



Hollandmey Renewable Energy Development Pre-Application Consultation (PAC) Report

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Pre-Application Consultation (PAC) Report

1 Introduction

1.1 Overview

1. This Report constitutes a Pre-application Consultation (PAC) Report which describes the consultation requirements for the Hollandmey Renewable Energy Development (RED) (the proposed Development), the consultation measures undertaken by the applicant ScottishPower Renewables (UK) Ltd (SPR), the feedback received and any resultant modifications to the proposed Development.
2. SPR recognises that it is very important to ensure that communities in the vicinity of any development are afforded appropriate and meaningful opportunities to comment on the proposals before they are finalised in accordance with regulations and good practice guidance.

1.2 The Proposed Development

3. The Site is located approximately 8 km south west of John o' Groats and 16 km east of Thurso, situated within the north eastern part of the Caithness area of the Highlands (**Figure 1.1**).
4. The Site lies wholly within the administrative boundary of the Highland Council (THC). Access to the Site will be provided via an existing opening from the C1033 Everly-Crockster Toll Road, which forms a crossroad junction with the West Lodge Road (**Figure 1.1 and 1.2**). The application boundary has been drawn to include some of the local road network where works will be required.
5. The proposed Development refers to all components of the Hollandmey Renewable Energy Development installation. The proposed Development, as assessed and reported in the EIA Report, comprises 10 wind turbines up to 149.9 m in height, with an installed capacity of around 50 MW, and around 15 MW of ground mounted solar arrays producing a combined output of around 65 MW. Approximately 15 MW of battery storage (BESS) would also be installed to store energy and so provide flexible balance of energy and the delivery of the full potential of renewable energy to meet the demands of the national grid.
6. Hollandmey RED is proposed by SPR ('the Applicant') part of the ScottishPower group of companies operating in the UK under the Iberdrola Group, one of the world's largest integrated utility companies and a world leader in wind energy. ScottishPower now only produces 100% green electricity – focusing on wind energy, smart grids and driving the change to a cleaner, electric future. The company has committed to investing over £4 m every working day between 2018 to 2022 to make this happen and is committed to speeding up the transition to cleaner electric transport, improving air quality and over time, driving down bills to deliver a better future, quicker for everyone.
7. SPR is at the forefront of the development of the renewables industry through pioneering ideas, forward thinking and outstanding innovation. Its ambitious growth plans include expansion of its existing onshore wind portfolio, investment in new large-scale solar deployment and innovative grid storage systems including batteries. The company is also delivering the Iberdrola Group's offshore windfarms in the Southern North Sea off East Anglia.
8. With over 40 operational windfarms, ScottishPower Renewables manages all its sites through its world leading Control Centre at Whitelee Windfarm, near Glasgow.
9. SPR are committed to developing renewable energy responsibly and strive to be good neighbours in all aspects of their work. SPR are committed to the Highlands and to maximising the opportunities for local communities to benefit from their projects.

1.3 Consultation Guidance and Legislation

10. The Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009 apply to all developments across Scotland and sets out various criteria that are to be used to differentiate planning applications by development types and to define developments as either National, Major or Local developments. That differentiation is used to ensure that applications are dealt with in an appropriate way to their scale and complexity, allowing decisions to be taken at the most appropriate level.
11. Proposals for REDs such as the subject application, with a potential electrical capacity greater than 50 MW are subject to the consenting procedures set out in Section 36 of the Electricity Act 1989 (the Electricity Act) and applications are made directly to the Scottish Ministers.
12. There is no statutory obligation to consult the public under the terms of the Electricity Act application process. Nevertheless, SPR has applied the principles of the consultation process recommended for 'major' planning applications as set out in The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 and circular 3:2013-Development Management Procedures. This enables the local community and all those with an interest in the proposals a clear opportunity to provide comment and feedback on the proposals.
13. SPR also took into consideration the report, dated August 2020, from the Scottish Government, entitled 'Consultation on Proposed Changes to Pre-Application Consultation Requirements in Planning'. The purpose of the report was to outline proposed changes to the pre-application requirements set out in the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013. Changes proposed in the report have since been laid before the Scottish Parliament and come into force on 2 October 2021 under The Town and Country Planning (Pre-Application Consultation) (Scotland) Amendment Regulations 2021. The changes are part of a wider effort to improve community engagement in planning matters and building public trust. The changes, which again would only apply to national and major developments as classified under the Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009 and not Section 36 applications, include the requirement for an additional public event (i.e. a required minimum of two public events) to allow for greater discussion of proposals and requirements on the content of PAC reports to improve their consistency and transparency. Although the changes will not apply to Section 36 developments like the proposed Development, SPR decided to host a second Public Information Event (PIE) to give an update on the project and provide greater feedback to the local community on their views.
14. Due to restrictions on travel and face-to-face meetings imposed by the Scottish Government in response to the Covid-19 pandemic and following the best available guidance, the PIEs were hosted online. The Events were designed in cognisance of the Scottish Government's 'Coronavirus (Covid-19): planning guidance on pre-application consultations for public events' (2020).
15. Finally, attention was given to community engagement, in cognisance of Planning Advice Note (PAN) 3/2010: Community Engagement (Scottish Government 2010).

1.4 Report Structure

16. Following this introductory section, the remainder of this Report comprises the following Sections:
 - 2: Consultation Measures - describes the different types of consultation undertaken for the proposed Development;
 - 3: Public Information Events (October 2020 and January/February 2021)- describes the consultation process undertaken for the Public Information Events in October 2020 and January/February 2021, and provides results of the feedback received;
 - 4. Conclusions - describes how the consultation process has influenced the design of the proposed Development; and
 - 5. Appendices - contains copies of the direct scoping documents, press adverts, posters, leaflets and other information used for public consultation. The content of PAC Reports is covered by circular 3:2013-Development Management Procedures. Section 35C(1) of The Town and Country Planning (Scotland) Act requires that the PAC Report should set out what has been done to effect compliance with the regulations. Circular 3:2013 advises that the contents of a PAC Report should:
 - *"specify who has been consulted;*
 - *set out what steps were taken to comply with the statutory requirements and those of the planning authority;*
 - *set out how the applicant has responded to the comments made, including whether and the extent to which the proposals have changed as a result of PAC;*

- *provide appropriate evidence that the various prescribed steps have been undertaken – for example, copies of advertisements of the public events and reference to material made available at such events; and*
- *demonstrate that steps were taken to explain the nature of PAC, in particular that it does not replace the application process whereby representations can be made to the planning authority.”*

17. As mentioned in **Section 1.4**, SPR has considered the proposed changes to pre-application consultation put forward in ‘Consultation on Proposed Changes to Pre-Application Consultation Requirements in Planning’ (Scottish Government, 2020). One of the proposed changes is to prescribe the content of PAC Reports and proposes the following additional requirements:

- “(a) the dates on which and places where public events were held,*
- (b) a description of any additional steps taken by the prospective applicant to consult with members of the public as regards the proposed development,*
- (c) a list of bodies, groups and organisations who were consulted by the prospective applicant,*
- (d) evidence of the prospective applicant carrying out the activities described under sub-paragraphs (a), (b) and (c),*
- (e) copies of—*
 - (i) any materials sent to consultees,*
 - (ii) any materials provided to those attending a public event, and*
 - (iii) any visual presentation shown or displayed at a public event,*
- (f) photographs of any display boards or models at public events,*
- (g) confirmation as to whether consultees and attendees at public events were informed that pre-application consultation does not remove the right or the potential need to comment on the final application once it is made to the planning authority,*
- (i) a summary of—*
 - (i) the written responses to consultations, and*
 - (ii) views raised at public events,*
- (j) an explanation of how the prospective applicant took account of views raised during the pre-application consultation process, and*
- (k) an explanation of how members of the public were given feedback on the prospective applicant's consideration of the views raised during the pre-application consultation process.”*

18. SPR have complied with the guidance on the content of the PAC Report as far as is reasonably practicable.

2 Consultation Measures

19. **Table 2.1** provides an overview of the stages of consultation undertaken for the proposed Development.

Table 2.1: Stages of consultation undertaken for proposed Development

Consultation activity	Details	Steps undertaken by SPR
Pre-application Consultation	A Pre-application consultation exercise was undertaken in 2019.	<p>Formal pre-application advice was sought from THC in 2019 in relation to the potential for a Renewable Energy Development at Hollandmey.</p> <p>The Pre-Application Advice pack provided by THC is provided in Appendix 1.</p>
Pre-application Consultation	<p>Regulation 7 (2.17) of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 states that: <i>“The prospective applicant must consult every community council any part of whose area is within or adjoins the land on which the proposed development is situated.”</i></p>	<p>In accordance with Regulation 7 the following Community Councils were consulted during the pre-application stages of the proposed Development:</p> <ul style="list-style-type: none"> • Bower Community Council; • Castletown Community Council; • Dunnet and Canisbay Community Council (the host community council, whose area the proposed Development falls entirely within); and • Sinclair’s Bay Community Council. <p>Additionally, a leaflet was distributed at the same time to all residential and commercial properties within 10 km of the Site to introduce the proposed Development. A total of 2113 leaflets were distributed. An example of the leaflet is provided in Appendix 2.</p>
Public Events	<p>Regulation 7 (2.19) of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 states: <i>“The prospective applicant is required to hold at least one event for members of the public where they can make comments to the prospective applicant on the proposals.”</i></p> <p>2.31 of circular 3:2013-Development Management Procedures states that: <i>“The public event should, as far as possible, be accessible to all members of the public. Consideration should be given to any additional needs of specific members of the public, such as people with disabilities. It may be appropriate for the public event to take place over a number of dates, times and places. Prospective applicants must ensure that individuals and community groups can submit written comments in response to the newspaper</i></p>	<p>During the Environmental Impact Assessment (EIA) process, SPR held two rounds of online Public Information Events (PIE) in October 2020 and January 2021. The first PIE was intended to:</p> <ul style="list-style-type: none"> (i) explain the EIA process, summarise the work undertaken and preliminary findings to date, and next steps (ii) allow the public to view the turbine and RED layout as informed by the environmental survey works; (iii) allow the public to view visualisations given a general representation of views of the proposed Development from key viewpoints; (iv) explain the benefits of the proposed Development; and (v) allow the public to provide comments or information in relation to the layout and the EIA. <p>The intention of the second PIE was to:</p> <ul style="list-style-type: none"> (i) provide an update since the first PIE, including identifying where the design was modified in response to surveys and consultation; (ii) present a refined site layout and how it has considered site constraints; (iii) provide visualisations giving a general representation of views of the refined design in views from the same viewpoints from before and additional

Consultation activity	Details	Steps undertaken by SPR
	<p><i>advertisement. There should be scope for people to take information away from public events and to respond in writing later, having considered what they have seen and heard.</i></p> <p>2.32 states that: <i>“Presentations at events should follow the guidance at paragraph 2.29 about information. Staffing of events should include people who are knowledgeable about the proposals and about the planning issues likely to be of concern or interest to the public. PAC should not be treated by prospective applicants as merely a marketing exercise to promote the development.”</i></p> <p>The Consultation on Proposed Changes to Pre-Application Consultation Requirements in Planning makes the following proposed change: <i>“An additional public event (i.e., a required minimum of two public events)”</i></p> <p>‘Coronavirus (Covid-19): planning guidance on pre-application consultations for public events’ provides the following advice for a replacement online public event: <i>“The intention is to find alternative ways to enable the exchange of views that would otherwise be achieved by face-to-face interaction. That is, it is not considered sufficient for alternative consultation to allow only ‘one way traffic’, with those submitting views not seeing a response until the application itself is made with a PAC report”</i></p> <p>The Scottish Government also expect to see the following information <i>“hosted at a central, free, publicly accessible web location”</i>:</p> <ul style="list-style-type: none"> • <i>“set out the pre-application consultation steps being undertaken, the location of information, how to engage and time limits</i> • <i>identify the location of the development site</i> 	<p>one agreed with statutory consultees and requested by the local community; and (iv) a further opportunity to provide feedback.</p> <p>The PIE webpages were made available up until the submission of the Section 36 application when they were superseded by the EIA Report and supporting documents, on the SPR project website: https://www.ScottishPowerRenewables.com/pages/HollandmeyRED</p> <p>The PIE feedback form was only accessible during the PIE; however, the project mailbox was available throughout the duration of the project.</p> <p>The information available as part of the PIEs was prepared by the relevant specialists.</p> <p>SPR met all of the accessibility recommendations set out by the Scottish Government regarding the hosting of virtual public events. The PIE was hosted on the SPR website, which is free to access and does not require a sign-up process. The public were able to access all the information through this route and it was available to read at whatever pace the person accessing it required and could be downloaded and printed if required. All awareness raising measures clearly referenced the web location.</p> <p>The Events lasted for three weeks and the public were able to submit feedback forms for the full three-week duration. SPR responded directly to all feedback forms received. A project email address (Hollandmeyred@scottishPower.com) was provided on the website for people to submit further comments for the duration of the EIA process. A postal address, serving the same purpose, was also provided on the leaflet issued to advertise the second PIE.</p>

Consultation activity	Details	Steps undertaken by SPR
	<ul style="list-style-type: none"> • <i>present the proposal for the site; and</i> • <i>be as user friendly as possible.</i>" 	
Advertisement	<p>Regulation 7 (2.19) of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 states: <i>"Notice of this 'public event' must be published at least 7 days in advance in a newspaper circulating in the locality of the proposed development"</i></p>	<p>The first PIE was advertised in the John o' Groats Journal on Friday 2 October 2020. In addition, online adverts were posted on https://www.johnogroat-journal.co.uk/. 100,000-page impressions were paid for, and the advert ran for the duration of the Event, from 2-23 October 2020. The online advert was also placed on http://caithness.org/, https://caithness-business.co.uk/ and Caithness.Org's Facebook account, which provide local information and news.</p> <p>The community councils and local councillors were contacted by email (on 30 September 2020) ahead of the PIE and were provided with a poster, which was a direct copy of the newspaper advert that they could distribute to members of the local community.</p> <p>A copy of each advert for the first PIE can be found in Appendix 3 and example correspondence with community councils and local councillors in Appendix 5.</p> <p>The second PIE was advertised for two consecutive weeks, beginning the week before the PIE launch, in both the John o' Groats Journal (Friday 15 and 22 January 2021) and the Caithness Courier (Wednesday 13 and 20 January 2021). Online adverts were displayed in the same way as the first PIE.</p> <p>A total of 2113 leaflets were distributed to the same residential and commercial addresses within 10 km of the Site. The leaflet stated that anyone could have any of the documents contained within the online PIE emailed or posted to them.</p> <p>A similar email to that issued for the first PIE was sent to community councils and local councillors on 14 January 2021. Another poster was attached for the recipient to distribute as they pleased.</p> <p>A copy of each advert for the second PIE can be found in Appendix 4 and example correspondence with community councils and local councillors in Appendix 5.</p>
Project Website and Project Mailbox	'Coronavirus (Covid-19): planning guidance on pre-application consultations for public events' states that:	A mailbox and project website were established on 29 April 2020 and 28 July 2020 respectively. The website provides outline information for the proposed Development and is available at:

Consultation activity	Details	Steps undertaken by SPR
	<i>“Prospective applicants are also still required to make information available to the public, which can be online, and allow comments to be submitted to them by a specified date”</i>	https://www.ScottishPowerRenewables.com/pages/HollandmeyRED The mailbox was created to allow for members of the public to contact the project team directly with comments, questions, or requests for further information.

20. In addition to specific regulations and guidance outlined in **Table 2.1**, all pre-application consultation has followed, where reasonably practicable, the general principles outlined in circular 3:2013-Development Management Procedures, namely:

- 2.6: *“PAC does not take away the need for, and right of, individuals and communities to express formal views to the planning authority during the planning application process itself. This should be emphasised by the prospective applicant during PAC.”*
- 2.24: *“Prospective applicants should consider the timing of their PAC with regard to pre-application discussions with the planning authority and statutory consultees. Either discussion may identify constraints on proposals or the ability to amend them.”*
- 2.27: *“Prospective applicants should have meaningful and proportionate engagement with those who represent the views of potentially affected communities, guided by PAN 3/2010: ‘Community Engagement’, the National Standards for Community Engagement or other locally agreed or adapted framework or set of principles”*
- 2.29: *“Prospective applicants should consider additional measures for publicising PAC activities, such as use of their own web sites to host information. Information issued as part of PAC should be factually accurate, easy to understand, jargon free, accessible, and relevant. It should be made available in appropriate formats and provided in good time to enable people to take part and discuss their views with others.”*
- 2.30: *“Prospective applicants will gain less from poorly attended or unrepresentative PAC events. For this reason, they should ensure that processes are put in place that will allow members of the community to participate meaningfully in any public event.”*
- 2.33: *“There is a need to emphasise to communities that the plans presented to them may alter in some way before the final proposal is submitted as a planning application. Ideally, those consulted or who expressed views could be given a chance to comment on any significant changes to proposals being considered as a result of PAC, before the application is finalised.”*

2.2 Pre-Application Meetings with Energy Consents Unit

21. A Pre-Application Meeting was held between SPR and the Scottish Government Energy Consents Unit (ECU) on 12 June 2020 where SPR introduced the proposed Development. Key issues discussed at the meeting included:

- the scale of the proposed Development including plans for co-located technologies such as BESS and solar array;
- likely turbine tip heights;
- recent site investigations and surveys;
- the proposed project programme;
- proposed direct scoping approach and consultees;
- consent in perpetuity and the issues that this raises;
- the potential economic benefits to the local communities via community benefit packages and/or community ownership;
- the possibility of sourcing from local suppliers; and
- plans and likely programme for public events.

22. This meeting was followed by phone and email correspondence to confirm the direct scoping approach taken with consultees and to keep them up-to-date with the progression of the proposals.

2.3 Pre-Application Consultation with the Highland Council

23. A pre-application pack was provided by THC on 6 March 2019 based on a 12-turbine layout (up to 149.9 m to blade tip), this contained details of key considerations, such as the likely project constraints, scope, a policy appraisal, and guidance on preparation and submission of the EIA and application.

24. Consultation was held in July 2020 to agree on how THC would manage the direct scoping request. This was followed by a direct scoping request on 30 July 2020.

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25. A meeting was held on 24 November 2020 with Jackie Sayer (EV Infrastructure Team) and Kremena Renwick (Sustainability Officer) from THC regarding potential opportunities to enhance the local electric vehicle charging network.
26. A meeting was held on 18 October 2021 with Simon Hindson (Team Leader, Strategic Projects team, THC) to provide a project update prior to submission.
27. Additional consultation was held directly between technical specialists and their THC counterpart to agree on the scope of the EIA and baseline information, including:
- Anne Cowling (Landscape Officer) on 26 August 2020;
 - Robin Fraser (Environmental Health Officer) on 25 August 2020;
 - Kirsty Cameron (Historic Environment) on 12 August 2020; and
 - Fred McIntosh (Transport Planning) on 10 and 25 August 2021.

2.4 Scoping

28. In July 2020, Scoping topic information sheets (**Appendix 5**) and a project information sheet were issued to relevant consultees to seek their views on the scope and content of the EIA for the current proposals.
29. A direct scoping exercise was undertaken following a prior pre-application consultation exercise completed in 2019 in relation to the potential for a RED at Hollandmey. The advice received as part of that process covered a lot of the information that would typically be contained in a formal scoping direction and was taken into account when preparing the Project Factsheet and EIA Topic Information Sheets provided to consultees.
30. Direct Scoping allowed a more focused and proportionate consultation to take place by building on the information that had already been identified and gathered for the proposed Development. This approach has been applied successfully on other SPR projects and achieved the purpose of scoping, namely:
- identifying important issues and significant impacts to be addressed by the EIA;
 - identifying the key stakeholders, their concerns, and their values; and
 - discussing and agreeing appropriate methods of impact assessment including survey methodology where relevant.
31. The Scoping Topic Information Sheets were issued to the following consultees:
- BAA Edinburgh;
 - BAA Glasgow;
 - British Horse Society;
 - BT;
 - Bower Community Council;
 - Caithness Access Panel;
 - Caithness Archaeology Trust;
 - Caithness Chamber of Commerce;
 - Caithness District Salmon Fisheries Board;
 - Caithness Voluntary Group;
 - Castletown Community Council;
 - Civil Aviation Authority (CAA);
 - Crown Estate Scotland;
 - Disability Equality Scotland;
 - Dunnet and Canisbay Community Council;
 - Fisheries Management Scotland;
 - Flow Country Rivers Trust;
 - Glasgow Prestwick Airport;
 - Highlands and Islands Airport Ltd;
 - Highland Biological Recording Group;
 - Historic Environment Scotland (HES);
 - John Muir Trust;
 - Joint Radio Company (JRC);

- Marine Scotland;
- Ministry of Defence;
- Mountaineering Scotland;
- National Air Traffic Services (NATS) Safeguarding;
- NatureScot;
- North Highland Initiative;
- North of Scotland Archaeological Society (NOSAS);
- Office for Nuclear Regulation;
- Ofcom;
- Royal Society for the Protection of Birds (RSPB);
- Scottish Forestry;
- Scottish Ornithologists Club;
- Scottish Squirrels;
- Scottish Water;
- Scottish Wildcat Action;
- ScotWays;
- Scottish Environment Protection Agency (SEPA);
- Sinclair's Bay Community Council;
- Telefonica;
- The Highland Council (THC);
- Transport Scotland;
- Venture North;
- VisitScotland; and
- Vodafone.

32. Consultation responses received as part of the Scoping process have been considered in the EIA and the issues raised are reported in **Chapter 6: Scoping and Consultation** of the EIA Report.

33. In addition to the direct scoping consultation, additional consultation was undertaken with the following consultees regarding specific issues. All further consultation is summarised in **Chapter 6: Scoping and Consultation** and detailed further in the relevant EIA Report Chapter.

- SEPA;
- NatureScot;
- HES.
- THC – Climate Change & Energy Team
- Telefonica
- Castle of Mey Trust; and
- Orkney Islands Council

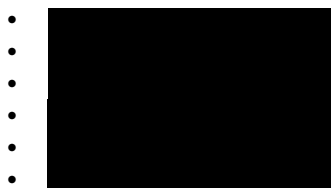
2.5 Community Council Consultation and Local Councillors

SPR has kept the four Community Councils local to the proposed Development and the local councillors from the Wick and East Caithness and Thurso and Northwest Caithness electoral wards informed of project progress. SPR also sent emails to the Community Councils and local community councillors to introduce the proposed Development in July 2020, invite them to participate in the PIEs in October 2020 and January 2021 (see an example emails to the community councils and local councillors in **Appendix 4**). The four Community Councils that have been contacted are:

- Bower Community Council;
- Castletown Community Council;
- Dunnet and Canisbay Community Council; and
- Sinclair's Bay Community Council.

34. The local councillors that have been contacted are:

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35. SPR received a request for a site layout figure from Dunnet and Canisbay Community Council on 16 November 2020, which was complied with. A further request was received from Councillor Karl Rosie Thurso and Northwest Caithness) to have a call to discuss the proposals when the first informative emails were issued in October 2020. After SPR responded this was not taken any further.

36. No other responses were received from community councillors or community councillors in relation to the PIEs.

2.6 Consultation with other Organisations

37. As the zone of theoretical visibility (ZTV) indicated theoretical visibility from the Orkney Islands Council (OIC) administrative area they were consulted on 2 September 2020 to agree on viewpoints (VP01 and VP02) representative of the views of the proposed Development from the OIC area for the Landscape and Visual Impact Assessment (LVIA) and to confirm that the use of wirelines to assess impacts on these viewpoints would suffice.

2.7 Public Information Events

38. In October 2020 and January 2021, two PIEs were undertaken to establish dialogue with the local community regarding the proposed Development. They were hosted online, and each lasted for three weeks. Members of the public could request for any of the documents contained within the PIEs to be emailed or posted to them.

39. Each PIE contained 6 'banners' that visitors could browse, similar to a traditional Public Information Day (PID). The PIE banners were as follows:

- Banner 1: Introduction;
- Banner 2: Site Overview, Key Facts and Development Process;
- Banner 3: Landscape and Visual Considerations;
- Banner 4: Environment Impact Assessment;
- Banner 5: Benefits of Proposed Development; and
- Banner 6: FAQs.

40. The PIE included clickable PDFs displaying the application boundary, site layout, project constraints and the ZTV, as well as photomontage visualisations giving a general representation of views of the proposed Development from key viewpoints. Members of the public were also invited to email the project team to request visualisations from a specific location. The first PIE allowed local residents to view the initial wind turbine layout and ask any questions specific to the proposed Development. The second PIE provided local residents with an update on the progress of the proposed Development, another opportunity to review the information, the chance to view the refined final layout and to submit further feedback or queries. Further information on the PIEs is presented in **Sections 3** and **4** of this Report.

2.8 Website and Email

41. SPR hosts a page dedicated to the proposed Development on its website to allow people to view details about the Development and contact the project team for further information:
https://www.scottishpowerrenewables.com/pages/hollandmey_renewable_energy_development.aspx

42. SPR can also be contacted at any time about the proposed Development by emailing: hollandmeyred@scottishpower.com.

3 Public Information Events October 2020 and January/February 2021

3.1 Website

43. The PIEs were hosted from 2 October 2020 to 23 October 2020 and 20 January to 10 February 2021 on the SPR project webpage: https://www.scottishpowerrenewables.com/pages/hollandmey_renewable_energy_development.aspx. This accords with the 'Coronavirus (Covid-19): planning guidance on pre-application consultations for public events' from the Scottish Government (2020) because:

- it was a "central, free, publicly accessible web location";
- all of the information was available at this one web location;
- no sign up was required to access the information;
- members of the public could read the information at their own pace and could download and print it if required;
- the public had a period of more than 7 days to submit questions or views electronically; and
- SPR responded to all questions or requests for clarification received.

44. The online PIEs complied with the current Data Protection obligations.

45. The PIEs were live for three weeks, during which time participants could submit feedback forms. After the PIE had concluded the information remained available on the SPR website so that anyone who had missed the consultation period, or anyone who wanted to go back and re-visit any of the content, could still view the Event and all of its information. Although the feedback form was removed after the PIEs finished, people were still invited to contact the Project Team through the Project email address throughout the development of our Projects, ensuring that the principle of two-way communication was not limited to the PIE.

3.2 Notification

46. In keeping with the spirit of Regulation 7 of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2008, SPR advertised that a pre-application public event was being arranged to publicise the forthcoming planning application within the area. The PIEs were advertised in several ways to help ensure as many local residents as possible were made aware of the proposed Development in good time to enable them to take part and discuss their views with others.

47. In accordance with 'Coronavirus (COVID-19): planning guidance on pre-application consultations for public events', the web location for the PIE was referenced in all awareness raising measures.

3.3 Newspaper Adverts

48. Regulation 7 of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2008 requires that a notice is published in a local newspaper a minimum of seven days before the event is held. The public notice should contain:

"(i) a description of, and the location of, the proposed development;

(ii) details as to where further information may be obtained concerning the proposed development;

(iii) the date and place of the public event;

(iv) a statement explaining how, and by when, persons wishing to make comments to the prospective applicant relating to the proposal may do so; and

(v) a statement that comments made to the prospective applicant are not representations to the planning authority and if the prospective applicant submits an application there will be an opportunity to make representations on that application to the planning authority."

3.3.1 October 2020

49. A public notice, containing all the information required by Regulation 7, was placed in the John o' Groats Journal. The notice was issued on 2 October 2020, the day that the Event went live. As the Event was live for 21 days and the public were able

to submit questions or views electronically for the duration of that time, which exceeded the suggested 7-day period in the Scottish Government guidance, assuming a seven-day notification period from the notification date, as outlined in Regulation 7, this would still give the public sufficient opportunity, fourteen days, to view the PIE and submit views or questions electronically. A copy of the notice is contained in **Appendix 3**.

3.3.2 January/February 2021

50. Public notices, containing all the information required by Regulation 7, were placed in the John o' Groats Journal and the Caithness Courier for two consecutive editions each. Adverts were placed in the John o' Groats Journal on 15 and 22 January and in the Caithness Courier on 13 and 20 January. The Event was held between 20 January and 10 February. An example of these notices is included in **Appendix 4**.

3.4 Online Adverts

3.4.1 October 2020

51. Online adverts were placed on the John o' Groats Journal and Caithness Courier website. The data did not detail how many unique visitors there were that viewed the advert. Online adverts were also placed on local news and interest websites and social media, including Caithness.org, Caithness-business.co.uk and Caithness.org's Facebook page.

52. The online advert displayed the deadline for submission of comments and questions and included a link to the SPR project webpage, where the PIE could be accessed from. An example of the online advert can be seen in **Appendix 3**

3.4.2 January/February 2021

53. Online adverts were placed on the John o' Groats Journal and Caithness Courier website. Online adverts were also placed on local news and interest websites and social media, including Caithness-business.co.uk, Caithness.org's Facebook page and caithnesswindfarms.co.uk.

54. The online advert displayed the deadline for submission of comments and questions and included a link to the SPR project webpage, where the PIE could be accessed from. An example of the online advert can be seen in **Appendix 3**.

55. A local website, Caithnesswindfarms.co.uk, which encourages members of the local community to participate in public engagement for windfarm proposals advertised the PIE on their events page.

3.5 Posters

3.5.1 October 2020

56. Posters were distributed to the four community councils and local councillors when they were notified about the PIE. The recipients were invited to distribute the posters because of their local knowledge and connections with relevant stakeholders. The posters were an exact copy of the newspaper advert as seen in **Appendix 3**.

3.5.2 January/February 2021

57. Posters were again distributed to the four community councils and local councillors when they were notified about the PIE. The posters were an exact copy of the newspaper advert as seen in **Appendix 4**.

3.6 Information Available at PIEs

3.6.1 October 2020

58. Copies of the materials that were available and on display at the PIEs are contained within **Appendix 3**. The information presented included: a site overview, a location plan for the proposed Development, a plan showing the project constraints, a site layout including the potential location for the solar array and BESS; a ZTV figure; details about the EIA process and survey work; details of community benefit; and information and facts about wind energy in general.

59. 4 photomontage visualisations were also available for the public to view to help give an impression of what the proposed Development could look like from different viewpoints in the area.

3.6.2 January/February 2021

60. Copies of the materials Drawings and Plans that were available and on display at the PIEs are contained within **Appendix 4**. The information presented included: a site overview and progress update since the last PIE, including were the proposals had changed in response to feedback; an updated location plan for the proposed Development confirming the increased application boundary, an updated plan showing the project constraints, a finalised site layout including the locations for the

solar array and BESS; two ZTV figures including points to identify viewpoint locations; details about the EIA process and survey work; details of community benefit; and a frequently asked questions section that provided information and facts about wind energy in general.

61. 8 photomontage visualisations were also available for the public to view and assess the likely visual effect from key viewpoints, including from Mey, which had been included after a request following the first PIE.

3.7 Leaflets

3.7.1 January/February 2021

62. In advance of the PIE, SPR distributed leaflets to 2113 households within a 10 km radius of the proposed Development, which included John o' Groats, Dunnet, Mey, Skarfskerry, Bower, and Barrock. The leaflets set out the purpose of the Public Event, provided details of the Event, provided a description of the proposed Development and background on the proposals, provided an update on the project since the last PIE and provided contact details for requests for further information from SPR. A copy of the leaflet is provided in **Appendix 4**.

3.8 Consultation Feedback

63. Scottish Planning Policy (SPP) (paragraph 6) notes that throughout the planning system, opportunities exist for everyone to engage in the development decisions which may affect them. Engagement should be early, meaningful, and proportionate. Expressions of support and concern should be considered in developing proposals.

3.8.1 October 2020

64. Attendees to the October 2020 PIE were invited to complete a feedback form or submit a response to the project mailbox. 192 people viewed the PIE over the three weeks and in total 2 feedback forms were returned and two emails regarding the PIE were sent to the project mailbox during the period the event was live. To ensure that the low level of feedback was not reflective of a low level of awareness, changes to the awareness raising measures were made for the second PIE.

65. In addition to the feedback received in relation to the PIE, four further comments and queries have been submitted to the project mailbox, which have been included here for completeness.

66. Comments suggest that out of the 8 respondents, 1 was generally in support of the proposed Development, 3 had expressed some degree of negative or opposing comments and 4 made no comment on their views of the proposed Development.

67. A summary of comments received is presented in **Table 3.1**. SPR responded directly via email, to everyone who submitted a feedback form during the PIE or who contacted the project mailbox throughout the duration of the EIA process. This was the preferred method for those who contacted SPR, and alternative arrangements would have been made if required.

Table 3.1: Feedback received from the October 2020 PIE and action taken

Topic	Feedback	Action Taken ¹
Community Benefit	<ul style="list-style-type: none"> The majority of community benefit should go to Mey, East Mey and West Mey. The local broadband service needs upgraded. A request was made to outline how community benefit would be distributed. A suggestion was made that solar panels could be offered to local residents to ensure that those most affected benefited directly. 	<ul style="list-style-type: none"> SPR has provided community benefits to local communities close to its onshore windfarms throughout the UK and is committed to offering a package of community measures to local communities that would include the opportunity for community benefit payments to be made. SPR favour a flexible approach to community benefit that allows the local community to decide how the fund is invested. The socio-economic assessment that was completed as part of the EIA considered both the direct and indirect positive effects to the local economy and employment that could potentially be created by the proposed Development.

¹ All action will be undertaken in accordance with appropriate legislation and guidance.

