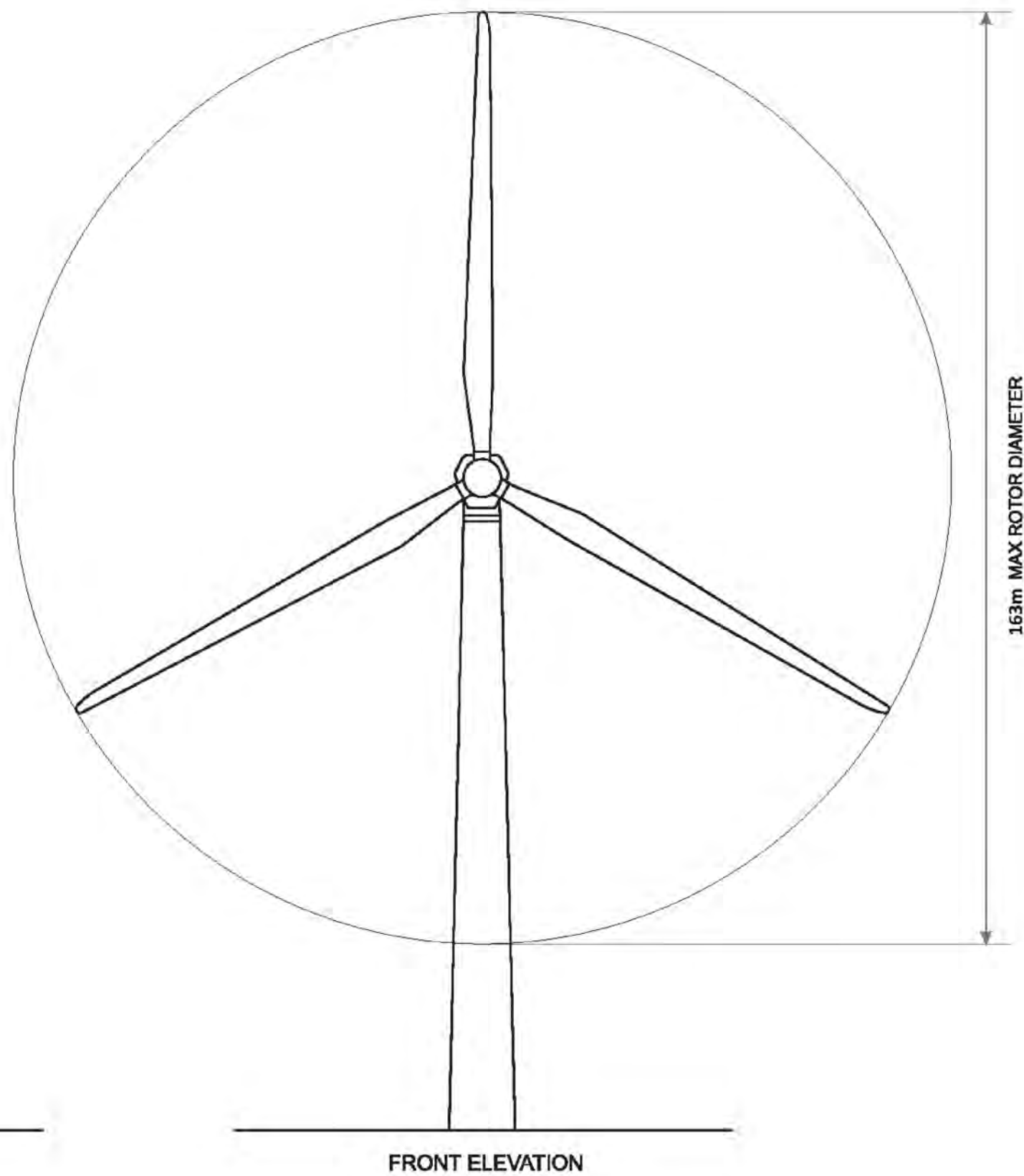
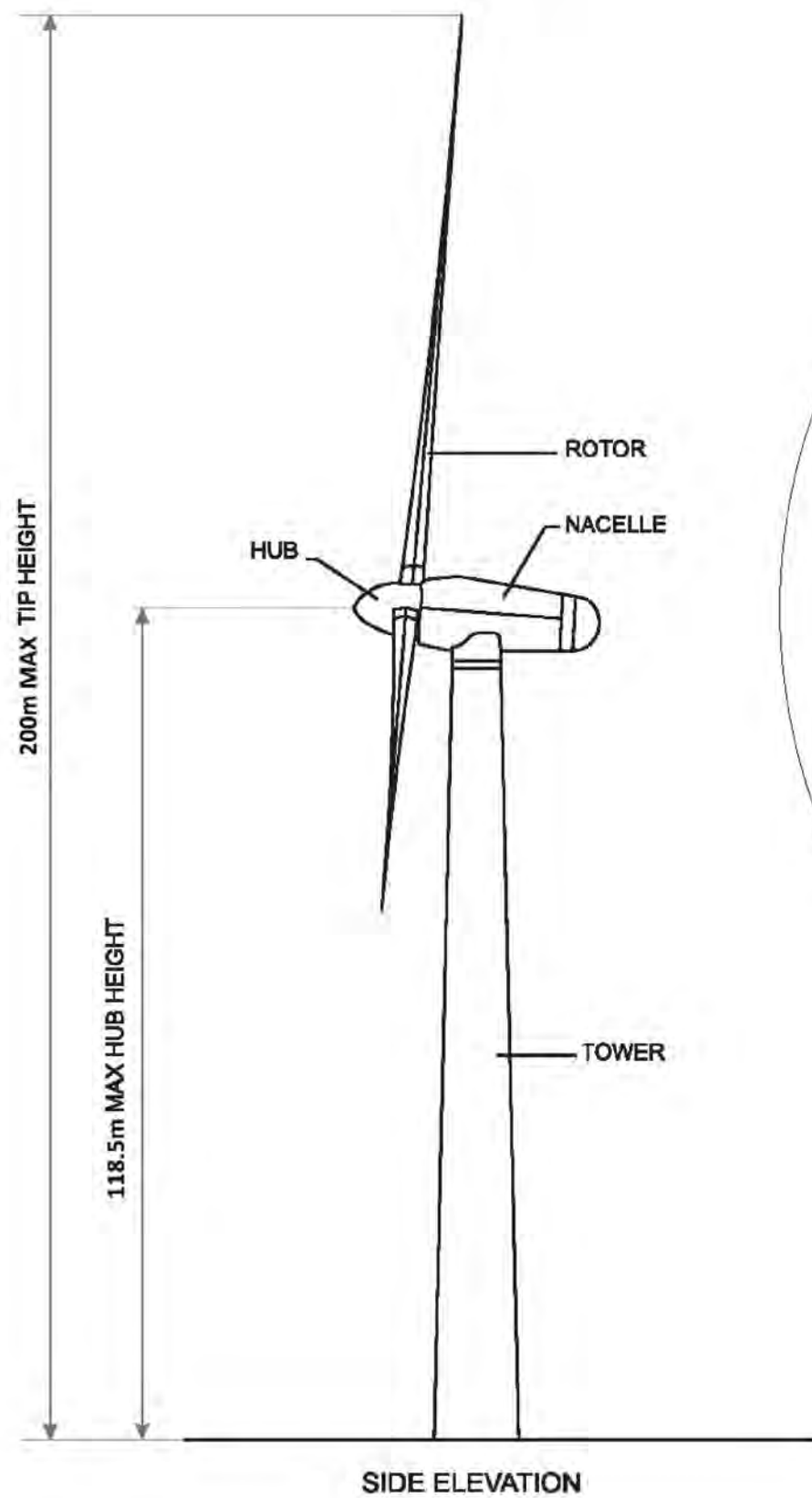


TITLE: Figure 3
Proposed Site Layout

ID:663657 DAS_Proposed Site Layout_A3_L1



REV 00



Legend:



00	08/08/2024	First Draft	CJ	SA	JS
Rev	Date	Description	Drn	Chk	App

Allt an Tuir Renewable Energy Park

RSK

TITLE: Figure 2.6:
Indicative Turbine Elevations

ID:663657 Technical Drawings_Figure 2.6 - Indicative Turbine Elevations

Not to Scale

REV 00