Topic	Feedback	Action Taken ¹
Biodiversity	<ul style="list-style-type: none"> The Dubh Lochans that exist in the Philips Mains SSSI used to have high biodiversity value, which has been degraded by commercial forestry operations. Enhancement measures could be introduced to improve the biodiversity of the Dubh Lochans again. 	<ul style="list-style-type: none"> SPR has listened to the feedback received relating to biodiversity and are proposing an enhanced HMP, which will be submitted as a technical appendix to the EIA Report.
Flood Risk	<ul style="list-style-type: none"> The introduction of the site infrastructure could increase runoff from the site An assessment of the flood risk should be conducted Any mitigation measures should be implemented and financed by the developer 	<ul style="list-style-type: none"> The EIA included a comprehensive assessment of surface water runoff, drainage, and downstream flood risk together with design proposals for controlling and managing surface water within the project area.
Ornithology	<ul style="list-style-type: none"> There is a population of Greenland White-fronted Geese in the vicinity of the Site, and they have been seen flying over part of the Site. The noise from the turbines might cause disturbance to the Geese. Siting of turbines should be sensitive to the Geese. 	<ul style="list-style-type: none"> All comments received will be factored into the ornithology assessment as part of the EIA. The EIA Report will be available on the Hollandmey RED project website.
Noise	<ul style="list-style-type: none"> Concern was raised that the people living in the Barrock area could be affected by noise emitted by the turbines. 	<ul style="list-style-type: none"> All comments received will be factored into the noise assessment as part of the EIA. The EIA Report will be available on the Hollandmey RED project website.
Cumulative Impact	<ul style="list-style-type: none"> There was concern about the cumulative impact of increasing windfarm development in Caithness. 	<ul style="list-style-type: none"> Each technical discipline has assessed potential cumulative effects in line with Schedule 4 of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017. The EIA Report will be available on the Hollandmey RED project website.
Socio-economics	<ul style="list-style-type: none"> Support was raised for the opportunity the construction work would bring to local businesses. Concern was expressed regarding the potential impact to local house prices, with reference to a case study by the London School of Economics. 	<ul style="list-style-type: none"> All comments received were factored into the socio-economic assessment as part of the EIA. The EIA Report will be available on the Hollandmey RED project website.
Landscape and Visual Impact	<ul style="list-style-type: none"> Concern was raised that visual impacts at certain locations would not be considered. 	<ul style="list-style-type: none"> Personalised visualisations were created for those who requested them and visualisations from

Topic	Feedback	Action Taken ¹
		<p>additional viewpoints were added to the second PIE.</p> <ul style="list-style-type: none"> The EIA Report, including the final LVIA findings, will be available on the Hollandmey RED project website.
Phone Reception	<ul style="list-style-type: none"> Concern was expressed about potential interference to 4G phone reception as this was important to livelihood. 	<ul style="list-style-type: none"> A telecommunication impact assessment was completed as part of the EIA. The EIA Report will be available on the Hollandmey RED project website.

January/February 2021

68. Attendees to the January/February 2021 PIE were invited to complete a feedback form or submit a response to the project mailbox. 142 people viewed the PIE over the three weeks and 11 people responded.
69. Comments suggest that out of the 8 respondents, 1 was generally in support of the proposed Development, 3 had expressed some degree of negative or opposing comments and 4 made no comment on their views of the proposed Development.
70. A summary of comments received is presented in **Table 3.2** SPR responded directly via email, to everyone who submitted a feedback form during the PIE or who contacted the project mailbox throughout the duration of the EIA process. This was the preferred method for those who contacted SPR, and alternative arrangements would have been made if required.

Table 3.2: Feedback received from the January/February 2021 PIE and action taken

Topic	Feedback	Action Taken
Community Benefit	<ul style="list-style-type: none"> The local broadband service needs upgraded. 	<ul style="list-style-type: none"> Responded to state that SPR favour a flexible approach to community benefit that allows the local community to decide how the fund is invested.
Tourism	<ul style="list-style-type: none"> The impact on visual amenity could adversely affect the rentability of accommodation and the attractiveness of the wider area for tourism. Adverse effects on the Castle of Mey could negatively affect tourism in the area. 	<ul style="list-style-type: none"> Chapter 7: Landscape and Visual Impact Assessment has assessed the potential visual impact of the proposed Development on tourism receptors and local properties. An assessment of potential effects of the proposed Development on the tourism economy during construction and operation and on tourism attractions is included in Chapter 14: Socio-Economics, Recreation and Tourism. SPR has also found from our previous developments that many local businesses operating in the tourism sector, such as accommodation providers, support our developments as they can receive a welcome boost from workers, engineers and consultants staying locally while working at the Site, which also often represents a boost out-with the peak tourist season.

Topic	Feedback	Action Taken
Property Prices	<ul style="list-style-type: none"> The impact on visual amenity will adversely affect property prices. Cited research by the London School of Economics that inferred wind turbines could cause a reduction in property prices. 	<ul style="list-style-type: none"> Provided distance of property from nearest turbines and commentary regarding the potential visual impact of the proposed Development. Provided details for studies that found no link between windfarms and property prices or tourism. Acknowledged the study referred to and have included discussion of this study in Chapter 14: Socio-Economics, Recreation and Tourism.
Recreation	<ul style="list-style-type: none"> A request was made regarding the provision of infrastructure to support cycling and horse riding, such as circular routes and car parking. 	<ul style="list-style-type: none"> Explained a circular track was considered during the iterative design process. Through ongoing consultation and discussions with SEPA, it became clear that the extra required area of track (floating or otherwise) to complete the circle would cause unnecessary disturbance to the deep peatland on site which we have sought to minimise with our design. The site would be available for recreational activities. There are no existing core paths, promoted routes or bridleways that traverse the Site so it is hoped that the windfarm tracks would facilitate and encourage recreational use of the land.
Shadow Flicker	<ul style="list-style-type: none"> Raised concern regarding potential for shadow flicker impact on residential properties in the locality. 	<ul style="list-style-type: none"> Provided results of shadow flicker assessment, including a description of the methodology used and a map showing the shadow flicker zone in relation to the nearest residential properties.
Residential Amenity	<ul style="list-style-type: none"> Requested visualisation from Upper Gills and showed concern that it was not included in list of viewpoints. Enquired about visibility of the proposed Development from Skirza. Complained that there were too many windfarms in the Highlands. 	<ul style="list-style-type: none"> Provided a visualisation showing a wireline view of the proposed Development from the minor road that passes through Upper Gills, along with commentary from the project landscape architect. Also stated that viewpoints had been agreed with NatureScot and THC. Provided commentary regarding potential visibility from Skirza.
Site Selection	<ul style="list-style-type: none"> Concern raised regarding the proximity of the proposed Development to inhabited areas. 	<ul style="list-style-type: none"> Explained the rationale behind the site selection, including the high wind yield potential of the Site, there are no national or international nature designations within the area identified for development and the Site is in close proximity to transport and grid connections and benefits from an existing commercial forestry track network.
Ornithology	<ul style="list-style-type: none"> Stated that overwintering population of Swans, Whitefront and Greylag geese and other wildfowl on the Loch 	<ul style="list-style-type: none"> Two years of bird surveys have been completed and survey results indicate that there are no scarce birds of conservation concern breeding or roosting within the survey buffers of the Site. However, as some flights by SPA-related species,

Topic	Feedback	Action Taken
	<p>of Mey would be affected by the turbines.</p>	<p>including wintering geese and swans, have been recorded within the survey buffers a full assessment of potential effects on these species and the integrity of the designated areas will be completed. Any potential adverse effects for any species will be mitigated to meet legislative requirements and good practice, with species-specific mitigation plans created where required.</p>
Landscape	<ul style="list-style-type: none"> Concern raised regarding impact on coastal landscape, which has natural beauty and is flat so increases the zone of theoretical visibility. Noted that views from Dunnet Head and Duncansby Head would be affected. 	<ul style="list-style-type: none"> A LVIA is being undertaken in line with NatureScot and THC requirements and in accordance with guidance from the Landscape Institute. LVIA will examine effects on both the landscape and the views and visual amenity experienced by people living and visiting the area, and will include visualisation from key viewpoints, including Dunnet Head and Duncansby Head.
Peat	<ul style="list-style-type: none"> Noted that there is carbon-rich soil on the Site. 	<ul style="list-style-type: none"> Through careful mapping of the extent of peat onsite, the areas of deepest peat have largely been avoided. Where this has not been possible (mostly in respect to sections of access track), location-specific mitigation design measures would be adopted, and additional mitigation have been set out to minimise effects on peat. SPR are also proposing peat restoration onsite, which could improve the condition of the Philips Mains Mire site of special scientific interest (SSSI). SPR are industry leaders in the restoration of peatland habitats, both in terms of the volume of peatland that is being restored and managed, and also in terms of innovative restoration techniques. Our Ecology Team have particular expertise in restoring peatlands that have previously been damaged by afforestation and their work has been recognised by conservation bodies such as SNH/NatureScot.
Forestry	<ul style="list-style-type: none"> Noted that the proposed Development would require felling, which would have adverse ecological and carbon balance effects. 	<ul style="list-style-type: none"> A keyhole felling technique (as opposed to clear felling) would be used to minimise the amount of felling required. In addition, the design of access tracks has tried to maximise the use of existing forestry tracks and forestry fire breaks to reduce the overall felling requirement. All forestry that is felled would be compensated by planting or peat restoration. The residual impacts on the peat and forestry resources and carbon losses associated with this will be considered as part of the EIA using the Scottish Government carbon calculator tool (available from SEPA) and reported in the EIA Report.

Topic	Feedback	Action Taken
Flood Risk	<ul style="list-style-type: none"> Noted that the proposed Development could lead to greater flood risk through deforestation, modifications to streams, compaction, construction and resurfacing, and drainage. 	<ul style="list-style-type: none"> The Highland Council requires that all developments on greenfield sites have sufficient water storage and attenuation so that runoff from the site is not increased from its baseline, undeveloped state. There is also a duty on developers not to increase flood risk to areas downstream of their development. A comprehensive assessment of water runoff, drainage and downstream flood risk will be included within the Environmental Impact Assessment (EIA) together with design proposals for controlling and managing surface water within the project area boundary. Felling has been minimised by design and peatland restoration will be undertaken. Active peatland, like at Phillips Mains Mire SSSI, acts as a water and carbon store and is, if anything, better at slowing water runoff than woodland. There are no plans to straighten or otherwise modify any watercourses within the Site. Some watercourse crossings will be required to allow access to the proposed turbine locations, but these will all be designed in line with best practice and SEPA's current guidance, which requires that they are sized to accommodate a 1-in-200 year flow plus climate change allowance. All plant and vehicles will be restricted to a specific working corridor to minimise areas of compaction through traffic movement. These corridors will be as small an area as practicable. There will inevitably be more hard surfaces resulting from the development, these will have associated drainage put in place to collect and slow the water.
Ecology	<ul style="list-style-type: none"> Noted that fish could be affected by impacts on watercourses. 	<ul style="list-style-type: none"> It has been established there is little suitable habitat on the site for fish, certainly no high calibre spawning habitat that would be directly impacted. The Caithness and District Fisheries Board did also advise there would be no implications to fisheries (within their catchments) as a result of a development here.

4 Conclusions

71. SPR have undertaken an extensive pre-application consultation process with statutory and non-statutory consultees and the local community. The consultation feedback received has been considered in the EIA and iterative design processes.

72. The key design objectives for the proposed Development were as follows:

- consideration of the underlying character and scale of the landscape;
- layout and spacing of wind turbines relative to key viewpoints;
- minimising impacts on peat;
- sensitive siting of the proposed infrastructure incorporating appropriate buffer distances from environmental receptors to avoid or reduce effects on the environment;
- considering the size and scale of the proposed Development appropriate to the location and proximity to residential areas;
- minimising removal of plantation/tree cover;
- re-using existing forestry tracks as much as possible to access proposed turbine locations;
- design of the tracks to minimise cut and fill, reducing landscape and visual effects as well as costs;
- inclusion and design of borrow pit(s) to minimise the amount of the material required to be imported to the Site; and
- potential for up to 50 m micro-siting of infrastructure during construction to ensure the best possible location is chosen based on detailed Site investigations.

73. Up to 11 turbines were considered on the Site in scoping, the final layout of 10 turbines for the proposed Development was a result of obtaining information from the extensive environmental surveys, consultations and feedback received at the PIEs.

74. Concerns and questions raised by consultees and members of the public at the PIEs have been addressed through the assessments presented in the EIA Report.

4.1 Publication of the EIA Report

75. SPR has a duty to undertake statutory publication of the EIA Report in accordance with Part 5 of the 2017 EIA Regulations and the Electricity (Applications for Consent) Regulations 1990.

76. A notice will be published as follows:

- on the project website;
- in the Herald;
- in the Edinburgh Gazette; and
- in the John o' Groats Journal and the Caithness Courier (which cover the area in which the proposed Development would be located).

77. In addition to the formal notifications of the application:

- SPR provided a Non-Technical Summary (NTS) of the EIA Report and Universal Serial Bus (USB) of the entire application submission to each Community Council invited to the PIEs;
- further copies of the Non-Technical Summary and the EIA Report were made available free of charge;
- SPR maintained a dedicated email address (hollandmeyred@scottishpower.com) to receive comments relating to the Proposed Development throughout the development and planning process; and
- SPR maintained ongoing contact with local residents and Community Councils at their request.

APPENDICES

Any advice provided under this service is given on the basis of the professional opinion of the officer(s) concerned, based on the information provided and the planning policies and site constraints prevailing at the time, and any views expressed are not intended to prejudice the Council's determination of any subsequently formal planning application.

This pre-application advice has been specifically prepared for Scottish Power Renewables (UK) Ltd as the applicant for the proposed development at Land At Hollandmey Farm And Philips Mains, Phillips Mains, Mey.

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Pre-Application Advice Pack

Reference No: 19/00053/PREAPP

Date Issued: 6th March 2019

Confidentiality Requested: NO

1. Proposed Development

Proposal for a wind energy generating station comprising of around 12 wind turbine generators, tip height up to 149.9m; with ancillary storage facilities

2. Summary of Key Issues

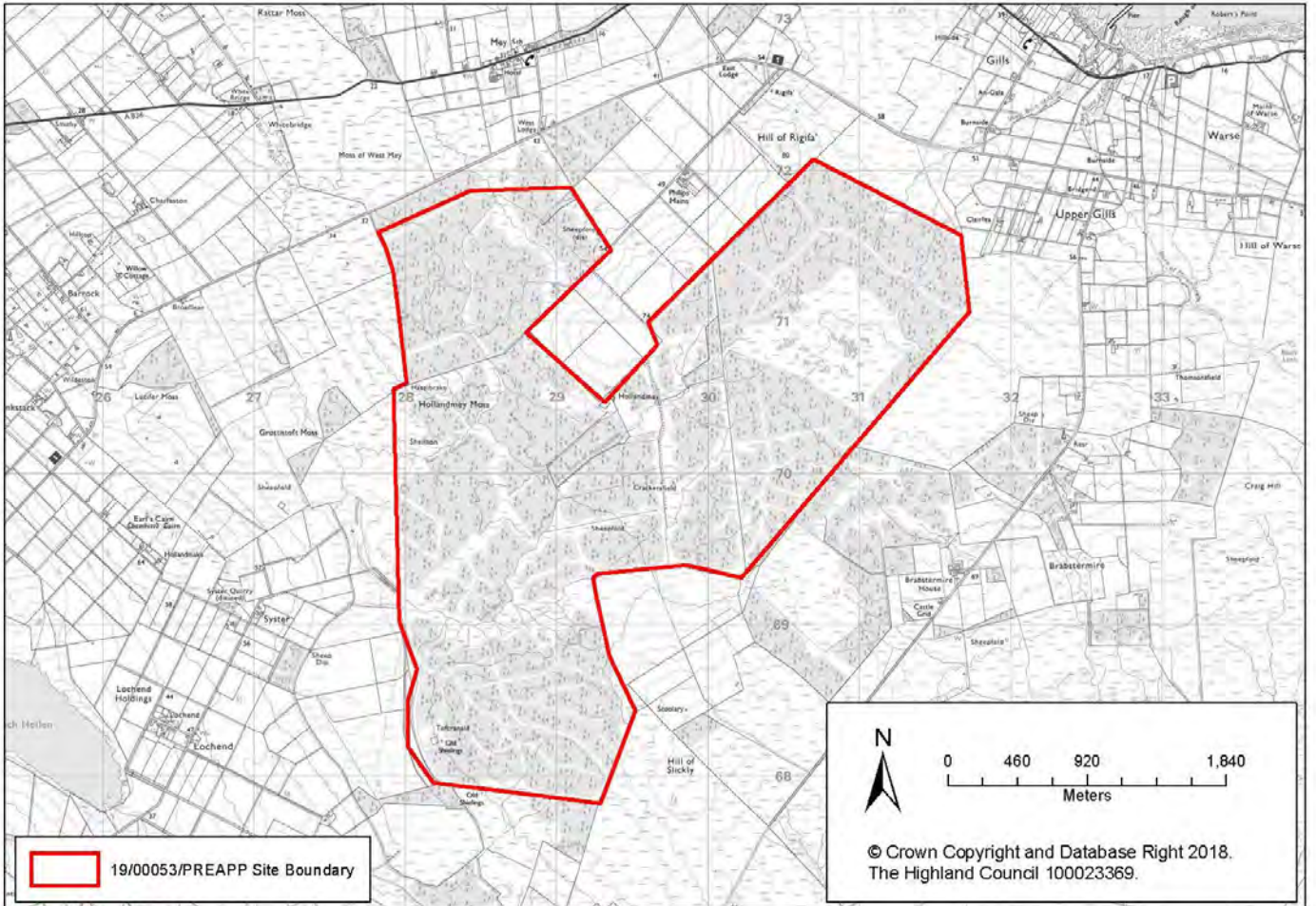
Based on the information submitted to date, the Planning Authority would express significant concerns about the visual and landscape impact of the proposed development including cumulatively in association with existing operational wind farms (Stroupster and Lochend). As such we would advise that it is very unlikely we would be in a position to support any application for the development as currently proposed.

Key issues have been identified by consultees and are outlined in this advice; these include the following:

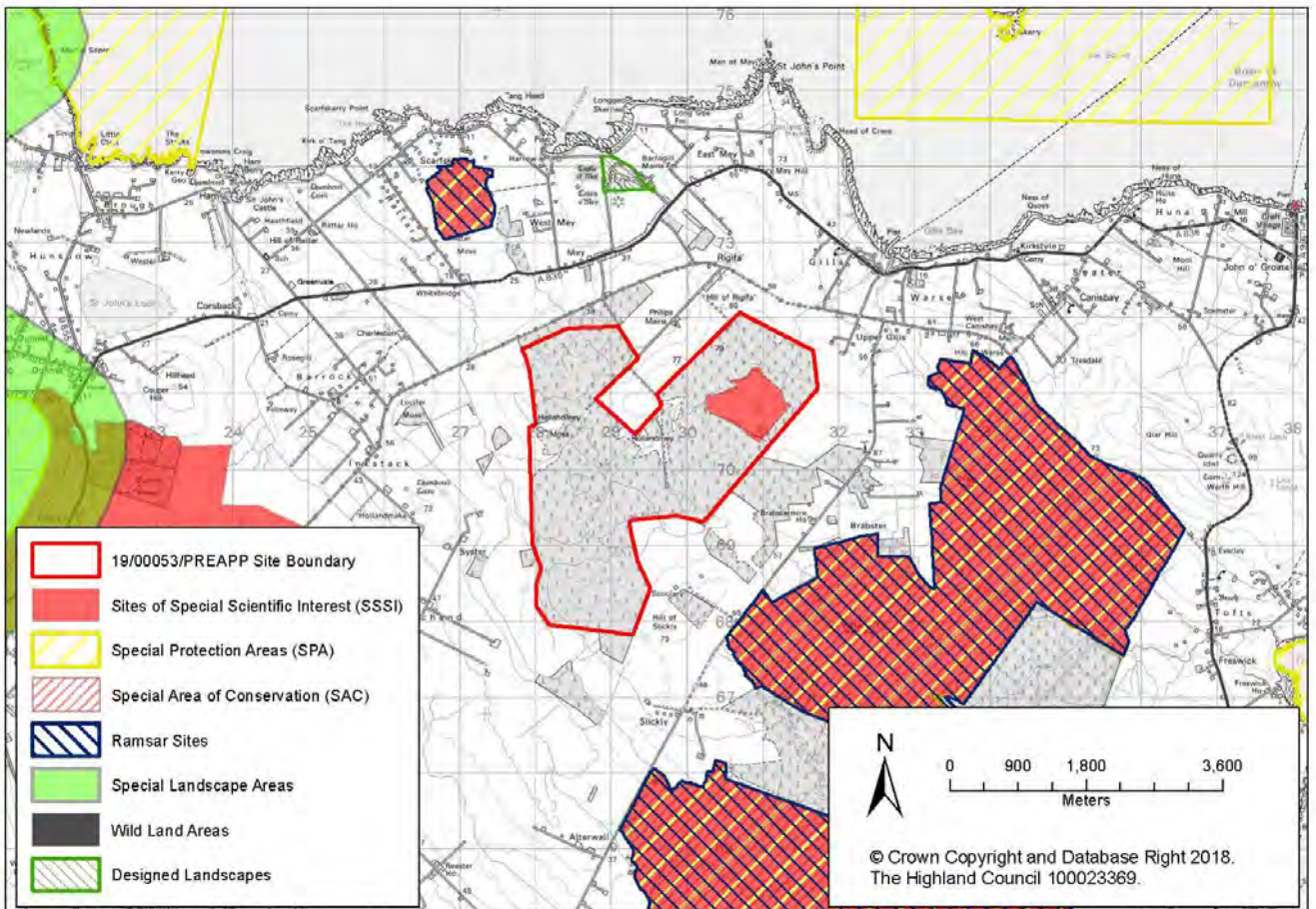
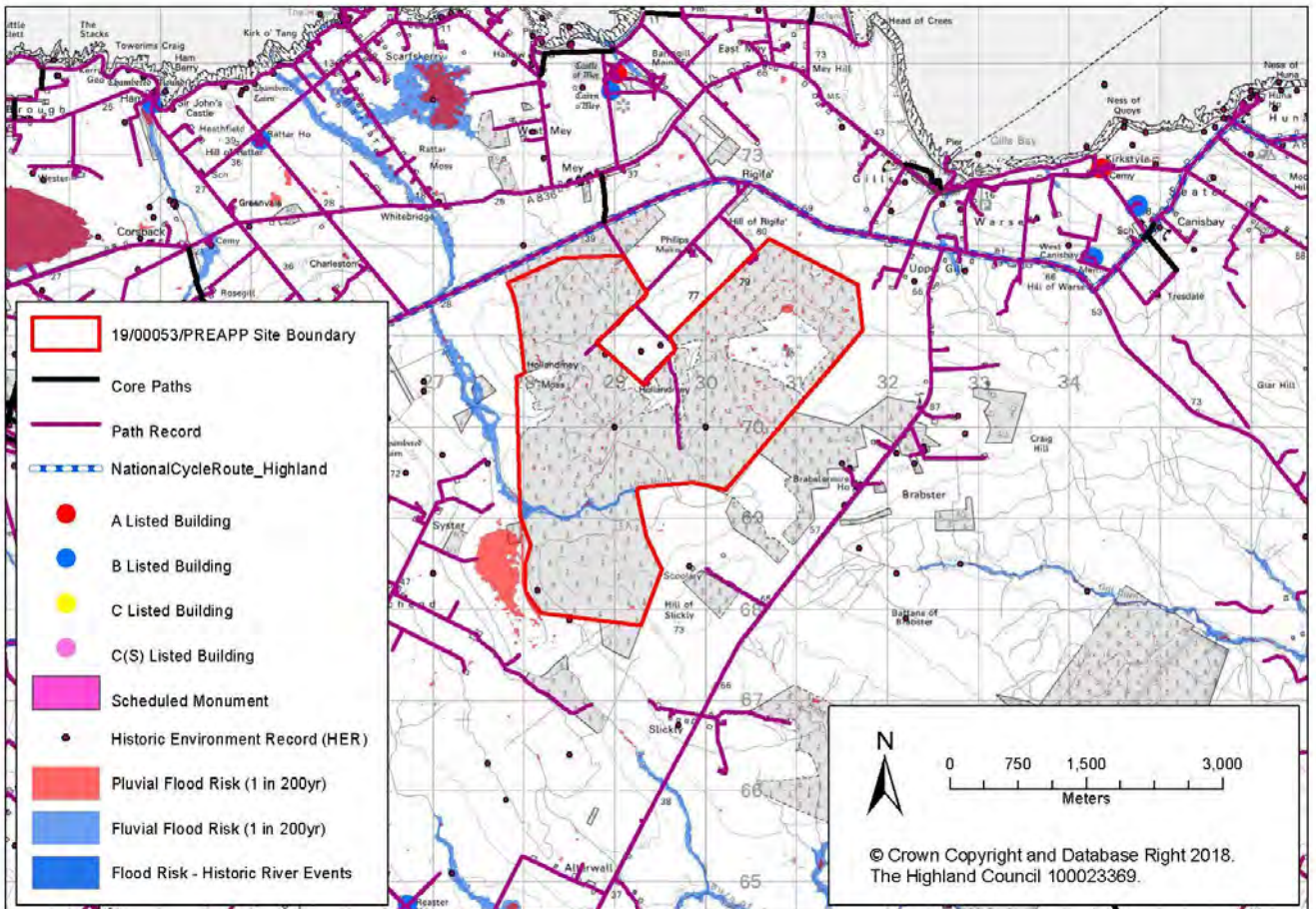
- You will need to overcome the issues which upheld the refusal of the previous application at Lyth Windfarm (planning ref: 13/01832/FUL) and the development will need to demonstrate compliance with The Highland Council's Onshore Wind Energy SG. As noted above, at this stage, it is unlikely that the proposal will be acceptable in terms of its visual impact and is therefore unlikely to be in accordance with the development plan;
- The application site contains areas of blanket bog listed as Class 1 peatland; these areas are considered to be nationally important carbon-rich soils and are afforded significant protection under Scottish Planning Policy. Proposals affecting this national interest are required to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting, design and other mitigation.
- It should be noted that the local roads in the vicinity of the site, are generally weak and considered unsuitable in their present form to withstand construction traffic. Significant road improvement/mitigation measures will, therefore, be required to enable any of the identified roads to accommodate construction traffic.

3. Background Information

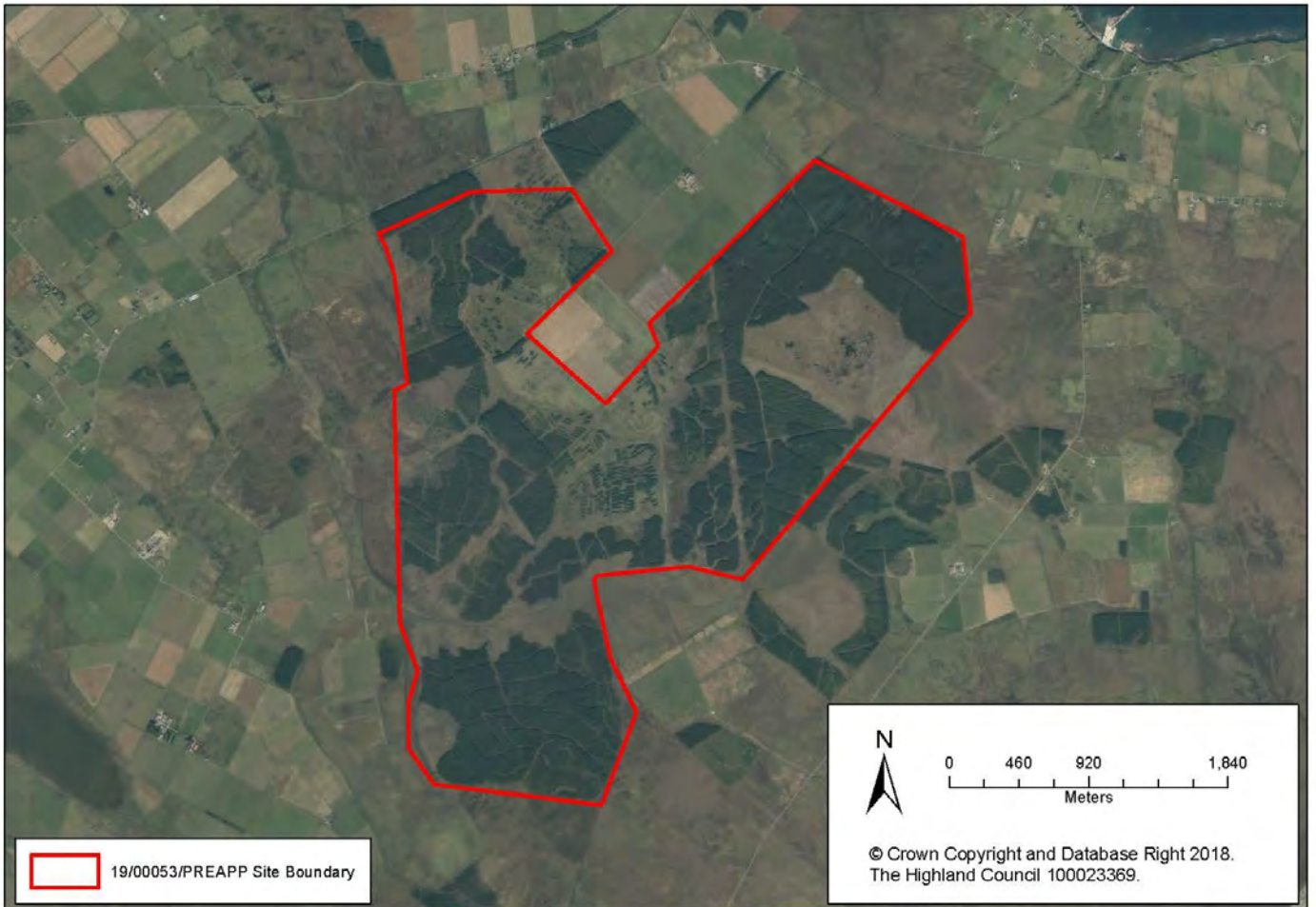
Site area	<i>Approx. 919 hectares</i>	
Land Ownership	Unknown	
Existing Land Use(s)	Agricultural/moorland/woodland	
Grid Reference	X: 329100	Y: 969876



5. Constraints © Crown Copyright. All Rights Reserved. 100023369 2018



6. Photographs of site



7. Development Plan Designation and Planning Policy Appraisal

Response from Policy, [REDACTED]

1. Policy Background

This pre-application should be considered against the following Development Plan documents:

- [Highland-wide Local Development Plan](#) (HwLDP) 2012;
- [Caithness and Sutherland Local Development Plan](#) (CaSPlan) which was adopted by the Council on 31 August 2018; and
- Relevant Supplementary Guidance, particularly the [Onshore Wind Energy Supplementary Guidance \(2016\)](#) and [‘Part 2b’ of the Supplementary Guidance \(2017\)](#).

This advice does not detail all policies in the Development Plan that may apply to this proposal but is instead limited to those most relevant and important to the assessment of any future planning application.

2. Policy Appraisal

HwLDP

The HwLDP sets out the general planning policies for the Highland Council area. The Council began to undertake a review of HwLDP in 2015 (with the publication of the [Main Issues Report in September 2015](#)). However, further progress has been delayed until the implications of the Scottish Government’s review of the Scottish planning system and how it may affect the preparation of the development plan for Highland are better known. It is not expected that any immediate work to progress the review of HwLDP will be undertaken. Applicants are advised to monitor the annual Development Plans Newsletter accessible via [the webpage \(on this link\)](#) as this provides a timetable of work on the Highland development plan.

Key policies of HwLDP relating to this proposal include:

- [Policy 51 Trees and Woodland](#) supports development that promotes protection to existing hedges, trees and woodland on and around development sites. Much of the site appears to be covered in mature plantation woodland. Further advice should be sought from the Council’s Forestry Officer on

this matter.

- Policy 52 Principle of Development in Woodland requires that development proposed within woodland justifies the need for the development and that the site has capacity to accommodate development. It also refers to the Scottish Government's Control of Woodland Removal Policy. As highlighted above, there is woodland on this site that will require to be assessed. Further advice should be sought from the Council's Forestry Officer.
- Policy 57 Natural, Built and Cultural Heritage states that all development will be assessed taking into account the level of importance and type of heritage features, the form and scale of development and any impact on the feature and its setting. The Policy details three categories of heritage feature importance (international, national and local/regional) and sets out relevant criteria which will apply to each of them. Further information on the categories and the heritage features is included within Appendix 2 of HwLDP.
- Policy 61 Landscape requires new development to reflect the landscape characteristics and special qualities identified in the relevant, recently refreshed and published (2019) SNH [Landscape Character Assessments](#) (LCAs). The LCAs are a starting point on which to base assessment of landscape and visual impact. It is important to set out *who* the visual receptors of the development are, *what* the landscape impacts are and *how* these two factors relate. The Council has undertaken landscape sensitivity appraisal work in this location to help inform decisions on onshore wind energy proposals. More information is provided below.
- Policy 67 Renewable Energy Developments sets out the Council's support in principle for renewable energy developments. This support is subject to addressing important key issues and other criteria. The Council must be satisfied that the development is located, sited and designed in a way that will not be significantly detrimental to a number of considerations as set out in the Policy. Further detail is set out in the Onshore Wind Energy Supplementary Guidance to this policy discussed below. This includes both individual impacts and cumulative impacts with other renewable energy developments.

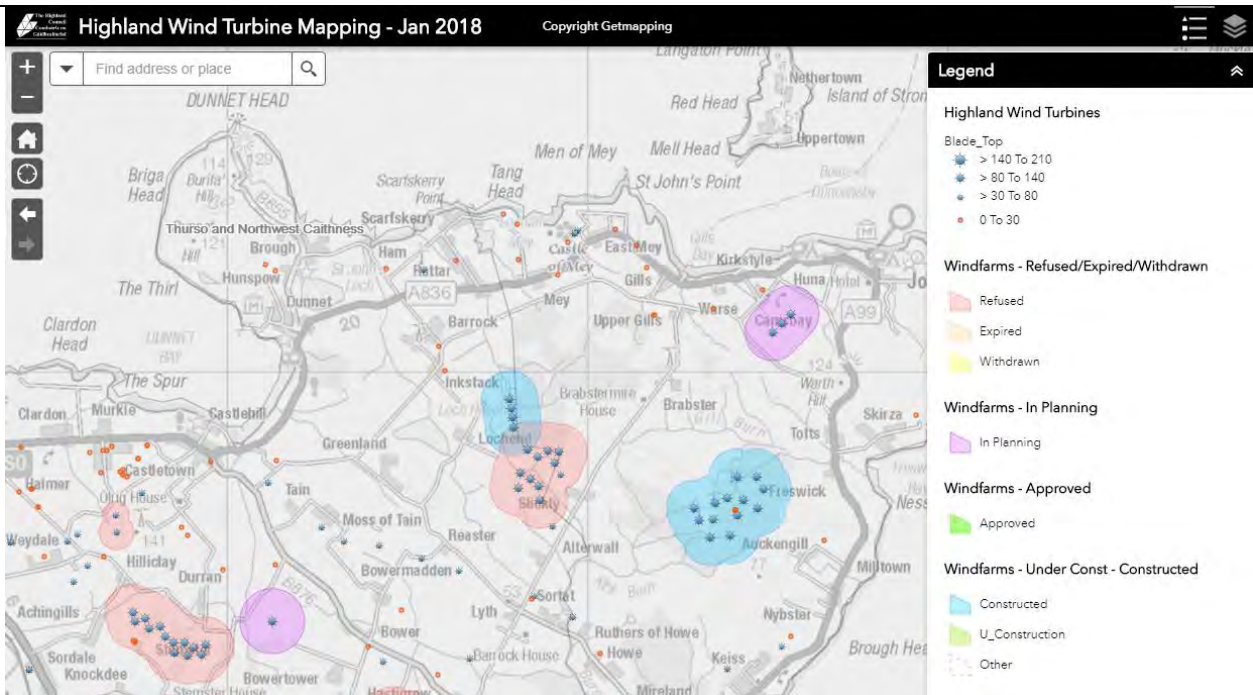
Other key policies from HwLDP include:

- Policy 28 – Sustainable Design
- Policy 30 – Physical Constraints
- Policy 55 – Peat and Soils
- Policy 56 – Travel
- Policy 58 – Protected Species
- Policy 59 – Other Important Species
- Policy 60 – Other Important Habitats
- Policy 63 – Water Environment
- Policy 64 – Flood Risk
- Policy 66 – Surface Water Drainage
- Policy 69 – Electricity Transmission Infrastructure

Please note that we expect visualisations provided to accord with the Council's latest [Visualisation Standards for Wind Energy Developments](#). Assessments should cover impacts of all elements of the development, not just the turbines, where they are not covered under a separate application. Applicants are strongly encouraged to provide information on all aspects of their proposal as far as possible at application stage, including information on intended grid connection, in order that the Council has the fullest understanding of the scheme.

It is important for the applicant of any wind energy proposal to maintain an up to date picture of development in the wider area, particularly for informing cumulative impact assessment. A starting point for this is the Council's [Highland Wind Map](#) – which is currently as at January 2018.

You will be aware of there being two constructed windfarms within the vicinity of your site – Stroupster and Lochend. Your cumulative assessment should take these into account together with other relevant schemes such as the 10 turbine proposal at Lyth which was refused in December 2013.



Area Local Development Plan

The area plans focus mainly on regional and settlement strategies and identifying specific site allocations. As a result, much of the content of them is not particularly relevant to a wind farm proposal. However, certain aspects of the strategy for the local area/settlement may help to inform plans for community engagement or community benefit.

The area plan covering this application site is the [Caithness and Sutherland Local Development Plan](#) (CaSPlan) which was adopted by the Council on 31 August 2018. It has replaced both the Sutherland Local Plan and the Caithness Local Plan.

The area plan defines Settlement Development Areas (SDAs) and those are the areas to which the Spatial Framework (in the Onshore Wind Energy SG) applies the Community Separation Distance. CaSPlan has introduced some changes to SDAs, including changes to which settlements have SDAs defined, which will be reflected in a future update to the Spatial Framework map. This includes no longer identifying a Settlement Development Area for the nearby settlement of Mey; however, the visual impact of proposals as experienced by people in the places where they live will still be a general consideration.

During the preparation of CaSPlan the Council took the opportunity to refine some of the boundaries of the Special Landscape Areas (SLAs) within the plan area to better reflect landforms and avoid severing landform features. The revised SLAs are all located on the north coast and some are relevant to this application. The [SLA citations webpage](#) provides information on the SLAs to help guide assessment.

Onshore Wind Energy Supplementary Guidance (2016) and Part 2b (2017)

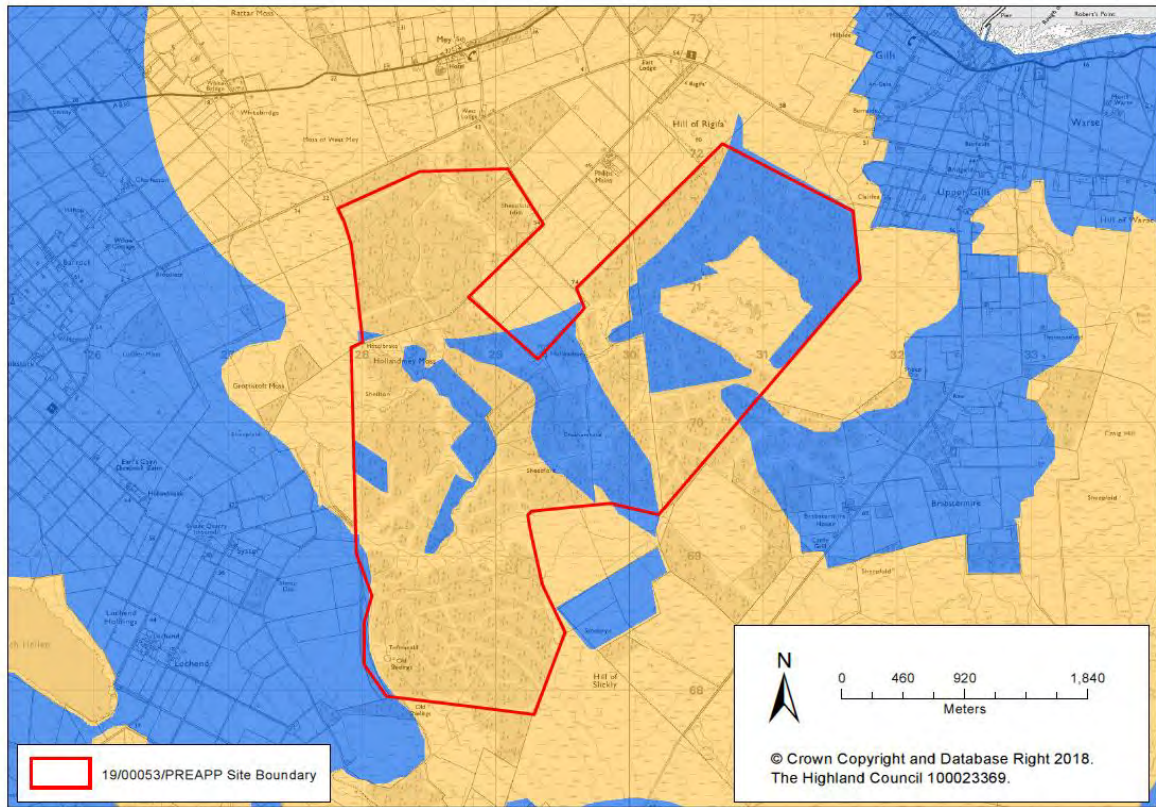
The Council adopted this [Supplementary Guidance](#) (SG) in November 2016 and it forms part of the Development Plan for Highland, setting the main framework for determining onshore wind energy proposals. In December 2017 the Council adopted '[Part 2b](#)' of the [Supplementary Guidance](#), which includes a landscape sensitivity appraisal for Caithness and your site is included within the area covered by that appraisal.

Spatial Framework

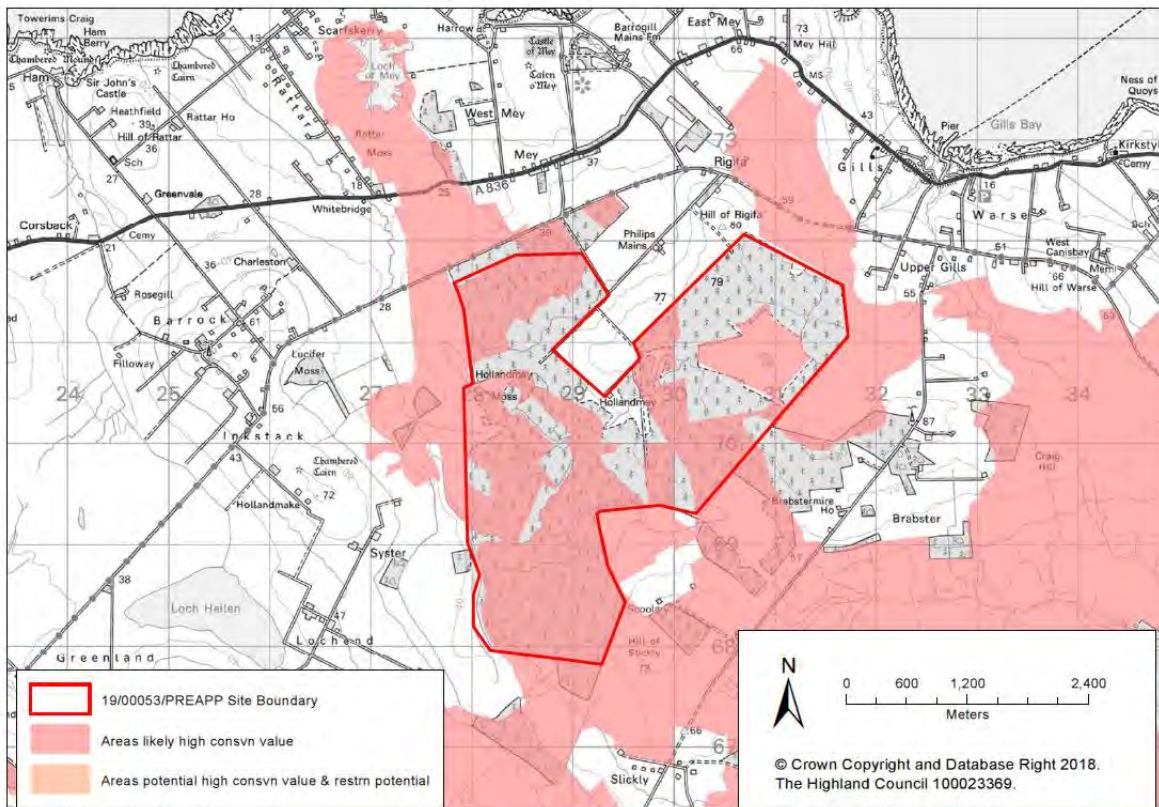
As required by Scottish Planning Policy (SPP) the SG includes the Council's Spatial Framework, which identifies the areas that are likely to be most appropriate for onshore wind energy development. The Spatial Strategy set out in the SG is based on three spatial groupings:

- **Group 1: Areas where wind farms will not be acceptable** (i.e. National Parks and National Scenic Areas);
- **Group 2: Areas of significant protection** (further consideration required to demonstrate that any significant effects can be substantially overcome by siting, design or other mitigation);
- **Group 3: Areas with potential for wind farm development** (areas where wind farms are likely to be acceptable, subject to detailed consideration against policy criteria).

As shown in the map below, the site lies mainly within Group 2 – Areas of significant protection.



This is mainly due to it being located within an area of Carbon Rich Soils, Deep Peat and Priority Peatland Habitat (CPP) which is a Group 2 constraint (as shown in the map below). In that regard attention is drawn to paragraph 4.34 on page 24 of the SG which outlines the expectations for safeguarding the peat resource and sets out a list of key factors which need to be taken into account for proposals affecting peatland.



Other Group 2 features within the site include the 2km buffer of Mey settlement development area (Community Separation Distance) which is discussed above and the Philips Main Mire SSSI, which protects

an area of blanket bog on the north eastern part of the site.

Within 5km of the site boundary there are also a number of Group 2 constraints which will need particularly careful consideration:

- Caithness Lochs SPA
- North Caithness Cliffs SPA
- Caithness and Sutherland Peatlands SPA
- Dunnet Links SSSI, Loch Heilen SSSI, Stroupster Peatlands SSSI, Loch of Mey SSSI
- Dunnet SDAs 2km buffer (Community Separation Distance)
- Castle of Mey (Barrogill Castle) Designed Landscape

Landscape Sensitivity

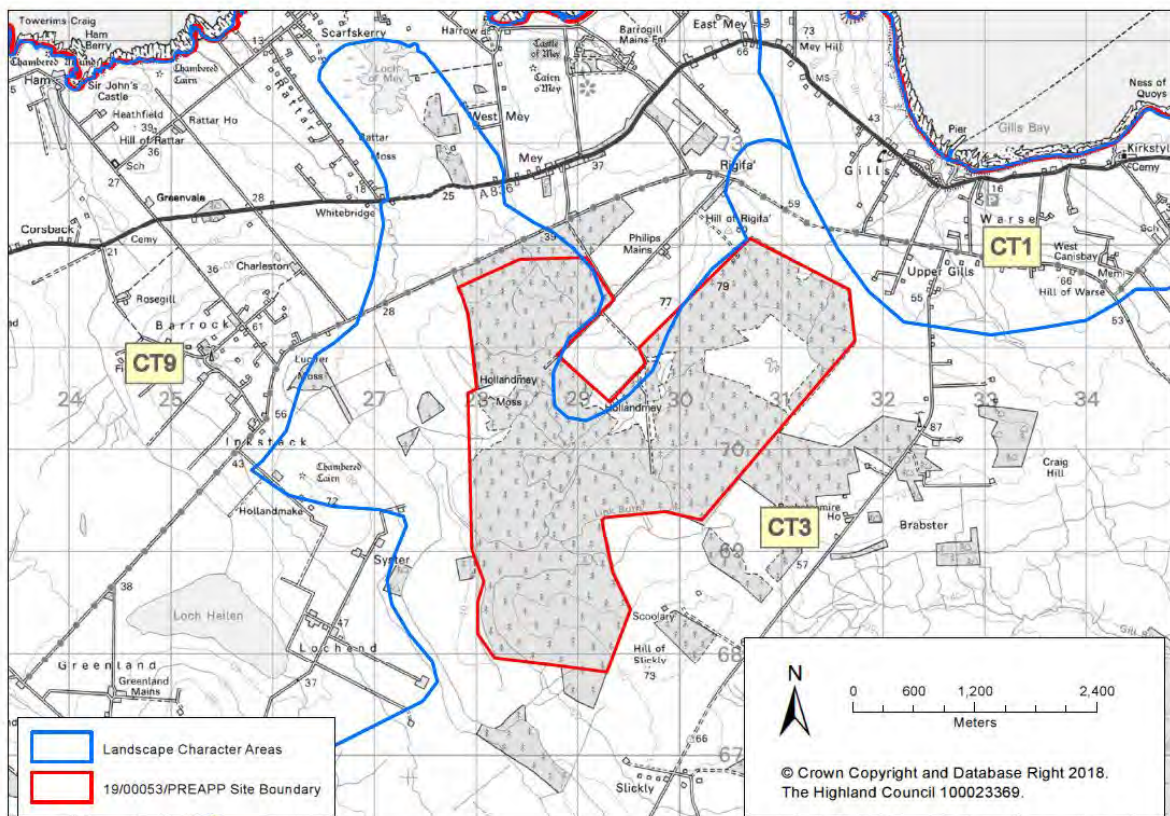
Pages 18-20 of the Supplementary Guidance list ten landscape and visual criteria that the Council will use as a framework for assessing proposals. They are not absolute requirements but set out key considerations of the Council that the developer should be aware of and take account of in progressing assessment and design of the proposal.

Given the proximity of the proposal to existing schemes and the range of nearby landscape features and designations, these aspects will require careful consideration, particularly in light of the indicative maximum height of turbines (149.9m to blade tip).

The Council also expects that all associated buildings including any required to accommodate electricity infrastructure with the wind farm scheme are designed in a way to reflect the vernacular of the area.

Landscape Sensitivity Appraisals

The Council has been undertaking work on appraising the sensitivity of the landscape to onshore wind energy development and identifying strategic capacity. Your site falls within the area covered by the Caithness study, which became part of the Council's adopted suite of Supplementary Guidance in December 2017. The map below shows the location of the boundaries of the landscape character areas as defined for the purposes of the appraisal, and helps to confirm that almost all of your site is located within the LCA referenced CT3 in the appraisal. You should consider within your assessment the guidance that the appraisal provides for CT3. You should read and have regard to all relevant parts of the appraisal.



It may be noted that for CT3 the appraisal concludes that there is limited scope for larger scale turbines – and turbines should:

- Consolidate and improve the existing layout of Stroupster
- Avoid cumulative effects by ensuring turbine height and proportions are similar to existing turbines

Within your assessment consideration of sensitive receptors will need to include those who reside in the area and those who visit it, with receptor locations particularly including areas of settlement, transport routes and visitor and recreational attractions.

Constraints not in the Spatial Framework:

There is a range of other considerations not included within the Spatial Framework but of significance. Some of these are identified within the SG and others are covered within the HwLDP general policies.

- Historic environment such as historic environment records. The section within the supplementary guidance on Natural and Historic Environment (page 22-24) is particularly relevant.
- Nearby residential properties - The Council considers all residential buildings to be particularly sensitive to wind energy development. It should be demonstrated how any potential impacts on amenity have been avoided or mitigated for any residential buildings within 2 km of the proposal. The section within the SG on Safety and Amenity at Sensitive Locations (page 20-21) is particularly relevant.
- Special Landscape Areas – All proposals must have regard to the relevant SLA citations that summarise key characteristics, qualities, sensitivities, and measures for enhancement. These citations will be used to assess impacts of proposals where relevant.

World Heritage Site (tentative):

You will be aware that the Flow Country is on the tentative list for World Heritage Site status and that the current programme of work on the proposal anticipates submission of a technical evaluation later in 2019. Firm proposals for a boundary and any buffers have yet to be reached but it is hoped to undertake some public consultation in spring/summer 2019 which would inform that. You should follow the progress of that work as it may, depending upon progress and timescale, have a bearing on your proposals – see: <http://www.theflowcountry.org.uk/world-heritage-site/> .

Community Benefit

Whilst Community Benefit is a separate issue to planning, the Council wants to make sure that local communities benefit directly from the use of their local resources and are compensated for the disruption and inconvenience associated with large scale development work. The Council's [Community Benefit](#) policy contains contacts for any further discussion on this with the Council.

8. Sustainability

The [Council's Sustainable Design Guide: Supplementary Guidance](#) provides advice and guidance on a range of sustainability topics, including design, building materials and minimising environmental impacts of development.

9. Natural Heritage

Impact on Landscape, [REDACTED], Landscape Officer

The proposed development site lies within the CT3 Northeast Caithness: Sweeping Moorland and Flows Landscape Character Area as identified in the Appendix 2 of the **Highland Council Onshore Wind Energy Supplementary Guidance**, and close to the boundary with areas CT1-Coastal crofts and Farms and CT9-Farmed Lowland Plain.

The high sensitivity of this area is enhanced by its elevation above surrounding LCAs and its relative separation from more extensive areas of Moorland and Flows. The area affords a contrast in character from the small scale settled coastal seaboard to the larger scale, open and simple moorland landscape. It provides an important backdrop and visual horizon in many views along the coast. More strategically this provides some remaining landscape screening and separation from the clusters of wind energy development to the south and west.

The Appendix 2 Landscape Sensitivity Appraisal identifies only 'limited scope' for large scale development that consolidates and improves the existing layout of Stroupster Wind Farm and avoids cumulative effects by ensuring turbine height and proportions are similar to existing turbines.

Given the proposed site's immediate proximity to the site of the previously refused Lyth Wind Farm, the challenge for the developers will be to demonstrate why and how this development will satisfy the requirements of Policies 28 and 67 of the Highland Wide Local Development Plan and ensure a 'proportional relationship between development scale and landscape character and setting is maintained, and avoid significant effects on the adjacent small scale narrow seaboard landscape' as required by the Supplementary Guidance.

Policy 28 Sustainable Development requires that proposed developments will be assessed on the extent to which they impact on resources including Landscape and Scenery ' particularly within designated areas '. In this instance the significant designated landscape will be the Dunnet Head SLA, with particular reference to the 'inland views to the peaks of Caithness including Morven, Maiden Pap and Scaraben' as highlighted in the Special Qualities section of the citation in THC's Assessment of Highland Special Landscape Areas.

Policy 67 Renewable Energy Developments requires that developments 'will not be significantly detrimental overall, either individually or cumulatively with other developments ...having regard in particular to any significant effects on 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)

The applicants should note that these are factors which were highlighted by the Scottish Government Reporter in respect of the dismissal of appeal for Lyth Wind Farm.

In addition and due to the difference in size of turbine between the proposed development and those existing in the locality, the developer's attention is drawn to the advice in '**Scottish Natural Heritage, Siting and Designing Wind Farms in the Landscape**' paragraph 33.3

'Careful consideration is ... needed in the siting and design of wind farms, and between wind farms, to avoid confusing our sense of perspective. This is particularly the case where different turbine sizes are used and / or where there are gaps between groups of wind turbines at varying distances to viewers'

And

'Perception of scale and distance [may] seem.. distorted due to variable sizes of wind turbines combined with an absence of reference points and size indicators'

In this regard any potential cumulative effects with off-shore developments at Beatrice and Moray East and West should also be assessed.

The applicants should note that SNH have now published their revised landscape Character Assessments, to be found at <https://www.nature.scot/professional-advice/landscape/landscape-character-assessment> and that the area boundaries are now essentially identical to those used in the **THC Supplementary Guidance Appendix 2**.

With particular reference to the criteria published in THC Onshore Wind Energy SG the following are likely to be the most significant.

4	The amenity of key recreational routes and ways is respected	Wind Turbines are liable to be prominent in view from all routes within the area, including the A99, B876 and A836 as well as minor roads and walking routes and NCR1, becoming a focal feature in the landscape and detracting from other landscape features characterising the routes at present..
5	The amenity of transport routes is respected	
6	The existing pattern of Wind Energy Development is respected	The proposal is unlikely to combine well with the existing pattern of nearby wind energy development, considerations include: <ul style="list-style-type: none"> • Turbine height and proportions, • density and spacing of developments, • typical relationship of development to the landscape, • previously instituted mitigation measures • Planning Authority stated aims for development of area

<u>7</u>	The proposal contributes positively to existing pattern or objectives for development in the area.	The proposal is unlikely to maintain appropriate and effective separation between developments at Stroupster and Lochend.
<u>8</u>	The perception of landscape scale and distance is respected	The perception of landscape scale and distance is likely to be challenged by introduction of turbines of this scale in relation to existing development.
<u>9</u>	Landscape setting of nearby wind energy developments is respected	Proposal is liable to increase the perceived visual prominence of surrounding wind turbines.
<u>10</u>	Distinctiveness of Landscape character is respected	Integrity and variety of Landscape Character Areas are liable to be eroded by a development which by its positioning and scale may tend to minimise the distinctiveness of this island of Sweeping Moorland and Flows..

Key Points	Assessments to be carried out and/or submitted with application
<p>Developers will need to overcome the issues which upheld the refusal of the previous application at Lyth Windfarm</p> <p>Development will need to demonstrate compliance with THC Onshore Wind Energy SG</p>	<p>LVIA and SG Criteria appraisal.</p>

Impact on Natural Environment, Debbie Skinner, Scottish Natural Heritage

The key issues which should be addressed in the Environmental Impact Assessment (EIA) are as follows:

Landscape and Visual Impacts

Cumulative Landscape and Visual Assessment (CLVIA)

We consider that there is potential for this proposal to have significant cumulative landscape and visual impacts.

We welcome the proposed viewpoints and also suggest that the following locations are included as viewpoints as part of the CLVIA;

- Spittal/Mybster;
- Noss Head
- Thrumster A99
- A9 near Loch Rangag.
- Bower
- A99 Warth Hill
- Ben Dorrey
- Far North Line, near Watten
- Burwick, Orkney Islands
- B876 near Castletown
- From the ferry to Gills Bay (within 10km);
- In the vicinity of Tesco in Wick;
- A location on the A99 within the vicinity of Sinclair's Bay; and
- From the minor Camster Road, in the vicinity of the Hill of Achalipster.

We recommend that you check with the Highland Council for an up-to-date and complete list on which developments to include within the CLVIA (operational, consented and proposed). Further information on cumulative assessments can be found within our guidance, "Assessing the Cumulative Impact of Onshore Wind Energy Developments," available at: <https://www.nature.scot/sites/default/files/2017-09/A675503%20-%20Assessing%20the%20cumulative%20impact%20of%20onshore%20wind%20energy%20developments.pdf>

Ornithology

The application site has connectivity with the Special Protection Areas (SPAs), Site of Special Scientific Interest (SSSI) and Ramsar sites listed below:

- Caithness and Sutherland Peatlands SPA& Ramsar site
- Caithness lochs SPA and Ramsar site
- North Caithness cliffs SPA
- Loch of Mey SSSI

We advise that two years of survey work undertaken within the last 5 years will be required. We understand that the applicant has undertaken some bird survey work which we would be happy to provide more detailed advice on.

Phillips Mains Mire Site of Special Scientific Interest

We note that the application boundary includes the Phillips Mains Mire SSSI designated for its blanket bog habitat. We understand there will be no construction work within the SSSI boundary. The EIA should include appropriate mitigation measures to demonstrate that the proposal will not either directly or indirectly impact on the SSSI.

Caithness and Sutherland Peatlands Special Area of Conservation (SAC)

The Caithness and Sutherland Peatlands SAC is designated for its internationally important peatland habitats, rare plant species and otter. The SAC is located to the east of the application site, immediately adjacent the road which connects Lyth to Upper Gills.

The EIA should look to include appropriate mitigation measures to demonstrate that the proposal will not either directly or indirectly impact on the SAC and that the integrity of the site will be maintained.

The proposal has the potential to impact upon otters which are a qualifying feature of the SAC. We therefore advise that an otter survey is undertaken to inform the EIA. If otters are found to be present then an otter protection plan should be produced.

Protected Species

The development site may support a range of European and nationally protected species including; otter, bats, freshwater pearl mussel, wild cat, badger, pine marten, and water vole. Any planning application should be informed by surveys of the presence of these species on the site together with an assessment of likely impacts and proposed mitigation. Further information is available from: [Planning and development: protected animals | Scottish Natural Heritage](#)

The applicant should be made aware that have recently published new guidance for the assessment of bats and onshore turbines. This guidance can be accessed via the following link:

[Bats and onshore wind turbines - survey, assessment and mitigation | Scottish Natural Heritage](#)

Forestry

We advise the applicant liaises with the Forestry Commission Scotland and all relevant landowners with regard to any proposed changes to the forest management as part of this proposal.

Peatland Advice

Class 1 Peatland

The application site contains areas of blanket bog listed as Class 1 peatland as shown on the [Carbon & Peatland Map 2016](#). Class 1 areas are considered to be nationally important carbon-rich soils, deep peat and priority peatland habitat, areas likely to be of high conservation value or areas of potentially high conservation value and restoration potential. These areas are afforded significant protection under Scottish Planning Policy.

Proposals affecting this national interest are required to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting, design and other mitigation. The siting of a wind farm within the 'Area of significant protection' does not, in itself, mean that the proposal doesn't comply with SPP, nor that carbon rich soils, deep peat and priority peatland habitat will be adversely affected. The quality of peatland is often highly variable across an application site and a detailed assessment is therefore required to identify the actual effects of the proposal.

We advise that an NVC survey is undertaken and that this is used to inform the turbine siting. If any of the proposed turbine locations and access track are located on blanket bog then we advise that further NVC survey will be required at these locations and within the micro siting buffer to determine the condition of the habitat.

Peat Management Plan and Habitat Management Plan

We advise that a Peat Management Plan is produced as part of the EIA. Further to this we advise that a Habitat Management Plan may be required. The plan should clearly demonstrate that any impacts on peatland habitats can be substantially overcome and that there will be no overall loss of peatland habitat or the services that peatland delivers. The plan should also take into account other habitats subject to loss and damage from the proposal.

Peat Depth and Peat Slide Risk Assessment

We advise that a peat depth survey should be carried out. The survey should conform to Peatland Survey 2017 guidance available from; <http://www.gov.scot/Resource/0051/00517174.pdf>.

The peat depths should be clearly mapped and areas of deep peat should be clearly identified. We advise that turbines and other large infrastructure should be located to avoid areas of deep peat. The ER should fully explore opportunities to reduce any impacts on deep peat.

A Peat Slide Risk Assessment should also be undertaken following the latest 2017 guidance on peat slide risk assessments available from; <http://www.gov.scot/Publications/2017/04/8868>.

Construction Environmental Management Plan (CEMP)

We advise that a CEMP should be produced. Paragraph 205 of SPP states; "Where peat and other carbon rich soils are present, applicants should assess the likely effects of development on carbon dioxide (CO₂) emissions. Where peatland is drained or otherwise disturbed, there is liable to be a release of CO₂ to the atmosphere. Developments should aim to minimise this release". This should be addressed through measures described in the proposed CEMP.

We further advise that the ER provides further information on the potential carbon dioxide emissions and 'payback' timescales as part of the description of the proposed development, with reference to the Scottish Government Carbon Calculator tool.

Deer Management

If wild deer are present on or will use the development site, an assessment of the potential impacts on deer welfare, habitats, neighbouring and other interests (e.g. access and recreation, road safety, etc.) should be presented with in the ER. Where significant impacts may be caused, a draft deer management statement will also be required to address the impacts. Please refer to our guidance "*What to consider and include in deer assessments and management at development sites*," available via the following link: <https://www.nature.scot/professional-advice/planning-and-development/renewable-energy-development/types-renewable-technologies/onshore-wind-energy/general-advice-wind-farm>

Appropriate deer management will be vital in ensuring habitat restoration is successful and we advise that this should be referenced within the Habitat Management Plan.

We would encourage the applicant, in line with [The Code of Practice on Deer Management](#), to collaborate with neighbours and other interested parties during the assessment and any subsequent management. If a Deer Management Statement is produced then it should comply with the Best Practice Guidance on Deer Management Plans which is available from; <http://www.bestpracticeguides.org.uk/planning/dmps>

Decommissioning and Redevelopment

The EIA process should consider the implications of decommissioning and redevelopment of renewable energy developments, and assess the likely impacts of both. Guidance on decommissioning can be found on our website at: <https://www.nature.scot/sites/default/files/2017-07/A1434319%20-%20Decommissioning%20and%20restoration%20plans%20for%20wind%20farms%20-%20Guidance%20-%20Feb%202016.pdf>.

The Decommissioning and Restoration Plan (DRP) presented in the ER should be brief but provide an appropriate level of detail about how the site infrastructure may be removed and how the site is intended to be restored. The DRP should be revised 3-5 years prior to the year of decommissioning, to provide full

details of decommissioning and restoration for approval by the Planning Authority. This is because environmental conditions, laws and techniques may change during the operational lifetime of a scheme. Further survey work may be required to inform the final decommissioning plan. As a guide, the final decommissioning plan should contain a similar level of detail to a Construction and Environmental Management Plan.

Restoration should include the removal of new tracks and restoration of existing tracks to their pre-wind farm width during the decommissioning process, to return the site to the same or better state than pre-construction. However, we recognise that there could be situations where retention of some tracks might be beneficial (e.g. for access and recreation where they provide links to important routes, where removal may cause damage to important natural heritage interests, etc.). The pros and cons of track removal/retention for each individual site can be considered more fully in the 3-5 years prior to a decision being taken on decommissioning. This should be done in consultation with the Planning Authority (and SNH and SEPA, as appropriate).

Key Points	Assessments to be carried out and/or submitted with application
<p>Landscape and Visual Impacts Should the applicant require further advice prior to the submission of a scoping request or an application, we ask that they allow sufficient time in their project plan to accommodate provision of our advice. Our customer care response time is set out in our Service Level Statement (Planning Service Statement Scottish Natural Heritage)</p>	<p>All natural heritage and landscape assessments should follow our published guidance. We would expect the applicant to follow the latest guidance, appropriate to the time of ES preparation/submission</p>
<p>Ornithology The proposed development has the potential to impact upon birds connected to protected areas and also birds which are not connected to a protected area.</p>	<p>Information regarding ornithological assessments are available at: https://www.nature.scot/professional-advice/planning-and-development/renewable-energy-development/types-renewable-technologies/onshore-wind-energy/wind-farm-impacts-birds.</p> <p>We recommend that the most recent version of our bird survey methods is followed.</p>
<p>Peatland</p>	<p>Calculating Carbon Savings https://www2.gov.scot/Topics/Business-Industry/Energy/Energy-sources/19185/17852-1/CSavings</p> <p>Surveys for peatland https://www2.gov.scot/Resource/0051/00517174.pdf</p>
<p>Deer management</p>	<p>What to consider and include in deer assessments and management at development sites,” available via the following link: https://www.nature.scot/professional-advice/planning-and-development/renewable-energy-development/types-renewable-technologies/onshore-wind-energy/general-advice-wind-farm</p>
<p>Protected Species</p>	<p>We have a range of guidance on protected species on our website at: https://www.nature.scot/professional-advice/planning-and-development/natural-</p>

[heritage-advice-planners- and-developers/planning-and-development-protected-animals](#)

[Bats and onshore wind turbines - survey, assessment and mitigation | Scottish Natural Heritage](#)

Where the applicant wishes to deviate from published guidance, they should present justification for doing so well in advance of submission. Not doing so runs the risk that the ES will be considered inadequate.

10. Design

The Design Quality and Place Making policy (Policy 29) in the HwLDP requires new development to be designed to make a positive contribution to the architectural and visual quality of the area. Furthermore development proposals must demonstrate sensitivity and respect towards the local distinctiveness of the landscape, architecture, design and layouts of their proposals.

Design and Access Statement

The Design and Access Statement should outline the design principles and concepts that have been applied to the development and:

- (i) explain the policy or approach adopted as to design and how any policies relating to design in the development plan have been taken into account.
- (ii) describe the steps taken to appraise the context of the development and demonstrates how the design of the development takes that context into account in relation to its proposed use.
- (iii) state what, if any, consultation has been undertaken on issues relating to the design principles and concepts that have been applied to the development; and what account has been taken of the outcome of any such consultation.

Further advice on the preparation of design statements is contained in the Council's advice note on [Design and Access Statements](#) and Scottish Government [Planning Advice Note 68](#).

11. Amenity

Contaminated Land, [REDACTED], Contaminated Land Team

Several small former quarries are present at various locations within the site boundary, for example at NGR: 330262 971622 and NGR: 329583 970711. Infilling of these quarries may have taken place and this should be checked should any new structures be located in the vicinity of these quarries. If infilled, depending on materials present, ground gas generation and migration towards new structures may be a concern.

In addition, a former steading building is present at NGR: 329371 970499, within the site boundary. Should any development be proposed in this area or the building is to be reused for any purpose, then a Redevelopment of Agricultural Buildings and Farm Steadings Questionnaire, as attached, would require completion, with further action as necessary.

Key Points	Assessments to be carried out and/or submitted with application
Former quarries	A history/inspection for infilling of any small quarries within the vicinity should be obtained to establish whether any potentially gas generating materials are present which may migrate to new structures.
Steading Building	Should the former steading building be proposed for reuse as part of the

	development, a questionnaire clarifying the possible presence of asbestos, fuel, chemical storage etc. will require to be completed.
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Noise Impacts, Robin Fraser, Environmental Health

Operational Noise

The applicant will be required to submit a noise assessment with regard to the operational phase of the development. The assessment should be carried out in accordance with ETSU-R-97 "The Assessment and Rating of Noise from Wind Farms" and the associated Good Practice Guide published by the Institute of Acoustics. However, it should be noted that there are some areas of the guidance which are not prescriptive and some matters are open to interpretation and discussion. It is recommended that the developer engages with the Council's Environmental Health Officer at an early stage to discuss any such issues.

The noise assessment should demonstrate that noise levels arising from the wind farm will meet either a simplified standard of 35dB LA90 at wind speeds up to 10m/s or a composite standard of 35dB LA90 (daytime) and 38dB LA90 (night time) or up to 5dB above background noise levels at up to 12m/s. It is recognised that ETSU suggests a higher night time limit of 43dB LA90 however, due to the very low background levels in many parts of the Highlands, this is unlikely to be acceptable.

Cumulative Noise

The noise assessment must take into account the potential cumulative effect from any other existing or consented or, in some cases, proposed wind turbine developments. Where there is a potential cumulative impact from more than one development the above limits should be applied to the cumulative level. Where an existing development has limits higher than suggested above, the applicant should agree appropriate limits with the Council's Environmental Health Officer.

Where applications run concurrently, developers and consultants are advised to consider adopting a joint approach with regard to noise assessments. The noise assessment must take into account predicted and consented levels from developments. The good practice guide to ETSU offers guidance on how to deal with cumulative issues.

The assessment must include a compliance monitoring mitigation scheme which will demonstrate how noise levels from the development will be identified should a complaint arise.

Background Noise Measurements

If background noise surveys are required, these should be undertaken in accordance with ETSU-R-97 and the Good Practice Guide. It is recommended that monitoring locations be agreed with the Council's Environmental Health Officer however, it is unlikely that they will be able to attend the installation of equipment. Where possible, sites must avoid other noise sources such as boiler flues, wind chimes, squeaking gate, rustling leaves etc. Otherwise, the results may not be valid for any other property. It is advised that the developer consults the Council's Environmental Health Officer at an early stage to discuss the proposed methodology and locations.

Construction Noise

Planning conditions are not used to control the impact of construction noise as similar powers are available to the Local Authority under Section 60 of the Control of Pollution Act 1974. However, where there is potential for disturbance from construction noise the application will need to include a noise assessment.

A construction noise assessment will be required in the following circumstances: -

- Where it is proposed to undertake work which is audible at the curtilage of any noise sensitive receptor, out with the hours Mon-Fri 8am to 7pm; Sat 8am to 1pm
- or
- Where noise levels during the above periods are likely to exceed 75dB (A) for short term works or 55dB (A) for long term works. Both measurements to be taken as a 1hr LAeq at the curtilage of any noise sensitive receptor. (Generally, long term work is taken to be more than 6 months)

If an assessment is submitted it should be carried out in accordance with BS 5228-1:2009 "Code of practice for noise and vibration control on construction and open sites – Part 1: Noise". Details of any mitigation measures should be provided including proposed hours of operation. Regardless of whether a construction noise assessment is required, it is expected that the developer/contractor will employ the best practicable means to reduce the impact of noise from construction activities. Attention should be given to construction traffic and the use of tonal reversing alarms.

Private Water Supplies

Highland Council holds records of some private water supplies however this database is not exhaustive and some individual supplies may be missing. The applicant can request what information is available but will also be required to carry out an investigation to identify any private water supplies, including pipework, which may be adversely affected by the development and to submit details of the measures proposed to prevent contamination or physical disruption.

Dust

Where houses are in close proximity to any construction area or access track, the applicant should assess the potential of dust arising from construction or traffic and if required should submit a scheme for the suppression of dust.

Key Points	Assessments to be carried out and/or submitted with application
Noise	Assessment of noise from wind turbines
Private water supplies	Assessment of noise from construction activities
Dust	Investigation into private water supplies
	Assessment of potential of dust nuisance

12. Transport and Wider Access

Traffic and Transportation Impacts, [REDACTED] Transport Planning Team

Proposed Development

The proposal is for an onshore wind farm consisting of up to 12 no. wind turbines each with a tip-height of up to 149.9 metres.

The Port of Entry for abnormal indivisible loads (AIL's) and the routes to site for development traffic have not yet been identified; however, access from the local road network will be at a point northwest of Phillips Mains.

Impact of the Development

Transport Planning's interest will relate largely to the impact of development traffic during the construction phase of the project.

The impacts of development traffic may include; impact on road carriageway, verges and associated structures; and impact on road users and adjacent communities.

Transport Assessment

A Transport Assessment (TA) or a section on traffic and transport within the Environmental Assessment for the project will be required. The TA should identify all Council maintained roads likely to be affected by the various stages of the development and consider in detail the impact of development traffic on these roads. Where necessary, the TA should consider and propose measures to mitigate the impact of the development.

Use of on-site borrow pits and the establishment of an on-site concrete batching plant could help reduce traffic impact on the road network.

Cumulative impact with any other developments in progress or committed, including other renewable energy projects, should be considered in the TA.

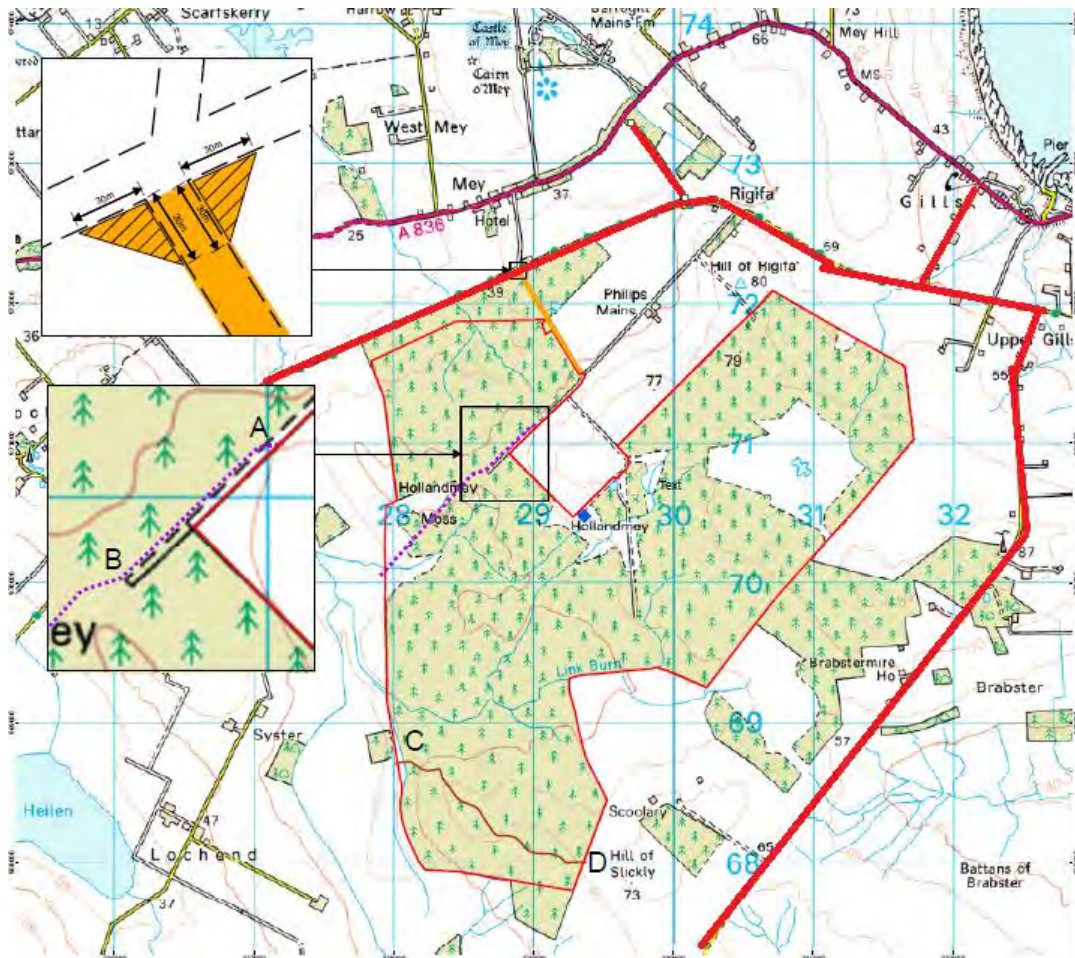
Within the TA justification for the chosen Port of Entry and the preferred route for AIL's shall be clearly demonstrated. This shall include details of alternative routes that have been considered and an explanation as to why these were discounted in favour of the preferred route. A detailed review of the preferred route, to include swept path assessment and consideration of any structures along the route, shall be undertaken. It is likely that a trial run to demonstrate the suitability of the route will also be required.

Early consultation with the Council's Structures Section is recommended with regard to affected

Council maintained structures.

The proposed routes for general construction traffic should also be identified and reviewed within the TA.

It should be noted that the local roads in the vicinity of the site, as highlighted in red on the plan below, are generally weak and considered unsuitable in their present form to withstand construction traffic. Significant road improvement/mitigation measures will, therefore, be required to enable any of the identified roads to accommodate construction traffic.



Prior to preparation of the TA, the applicant shall undertake a detailed scoping exercise in consultation with the Council's Transport Planning team and, as required, Transport Scotland.

The attached guidance documents provide further information on the required content of the TA.

Further information regarding construction traffic can be found in the Council's [Roads and Transport Guidelines for New Developments](#), Chapter 9 and Appendix 9.

It should be noted that traffic levels on A836 increase significantly during the summer tourist season.

Construction Traffic Management Plan

A Construction Traffic Management Plan (CTMP) to help control and reduce the impact of construction traffic will be required prior to the commencement of development. A Framework CTMP should be included in the planning submission and consultation with stakeholders, including local community representatives, will be necessary regarding the detailed content and implementation of the CTMP.

Mitigation

Mitigation required may include; new or improved infrastructure, road safety measures and traffic management. Traffic management shall include measures to ensure that development traffic adheres to approved routes.

Access onto the public road

The proposed access to the site should be clearly detailed on dimensioned drawings related to OS data;

and include confirmation of geometry, construction and drainage, as well as junction and forward visibility splays.

Section 96 Agreement

Notwithstanding the above requirements, there will remain a risk of damage to Council maintained roads from development related traffic. In order to protect the interests of the Council, as roads authority, a suitable agreement relating to Section 96 of the Roads (Scotland) Act and appropriate planning legislation will therefore be required. The agreement shall include the provision of an appropriate Road Bond or similar security.

Flooding and Drainage

The Council's Flood Team should be consulted with regard to potential flooding and drainage issues associated with the development.

Grid Connection Works

Should related grid connection and/or substation works be likely to impact on the local road network, it would be desirable to consider the impact of these works and the mitigation required in conjunction with the proposed wind farm.

Useful contacts:

Structures - Norman Smart, Principal Engineer norman.smart@highland.gov.uk Tel. (01349) 886754
Traffic Data - Greg Otreba, Senior Technician grzegorz.Otreba@highland.gov.uk Tel. (01463) 252947

Key Points	Assessments to be carried out and/or submitted with application
Impact on local road network and travelling public.	Transport Assessment
Roads mitigation/improvement measures.	
Scoping agreement with Highland Council and Transport Scotland.	
Construction Traffic Management Plan	

Impacts on Public Access, [REDACTED], Access Officer

General

Access rights, as provided by the Land Reform (Scotland) Act 2003, are exercisable throughout the majority of the development area and would continue to be so during the operation of any development. The use of the area of the proposed turbine locations for such access rights is limited at present though the development would provide an access resource for the public in terms of built tracks.

Landscape and Visual Impact

Public recreational access in the area of the development is focused on the coast, Dunnet Head/Dunnet Bay/Dunnet Forest, Duncansby Head etc. There is use of the A836 which forms part on the National Cycle Network route 1 and the A99 as part of the John O'Groats to Land End route for non-motorised means. There are a number of core paths within 5km of the proposal, namely the Mey Link (CA05.16) and Stroupster Hill (CA08.07). Viewpoints should be considered from these locations.

There are a number of core paths by the Castle of Mey and at St John Point, the former will be covered by viewpoints from the Castle itself and it is not clear there will be any visible turbines from the later.

Location of quarries or borrow pits for the development should be included in any planning application and visual/landscape impact assessment.

Recreational Access Management Plan

A Recreational Access Management Plan (RAMP) will be required before any development takes place. This plan should consider public access during the construction and the operation of the proposed development.

Given the lack of public use of the site at present for recreational purposes it would not be expected that public access will be expected to be managed during any construction phase, that is the public may be

excluded from the site during the construction phase. This lack of known public use should be clarified in any community consultation prior to the submission of any planning application.

The RAMP should also consider how the public will access the site during the operation of the development. Any access control infrastructure to control vehicle access should be designed to accommodate non-motorised users. Permanent site signage in relation to the development should be approved by the planning authority prior to operation of the development.

Experience of other wind farms in Caithness suggests that the main access tracks in any development will be used by the public to undertake recreational activities. This should be assumed for this development and considered in the design of access control infrastructure or improved by provision of circular tracks, links to adjacent land or parking provision for use by the public.

Key Points	Assessments to be carried out and/or submitted with application
Impact of proposal on recreation access resource in the vicinity	Landscape and Visual Impact Assessment using suitable locations including core paths.
To manage public access during the operation of the development.	To consider public access, to and within the site, in the planning application, especially during the operation of any development. Recreational Access Management Plan expected as a suspensive planning condition for any approval.

Impact on the Trunk Road Network, [REDACTED], for Transport Scotland

The proposal is for a 12-turbine wind farm located approximately 6km to the west of John o’ Groats. The closest trunk road to the site is the A9 (T) at Thurso, some 22km to the west.

It is anticipated that the turbines will have a blade tip height of up to 149.9m. The information supporting the pre-application does not state what the likely installed capacity will be, or whether it will exceed the 50MW threshold for Section 36 consent.

In addition, there is no indication as to how the turbines are to be delivered to site. If the trunk road network forms part of the Abnormal Load Route, Transport Scotland will require to be satisfied that the chosen route(s) can accommodate the movement of abnormal loads associated with the development. The details required would include a report which considers the movement of abnormal loads including swept path analysis and potential mitigation measures required including the temporary removal of street furniture, any proposed junction widening, traffic management etc. to ensure that transportation will not have any detrimental effect on structures within the trunk road route path.

The information requirements of the wind farm development are summarised below.

In the absence of more detailed information, Transport Scotland has no further comment to make at this stage.

Key Points	Assessments to be carried out and/or submitted with application
Proposed wind farm development of 12 turbines.	An abnormal load assessment

13. Water

Impact of Flooding, Alison Fernie, Flood Risk Management Team

The Highland Council Flood Risk Management Team has reviewed the information provided and has the following advice for the applicant at this stage. We would be happy to provide comment on any further draft proposals prior to the formal submission of the planning application.

A number of watercourses are located within the site boundary. We believe that through careful siting of the infrastructure, flood risk from these watercourses can be avoided. Should any infrastructure be located within close proximity of any of the watercourses, we would request that a Flood Risk Assessment is submitted to demonstrate that the development is not at risk from flooding and will not increase flood risk elsewhere. Development or land raising within any flood plain should be avoided. If this cannot be achieved, further consultation with the Flood Risk Management Team will be required.

The upgraded and new access tracks to/on the site may need to cross the existing watercourses. Culverting of watercourses should be avoided unless there is no practical alternative. Any new or upgraded culverts or bridges should be adequately designed to accommodate the 1 in 200 year flows (including a 20% allowance for climate change) to avoid increasing the risk of flooding. Analysis of the impact of any proposed new bridges/crossings should be submitted for review.

We would request that a Drainage Impact Assessment (DIA) for the site is submitted. The DIA should include details relating to any existing field drains and the management of surface water drainage which should be designed in line with general Sustainable Drainage Systems (SuDS) principles. The Applicant should demonstrate, within the proposals submitted, any mitigation measures to manage the residual risk of overland flow/pluvial flooding.

Natural Flood Management Techniques should always be applied to reduce the rate of runoff where possible.

Tracks should not act as preferential pathways for runoff and efforts should be made to retain the existing drainage network.

Appropriate drainage is required to restrict runoff to pre-development rates and to minimise erosion to existing watercourses. The DIA should ensure that post development runoff rate is no greater than pre-development runoff rate (i.e. greenfield runoff) for all return periods up to the 1 in 200 year event (Including an allowance for Climate Change).

Runoff from all events up to and including the 1 in 200 year event should be managed within the site boundary, with no flooding to critical roads or buildings, and evidence as to how this will be achieved should be included within the DIA.

A minimum buffer strip of 10m should be kept free from development from the top of bank(s) of any watercourse/waterbody. Storage of materials within this area during construction is not permitted.

Please refer to the Supplementary Guidance: Flood Risk and Drainage Impact Assessment, available from the Highland Council website, for further detailed requirements for addressing flood risk and drainage.

Key Points	Assessments to be carried out and/or submitted with application
<ul style="list-style-type: none">• 10m buffer zone around waterbodies• Management of surface water to be assessed in a Drainage Impact Assessment for events up to the 1 in 200 year return period• Discharge to be limited to greenfield runoff rates.• Flood Risk Assessment may be required.	<ul style="list-style-type: none">• Drainage Impact Assessment

Impacts on the Water Environment, [REDACTED], SEPA

SEPA welcomes pre-application engagement, but please be aware that our advice at this stage is based on emerging proposals and we cannot rule out potential further information requests as the project develops. Similarly, our advice is given without prejudice to our formal planning response, or any decision made on elements of the proposal regulated by us, which may take into account factors not considered at the pre-application or planning stage.

SEPA's advice is divided into two sections, site specific comments and a generic appendix applicable to all windfarm developments. The site specific section should help the developer focus the scope of the assessment whereas the generic appendix provides the detailed survey requirements where applicable. We would encourage the developer to consult us on their draft layouts and assessments so that we can

provide early feedback before the project approaches design freeze.

Site specific comments

- It appears that much of the site is on peat, therefore we would expect the layout to be designed to minimise the disturbance of peat and be supported by a full site specific Peat Management Plan. Depending on the results of the peat depth survey, piling turbine bases and floating all infrastructure on site should be considered. Please refer to the Scottish Government's [Guidance on Developments on Peatland - Peatland Survey \(2017\)](#) and refer to Paragraph 3 in the appendix below for further submission requirements relating to peat.
- We would be fully supportive of any investigations which would seek to compensate for any historic or proposed impacts to the site, and add environmental improvements where appropriate. The application should include any opportunities for peatland restoration proposals to help compensate for the peat disturbance caused by the development. This could include for example, the restoration of local peat cuttings (if they do not have a cultural or historic interest); and peatland restoration on areas that were previously forested on deep peat. This could form part of the proposed Habitat Management Plan, a draft of which should be included in the submission.
- Careful consideration will need to be given to the layout of the tracks that connect the turbines as these can have just as significant an effect on the aspects of the environment in which we have an interest as the turbines. The track should be demonstrated to be as short as possible and we are unlikely to support excessive use of spurs for example.
- We would expect floating tracks for any areas of peat exceeding a depth of 1m. Floating tracks would mitigate against impacts on peat as well as the hydrological impacts of any Ground Water Dependent Terrestrial Ecosystems (GWDTE) and we would therefore like to see floated tracks throughout the whole development unless proven technically infeasible. All tracks should be kept a minimum 10m away from any waterbody, with the exception of watercourse crossings. We would expect the 10m buffer to be shown on a site plan to confirm that this buffer is maintained and that no construction works occur within this buffer.
- We will expect the layout to avoid Ground Water Dependant Terrestrial Ecosystems (GWDTE), which are identified through a National Vegetation Classification (NVC) survey. Therefore, a map demonstrating that all GWDTE are out with a 100m radius of all excavations shallower than 1m and out with 250m of all excavations deeper than 1m must be submitted.
- Connecting tracks should minimise watercourse crossings. As long as watercourse crossings are designed to accommodate the 1 in 200 year flow and other infrastructure is located well away from watercourses we do not foresee a need for detailed information on flood risk to be provided. All watercourse crossings must be designed as traditional style bridges or bottomless arched culverts.
- We note that much of the site is forested with trees of various ages. We will require reassurance that any felled trees will be removed from site and not left as waste. We would expect forestry removal to enable peatland restoration by reinstating forestry to bog habitat where appropriate. We would be happy to discuss this in further detail. If alternatives are proposed we would expect clear justifications to support the proposal.
- The layout must ensure a separation distance of 50m between turbines and water bodies.
- There will likely be a temporary construction compound, which is likely to have a hard-core base. In the first instance, please refer to [SEPA's Guidance on the life extension and decommissioning of onshore wind farms](#). This contains a hierarchy of environmental impact, for which we would expect any redundant infrastructure to be considered and justified.
- Our preference would be to have any required aggregate sourced from existing quarries to reduce the impacts to the site. Any proposed locations for borrow pits will need to provide evidence of ground investigations that demonstrate that appropriate materials will be present in the proposed location. Minimising the disturbance to peat will also need to be demonstrated, as well proximity/disturbance to watercourses and detailed restoration plans. Further requirements are outlined in the appendix below.
- If any battery storage facilities are proposed on site, further information should be provided and plans should include appropriate bunding and drainage.
- You may need a Construction Site Licence under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR). Please see our regulatory requirements below for further detail.

Detailed generic scoping requirements for windfarm developments

This appendix sets out our generic scoping information requirements. There may be opportunities to scope out some of the issues below depending on site specific conditions. Evidence must be provided in the

submission to support why an issue is not relevant in this site specific instance in order to avoid delay and potential objection.

If there is a delay between scoping and the submission of the application then please refer to our website for our latest information requirements as they are regularly updated; current best practice must be followed.

SEPA would welcome the opportunity to comment on the draft submission. As we can process files of a maximum size of only 25MB the submission must be divided into appropriately named sections of less than 25MB each.

Site layout

All maps must be based on an adequate scale with which to assess the information. This could range from OS 1: 10,000 to a more detailed scale in more sensitive locations. Each of the maps below must detail all proposed upgraded, temporary and permanent site infrastructure. This includes all tracks, excavations, buildings, borrow pits, pipelines, cabling, site compounds, laydown areas, storage areas and any other built elements. Existing built infrastructure should be re-used or upgraded wherever possible. The layout should be designed to minimise the extent of new works in previously undisturbed ground. For example a layout which makes use of lots of spurs or loops is unlikely to be acceptable. Cabling must be laid in ground already disturbed such as verges. A comparison of the environmental effects of alternative locations of infrastructure elements, such as tracks, may be required.

Engineering activities which may have adverse effects on the water environment

The site layout must be designed to avoid impacts upon the water environment. Where activities such as watercourse crossings, watercourse diversions, water abstractions or other engineering activities in or impacting on the water environment cannot be avoided then the submission must include justification of this and:

- a) A map showing all proposed temporary or permanent infrastructure overlain with all lochs and watercourses.
- b) A buffer of at least 50m demarcated around each loch or watercourse. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse, drawings of what is proposed in terms of engineering works, volumes and timings of any abstractions and what mitigation measures are to be put in place.
- c) Each plan must detail the layout of all proposed mitigation including all cut off drains, location, number and size of settlement ponds.

Further advice and our best practice guidance is available within the water [engineering](#) section of our website. Guidance on the design of water crossings can be found in our [Construction of River Crossings Good Practice Guide](#).

Reference should be made to Appendix 2 of our [Standing Advice](#) for advice on flood risk. Watercourse crossings should be designed to accommodate the 1 in 200 year flow, or information provided to justify smaller structures. If it is thought that the development could result in an increased risk of flooding to a nearby receptor then a Flood Risk Assessment must be submitted in support of the planning application. Our [Technical flood risk guidance for stakeholders](#) outlines the information we require to be submitted as part of a Flood Risk Assessment. Please also refer to [Controlled Activities Regulations \(CAR\) Flood Risk Standing Advice for Engineering, Discharge and Impoundment Activities](#).

Disturbance and re-use of excavated peat and other carbon rich soils

Scottish Planning Policy (SPP) states (Paragraph 205) that "Where peat and other carbon rich soils are present, applicants should assess the likely effects of development on carbon dioxide (CO₂) emissions. Where peatland is drained or otherwise disturbed, there is liable to be a release of CO₂ to the atmosphere. Developments should aim to minimise this release."

The planning submission should a) demonstrate how the layout has been designed to minimise disturbance of peat and consequential release of CO₂ and b) outline the preventative/mitigation measures to avoid significant drying or oxidation of peat through, for example, the construction of access tracks, drainage channels, cable trenches, or the storage and re-use of excavated peat. There is often less environmental impact from localised temporary storage and reuse rather than movement to large central peat storage areas.

The submission must include:

- a) A detailed map of peat depths (this must be to full depth and follow the survey requirement of the Scottish Government's [Guidance on Developments on Peatland - Peatland Survey \(2017\)](#)) with all the built elements (including peat storage areas) overlain to demonstrate how the development avoids areas of deep peat and other sensitive receptors such as Groundwater Dependent Terrestrial Ecosystems.
- b) A table which details the quantities of acrotelmic, catotelmic and amorphous peat which will be excavated for each element and where it will be re-used during reinstatement. Details of the proposed widths and depths of any peat to be re-used and how it will be kept wet must be included.

To avoid delay and potential objection proposals must be in accordance with [Guidance on the Assessment of Peat Volumes, Reuse of Excavated Peat and Minimisation of Waste](#) and our [Developments on Peat and Off-Site uses of Waste Peat](#).

Dependent upon the volumes of peat likely to be encountered and the scale of the development, applicants must consider whether a full Peat Management Plan (as detailed in the above guidance) is required or whether the above information would be best submitted as part of the schedule of mitigation. Please note we do not validate carbon balance assessments, but our advice on peat management options may need to be taken into consideration when you consider such assessments.

Disruption to Groundwater Dependant Terrestrial Ecosystems (GWDTE)

GWDTE are protected under the Water Framework Directive and therefore the layout and design of the development must avoid impact on such areas. The following information must be included in the submission:

- a) A map demonstrating that all GWDTE are out with a 100m radius of all excavations shallower than 1m and out with 250m of all excavations deeper than 1m and proposed groundwater water abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it.
- b) If the above minimum buffers cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. We are likely to seek conditions securing appropriate mitigation for all GWDTE affected.

Please refer to [Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems](#) for further advice and the minimum information we require to be submitted. The checklist form provided in Appendix 2 of this letter must be completed and submitted with the above information.

Existing groundwater abstractions

Excavations and other construction works can disrupt groundwater flow and impact on existing groundwater abstractions. The submission must include:

- a) A map demonstrating that all existing groundwater abstractions are out with a 100m radius of all excavations shallower than 1m and out with 250m of all excavations deeper than 1m and proposed groundwater water abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it.
- b) If the above minimum buffers cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. We are likely to seek conditions securing appropriate mitigation for all existing groundwater abstractions affected.

Please refer to [Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems](#) for further advice on the minimum information we require to be submitted.

Forest removal and forest waste

Key-holing must be used wherever possible as large scale felling can result in large amounts of waste material and in a peak release of nutrients which can affect local water quality.

Clear felling may be acceptable only in cases where planting took place on deep peat and it is proposed through a Habitat Management Plan to reinstate peat-forming habitats. The submission must include:

- a) A map demarcating the areas to be subject to different felling techniques.

- b) Photography of general timber condition in each of these areas.
- c) A table of approximate volumes of timber which will be removed from site and volumes, sizes of chips or brash and depths that will be re-used on site.
- d) A plan showing how and where any timber residues will be re-used for ecological benefit within that area, supported by a Habitat Management Plan. Further guidance on this can be found in [Use of Trees Cleared to Facilitate Development on Afforested Land – Joint Guidance from SEPA, SNH and FCS](#).

Borrow pits

Scottish Planning Policy (SPP) states (Paragraph 243) that “Borrow pits should only be permitted if there are significant environmental or economic benefits compared to obtaining material from local quarries, they are time-limited; tied to a particular project and appropriate reclamation measures are in place.” The submission should provide sufficient information to address this policy statement.

In accordance with Paragraphs 52 to 57 of Planning Advice Note 50 [Controlling the Environmental Effects of Surface Mineral Workings](#) (PAN 50) a Site Management Plan should be submitted in support of any application. A map of all proposed borrow pits must be submitted. The following information should also be submitted for each borrow pit:

- a) A map showing the location, size, depths and dimensions.
- b) A map showing any stocks of rock, overburden, soils and temporary and permanent infrastructure including tracks, buildings, oil storage, pipes and drainage, overlain with all lochs and watercourses to a distance of 250 metres. You need to demonstrate that a site specific proportionate buffer can be achieved. On this map, a site-specific buffer must be drawn around each loch or watercourse proportionate to the depth of excavations and at least 10m from access tracks. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse, drawings of what is proposed in terms of engineering works.
- c) You need to provide a justification for the proposed location of borrow pits and evidence of the suitability of the material to be excavated for the proposed use, including any risk of pollution caused by degradation of the rock.
- d) A ground investigation report giving existing seasonally highest water table including sections showing the maximum area, depth and profile of working in relation to the water table.
- e) A site map showing cut-off drains, silt management devices and settlement lagoons to manage surface water and dewatering discharge. Cut-off drains must be installed to maximise diversion of water from entering quarry works.
- f) A site map showing proposed water abstractions with details of the volumes and timings of abstractions.
- g) A site map showing the location of pollution prevention measures such as spill kits, oil interceptors, drainage associated with welfare facilities, recycling and bin storage and vehicle washing areas. The drawing notes should include a commitment to check these daily.
- h) A site map showing where soils and overburden will be stored including details of the heights and dimensions of each store, how long the material will be stored for and how soils will be kept fit for restoration purposes. Where the development will result in the disturbance of peat or other carbon rich soils then the submission must also include a detailed map of peat depths (this must be to full depth and follow the survey requirement of the Scottish Government’s [Guidance on Developments on Peatland - Peatland Survey \(2017\)](#)) with all the built elements and excavation areas overlain so it can clearly be seen how the development minimises disturbance of peat and the consequential release of CO₂.
- i) Sections and plans detailing how restoration will be progressed including the phasing, profiles, depths and types of material to be used.
- j) Details of how the rock will be processed in order to produce a grade of rock that will not cause siltation problems during its end use on tracks, trenches and other hardstanding.

Pollution prevention and environmental management

One of our key interests in relation to developments is pollution prevention measures during the periods of construction, operation, maintenance, demolition and restoration.

A schedule of mitigation supported by the above site specific maps and plans must be submitted. These must include reference to best practice pollution prevention and construction techniques (for example, the maximum area to be stripped of soils at any one time) and regulatory requirements. They should set out the daily responsibilities of ECOWs, how site inspections will be recorded and acted upon and any

proposals to fund a planning monitoring enforcement officer. Please refer to the [Guidance for Pollution Prevention \(GPPs\)](#).

Life extension, repowering and decommissioning

Proposals for life extension, repowering and/or decommissioning must demonstrate accordance with [SEPA Guidance on the life extension and decommissioning of onshore wind farms](#). Table 1 of the guidance provides a hierarchical framework of environmental impact based upon the principles of sustainable resource use, effective mitigation of environmental risk (including climate change) and optimisation of long term ecological restoration. The submission must demonstrate how the hierarchy of environmental impact has been applied, within the context of latest knowledge and best practice, including justification for not selecting lower impact options when life extension is not proposed.

The submission needs to demonstrate that there will be no discarding of materials that are likely to be classified as waste as any such proposals would be unacceptable under waste management licensing. Further guidance on this may be found in the document [Is it waste - Understanding the definition of waste](#).

Regulatory requirements

Authorisation is required under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR) to carry out engineering works in or in the vicinity of inland surface waters (other than groundwater) or wetlands. Inland water means all standing or flowing water on the surface of the land (e.g. rivers, lochs, canals, reservoirs).

Management of surplus peat or soils may require an exemption under The Waste Management Licensing (Scotland) Regulations 2011. Proposed crushing or screening will require a permit under The Pollution Prevention and Control (Scotland) Regulations 2012. Consider if other environmental licences may be required for any installations or processes.

A Controlled Activities Regulations (CAR) construction site licence will be required for management of surface water run-off from a construction site, including access tracks, which:

- is more than 4 hectares,
- is in excess of 5km, or
- includes an area of more than 1 hectare or length of more than 500m on ground with a slope in excess of 25°

See SEPA's [Sector Specific Guidance: Construction Sites \(WAT-SG-75\)](#) for details. Site design may be affected by pollution prevention requirements and hence we strongly encourage the applicant to engage in pre-CAR application discussions with a member of the regulatory services team in your local SEPA office.

Details of regulatory requirements and good practice advice for the applicant can be found on the [Regulations section](#) of our website. If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the operations team in your local SEPA office at: Strathbeg House, Clarence Street, Thurso KW14 7JS. Telephone 01847 894 422.

Key Points	Assessments to be carried out and/or submitted with application
<p>To avoid delay and potential objection the following information must be submitted in support of the application.</p> <p>a) Map and assessment of all engineering works within and near the water environment including buffers, details of any flood risk assessment and details of any related CAR applications;</p> <p>b) Map and assessment of impacts upon Groundwater Dependent Terrestrial Ecosystems and buffers;</p> <p>c) Map and assessment of impacts upon groundwater abstractions and buffers;</p> <p>d) Peat depth survey and table detailing re-use proposals;</p>	See above for details

<ul style="list-style-type: none"> e) Map and table detailing forest removal; f) Map and site layout of borrow pits; g) Schedule of mitigation including pollution prevention measures; h) Borrow pit pollution prevention measures and restoration plans; i) Map of proposed waste water drainage layout; j) Map of proposed surface water drainage layout; k) Map of proposed water abstractions including details of the proposed operating regime; l) Decommissioning statement. 	
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14. Built and Cultural Heritage

Impact on the Historic Environment, [REDACTED], Historic Environment Team

A few features of historic interest are currently recorded within the boundary of the proposal area. These consist of the remains of historic land-use such as farmsteads, sheepfolds and areas of shieling settlement. Many other sites, including prehistoric settlement are recorded across the wider area and there remains the potential for further features or remains of prehistoric or later date to be present. Overall, direct impacts to cultural heritage are not envisaged to be a significant constraint in this case. There are, however, a number of important historic features in the wider area that may have their setting adversely impacted by a development in the location proposed.

The Cultural Heritage chapter of the Environmental Statement will need to be undertaken by a professional and competent historic environment consultant. The ES chapter will need to follow Highland Council Standards for Archaeological Work, specifically Section 4 which deals with Environmental Statements and Section 3. The Standards are available at http://www.highland.gov.uk/downloads/file/1022/standards_for_archaeological_wok. The assessment will include a walkover survey of the development area (including any land required for associated infrastructure). The assessment will consider the potential direct impacts of the development to cultural heritage as well as indirect impacts. The indirect impact assessment must include a study of cumulative impacts. Where indirect impacts are predicted, these will be illustrated using photomontages.

Where impacts are unavoidable, HET expect proposed methods to mitigate this impact to be discussed in detail, including both physical (i.e. re-design) and where appropriate, compensatory/off-setting.

Key Points	Assessments to be carried out and/or submitted with application
<p>Ideally, direct impacts to the historic environment can be avoided by careful design and micro-siting.</p> <p>Indirect (setting) impacts are likely to be a more significant issue than direct impacts</p>	<p>Cultural heritage will be rigorously assessed as part of any forthcoming Environmental Statement.</p> <p>A discussion of direct impacts will be supported by a full and detailed archaeological survey.</p> <p>Appropriate mitigation strategies will be formulated where adverse impacts are predicted.</p>

Impact on the Historic Environment, Victoria Clements, Historic Environment Scotland

Historic Environment Scotland's remit is to comment where proposals might impact upon the fabric and/or setting of designated historic features, such as Scheduled Monuments, A-Listed Buildings, sites on the Inventories of Gardens and Designed Landscapes and Historic Battlefields. <http://portal.historic->

Key Points	Assessments to be carried out and/or submitted with application
<p>Very limited information has been submitted at this stage and therefore it is difficult to provide detailed comments at this stage.</p> <p>We can confirm that there are no scheduled monuments, category A listed buildings, Inventory gardens & designed landscapes (GDLs) or battlefields within the proposed development site boundary. Significant direct physical impacts on assets within our remit are therefore unlikely. There are, however, a number of historic environment assets within HES' remit in the surrounding area which have the potential to receive significant adverse impacts to their setting from the proposed development.</p> <p>Assets within our remit which we consider should be assessed for potentially significant impacts include (but are not limited to):</p> <ul style="list-style-type: none">• Earl's Cairn, chambered cairn N of Hollandmake, Inkstak (SM 449)• Thomsonfield, broch 780m SW of, Brabstermire (SM 558)• Category A listed Castle of Mey (LB 1797)• Castle of Mey (Barrogill Castle) Inventory GDL (GDL 00096) <p>Given the proximity of the Earl's Cairn scheduled monument to the proposed turbines, there is the potential for them to be very prominent in the surrounding open landscape and potentially affect the integrity of the setting of this monument. We also have concerns about the potential impacts on the setting of Castle of Mey and its associated Inventory garden and designed landscape. We would therefore recommend that any assessment should include visualisations to assist with assessment.</p> <p>We would also recommend that cumulative effects on the setting of historic environment assets are assessed given the number and proximity of other operational, consented and proposed wind developments in the surrounding area.</p> <p>If you have not already done so, you should also seek the advice of your local authority archaeological and conservation services regarding any impacts on unscheduled archaeology and category B and C listed buildings.</p> <p>Any application should be assessed by your Council against local and national policy and guidance on the historic environment.</p> <p>Guidance about national policy can be found in our 'Managing Change in the Historic Environment' series available online at www.historicenvironment.scot/advice-and-support/planning-and-guidance/legislation-and-guidance/managing-change-in-the-historic-environment-guidance-notes</p>	

15. Developer Contributions

The need for any developer contributions to offset any adverse impacts arising from the proposed development would be identified during the course of the application.

16. Pre-application Procedures/Guidance

Public consultation should be undertaken as the proposals develop to help both gauging the opinion of the local community and also scoping potential areas of conflict which could be addressed prior to submission of the application.

When carrying out community consultation we recommend that full consideration is taken of Scottish Government Planning Advice Note 3/2010 - Community Engagement. This includes the standards for community involvement which should be adhered to. These standards are:

- Involvement
- Support
- Planning
- Methods
- Working together
- Sharing information
- Working with others
- Improvement
- Feedback
- Monitoring and evaluation

It is advisable to take into consideration all of the comments made by members of the public before a planning application is submitted to ensure that the public feel they have had an influence over the proposals. For public consultation it may be useful to use the SP=EED tool developed by Planning Aid Scotland. This builds on the Standards for Community Engagement set out in PAN 3/2010. This is available online at <http://www.planningaidscotland.org.uk>.

Processing Agreements

A processing agreement is a way of helping developers, the Council and relevant stakeholders work together through the planning process. It involves setting out the key stages involved in deciding a planning application, identifying what information is required from whom and setting time scales for the various stages of the process.

The Council actively encourages the use of processing agreements for major applications. You are advised to contact the Development Management Case Officer with a view to agreeing a Processing Agreement at the earliest possible opportunity. Contact details are provided in section 18 towards the end of this pack.

Proposal of Application Notice

The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 (As Amended) require that for any major development pre-application consultation must be undertaken. This requires a formal Proposal of Application Notice to be submitted to the Planning Authority at least 12 weeks prior to any formal planning application being lodged and any subsequent planning application must be accompanied by a Pre-application Community Consultation report. Further information is provided on the Council website, see:

<http://www.highland.gov.uk/yourenvironment/planning/pre-application-advice/statutory-preapplication-consultation.htm>

Environmental Impact Assessment Screening

The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 requires that the application must be screened to determine whether an Environmental Impact Assessment (EIA) is required to support a planning application. A formal request for a Screening Opinion/s should be made in writing to the Planning Authority. An EIA Screening Opinion form can be downloaded from the Councils

website by following the link below. At present it is not possible to do this online.

<http://www.highland.gov.uk/yourenvironment/planning/planningapplications/applyforplanningpermission.htm>

Community Councils

In terms of the appropriate Community Councils to consult, the proposal is located within the Dunnet and Community Council area. A development of the nature proposed may affect a number of adjacent Community Councils, as such it is recommended that adjacent Community Councils are also consulted. The Ward Manager (David Sutherland) can provide advice further in this regard if required. Contact details for all community Councils can be found on the link below:

<http://www.highland.gov.uk/livinghere/communitiesandorganisations/communitycouncils/>

Access

It would be beneficial to at this stage consult with the local Disability Access Panel. The contact details for your local panel are:

- Caithness Access Panel, Caithness Voluntary Group, Telford House, Williamson Street, Wick, KW1 5ES. Telephone: (01955) 609962.

For general advice in relation to the removal of barriers and the promotion of equal access for all people affected by disability for your development contact the [Scottish Disability Equality Forum](#), 12 Enterprise House, Springkerse Business Park, Stirling, FK7 7UF. Telephone: (01786) 446456.

Councillors Code of Conduct

It would be beneficial for you to be familiar with the Councillors' Code of Conduct. This is available online [from the Scottish Government's website](#).

17. Any other appropriate information

Gaelic

In line with the Council's ongoing commitment to promote the increased use of Gaelic in developments within the Highlands, you are encouraged to consider the use of bilingual signs - both internal and external - as part of your proposal. Our Gaelic Translation Officers are able to provide additional advice and help with translations, if required.

For further information and guidance, please contact the Council's Gaelic Translation Officer on (01463) 724287 or visit <http://www.gaidhealtachd.gov.uk>.

To download a copy of the Council's 'Using Gaelic in Signs' advice note, please visit:

<http://www.highland.gov.uk/yourenvironment/planning/planningapplications/Adviceandguidance.htm>.

For details on grant funding for bilingual signage, please contact Comunn na Gàidhlig on (01463) 724287 or visit www.cnag.org.uk.

18. Contacts

Major Applications Team
Planning and Development Service
Council Headquarters
Glenurquhart Road
Inverness
IV3 5NX

E-mail

██████████@highland.gov.uk

Phone

██████████

Highland Council

Contact

Gillian Pearson, Acting Principal
Planner

Email

██████████@highland.gov.uk

Phone

██████████

Shirley Ross, Scientific Officer,
Contaminated Land

██████████@highland.gov.uk

██████████

Matt Dent, Access Officer

██████████@highland.gov.uk

██████████

Kirsty Cameron, Archaeologist, Historic Environment	[REDACTED] @highland.gov.uk	[REDACTED]
Fred McIntosh, Transport Development Officer	[REDACTED] @highland.gov.uk	[REDACTED]
Alison Fernie, Flood Risk Management	[REDACTED] @highland.gov.uk	[REDACTED]
Douglas Chisholm, Policy	[REDACTED] @highland.gov.uk	[REDACTED]
Robin Fraser, Environmental Health	[REDACTED] @highland.gov.uk	[REDACTED]
Outside Agencies		
John McDonald, Transport Scotland	[REDACTED] @transportscotland.gov.uk	[REDACTED]
Aden McCorkell, Planning Officer, SEPA	[REDACTED] @sepa.org.uk	[REDACTED]
Debbie Skinner, Operations Officer, Scottish Natural Heritage	[REDACTED] @nature.scot	[REDACTED]
Victoria Clements Senior Heritage Management Officer, Historic Environment Scotland	[REDACTED] @hes.scot	[REDACTED]

Disclaimer

The Council will make every effort to ensure that the advice given in the pre-application process is as accurate as possible. However any advice given by Council officers for pre-application inquiries does not constitute a formal decision of The Council with regards to any planning application and, whilst it may be a material consideration, cannot be held to bind The Council in its validation or formal determination of a subsequent application.

If an application is subsequently submitted which fails to take on board advice given by officers, then The Council may refuse it without further discussion with the applicant or their agent.

There is a possibility that, under the Freedom of Information Act, The Council will be asked to provide information regarding inquiries for pre-application advice and copies of any advice provided or correspondence entered into. This information may only be withheld if its disclosure could prejudice commercial interests, inhibit the free and frank provision of advice or exchange of views during the planning process, or could prejudice the effective conduct of public affairs. Those seeking pre-application advice should provide a covering letter that sets out the reasons why, and for how long, any information relating to the case needs to remain confidential.

It will be for The Council to decide whether information can be treated as exempt from disclosure and it should be recognised that the thrust of the legislation is to make information accessible unless there is a pressing reason why not. Each case will be assessed on its merits. The passage of time may remove the need for exemption as information becomes less sensitive. Generally, notes and correspondence relating to pre-application discussions will not be treated as confidential, once a planning application has been submitted and the case is in the public domain.

Planning Application Submission Checklist

If there is a tick next to one of the following documents then we will require you to submit it along with your application for planning permission. If you choose not to follow our advice and do not submit one of the required documents then we will expect a justification for this. A form for this which should be submitted with your application is available to download from <http://www.highland.gov.uk/>

Natural Heritage	Landscape and Visual Impact Assessment (including appraisal of criteria outlined in Supplementary Guidance and assessment of impact on recreation/core paths)	✓
	Landscape Plan	
	Landscape Maintenance/Management Plan	
	Protected Habitat Survey	✓
	Protected Species Survey	✓
	Peatland Survey	✓
	Deer Management Assessment	
	Tree Survey	
Design	Design Brief and/or Master Plan	
	Design and Access Statement	
	Sustainable Design Statement	
Amenity	Contaminated Land Report	
	Dust Survey	✓
	Noise Impact Assessment	✓
	Assessment of Private Water Supplies	✓
	Contaminated Land Questionnaire	✓
	Assessment of former quarries within site	✓
	Waste Strategy	
Transport and Wider Access	Green Travel Framework	
	Scottish Transport Appraisal Guidance (STAG)	
	Abnormal Load Assessment	✓
	Transport Assessment	✓
Water	Flood Risk Assessment	
	Drainage Impact Assessment	✓
Built and Cultural Heritage	Archaeology Survey	✓
	Assessment of Cultural Heritage Assets	✓
	Conservation Statement	
	Structural Survey	
Public Consultations	Pre-application Consultation Report	✓
Miscellaneous	Minerals (mitigation and restoration management plan)	
	Retail Assessment	
Any other appropriate document	See SEPA advice	

Environmental Impact Assessment

Screening

The Council is obliged to screen development proposals that may require an Environmental Impact Assessment (EIA). Unless specifically requested it is not the Council's intention to automatically screen proposals and issue a formal Screening Opinion.

The Highland Council Screening response was issued on.....	
The Highland Council Screening response is attached	
The Highland Council Screening response is not attached because it was not requested.	✓

Scoping

Where a proposal has been determined to require an EIA, and therefore will require the production of an Environmental Statement, we aim to give a Scoping response at this stage if we have not already been approached to do so.

The Highland Council Scoping Response was issued on....	
The Highland Council Scoping Response is attached	
The Highland Council Scoping Response is not attached because it was not requested.	✓



Hollandmey Renewable Energy Development Public Consultation Leaflet



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Why are we contacting you?

ScottishPower Renewables (SPR) is investigating the potential for a renewable energy development on an area of land approximately 8 km south west of John o' Groats, as shown on the plan. Design work is in the early stages; however, the proposed Development could comprise up to 11 wind turbines (with a maximum height to blade tip of up to 149.9 metres), solar photovoltaic (solar PV) generation and an energy storage facility.

Early consultation is key to the way we develop projects. We believe in open consultation with communities and stakeholders to inform the design process. However, current COVID-19 legislation¹ prevents face-to-face consultation and this may not be permitted for the foreseeable future. SPR remains committed to undertaking meaningful and wide-reaching consultation during this difficult and challenging time. We are, therefore, contacting you to provide you with information on our proposal and to let you know how you can provide feedback.

Who are we?

SPR is part of the ScottishPower group of companies operating in the UK under the Iberdrola Group, one of the world's largest integrated utility companies and a world leader in wind energy. ScottishPower now only produces 100% green electricity – focusing on wind energy, smart grids and driving the change to a cleaner, electric future. The company is investing over £4 million every working day² to make this happen and is committed to speeding up the transition to cleaner electric transport, improving air quality and, over time, driving down bills to deliver a better future for everyone.

SPR is at the forefront of the development of the renewables industry through pioneering ideas, forward thinking and outstanding innovation. Its ambitious growth plans include expansion of its existing onshore wind portfolio, investment in

¹ The Town and Country Planning (Miscellaneous Temporary Modifications) (Coronavirus) (Scotland) Regulations 2020: Scottish Government: 2014. Available at www.legislation.gov.uk/ssi/2020/124/contents/made

² Between 2018 and 2022

new large-scale solar deployment and innovative grid storage systems, including batteries. The company is also delivering the Iberdrola Group's offshore windfarms in the southern North Sea off East Anglia. With over 40 operational windfarms, SPR manages all its sites through its world-leading control centre at Whitelee Windfarm, near Glasgow.

ScottishPower Renewables in the Highlands of Scotland

SPR has been working alongside communities across the UK for nearly two decades and has, to date, contributed more than £36 million in benefit funds to support initiatives and projects for those communities local to its windfarm sites. The majority of our projects to date have been in the south of Scotland. However, we have two existing projects in the north: Beinn Tharsuinn Windfarm (operational) and Halsary Windfarm (under construction). Community benefit funds from these developments are projected to exceed £2.5 million in the local area.

With the development of these sites nearby, SPR is continuing its history of working positively with local communities within the south of Scotland and applying this approach to the northern region. We are keen to create employment opportunities during the construction and operation of our windfarms that can be delivered locally to benefit those who live near our sites.

The flexible approach adopted by SPR has empowered local communities to decide what the community benefit is spent on. This has resulted in a fantastic diversity of projects being delivered, from improving local amenities, including town halls, cinemas and local youth clubs, to supporting work experience places, educational workshops and much more.

Drivers for renewable energy

The UK government, the Scottish Government and the Highland Council have all declared a "climate emergency" and are committed to ensuring that an increased proportion of electricity is generated from renewable energy sources in order to meet carbon emission targets. The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 introduced a target of net zero greenhouse gas emissions by 2045 at the latest. Scotland will also have to reduce emissions by at least 56% by 2020, 75% by 2030 and 90% by 2040. These are currently the most ambitious statutory targets in the world. Scotland's Climate Change Plan 2018–2032, which sets out the road map for achieving those targets, has set the goal of 50% of Scotland's energy needs to be met by renewable energy by 2030.

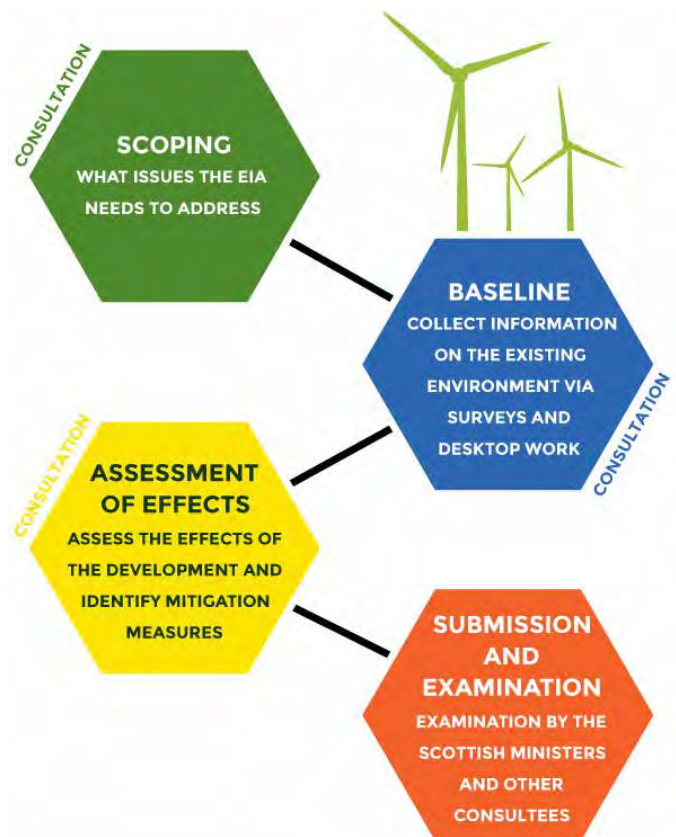
Powering your community

SPR is committed to being a responsible developer of renewable energy and strives to be a good neighbour in all areas of its work. We encourage as many people as possible to get involved in and to learn more about our projects, particularly in understanding the local economic and social benefits our developments can create. As we progress with the Hollandmey Renewable Energy Development proposal, we will engage with communities, stakeholders and the Highland Council to understand how benefits could be delivered to best meet the needs of the local area, should the proposed Development be consented.

Environmental Impact Assessment and design

An Environmental Impact Assessment (EIA) is required for the proposed Development, and this will be informed by the consultation responses that SPR receives from stakeholders to the direct scoping exercise that is currently under way. These scoping responses will confirm the environmental aspects that are to be assessed.

We have been undertaking bird surveys in the vicinity of the site since 2017, and several feasibility studies have been conducted that have helped to shape the proposed Development. We will also be undertaking a range of further environmental surveys and technical studies throughout the course of this year (when possible and in line with government guidance) to ensure that the potential environmental effects are fully understood and mitigated. We will also give careful consideration to how this proposed Development looks within the existing landscape, considering its visibility from key viewpoints in the surrounding area and how it "fits" with surrounding windfarms in the area.



Next steps

We will use the findings from environmental surveys, technical studies and consultation feedback to continue to shape the design of the proposed Development ahead of submitting an application to the Scottish Government Energy Consents Unit, which we anticipate will be in winter 2020.

CONTACT

If you require more information on the proposed Development, have a query or wish to provide feedback, please contact us directly.

WEBSITE:

www.ScottishPowerRenewables.com/HollandmeyRED

PROJECT E-MAIL:

hollandmeyred@scottishpower.com

TELEPHONE:

+44 (0)141 614 9075

POST:

Hollandmey Renewable Energy Development Project Team
ScottishPower Renewables
9th Floor ScottishPower Headquarters
320 St Vincent Street
Glasgow G2 5AD

Hollandmey Renewable Energy Development - Public Information Event

1st October 2020

ScottishPower Renewables (SPR) invites you to participate in its Public Consultation on the draft proposals for the Hollandmey Renewable Energy Development (Hollandmey RED).

Hollandmey Renewable Energy Development Public Information Event

Please review and submit your comments and questions on the proposals via the feedback form on the project website by 21 October 2020.

SPR is proposing to develop Hollandmey RED, situated approximately 8 km south-west of John o'Groats and 16 km east of Thurso within the north-eastern part of the Caithness area of the Highlands.

The proposed Development is anticipated to consist of approximately 10 wind turbines with tip heights of up to 149.9 m. The deployment of other renewable technologies within the Site is also being proposed, including battery storage and solar photovoltaic (solar PV) generation.

Early consultation is key to developing our projects and, throughout the development process, we ensure local communities and stakeholders are given the opportunity to provide feedback and are kept informed of project progress.

Given the restrictions requiring social distancing, instead of holding Public Information Days, a Public Information Event on the proposals will be available online from 2 October 2020 on the project website www.ScottishPowerRenewables.com/HollandmeyRED

The online Public Information Event will include information banners as well as visualisations to help to give an impression of what the proposed Development could look like from different viewpoints in the area.

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The online Public Information Event will include information banners as well as visualisations to help to give an impression of what the proposed Development could look like from different viewpoints in the area.

The event will include a link to a feedback form through which comments and questions, as well as any requests for further information, can be submitted directly to the Project Team.

Alternatively, you may contact the Project Team by emailing HollandmeyRED@scottishpower.com

or writing to

ScottishPower Renewables

Hollandmey Renewable Energy Development Team

9th Floor ScottishPower Headquarters

320 St Vincent Street

Glasgow

G2 5AD

If you have any questions or wish to make comments on the proposal, we request that these are submitted via the feedback form by 23 October 2020.

Please note that this notice does not relate to an application and that any comments made on the proposals to SPR at this stage are not representations to the Scottish Ministers. If an application is subsequently submitted, normal publicity will be undertaken at that time and you will have the opportunity to make a formal representation then.

www.scottishpowerrenewables.com



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1/10/2020

Hollandmey Renewable Energy Development - Public Information Event



ScottishPower Renewables (SPR) invites you to participate

in its Public Consultation on the draft proposals for the Hollandmey Renewable Energy Development (Hollandmey RED). SPR is proposing to develop Hollandmey RED, situated approximately 8 km south-west of John o'Groats and 16 km east of Thurso within the north-eastern part of the Caithness area of the Highlands.

1/10/2020

Orkney Craft Vinegar Expands As Demand Rises



Founder of Orkney Craft Vinegar Limited, Sam Britten started the business in a garage in the village of Orphir in 2017. The award-winning firm has grown rapidly after becoming a favourite with celebrity chefs.

1/10/2020

1000s Of Seafarers To Receive Fair Pay As UK

1/10/2020

Ashley Ann In Wick Now Recruiting To Various

[Furniture & Wood]

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- [Community Area Help](#)

Covid-19 Highland
Freephone Helpline
 0300 303 1362
[Shielding For Vulnerable](#)
Highland Council
Emergency Number
 01349 886669

Scot Covid Stats/Links

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Hollandmey Renewable Energy Development - Public Information Event

Hollandmey Renewable Energy Development

Public Information Event

Please review and submit your comments and questions on the proposals via the feedback form on the project website by 23 October 2020.

ScottishPower Renewables (SPR) invites you to participate in its Public Consultation on the draft proposals for the Hollandmey Renewable Energy Development (Hollandmey RED). SPR is proposing to develop Hollandmey RED, situated approximately 8 km south-west of John o'Groats and 16 km east of Thurso within the north-eastern part of the Caithness area of the Highlands. The proposed Development is anticipated to consist of approximately 10 wind turbines with tip heights of up to 149.9 m. The deployment of other renewable technologies within the Site is also being proposed, including battery storage and solar photovoltaic (solar PV) generation.

30 September 2020

Wick High Street Devastation Continues - TSB To Close Wick Branch

TSB has today announced it will close 164 branches as the Bank continues to implement its three-year strategy announced in November 2019. **73 Branches of TSB in Scotland will close including the one at Wick.** The writing has been on the wall for bank closures for sometime but the pandemic has made more people sign up for online

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Hollandmey Renewable Energy Development - Public Information Event

ScottishPower Renewables (SPR) invites you to participate in its Public Consultation on the draft proposals for the Hollandmey Renewable Energy Development (Hollandmey RED). SPR is proposing to develop...

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Send Message

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 **NorthLink Ferries**

 **HOSTGA Highlands Of Scotland ...**

See more

Pages Other Community Caithness.Org

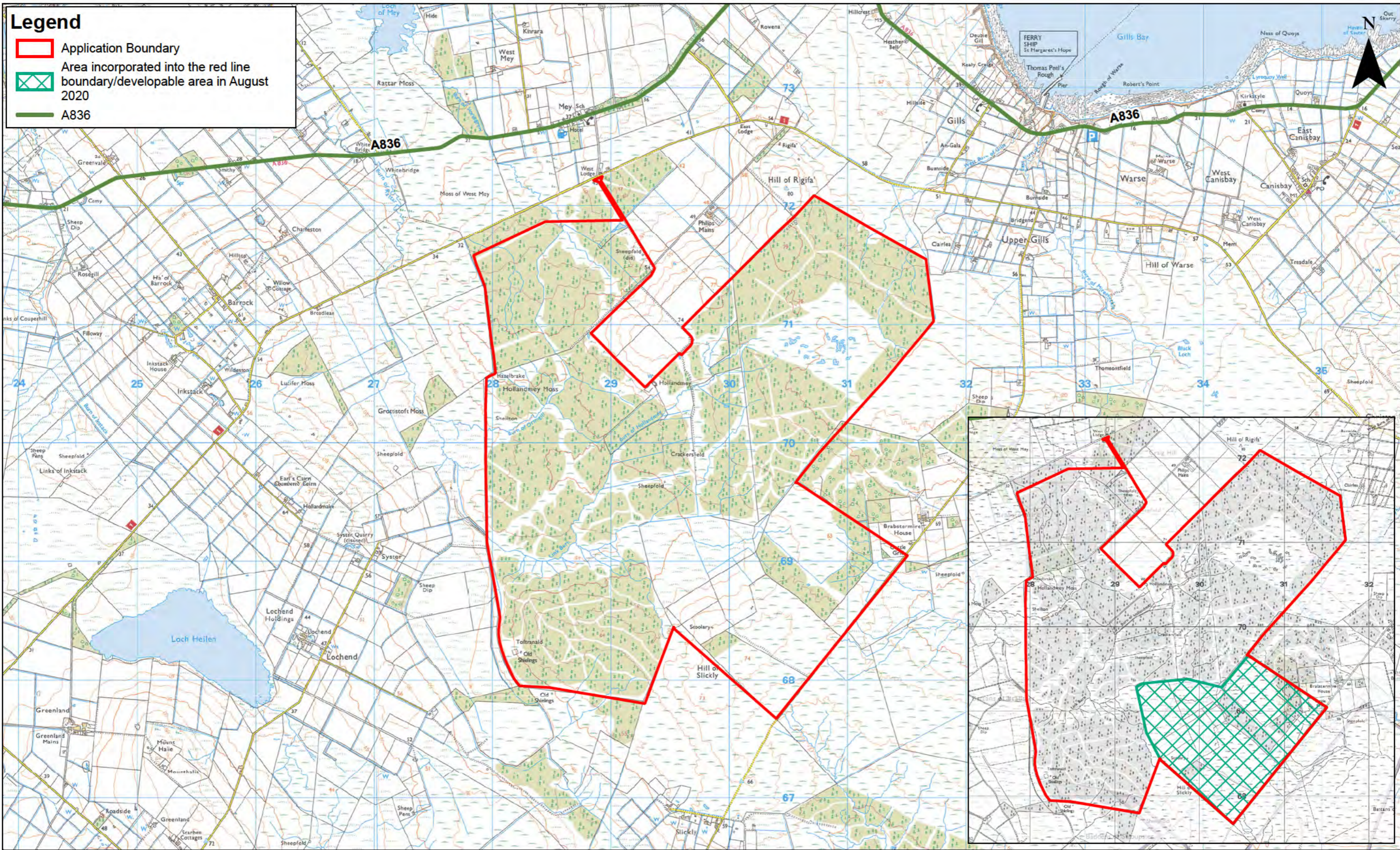
English (UK) Polski Español
Portugués (Brasil) Français (France)

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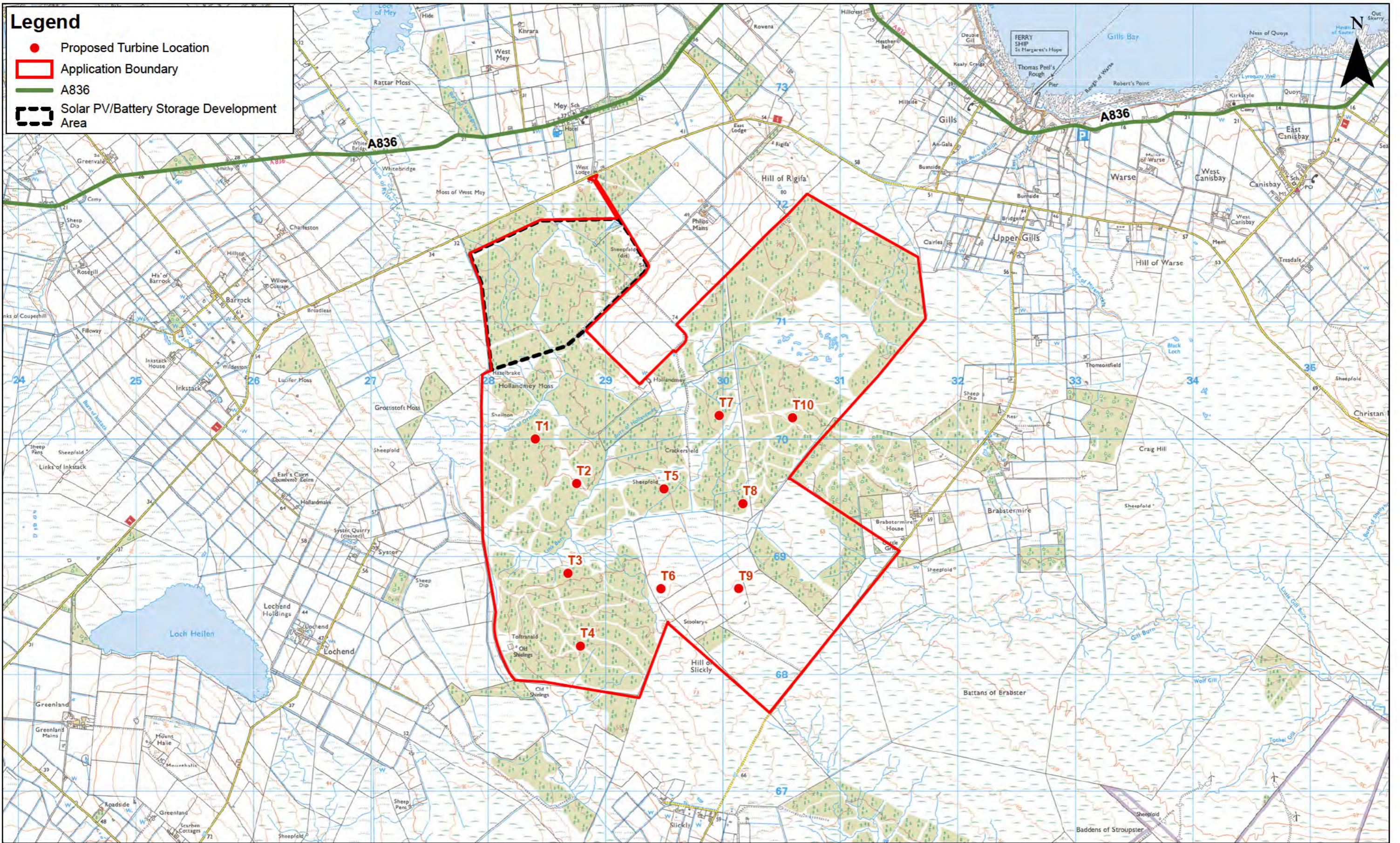
Rev	Date	By	Comment
F	25/08/2020	AJ	Inset added.
E	20/08/2020	DL	RLB changed.
D	14/07/2020	AJ	RLB changed.

1:30,000
Scale @ A3

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Hollandmey Renewable Energy Development Application Boundary

Drg No	HMY_C_016	
Rev	F	Datum: OSGB36
Date	25/08/2020	Projection: TM
Figure	-	



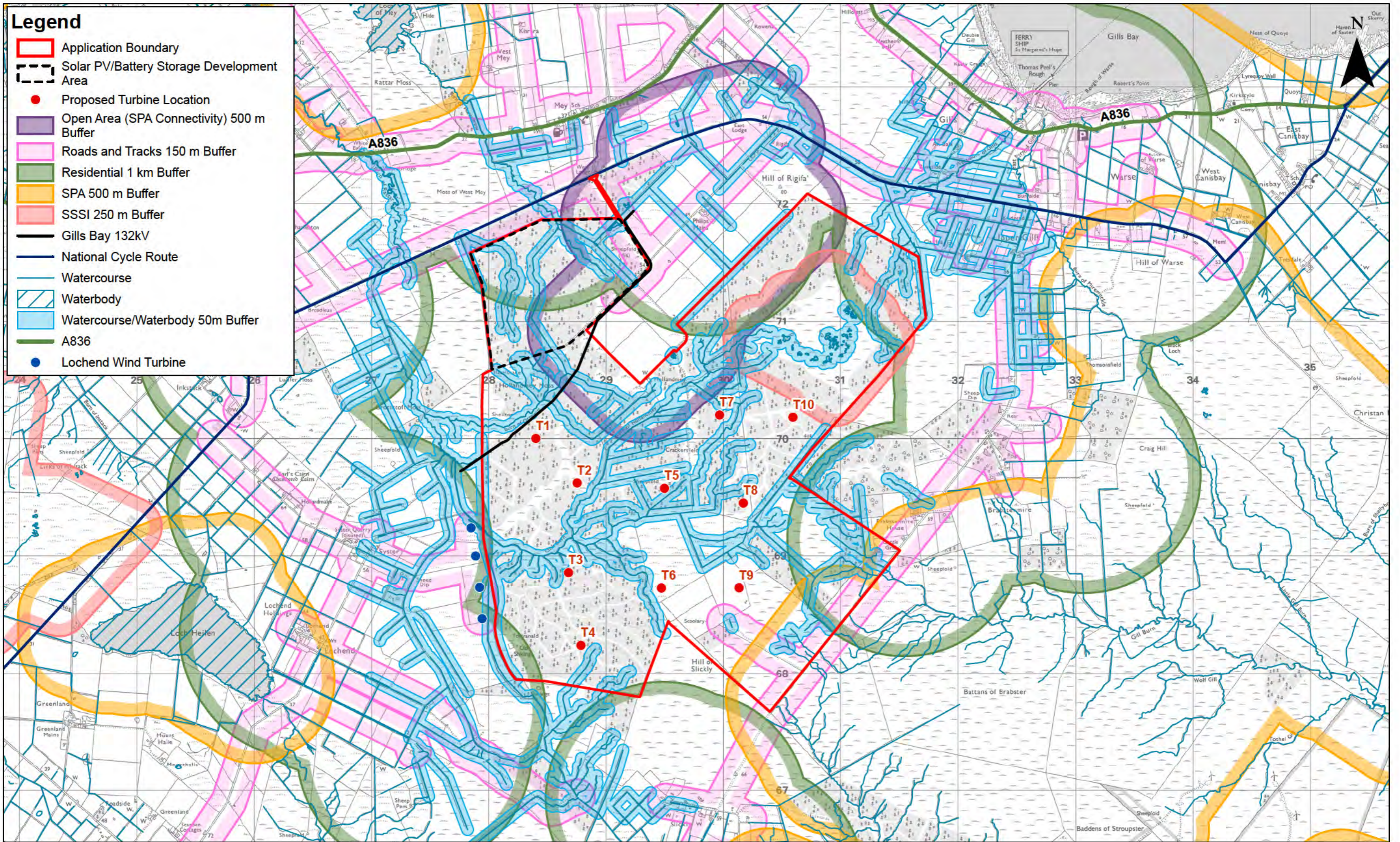
Rev	Date	By	Comment
A	20/05/2020	DL	First Issue.

1:30,000
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Hollandmey Renewable Energy Development Site Layout

Drg No	HMY_C_048	
Rev	A	Datum: OSGB36
Date	14/08/2020	Projection: TM
Figure	-	



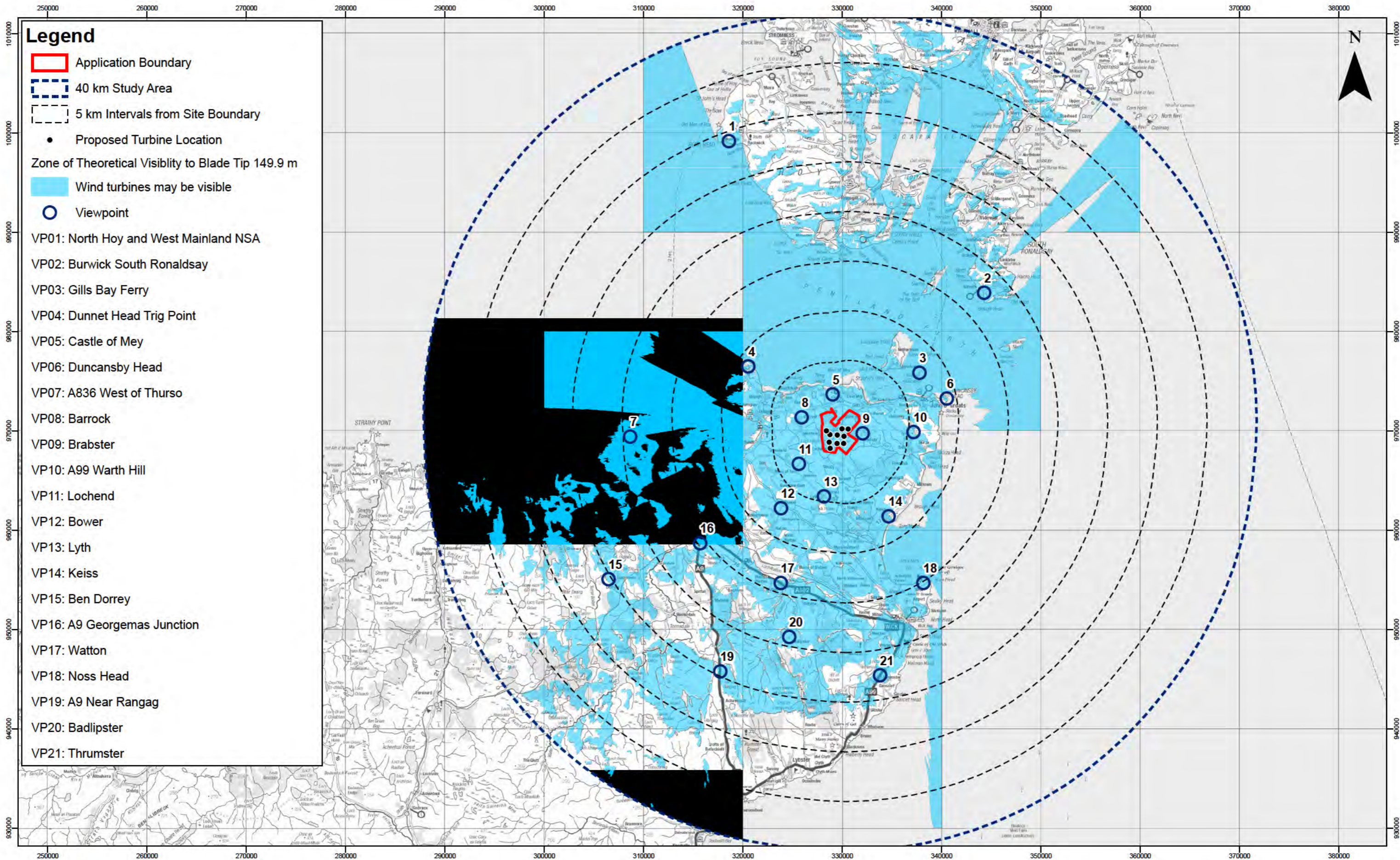
C	25/08/2020	AJ	RLB changed.
B	25/08/2020	AJ	Constraints updated.
A	19/08/2020	AJ	First Issue.
Rev	Date	By	Comment

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Hollandmey Renewable Energy Development Project Constraints

Drg No	HMY_C_049	
Rev	C	Datum: OSGB36
Date	25/08/2020	Projection: TM
Figure	-	



- Legend**
- Application Boundary
 - 40 km Study Area
 - 5 km Intervals from Site Boundary
 - Proposed Turbine Location
- Zone of Theoretical Visibility to Blade Tip 149.9 m
- Wind turbines may be visible
 - Viewpoint
- VP01: North Hoy and West Mainland NSA
 VP02: Burwick South Ronaldsay
 VP03: Gills Bay Ferry
 VP04: Dunnet Head Trig Point
 VP05: Castle of Mey
 VP06: Duncansby Head
 VP07: A836 West of Thurso
 VP08: Barrock
 VP09: Brabster
 VP10: A99 Warth Hill
 VP11: Lochend
 VP12: Bower
 VP13: Lyth
 VP14: Keiss
 VP15: Ben Dorrey
 VP16: A9 Georgemas Junction
 VP17: Watton
 VP18: Noss Head
 VP19: A9 Near Rangag
 VP20: Badlipster
 VP21: Thrumster



Rev	Date	By	Comment
A	26/08/2020	AJ	First Issue.

1:350,000
Scale @ A3

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**Hollandmey Renewable Energy Development
Blade Tip Height (149.9 m) ZTV and
Viewpoint Locations**

Drg No	HMY_C_051	
Rev	A	Datum: OSGB36
Date	26/08/2020	Projection: TM
Figure	-	

Hollandmey Renewable Energy Development

Public Information Event

Please review and submit your comments and questions on the proposals via the feedback form on the project website by 23 October 2020.

[Click here to find out more](#)



Hollandmey Renewable Energy Development

Public Information Event

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The proposed Development is anticipated to consist of approximately 10 wind turbines with tip heights of up to 149.9 m. The deployment of other renewable technologies within the Site is also being proposed, including battery storage and solar photovoltaic (solar PV) generation.

Early consultation is key to developing our projects and, throughout the development process, we ensure local communities and stakeholders are given the opportunity to provide feedback and are kept informed of project progress.

Given the restrictions requiring social distancing, instead of holding Public Information Days, a Public Information Event on the proposals will be available online from 2 October 2020 on the project website:

www.ScottishPowerRenewables.com/HollandmeyRED

The online Public Information Event will include information banners as well as visualisations to help to give an impression of what the proposed Development could look like from different viewpoints in the area.

The event will include a link to a feedback form through which comments and questions, as well as any requests for further information, can be submitted directly to the Project Team. Alternatively, you may contact the Project Team by emailing **HollandmeyRED@scottishpower.com**

or writing to

ScottishPower Renewables
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G2 5AD

If you have any questions or wish to make comments on the proposal, we request that these are submitted via the feedback form by 23 October 2020.

Please note that this notice does not relate to an application and that any comments made on the proposals to SPR at this stage are not representations to the Scottish Ministers. If an application is subsequently submitted, normal publicity will be undertaken at that time and you will have the opportunity to make a formal representation then.

www.scottishpowerrenewables.com



Hollandmey Renewable Energy Development

Public Information Event

ScottishPower Renewables (SPR) invites you to participate in its Public Consultation on the draft proposals for the Hollandmey Renewable Energy Development (Hollandmey RED).

SPR is proposing to develop Hollandmey RED, situated approximately 8 km south-west of John o'Groats and 16 km east of Thurso within the north-eastern part of the Caithness area of the Highlands.

The proposed Development is anticipated to consist of approximately 10 wind turbines with tip heights of up to 149.9 m. The deployment of other renewable technologies within the Site is also being proposed, including battery storage and solar photovoltaic (solar PV) generation.

Early consultation is key to developing our projects and, throughout the development process, we ensure local communities and stakeholders are given the opportunity to provide feedback and are kept informed of project progress.

Given the restrictions requiring social distancing, instead of holding Public Information Days, a Public Information Event on the proposals will be available online from 2 October 2020 on the project website:

www.ScottishPowerRenewables.com/HollandmeyRED

The online Public Information Event will include information banners as well as visualisations to help to give an impression of what the proposed Development could look like from different viewpoints in the area.

The event will include a link to a feedback form through which comments and questions, as well as any requests for further information, can be submitted directly to the Project Team. Alternatively, you may contact the Project Team by emailing HollandmeyRED@scottishpower.com

or writing to

ScottishPower Renewables
Hollandmey Renewable Energy Development Team
9th Floor ScottishPower Headquarters
320 St Vincent Street
Glasgow
G2 5AD

If you have any questions or wish to make comments on the proposal, we request that these are submitted via the feedback form by 23 October 2020.

Please note that this notice does not relate to an application and that any comments made on the proposals to SPR at this stage are not representations to the Scottish Ministers. If an application is subsequently submitted, normal publicity will be undertaken at that time and you will have the opportunity to make a formal representation then.



PHOTOMONTAGE

VIEW FLAT AT A COMFORTABLE ARM'S LENGTH
IF VIEWING THIS IMAGE ON A SCREEN, ENLARGE TO FULL SCREEN HEIGHT

Date August 2020	By AW
Image Size 820 x 260mm	QA RA
Paper Size 840 x 297mm	Rev 0
Exhib-53.5deg-SNHbased Layouts.indd	

Notes:
 1) This visualisation is a planar projection panorama. View flat at a comfortable arm's length.
 2) This data has been output directly from the wireline model. It ignores screening effects of woodland and other intervening objects.
 3) All directions given as bearings relative to Grid North (BNQ).
 4) Location map scale: OS 1:25,000 mapping shown at 1:15,000.

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Viewpoint Information	
Grid Reference:	320534E 976491N
Ground Height:	127m AOD
Direction of Centre View: ³	128.75°
Horizontal Field of View:	53.5°
Vertical Field of View:	18.2°
Principal Distance:	812.5mm

Photography Information	
Camera:	Nikon D810 36.3 - Full Frame
Lens:	50mm Fixed Focal Length
Camera Height:	1.5m
Photography Date:	31/05/2020
Photography Time:	17:45

Hollandmey Layout Information (turbine numbers on image)	
Layout:	Exhibition_Aug-2020.WFL
Hub Height:	84m
Height to Blade Tip:	149.9m
Nearest Visible Turbine:	T4 @ 10193m
Number of sets of Tips Visible: ²	10
Number of Hubs Visible: ²	10



Hollandmey Renewable Energy Development

**Viewpoint 4: Dunnet Head
PHOTOMONTAGE VISUALISATION 4**



PHOTOMONTAGE

**VIEW FLAT AT A COMFORTABLE ARM'S LENGTH
IF VIEWING THIS IMAGE ON A SCREEN, ENLARGE TO FULL SCREEN HEIGHT**

Date August 2020	By AW
Image Size 820 x 260mm	QA RA
Paper Size 840 x 297mm	Rev 0
Exhib-53.5deg-SNHbased Layouts.indd	

Notes:

- 1) This visualisation is a planar projection panorama. View flat at a comfortable arm's length.
- 2) The data has been output directly from the wireline model. It ignores screening effects of woodland and other intervening objects.
- 3) All directions given as bearings relative to Grid North (BNG).
- 4) Location map scale: OS 1:25,000 mapping shown at 1:15,000.

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Viewpoint Information	
Grid Reference:	325933E 971349N
Ground Height:	66m AOD
Direction of Centre View: ³	120.75°
Horizontal Field of View:	53.5°
Vertical Field of View:	18.2°
Principal Distance:	812.5mm

Photography Information	
Camera:	Nikon D810 36.3 - Full Frame
Lens:	50mm Fixed Focal Length
Camera Height:	1.5m
Photography Date:	31/05/2020
Photography Time:	16:55

Hollandmey Layout Information (turbine numbers on image)	
Layout:	Exhibition_Aug-2020.WFL
Hub Height:	84m
Height to Blade Tip:	149.9m
Nearest Visible Turbine:	T1 @ 2807m
Number of sets of Tips Visible: ²	10
Number of Hubs Visible: ²	10



Hollandmey Renewable Energy Development

Viewpoint 8: Barrock

PHOTOMONTAGE VISUALISATION 8



PHOTOMONTAGE

VIEW FLAT AT A COMFORTABLE ARM'S LENGTH
IF VIEWING THIS IMAGE ON A SCREEN, ENLARGE TO FULL SCREEN HEIGHT

Date August 2020	By AW
Image Size 820 x 260mm	QA RA
Paper Size 840 x 297mm	Rev 0
Exhib-53.5deg-SNHbased Layouts.indd	

Notes:
 1) This visualisation is a planar projection panorama. View flat at a comfortable arm's length.
 2) The data has been output directly from the wireline model. It ignores screening effects of woodland and other intervening objects.
 3) All directions given as bearings relative to Grid North (BNG).
 4) Location map scale: OS 1:25,000 mapping shown at 1:15,000.
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Viewpoint Information	
Grid Reference:	337164E 969879N
Ground Height:	125m AOD
Direction of Centre View: ³	265.75°
Horizontal Field of View:	53.5°
Vertical Field of View:	18.2°
Principal Distance:	812.5mm

Photography Information	
Camera:	Nikon D810 36.3 - Full Frame
Lens:	50mm Fixed Focal Length
Camera Height:	1.5m
Photography Date:	31/05/2020
Photography Time:	11:10

Hollandmey Layout Information (turbine numbers on image)	
Layout:	Exhibition_Aug-2020.WFL
Hub Height:	84m
Height to Blade Tip:	149.9m
Nearest Visible Turbine:	T10 @ 6583m
Number of sets of Tips Visible: ²	10
Number of Hubs Visible: ²	10



Hollandmey Renewable Energy Development
Viewpoint 10: A99 Warth Hill
PHOTOMONTAGE VISUALISATION 10



PHOTOMONTAGE

VIEW FLAT AT A COMFORTABLE ARM'S LENGTH
IF VIEWING THIS IMAGE ON A SCREEN, ENLARGE TO FULL SCREEN HEIGHT

Date	By
August 2020	AW
Image Size	QA
820 x 260mm	RA
Paper Size	Rev
840 x 297mm	0
Exhib-53.5deg-SNHbased Layouts.indd	



Notes:
 1) This visualisation is a planar projection panorama. View flat at a comfortable arm's length.
 2) The data has been output directly from the wireline model. It ignores screening effects of woodland and other intervening objects.
 3) All directions given as bearings relative to Grid North (BNG).
 4) Location map scale: OS 1:25,000 mapping shown at 1:15,000.
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Viewpoint Information	
Grid Reference:	323827E 962213N
Ground Height:	45m AOD
Direction of Centre View: ³	37.25°
Horizontal Field of View:	53.5°
Vertical Field of View:	18.2°
Principal Distance:	812.5mm

Photography Information	
Camera:	Nikon D810 36.3 - Full Frame
Lens:	50mm Fixed Focal Length
Camera Height:	1.5m
Photography Date:	31/05/2020
Photography Time:	14:45

Hollandmey Layout Information (turbine numbers on image)	
Layout:	Exhibition_Aug-2020.WFL
Hub Height:	84m
Height to Blade Tip:	149.9m
Nearest Visible Turbine:	T4 @ 7801m
Number of sets of Tips Visible: ²	10
Number of Hubs Visible: ²	10



Hollandmey Renewable Energy Development
Viewpoint 12: Bower
PHOTOMONTAGE VISUALISATION 12

Onshore Wind

HOLLANDMEY RENEWABLE ENERGY DEVELOPMENT - INTRODUCTION

ScottishPower Renewables

ScottishPower Renewables (SPR) is part of the ScottishPower group of companies operating in the UK under the Iberdrola Group, one of the world's largest integrated utility companies and a world leader in wind energy. ScottishPower now only produces 100% green electricity – focusing on wind energy, smart grids and driving the change to a cleaner, electric future. The company is investing over £4m every working day* to make this happen and is committed to speeding up the transition to cleaner electric transport, improving air quality and over time, driving down bills to deliver a better future, quicker for everyone.

SPR is at the forefront of the development of the renewables industry through pioneering ideas, forward thinking and outstanding innovation. Its ambitious growth plans include expansion of its existing onshore wind portfolio, investment in new large-scale solar deployment and innovative grid storage systems including batteries. The company is also delivering the Iberdrola Group's offshore windfarms in the Southern North Sea off East Anglia.

With over 40 operational windfarms, ScottishPower Renewables manages all its sites through its world leading Control Centre at Whitelee Windfarm, near Glasgow.

* between 2018-2022

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Above: Turbines in image are 120 m tall. The proposed turbine height at Hollandmey will be up to 149.9 m to blade tip.

ScottishPower Renewables' History in Your Area

SPR has been working alongside communities throughout the UK for nearly two decades and has to date contributed more than £36 million in benefit funds to support initiatives and projects for those communities local to our windfarm sites. ScottishPower Renewables (SPR) has been a neighbour for many years, generating cleaner power and socio-economic benefits to local communities in the Highlands. We own and operate Beinn Tharsuinn Windfarm and are currently constructing Halsary Windfarm. Community benefit funds from these developments are projected to exceed £2.5 million in the local area over the lifespan of the projects.

With the development of these sites nearby, SPR is continuing the history of working positively with local communities in the Highland region of Scotland. The flexible approach adopted by SPR has empowered local communities to decide what the Community Benefit funds are spent on. This has resulted in a fantastic diversity of projects being delivered from improving local amenities including town halls, cinemas and local youth clubs, to supporting work experience places, educational workshops and much more.

We are also keen to create employment opportunities during the construction and operation of our windfarms that can be delivered locally to benefit those who live near our sites.

CONTINUE

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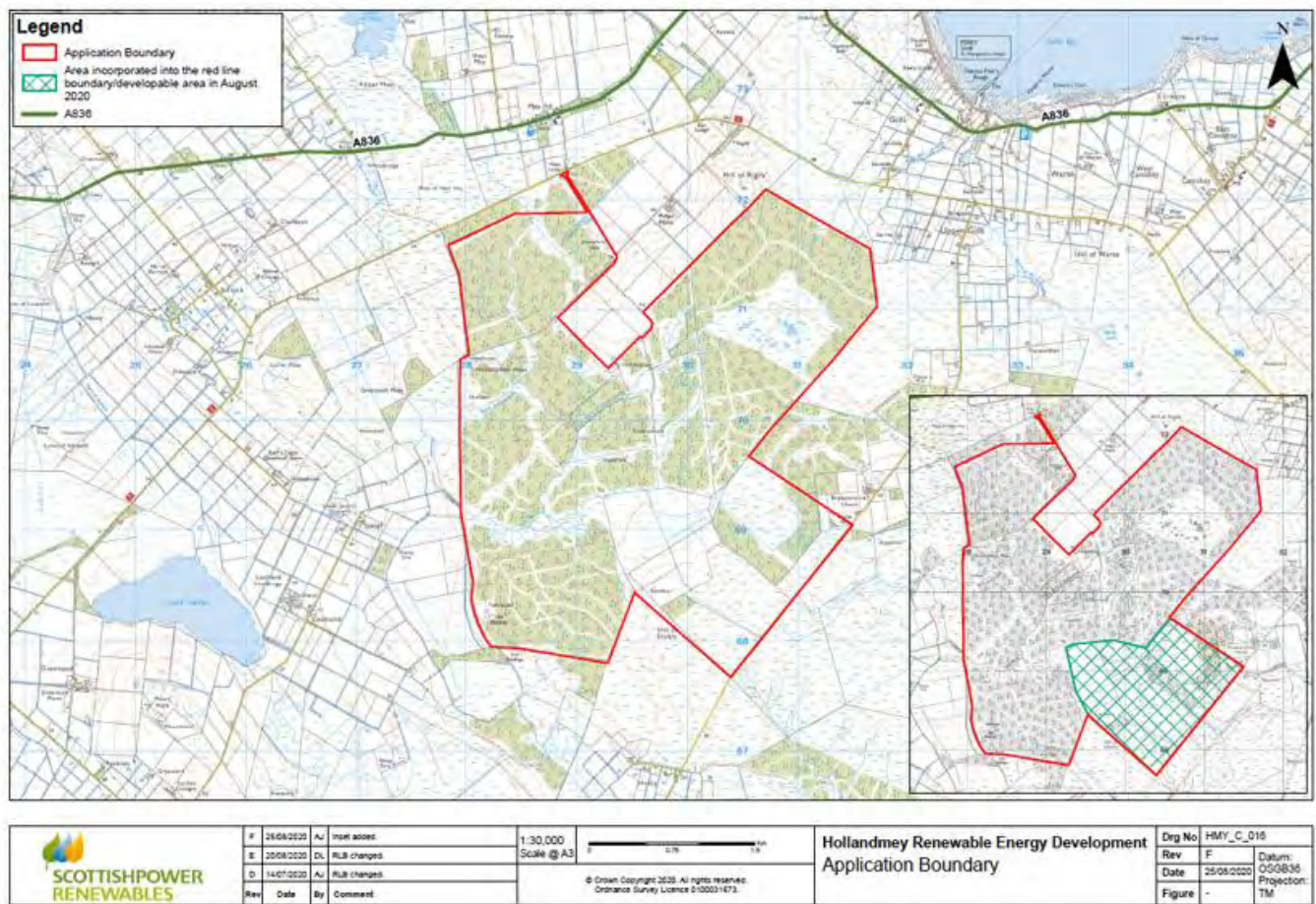
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Onshore Wind

HOLLANDMEY RENEWABLE ENERGY DEVELOPMENT - SITE OVERVIEW, KEY FACTS AND DEVELOPMENT PROCESS

The proposed Site boundary is shown below:



[View a larger version of the map above ↗](#)
(/userfiles/file/Hollandmey_PIE2_Application%20Boundary.pdf)

The application boundary has evolved as the project has progressed. Since we distributed our initial leaflet on 03 August 2020, the application boundary has extended to include the land to the south east. This area has also been the subject of environmental surveys, constraints-led design and ongoing environmental impact assessment. This application boundary differs to the map that was shown on scoping documentation and the initial information leaflet; however, the scope and methodology proposed in those documents and agreed with consultees remains relevant and has also been applied to this area.

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Work Undertaken to Date

SPR has a good understanding of the Site having completed a comprehensive suite of feasibility assessments, environmental surveys and technical studies. This work has been ongoing since 2017 and has allowed for a thorough collection of the baseline data necessary for designing the proposed Development and conducting the EIA.

This understanding has been bolstered by information provided by stakeholders during Scoping and further consultation, and by feedback received during our first Public Information Event. This information was used to influence design.

An iterative, constraints-led approach was adopted, meaning that the design reacted to the environmental data as it was collected so that, where possible, likely significant effects could be avoided by design. Avoidance is the best form of mitigation and has been SPR's preferred approach on this project.

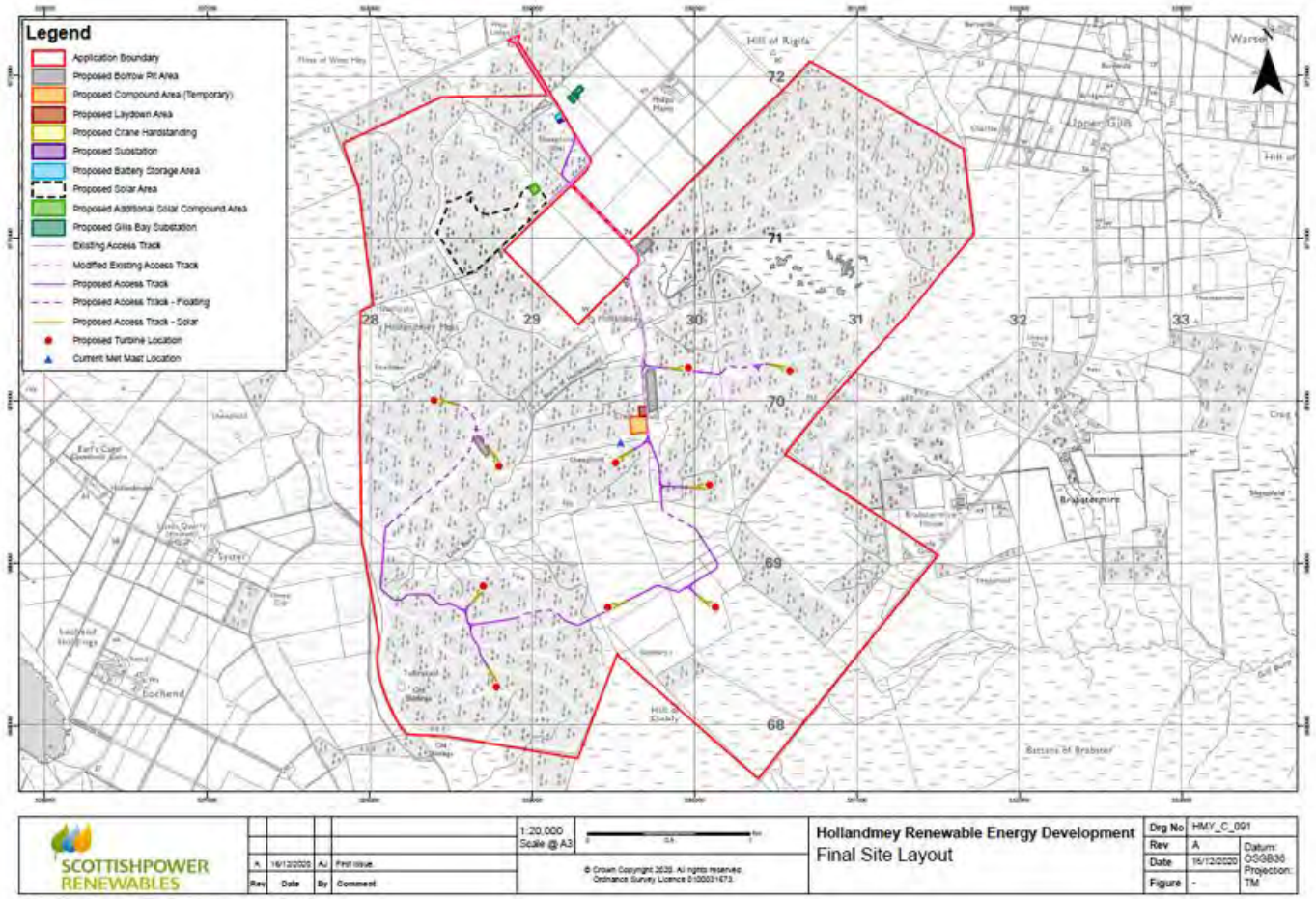
Now that the design of the proposed Development has been finalised we have sought to identify potential impacts and evaluate the sensitivity of potential receptors. The wealth of data collected ensures that the specialists can complete robust assessments and identify appropriate mitigation measures to determine whether there would be any likely significant residual effects. There is no proposal to limit the lifetime of the proposed Development. Therefore, the assessment of potential effects on all aspects will consider the operational phase of the proposed Development without time limitations.

SPR are in the process of preparing the EIA Report, which will accompany the Section 36 (S36) application to the Scottish Ministers for consent for the proposed Development. The EIA Report will allow the Scottish Ministers to make a fully informed decision and adds greater transparency and accountability to the planning system. The EIA Report will also be made publicly available and members of the public will have the opportunity to submit representations to the Scottish Ministers, which will be considered in the planning decision.

The final Site layout, which has taken account of all known environmental and physical constraints identified, is shown below.

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[View a larger version of the map above](/userfiles/file/Hollandmey_PIE2_Final_Site_Layout.pdf)

Key Project Details

	10 wind turbines generating around 50 megawatts with a maximum height to blade tip of 149.9 metres
	Battery Energy Storage System (BESS) with a storage capacity of around 15 megawatts and potential ground mounted solar array
	Generating capacity of around 65 megawatts, from turbines and BESS (not including potential ground mounted solar array)
	Generating enough electricity to supply the equivalent of over 37,000* UK homes.

* using the formula described on the [RUK website](#)

(<https://www.renewableuk.com/page/UKWEDEXplained>), 50 MW installed capacity x 0.3114 "all wind" load factor x 8,760 hours / 3.618 MWh annual consumption = 37,698 homes powered equivalent.
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Site Design Considerations

The Site was chosen for a number of reasons including:

- The excellent wind resource on Site which means good wind speeds for energy generation;
- There are no national or international nature designations within the area identified for development; and
- The Site is in close proximity to transport and grid connections and benefits from an existing commercial forestry track network.

Initial feasibility and design work indicated that the Site has the potential to accommodate around 10 wind turbines of up to 149.9 metres to blade tip, an associated Battery Energy Storage System (BESS) and ground mounted solar array. The proposed design has sought to find an appropriate balance between optimising the energy yield and minimising the environmental effects. This is important to maximise the contribution the proposed Development would make to the Scottish Government's renewable energy and climate change targets, and the response to the climate emergency.

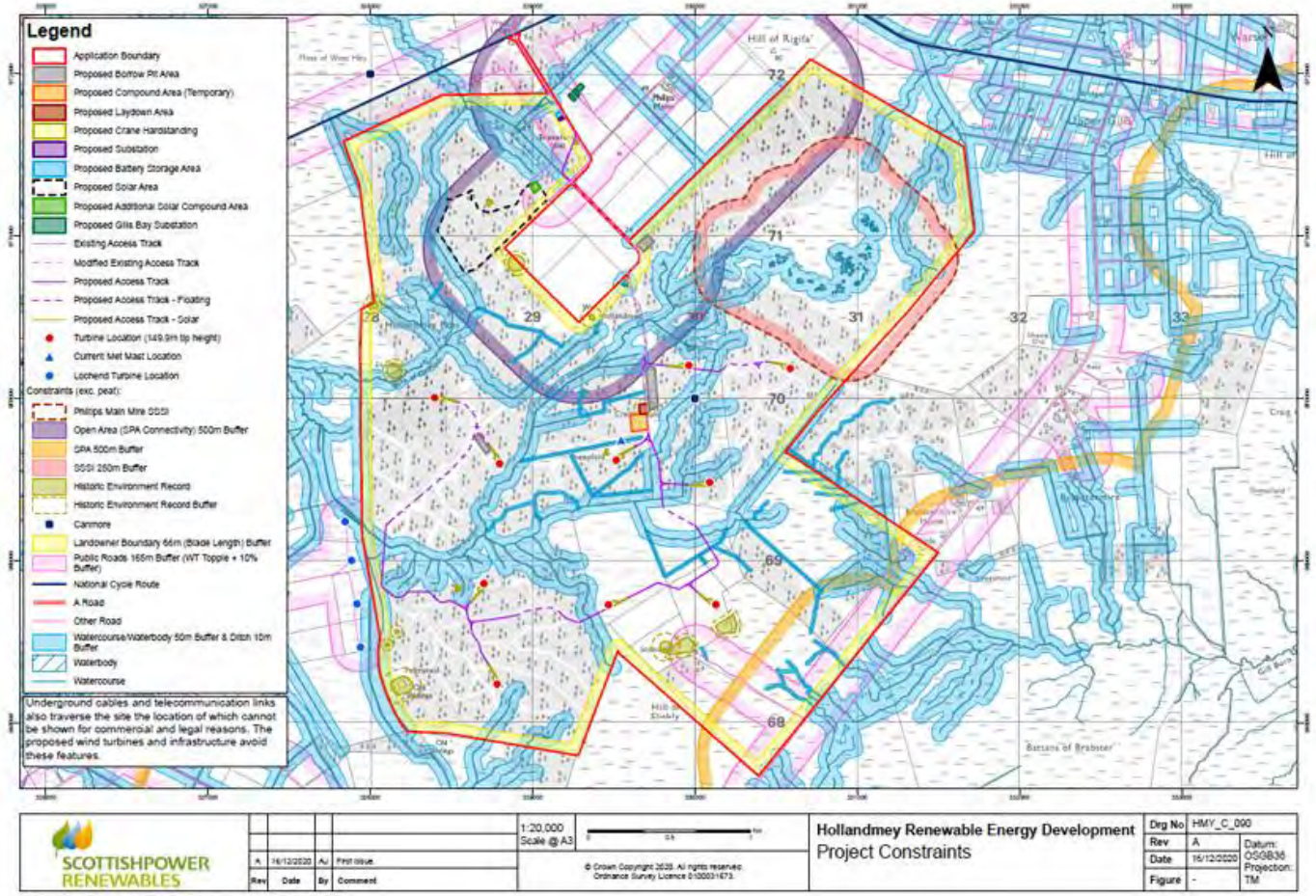
In addition, the BESS could be used to smooth out variances between available resource and electricity demand. It can also be used to provide services to help stabilise the operation of the local electricity network. This will become increasingly important as the electrification of the energy sector intensifies.

As a result of this feasibility and design work, key constraints were identified and a proposed Site layout was designed with respect to these constraints.

The proposed Site layout in the context of these constraints is shown below:

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[View a larger version of the map above](/userfiles/file/Hollandmey_PIE2_Project_Constraints.pdf)

Construction of the proposed Development is anticipated to commence in 2024 and would take approximately 22 months.

The table below explains the development and EIA process and timeline that the project is following. Since the first Public Information Event the proposed S36 application date has been extended to late 2021, to allow for additional environmental surveys to be undertaken as well as further consultation with key stakeholders and communities.

Development and Environmental Impact Assessment (EIA) Process

Initial Site investigation and design	Initial Site viability and project feasibility assessment.
EIA Scoping consultations: Summer 2020	Identifying and agreeing with stakeholders what aspects and potential effects of the development should be covered by the EIA, through Direct Scoping with consultees.

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Public engagement: Summer 2020	A leaflet was mailed to all properties within 10 km of the Site introducing the concept of the proposed Development.
On Site and desktop surveys: Spring – Winter 2020	Research to establish what the conditions of the Site are today, this will allow the effects of the predicted changes to be assessed.
Public consultation: Autumn 2020	1 st Public Information Event hosted online – Introducing Project.
Design evolution and environmental assessment: Spring – Winter 2020	<p>Iterative process to optimise the design to achieve balance between Site performance and environmental effects.</p> <p>It also sought to identify measures to eliminate, avoid, reduce or mitigate any potentially significant effects where possible.</p>
Public consultation: Winter 2020/21	2 nd Public Information Event hosted online. The current Public Information Event to provide the local community with an update regarding the design evolution and EIA progress.
Submission of application for consent: Late 2021	We will submit an application to build and operate the proposed Development to the Scottish Ministers for determination under Section 36 of the Electricity Act 1989.
Evaluation and determination of the application	The Section 36 application will be administered by the Scottish Government Energy Consents Unit (ECU) on behalf of Scottish Ministers. There will be an opportunity at this stage for you to make formal representations on the application to the ECU. These will then be taken into account by Scottish Ministers when determining whether to grant consent for the proposed Development. Timescales for determination are variable and dependent upon case-specific issues but typically take between 12 to 15 months.

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Onshore Wind

HOLLANDMEY RENEWABLE ENERGY DEVELOPMENT - LANDSCAPE AND VISUAL CONSIDERATIONS

What Will It Look Like?

The proposed Development will result in changes to views and it is important to show what it would potentially look like as part of the landscape. It is also important that a transparent and objective assessment of potential changes to landscape and views resulting from the proposed Development is made using established guidance and procedures.

Landscape and Visual Impact Assessment (LVIA)

An LVIA is being undertaken in line with NatureScot (formerly Scottish Natural Heritage (SNH)) and The Highland Council (THC) requirements and in accordance with guidance from the Landscape Institute. The LVIA examines effects on both the landscape and the views and visual amenity experienced by people living and visiting the area.

The LVIA will use a series of viewpoints representative of views experienced from publicly accessible locations in the area. Through the Direct Scoping process, viewpoints have been agreed with THC, NatureScot and other consultees as appropriate and photographs have been taken at each viewpoint by a professional photographer.

A series of visualisations will be prepared for each viewpoint. These will be a mix of photomontages and wireline representations of the proposed Development.

The viewpoints and photography form part of the information used to inform a systematic and objective assessment of the potential impacts of the proposed Development on landscape, views and visual amenity of the area surrounding the Site.

What we will do...

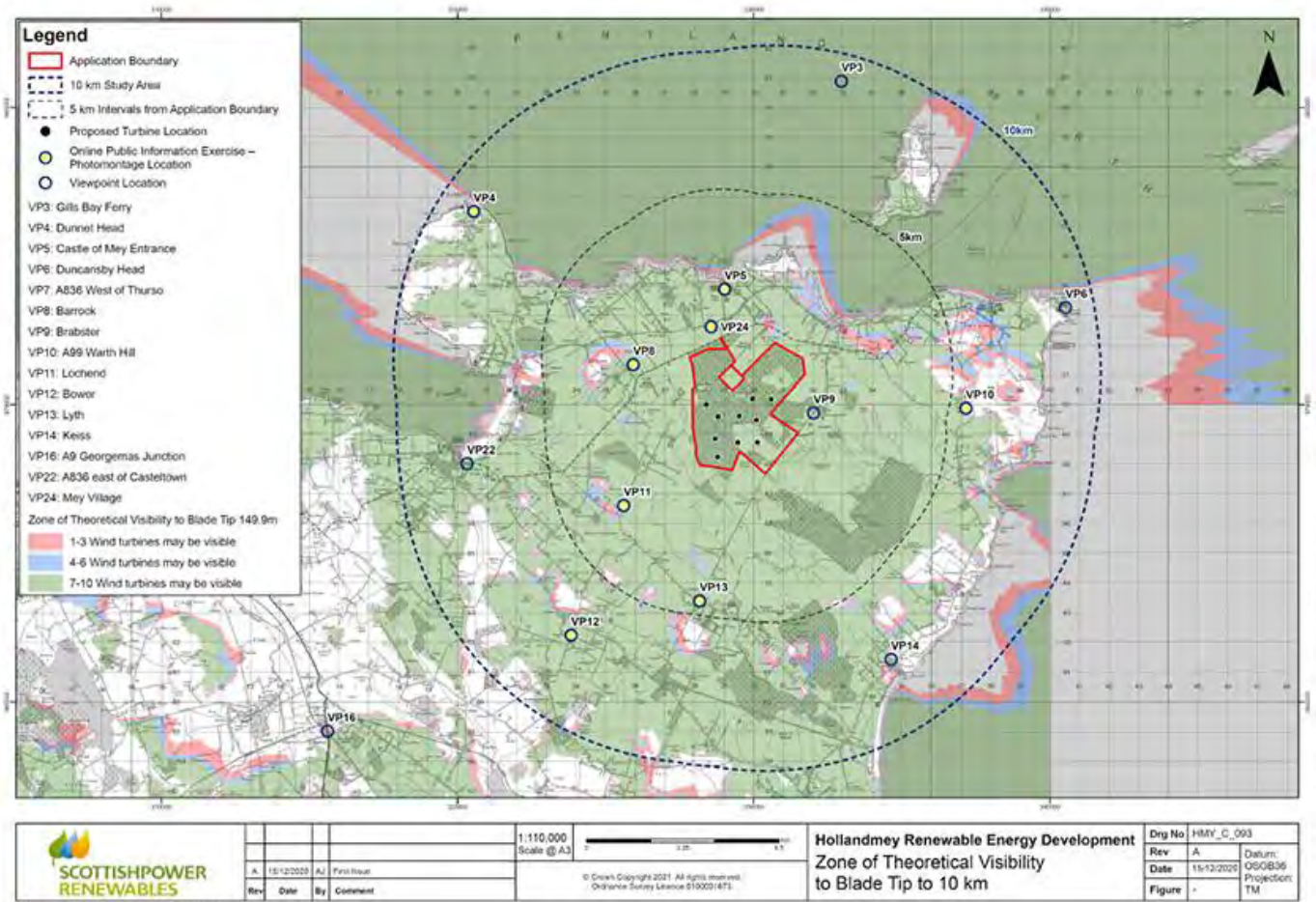
The findings of the ongoing LVIA will be presented in the associated EIA Report Chapter and Technical Appendices, which will be made publicly available on the SPR website once the Section 36 application has been submitted to the ECU in Spring 2021.

Zone of Theoretical Visibility (ZTV)

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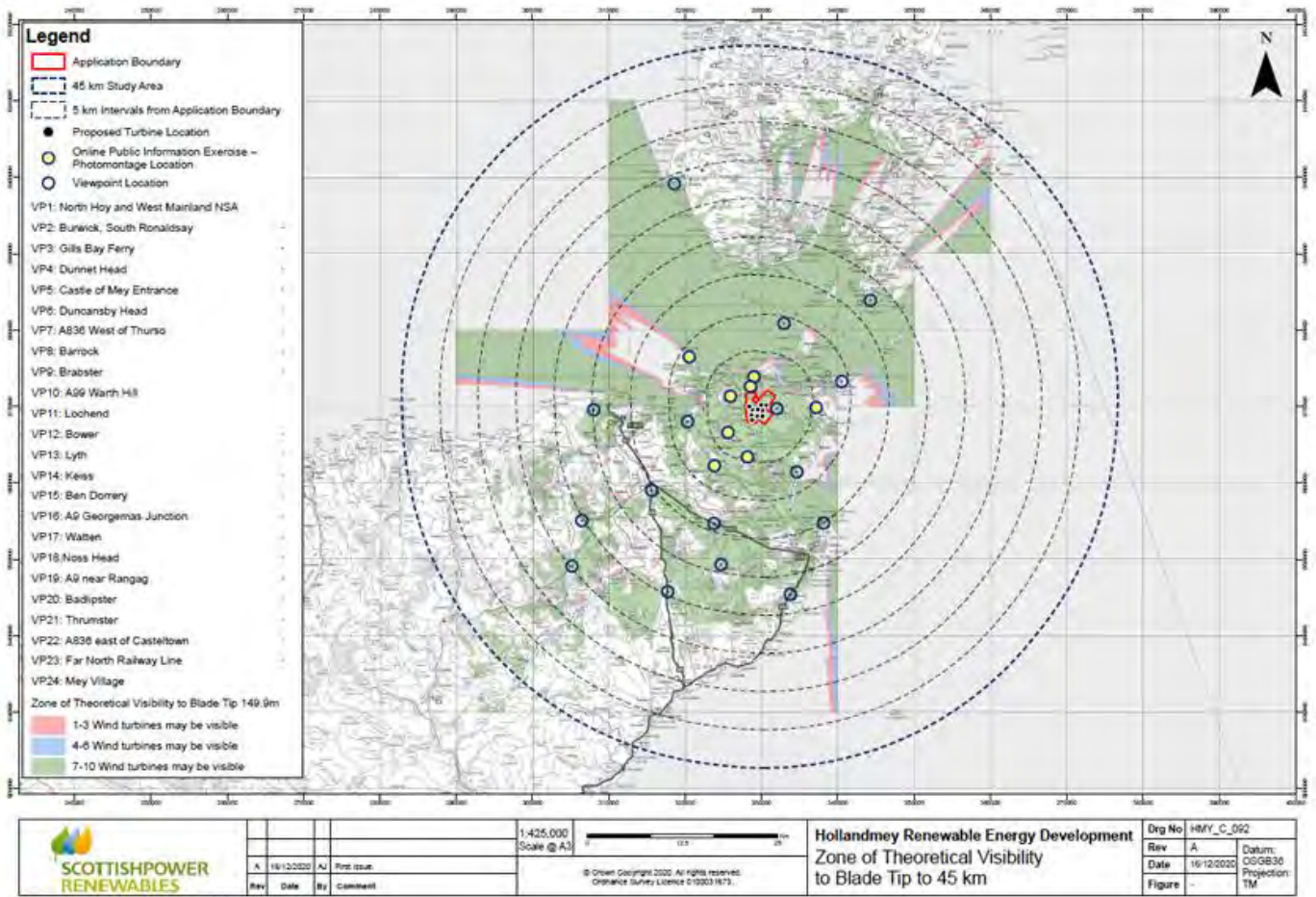
The ZTV illustrates theoretical visibility of wind turbines of the proposed Hollandmey Renewable Energy Development, based on what is referred to as a bare earth model. It does not include the screening effect of ground cover features, such as vegetation and buildings, which typically reduce the amount of actual visibility of turbines.



[View a larger version of the above map](/userfiles/file/Hollandmey_PIE2_10km_ZTV.pdf)

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[View a larger version of the above map](/userfiles/file/Hollandmey_PIE2_45km_ZTV.pdf)

Visualisations

Click the links below to view photomontages from each location.

Viewpoint 04 - Dunnet Head



Viewpoint 04

(/userfiles/file/Hollandmey_VP04-Exhib-Jan-2021.pdf) is at the Trig point and viewing area in Dunnet Head Special Landscape Area (SLA).

Viewpoint 05 - Castle of Mey



Viewpoint 05

(/userfiles/file/Hollandmey_VP05-Exhib-Jan-2021.pdf) is in Castle of Mey Garden and Designed Landscape (GDL) and is positioned at the south entrance to the castle as requested by Historic Environment Scotland (HES)*.

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Viewpoint 08 - Barrock

Viewpoint 10 - A99 Warth Hill

CONTINUE



[Viewpoint 08](#)

([/userfiles/file/Hollandmey_VP08-Exhib-Jan-2021.pdf](#)) is located at the eastern edge of Barrock where views are more open than in the central and western parts of the settlement.



[Viewpoint 10](#)

([/userfiles/file/Hollandmey_VP10-Exhib-Jan-2021.pdf](#)) is located near a Trig point at Warth Hill to the west of and above the A99, which is the route of the North Coast 500 (NC500).

Viewpoint 11 - Lochend



[Viewpoint 11](#)

([/userfiles/file/Hollandmey_VP11-Exhib-Jan-2021.pdf](#)) is located near the Trig point on the minor road that leads to Lochend.



[Viewpoint 12](#)

([/userfiles/file/Hollandmey_VP12-Exhib-Jan-2021.pdf](#)) is located on a footway that runs alongside the minor road to the north of Bower Parish Church.

Viewpoint 13 - Lyth



[Viewpoint 13](#)

([/userfiles/file/Hollandmey_VP13-Exhib-Jan-2021.pdf](#)) is located near the war memorial on the minor road to the east of the cross-roads at Lyth.



[Viewpoint 24](#)

([/userfiles/file/Hollandmey_VP24-Exhib-Jan-2021.pdf](#)) is from the eastern part of Mey village where there are a number of residential properties with views in the direction of the proposed Development.

** The agreed viewpoint location provides a general representation of views from a specific location requested by HES. In this locality views of wind turbines would be partly interrupted by landform and vegetation.*

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Onshore Wind

HOLLANDMEY RENEWABLE ENERGY DEVELOPMENT - ENVIRONMENTAL IMPACT ASSESSMENT

Quick Links

- [Ecology, Ornithology and Nature](#)
- [Hydrology, Geology and Hydrogeology](#)
- [Archaeology and Cultural Heritage](#)
- [Noise](#)
- [Traffic and Transport](#)
- [Socio Economics, Recreation and Tourism](#)
- [Aviation](#)
- [Utilities, Telecommunications and Television](#)
- [Shadow Flicker](#)
- [Carbon Balance](#)
- [Forestry](#)
- [Embedded Design](#)

Note: Solar glint and glare were identified as a consideration at the scoping stage, but have now been scoped out based on comments received from The Highland Council.

Background

SPR have conducted an extensive site investigation and design process that began with a pre-application advice pack from THC and was supplemented by further feasibility studies, environmental surveys, and consultation. This has resulted in the final design, which is currently being assessed. The scope of the EIA has been agreed with key consultees and is intended to be proportionate and robust.

Ecology, Ornithology and Nature

Establishing a detailed ecological record of the Site has enabled us to develop the design in a manner that avoids or minimises adverse effects on sensitive habitats and protected species.

We have

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- Undertaken a series of desk-based studies and consultations with organisations including NatureScot, RSPB and Local Fisheries Boards to identify existing records of species and habitats;
- Undertaken baseline ecological surveys on site for protected species and habitats; and
- Undertaken baseline ornithological surveys (including breeding and wintering bird and flight activity surveys) in 2017, 2018, 2019 and 2020.

We found...

The Site primarily consists of commercially managed forestry but supports some areas of sensitive bog and heathland habitats located within the Phillips Mains Mire Site of Special Scientific Interest (SSSI). The Caithness and Sutherland Peatlands Special Area of Conservation (SAC), designated for its important moorland habitat and otter interests is also located south east of the Site. Surveys undertaken have found evidence of protected species including water vole, bats and otter, with the habitats present within the Site also suitable for a number of other protected species including red squirrel and pine marten.

There are three international designated areas nearby which will require consideration (along with their component SSSIs where applicable) in our ornithology assessments: Caithness and Sutherland Peatlands SPA and Ramsar site (c 1 km from the application boundary); Caithness Lochs SPA and Ramsar site (Loch of Mey and Loch Heilan c 1.5 km and 2 km respectively from the application boundary); and North Caithness Cliffs SPA (3.5 km at its nearest point from the application boundary).

Two years of bird surveys have been completed and survey results indicate that there are no scarce birds of conservation concern breeding or roosting within the survey buffers of the Site.

What we will do...

As some flights by SPA species, including wintering geese and swans, passed within the survey buffers, a full assessment of potential effects on these species and the integrity of the designated areas will be completed.

Protecting Species and Habitat

SPR will seek to mitigate impacts on ecology in a variety of ways by:

- Avoiding construction during the bird breeding season where possible, or where not possible undertaking surveys to identify and protect any nesting birds;
- Avoiding watercourses and areas of sensitive blanket bog habitats identified during the Phase 1/NVC vegetation surveys where possible;
- Adopting safe working buffers where protected species are found;
- Adopting pollution control measures to prevent silt or dusts entering watercourses; and
- Designing any new or upgraded watercourse crossings to maintain safe passage of fish.

Any potential adverse effects for any species will be mitigated to meet legislative requirements and good practice, with species-specific mitigation plans created where required.

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SPR will also identify opportunities for ecological enhancement, either through onsite habitat management or through consultation with conservation organisations to support existing biodiversity projects. During the first Public Information Event, feedback was received from a member of the public detailing the biodiversity potential of the Dubh Lochans on Site and SPR are looking at the potential to incorporate positive enhancement measures as part of the Habitat Management Plan (HMP) for the proposed Development.



Above: Bog pools in the Philip Mains Mire

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CONTINUE



Above: SPR's inhouse ecology team conducting conservation fieldwork

Hydrology, Geology and Hydrogeology

Our understanding of the ground conditions and surface water network informed the Site design. This minimises the risk of groundwater and surface water being adversely affected. Our technical specialists work closely with one another to ensure that the potential effects of the proposed Development on hydrology and related habitats and species are considered holistically. This is particularly important for Groundwater Dependent Terrestrial Ecosystems (GDTEs), for example.

We have...

Assessed watercourses on the Site and avoided them as far as possible in the design process, investigated peat depths across the Site, identified the location of private water supplies near the Site and the potential for flooding from Site watercourses.

We found...

Our technical teams have identified the key hydrological components in and around the proposed Development. This allows us to understand how rainfall and surface water run off infiltrate into soils and peat and discharge into watercourses and drainage channels.

This information will also allow us to assess whether any private water supplies are potentially at risk of being affected by construction works.

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CONTINUE

Peat surveys identified peat deposits of variable depth across the Site, including some areas where there is no peat present. Our design avoids the areas of deepest peat where possible.

What we will do...

Where peat cannot be avoided, location-specific mitigation measures will be set out to minimise effects on peat. This is planned to include peatland restoration proposals for suitable areas.

Protecting Watercourses during Construction

During the construction phase, pollution of water entering watercourses will be prevented through a range of measures including the use of silt traps, settlement ponds and cut off drains, as well as a surface water monitoring programme. This is to ensure that water quality in all downstream watercourses is protected and maintained.



Above: SPR’s inhouse Ecology Team conducting onsite fieldwork

Archaeology and Cultural Heritage

Archaeology relates primarily to the buried remains and artefacts that could be affected by the construction works related to the building of the proposed Development.

Cultural heritage generally relates to other sites, features and locations in the wider landscape which have the potential to have their setting affected by the proposed Development.

CONTINUE

We have...

Undertaken a desk-based study of the Site and surrounding areas to identify all known assets registered with national and local archaeological bodies. Completed a site walkover to investigate potential for archaeological remains and visited key historical assets in the surrounding area to assess potential impacts to setting. Detailed consultation is ongoing with Historic Environment Scotland (HES) regarding the impact assessment.

We found...

No designated heritage assets (World Heritage Sites, Inventory Historic Battlefields, or Inventory Gardens and Designed Landscapes) are found within the proposed Development boundary. There are 15 known undesignated assets recorded in The Highland Council's Historic Environment Record (HER). These include four shielings or possible shielings, four sheepfolds, six farmsteads or possible farmsteads and one possible broch. In addition, survey of the site identified 19no. further heritage assets from first edition OS mapping, historical aerial photography, and walkover survey. These assets comprise three wells, six quarries, an enclosure, a re-erected/modern boundary stone and seven areas of rig and furrow (no longer extant). The findings will be presented in the EIA Report.

Several designated assets are present within 20 km of the Site. Of these, there are a number that might have their setting affected during the operational phase of the proposed Development. These assets are the Castle of Mey Inventory Garden and Designed Landscape (c 1.8 km from the application boundary), which provides the setting for the Castle of Mey Category A Listed Building; and two Scheduled Monuments known as Earl's Cairn and Thomsonfield Broch. (c 1.6 km west and 1.8km east from the application boundary, respectively); Each of these key assets have been visited by a heritage consultant and the outcome of their assessments, including visualisation (wireframe or photomontage), will be presented in the EIA Report.

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Above: The Highland Council Historic Environment Record heritage asset MHG56454: Scolary Farmstead, along with all built heritage assets within the site boundary, have been avoided by the proposed Development layout

What we will do...

Archaeology and Cultural Heritage assessments are ongoing and will be informed by the findings and analysis of other environmental studies and feedback from consultees.

Protecting Assets during Construction

The protection of assets has been a key consideration during the EIA process and proposed mitigation measures have evolved as our understanding of the nature of the characteristics of the proposed Development and the receiving environment has improved over the course of the design process and assessment. Relevant mitigation measures will be included in the EIA Report.

Noise

We have...

SPR is undertaking a detailed study of the noise environment. This has included using existing background noise data from assessments for nearby windfarms and noise modelling to predict likely levels of wind turbine noise. Existing and predicted levels of windfarm noise will be considered against the current guidance to determine whether the scale of impacts will be significant.

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We found...

The nearest noise sensitive receptors considered to be representative of residential dwellings in the immediate vicinity have been identified. The potential impact of noise from the proposed Development was continuously assessed during the design process, and the layout refined through the appropriate siting of turbines in relation to the noise sensitive receptors.

What we will do...

Noise assessments are ongoing, and will be informed by the findings and analysis of other environmental studies and feedback from consultees.

Protecting Residents during Construction

Noise from construction activities will be controlled through the use of a Construction Environmental Management Plan (CEMP).

Traffic and Transport

We have...

SPR and our technical consultants have undertaken a preliminary assessment of the potential impacts on access, traffic and transport. This considered the potential effects of the proposed Development on the transport network, primarily in relation to construction vehicles.

Further studies also considered the route to the Site from the nearby ports, and the potential for environmental effects of vehicles using the public road network.

We found...

Abnormal load access is anticipated to be from the A836, bringing the turbine components from either from the Ports of Scrabster or Wick.

Potential routes from the Ports of Scrabster and Wick for the delivery of wind turbine blades and other components have been identified in an initial route survey report. These routes will be assessed in the route access study, which will also consider alternatives to ensure that the most appropriate route is chosen.

What we will do...

Traffic and transport assessments are ongoing. SPR and our technical consultants will undertake a detailed assessment of the potential impacts on access, traffic and transport which will be informed by the findings and analysis of other environmental studies and feedback from consultees.

Protecting Road Users and Residents

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In order to minimise the impact on local residents and other road users, a Construction Environmental Management Plan (CEMP) and a Traffic Management Plan (TMP) will be produced. The following practices will be used:

- Construction vehicles to use approved access routes and adhere to any necessary restrictions;
- Erection of appropriate temporary signage in the vicinity of the Site warning of construction traffic and warning other users of abnormal load turbine movements;
- Abnormal loads will be escorted from the port of entry with timings agreed with the road authorities and police as appropriate;
- Ground preparation, including protection of services; and
- Arrangements for road maintenance, wheel washing and road sweeping where necessary.



Above: Image shows delivery vehicle with 57 m blade, Hollandmey RED blades will be up to 64.5 m in length

Socio-Economics, Recreation and Tourism

An assessment of the potential socio-economic, tourism and recreation impacts of the proposed Development is being undertaken as part of the Environmental Impact Assessment Report.

We have...

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Reviewed the existing baseline conditions, including the identification of community councils, local interest groups, tourist attractions and public access.

CONTINUE

Local interest groups were included in scoping consultation, giving them the opportunity to consider the proposed Development and assist with the collection of baseline data, scrutinise the proposed scope of and approach to impact assessment, and provide feedback regarding any concerns they may have.

An assessment of the potential effects of the proposed Development against these baseline conditions will be undertaken as part of the Environmental Impact Assessment.

We found...

The construction and operation of the proposed Development has the potential to benefit the local and regional economies through:

- Direct construction and operation employment opportunities;
- Indirect employment further down the supply chain for those companies providing services to the Contractors during the construction and operation phases of the development;
- Indirect employment within the local economy arising from the proposed Development's work force spend on accommodation and subsistence; and
- Contribution to a Community Benefit Fund

What we will do...

Assessments are ongoing and will be informed by the findings and analysis of other environmental studies and feedback from consultees.

As a minimum SPR is committed to:

- Seeking to use local labour where practical to maximise the benefits to the local economy;
- Making provision for access during the operation of the proposed Development;
- Continuing to consult with recreational groups to identify and respond to any opportunities and areas of concern;
- Engaging with local schools and educational establishments to share knowledge and build relationships; and
- Working with the community to develop the Community Benefit and investment opportunities in a way that responds to their needs.

Aviation

Wind turbines have the potential to interfere with military and civil aviation operations, primarily through effects on surveillance radar and communication and navigation equipment, but also as a physical obstruction if they are sited within military low flying areas.

We have...

Consulted with relevant stakeholders (MOD, CAA, NATS, Highland and Islands Airport, BAA Edinburgh, BAA Glasgow and Glasgow Prestwick Airport) in order to understand the current context and to identify any constraints.

CONTINUE

We found...

The proposed Development is in an area remote from military aviation infrastructure, approximately 16 km to the north of Wick Airport. The Site is outside the Aerodrome Traffic Zone, but underneath or close to several of the instrument approach procedures published for the airport.

What we will do...

- An assessment of civil and military aviation issues will be undertaken; and
- Input will be obtained from the specialist consultants should any issues be identified that require mitigation or detailed technical assessment, including line-of-sight assessments.

Utilities, Telecommunications and Television

Wind turbines can potentially cause interference to telecommunication system signals through reflecting and shadowing telecommunication signals between transmitters and receivers.

We have...

Undertaken consultation with relevant bodies to establish the presence of utilities and telecommunication links across the Site.

Conducted a Telecommunications Impact Assessment to identify the links that might be affected by the proposed Development and potential mitigation measures.

We found...

Consultation has been undertaken with Spectrum Licensing (Ofcom) who confirmed that there are several telecommunications links in the vicinity of the Site.

SSE operate a powerline connecting Lochend Windfarm which runs through the southern portion of the Site. The location of this has been avoided during design development.

What we will do...

- Any potential information on communication links will be sought through consultation with relevant link operators.
- An assessment will be undertaken to determine the significance of any potential operational effects and where appropriate, suitable mitigation measures will be discussed with the link operator

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Above: Marshy grassland within the Site looking west to Lochend Wind Turbines.

Shadow Flicker

Shadow flicker is an effect caused by the rotation of the turbine blades when the sun is shining, which can create a flickering or strobe-like effect. This can be a cause of annoyance at residences near wind developments.

We have...

Reviewed the regional and national policy on shadow flicker and identified residential properties within 2 km of the application boundary.

We found...

There are no formal guidelines currently available on what exposure would be acceptable in relation to shadow flicker. There is no standard for the assessment of shadow flicker. The Scottish Government's web-based guide relating to onshore wind turbines (Scottish Government 2013) suggests that as a general rule shadow flicker should not pose problems beyond a distance of 10 rotor diameters from a wind turbine, which equates to a maximum of 1500 m in this instance.

Department of Environment and Climate Change studies have shown that in northern latitudes shadows from wind turbines can only be cast 130 degrees either side of north relative to the turbine due to the orientation of the Earth's axis and the positioning of the Sun.

This equates to a region of 50 degrees either side of due south where a wind turbine would never cast a shadow and therefore properties within this region would experience no effects from shadow flicker.

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What we will do...

The proposed Development has been designed where possible to avoid turbine placements within the Zone of Potential Shadow Flicker (ZPSF). A shadow flicker assessment will be undertaken as part of the EIA, and if it is not possible to avoid shadow flicker effects through turbine placement, then the dates, times and durations of shadow flicker events for each property within the ZPSF will be calculated and an assessment of effects at these properties also included in the EIA.

Carbon Balance

The proposed Development, once operational, would generate zero carbon energy which would help to offset the release of greenhouse gas (GHG) emissions by fossil fuel-dependent energy generation. During their construction and decommissioning, however, renewable energy developments can themselves result in GHG emissions, for example from turbine manufacture and site preparation. This is particularly the case where natural carbon stores such as forestry or peat are present and potentially impacted by the development. These resulting GHG emissions, however, are normally offset by developments of this nature within 1.5 to 2 years of operation.

We have...

Avoided siting wind turbines within the areas of deepest peat throughout the design process.

What we will do...

To minimise peat disturbance during construction, especially during excavation, Best Practicable Measures will also be considered that will be provided as part of the Construction Environmental Management Plan (CEMP).

A Carbon Balance Assessment will be prepared in accordance with best practice guidance to outline the time taken for the carbon impact of the proposed Development to be reversed by the zero-carbon electricity generation.

Forestry

The current land use of the Site is predominantly commercial forestry.

We have...

Undertaken a desk-based review and conducted a field survey to understand the nature of the forestry onsite.

A Development Forest Design Plan will be produced as part of the Environmental Impact Assessment process to show which woodlands would be felled to facilitate the proposed Development and how the forest will be re-stocked during the life of the proposed Development.

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Above: SPR's Kilgallioch Windfarm during construction, Kilgallioch hub height is 105 m, Hollandmey hub height will be 84 m

What we will do...

This Site is largely stocked with middle aged conifers and the aim will be to carry out keyhole felling to accommodate the turbines wherever possible to avoid adverse environmental impacts; this will also minimise both the amount of felling and the area of Compensatory Planting that may be required. Keyhole felling, as opposed to the alternative of clear felling, will not have as great an impact on the local environment. Keyhole felling aims to avoid woodland loss wherever possible and where this is not possible, to have the smallest possible area of felling within afforested areas. The size of the keyhole is dependent on a number of factors relating to the crop, turbine selection and other factors such as the presence of protected species.

A complete forestry assessment will be carried out to provide the information required by The Highland Council and Scottish Forestry and to provide all the necessary advice and information, including a complete assessment of the growing stock and the volume of timber that would need to be felled, as required for the Environmental Impact Assessment.

Embedded Design

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Design mitigation has been embedded into the Site design as a result of the Environmental Impact Assessment surveys where possible. Factors considered throughout the project development have taken cognisance of the following:

- Consideration of important viewpoints such as Dunnet Head and seeking to reduce the horizontal extent of the proposed Development;
- Consideration of how the proposed Development would fit with other windfarms in the area and cumulative effects on views;
- Turbines are located such that that they are at least 1 km away from the nearest noise sensitive receptor;
- We have sought to avoid areas of deep peat as far as practicable.
- Potential impacts on watercourses were minimised by retaining a suitable buffer from any of the site infrastructure where possible;
- The road layout used as much existing forestry road as possible, reducing the amount of new track and water crossings required for the construction of the proposed Development;
- Avoided any known designated assets;
- Appropriate stand-off distances were integrated into the Site design to ensure there is no impact on the underground power cables traversing the site.

In addition, SPR will ensure there are no detrimental effects for residents on their telecommunication services.

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Onshore Wind

HOLLANDMEY RENEWABLE ENERGY DEVELOPMENT - BENEFITS

As a responsible developer, SPR strives to be a good neighbour in all aspects of our work. We are committed to the Highlands and, in particular, to maximising opportunities for local communities to benefit from our projects.

SPR has been working alongside communities throughout the UK for nearly two decades and has to date contributed more than £36 million in benefit funds to support initiatives and projects for those communities local to our windfarm sites. ScottishPower Renewables (SPR) has been a neighbour for many years, generating cleaner power and socio-economic benefits to local communities in the Highlands. We own and operate Beinn Tharsuinn Windfarm and are currently constructing Halsary Windfarm. Community benefit funds from these developments are projected to exceed £2.5 million in the local area over the lifespan of the projects.



Above ScottishPower Renewables completed a £38,000 programme of environmental enhancements at Wick's riverside area

CONTINUE

Sharing the Benefit

With the development of these Sites nearby, SPR is continuing the history of working positively with local communities in the Highland region of Scotland. The flexible approach adopted by SPR has empowered local communities to decide what the Community Benefit funds are spent on. This has resulted in a fantastic diversity of projects being delivered from improving local amenities including town halls, cinemas and local youth clubs, to supporting work experience places, educational workshops and much more.

We are also keen to create employment opportunities during the construction and operation of our windfarms that can be delivered locally to benefit those who live near our Sites.



Above: Local walking group at SPR's Dersalloch Windfarm

Employment Opportunities

We are committed to maximising employment opportunities for those local to our projects by making sure that local people and businesses have the opportunity to be part of our industry's success.

As a major infrastructure development, Hollandmey Renewable Energy Development has the potential to create employment opportunities. If consent is granted, jobs would be created both during construction and after completion, in support, operation and maintenance activities.

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Opportunities for Local Businesses

CONTINUE

New renewable energy developments can bring increased opportunities for local companies to gain new business. We are interested in working with local businesses that can provide a variety of skills and services during the construction phase and operational lifetime of our development. This may include services such as ground and road maintenance, catering, building trades and plant hire.



Above: Tower construction at SPR's Kilgallioch Windfarm

We will host 'Meet the Contractor' events prior to construction, aimed specifically at small to medium enterprises, to discuss the types of contracts being let during construction and operation.

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Onshore Wind

HOLLANDMEY RENEWABLE ENERGY DEVELOPMENT - FAQs

How many wind turbines are proposed?

Up to 10 wind turbines, with a maximum height to blade tip of 149.9 m.

Why are the proposed wind turbines 149.9 m height to blade tip?

- Reduces Levelised Cost of Energy, which equals greater efficiency.
- Taller, more efficient turbines mean we can generate more power with fewer wind turbines. The net effect is less new structures needed in the landscape.
- The Project would make an important contribution to renewables targets (e.g. 50% of all energy consumption in Scotland from renewable sources by 2030).

What will the generating capacity of the development be?

Combining the 10 wind turbines and battery energy storage system (BESS) would give a generating capacity of around 65MW. We are also looking to incorporate a solar array.

What will the Development look like from my property?

As part of this online Public Information Event, we have presented photomontages of what the proposed Development could look like from a number of selected key viewpoints surrounding the Site Boundary. Unfortunately, due to this being an online consultation, we are unable to show the views from all possible locations during the Event. However, if you would like to see what the proposed Development could look like from a specific location not shown online as part of this Event, please contact us via email at hollandmeyred@scottishpower.com (<mailto:hollandmeyred@scottishpower.com>).

A Landscape and Visual Impact Assessment, and Residential Visual Amenity Assessment are currently underway and will be presented in the Environmental Impact Assessment Report to be submitted with the application for planning consent.

How long is the construction period and when is it likely to commence?

If the proposed Development receives consent, construction would likely commence around 2024. This is dependent on timescales for the application to be processed by the Scottish Government and other factors. The construction period is anticipated to be approximately 22 months.

CONTINUE

How will construction traffic and turbine deliveries access the Site?

Options for construction traffic and wind turbine deliveries are still being assessed for the Site. However, it is proposed that wind turbine components are delivered to either Wick or Scrabster Harbour after which they would principally use the A99, A9 and A836 to the proposed Site access junction.

Prior to construction, a Traffic Management Plan would be compiled and agreed with the relevant authorities, this will include specific mitigation measures for delivery of abnormal loads such as timing of deliveries outside peak flow hours, and police escorts where necessary. Once the Development is operational, impacts relating to traffic and transport would be minimal.

Will there be any potential impacts on private water supplies in the area?

A survey of private water supplies identified within 5 km of the Site has been carried out. The supply locations will be considered based on their position relative to the Site and on the potential for the proposed Development to affect the supplies in order to determine if there could be potential pollutant-source-pathway-receptor relationships.

The assessment will be undertaken assuming that good practice mitigation measures will be implemented on Site, during construction and operation.

Private water supplies will be fully assessed as part of the Environmental Impact Assessment and presented within the Environmental Impact Assessment Report.

How would the Development connect to the grid?

The grid connection would be subject to a separate design and consent process undertaken by National Grid and ScottishPower Energy Networks (SPEN are a separate, regulated part of ScottishPower Group and not part of SPR).

It is thought at this stage, however, that the proposed Development will most likely connect to the proposed Gills Bay Substation.

Why do windfarms get paid to switch off?

To ensure the secure operation of the electricity system, National Grid can take over a thousand separate actions each day to balance supply (Generators) and demand (Customers/ Users) across the electricity grid network. This includes instructing generators to alter their output. This is how National Grid operated and controlled its electricity network even before windfarms were connected to the grid. National Grid is obligated by Ofgem to ensure that it balances the supply and demand on its networks in the most effective way.

Why do we need more renewables?

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The deployment of renewable technologies, including onshore wind, continues to grow and more will be required to achieve the UK's Net Zero greenhouse gas emissions targets; in the first quarter of 2020, 14.8% of the electricity generated in the UK came from onshore wind, compared to 11.3% at the start of 2019.


The National Infrastructure Commission highlighted earlier this year that renewables are now the cheapest form of electricity generation due to dramatic cost reductions in recent years.

How does the electricity generation mix impact electricity bills?

There are many factors which affect the price of a consumer's electricity bill such as the wholesale costs of energy (including fossil fuel costs), costs to maintain and operate the network, costs of government support and other operational costs. Given the significant reductions in cost experienced in the wind sector to date, future deployment of wind could provide significant benefits to electricity consumers.

You may be interested in the following reports for further information:

- [The Power of Onshore Wind](https://bvgassociates.com/the-power-of-onshore-wind/)  (https://bvgassociates.com/the-power-of-onshore-wind/)
- [Quantifying Benefits of Onshore Wind to the UK](https://www.vivideconomics.com/wp-content/uploads/2019/08/Quantifying_the_Benefits_of-report-.pdf)  (https://www.vivideconomics.com/wp-content/uploads/2019/08/Quantifying_the_Benefits_of-report-.pdf)

Ofgem, the market regulator, who ensure that consumers get a fair deal on their energy have [online resources](https://www.ofgem.gov.uk/consumers/household-gas-and-electricity-guide/understand-your-gas-and-electricity-bills)  (https://www.ofgem.gov.uk/consumers/household-gas-and-electricity-guide/understand-your-gas-and-electricity-bills) which may help to further explain how bills are calculated.

What opportunities do the co-location of energy storage technology (i.e. battery) provide?

- By storing and redistributing energy quickly, in response to when that energy is needed, storage helps stabilise the grid network.
- It makes grid networks more resilient, efficient, and cleaner than ever before by supporting the greater integration of renewable energy generation.
- It can be used during emergencies like power outages during storms, or equipment failures.
- It makes sense to co-locate this technology with a windfarm as this offers the opportunity to share the grid connection.

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Hollandmey Renewable Energy Development - Online Event

19th January 2021

Online Public Information Event: 20 January - 10 February 2021

ScottishPower Renewables (SPR) invites you to participate in further public consultation on the draft proposals for the Hollandmey Renewable Energy Development (Hollandmey RED).

SPR is proposing to develop Hollandmey RED, situated approximately 8 km south-west of John O'Groats and 16 km east of Thurso within the north-eastern part of the Caithness area of the Highlands.

The proposed Development is planned to comprise ten wind turbines of around 5 megawatts (MW) each (maximum height to blade tip of 149.9 metres) and a battery energy storage system (BESS) with a capacity of approximately 15 MW, resulting in a combined generating capacity of around 65 MW.



turbines of around 5 megawatts (MW) each (maximum height to blade tip of 149.9 metres) and a battery energy storage system (BESS) with a capacity of approximately 15 MW, resulting in a combined generating capacity of around 65 MW.

A ground mounted solar array area is also being proposed.

Early consultation is key to developing our projects and, throughout the development process, we ensure local communities and stakeholders are given the opportunity to provide feedback and are kept informed of project progress.

Given the restrictions requiring social distancing, instead of holding Public Information Days, we will be hosting a Public Information Event on the proposals online from 20 January until 10 February 2021 on the project website:

www.ScottishPowerRenewables.com/HollandmeyRED

The online Public Information Event will include information banners as well as visualisations to help to give an impression of what the proposed Development could look like from different viewpoints in the area.

The Event will include a link to a feedback form through which comments and questions, as well as any requests for further information, can be submitted directly to the Project Team. If you have any questions or wish to make comments on the proposal, we request that these are submitted via the feedback form by 17:00 on 10 February 2021. Alternatively, you may contact the Project Team by emailing HollandmeyRED@scottishpower.com or writing to:

ScottishPower Renewables
Hollandmey Renewable Energy Development Team
9th Floor ScottishPower Headquarters
320 St Vincent Street
Glasgow
G2 5AD

Please note that this notice does not relate to an application and that any comments made on the proposals to SPR at this stage are not representations to the Scottish Ministers. If an application is subsequently submitted, normal publicity will be undertaken at that time and you will have the opportunity to make a formal representation then.

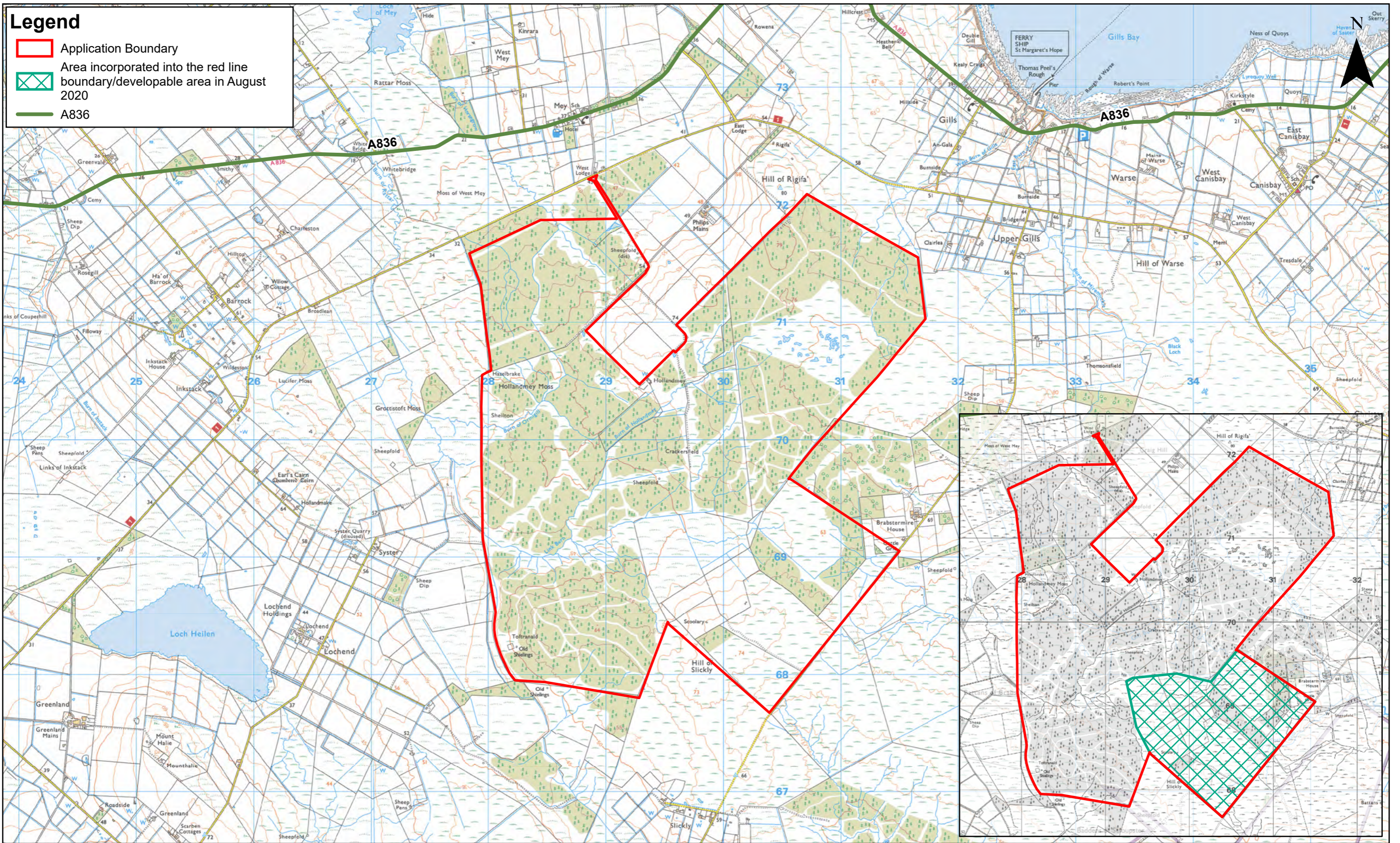
Hollandmey Renewable

Energy Development

Online Public Information Event: 20 January - 10 February 2021

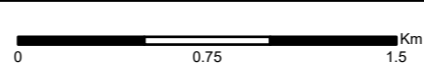


Cheapest Business M&Co Store In Ventilation Duct Property For



Rev	Date	By	Comment
F	25/08/2020	AJ	Inset added.
E	20/08/2020	DL	RLB changed.
D	14/07/2020	AJ	RLB changed.

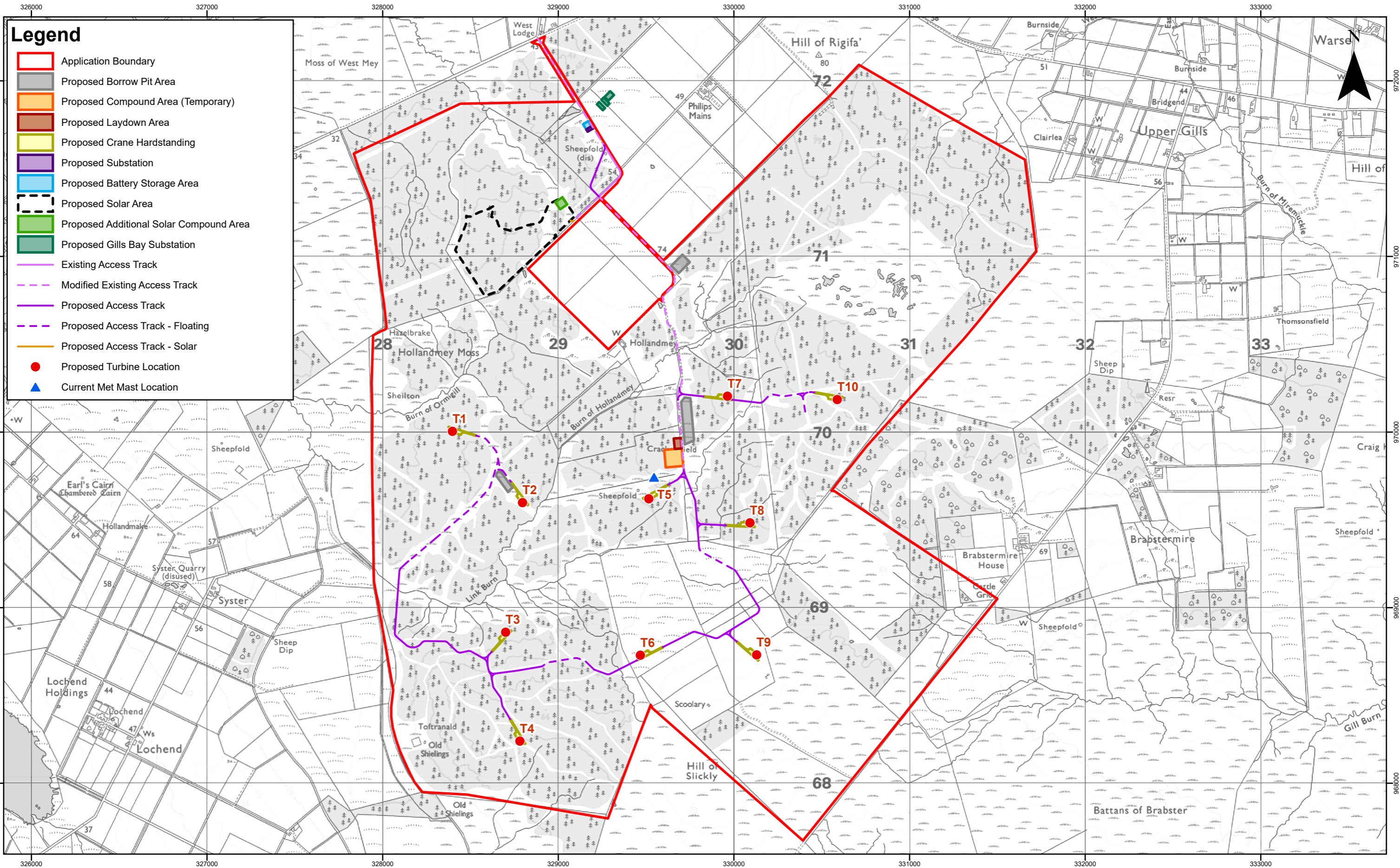
1:30,000
Scale @ A3



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Hollandmey Renewable Energy Development Application Boundary

Drg No	HMY_C_016	
Rev	F	Datum: OSGB36
Date	25/08/2020	Projection: TM
Figure	-	



Legend

- Application Boundary
- Proposed Borrow Pit Area
- Proposed Compound Area (Temporary)
- Proposed Laydown Area
- Proposed Crane Hardstanding
- Proposed Substation
- Proposed Battery Storage Area
- Proposed Solar Area
- Proposed Additional Solar Compound Area
- Proposed Gills Bay Substation
- Existing Access Track
- Modified Existing Access Track
- Proposed Access Track
- Proposed Access Track - Floating
- Proposed Access Track - Solar
- Proposed Turbine Location
- Current Met Mast Location



Rev	Date	By	Comment
A	16/12/2020	AJ	First Issue.

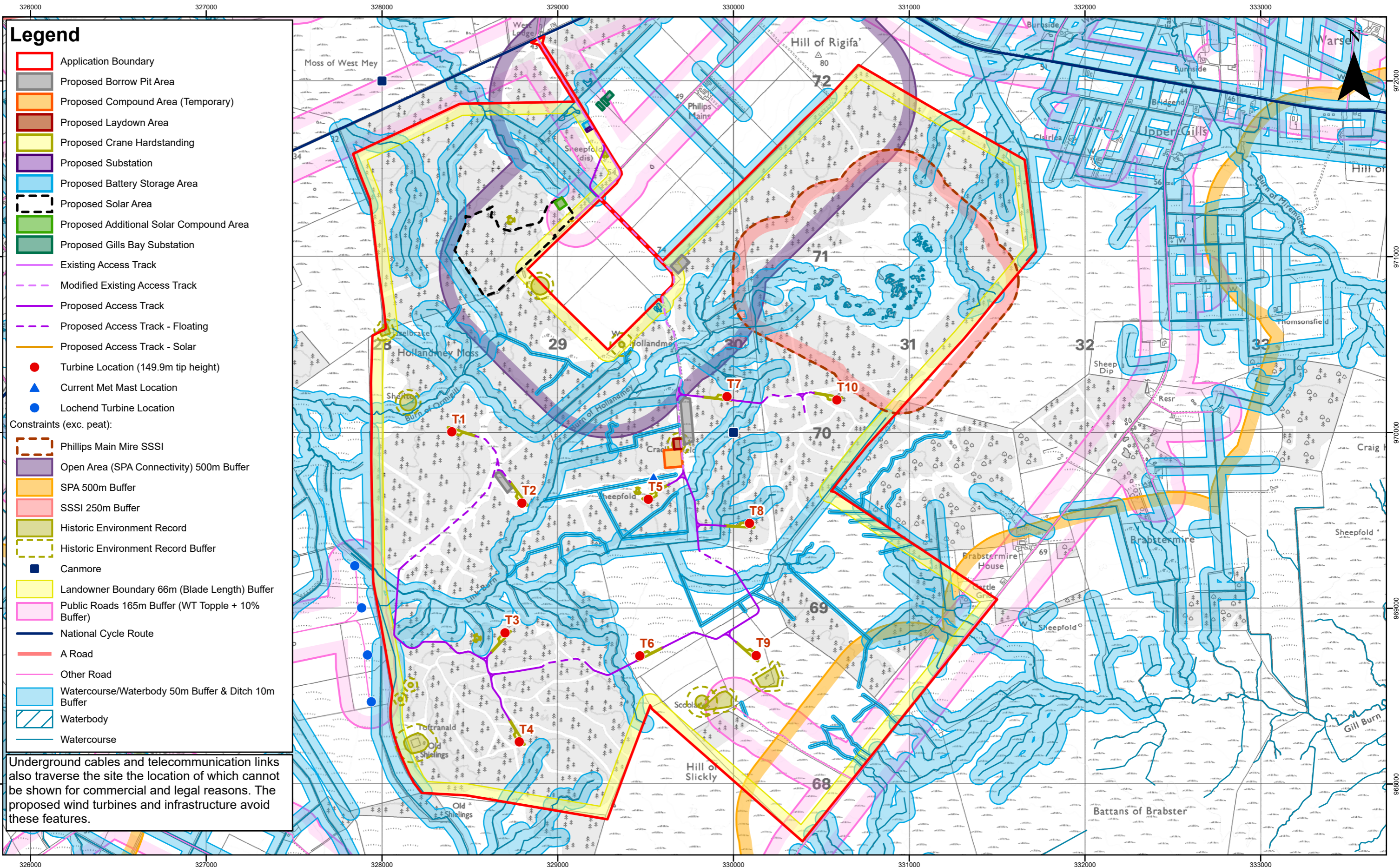
1:20,000
Scale @ A3

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Hollandmey Renewable Energy Development

Final Site Layout

Drg No	HMY_C_091	
Rev	A	Datum: OSGB36
Date	16/12/2020	Projection: TM
Figure	-	



Legend

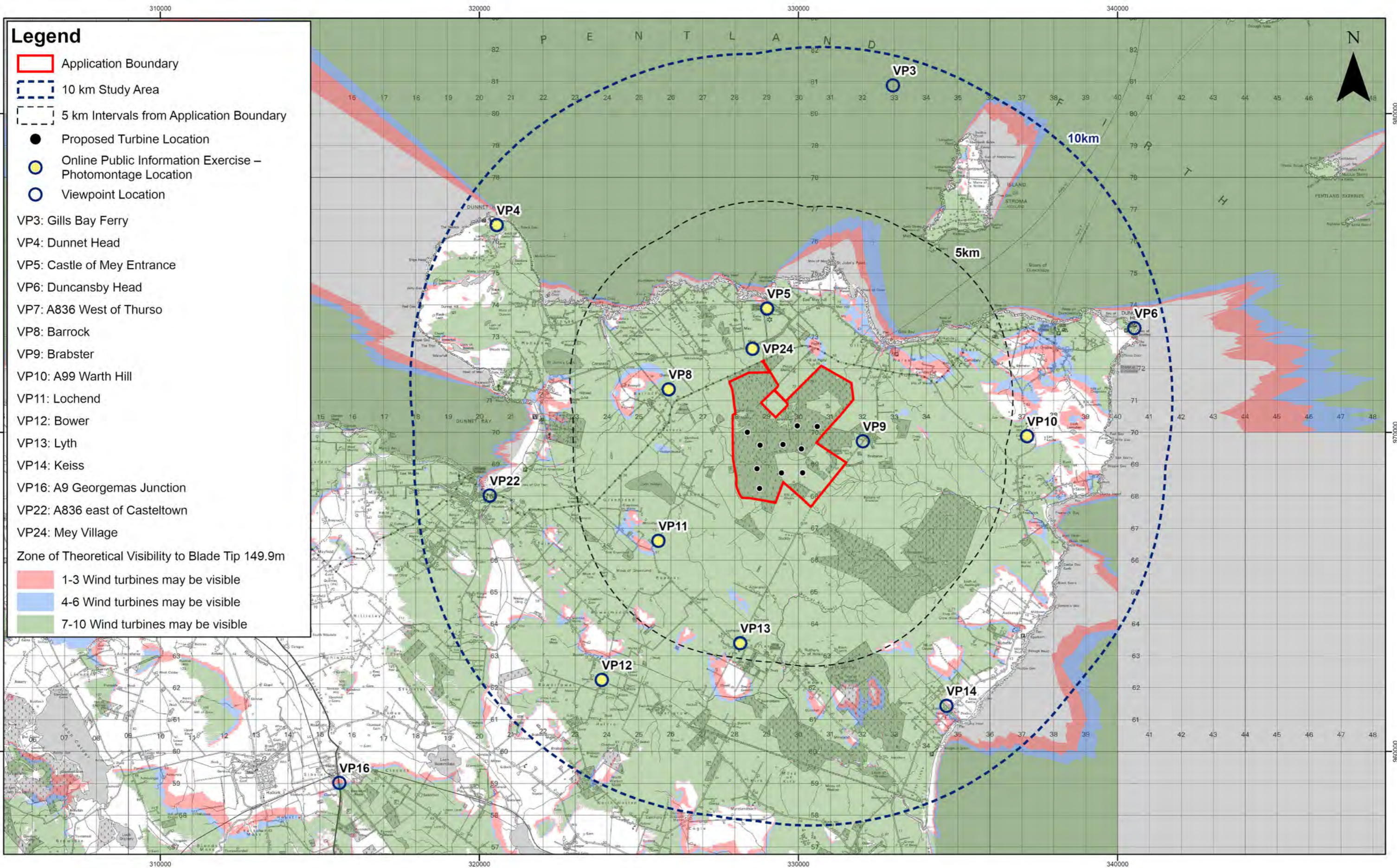
- Application Boundary
- Proposed Borrow Pit Area
- Proposed Compound Area (Temporary)
- Proposed Laydown Area
- Proposed Crane Hardstanding
- Proposed Substation
- Proposed Battery Storage Area
- Proposed Solar Area
- Proposed Additional Solar Compound Area
- Proposed Gills Bay Substation
- Existing Access Track
- Modified Existing Access Track
- Proposed Access Track
- Proposed Access Track - Floating
- Proposed Access Track - Solar
- Turbine Location (149.9m tip height)
- Current Met Mast Location
- Lochend Turbine Location

Constraints (exc. peat):

- Phillips Main Mire SSSI
- Open Area (SPA Connectivity) 500m Buffer
- SPA 500m Buffer
- SSSI 250m Buffer
- Historic Environment Record
- Historic Environment Record Buffer
- Canmore
- Landowner Boundary 66m (Blade Length) Buffer
- Public Roads 165m Buffer (WT Topple + 10% Buffer)
- National Cycle Route
- A Road
- Other Road
- Watercourse/Waterbody 50m Buffer & Ditch 10m Buffer
- Waterbody
- Watercourse

Underground cables and telecommunication links also traverse the site the location of which cannot be shown for commercial and legal reasons. The proposed wind turbines and infrastructure avoid these features.

					1:20,000 Scale @ A3		Hollandmey Renewable Energy Development Project Constraints	Drg No	HMY_C_090		
	A	16/12/2020	AJ	First Issue.	© Crown Copyright 2020. All rights reserved. Ordnance Survey Licence 0100031673.			Rev	A	Datum:	OSGB36
Rev	Date	By	Comment				Date	16/12/2020	Projection:	TM	
								Figure	-		



Legend

- Application Boundary
- 10 km Study Area
- 5 km Intervals from Application Boundary
- Proposed Turbine Location
- Online Public Information Exercise – Photomontage Location
- Viewpoint Location

VP3: Gills Bay Ferry
 VP4: Dunnet Head
 VP5: Castle of Mey Entrance
 VP6: Duncansby Head
 VP7: A836 West of Thurso
 VP8: Barrock
 VP9: Brabster
 VP10: A99 Warth Hill
 VP11: Lochend
 VP12: Bower
 VP13: Lyth
 VP14: Keiss
 VP16: A9 Georgemas Junction
 VP22: A836 east of Casteltown
 VP24: Mey Village

Zone of Theoretical Visibility to Blade Tip 149.9m

- 1-3 Wind turbines may be visible
- 4-6 Wind turbines may be visible
- 7-10 Wind turbines may be visible



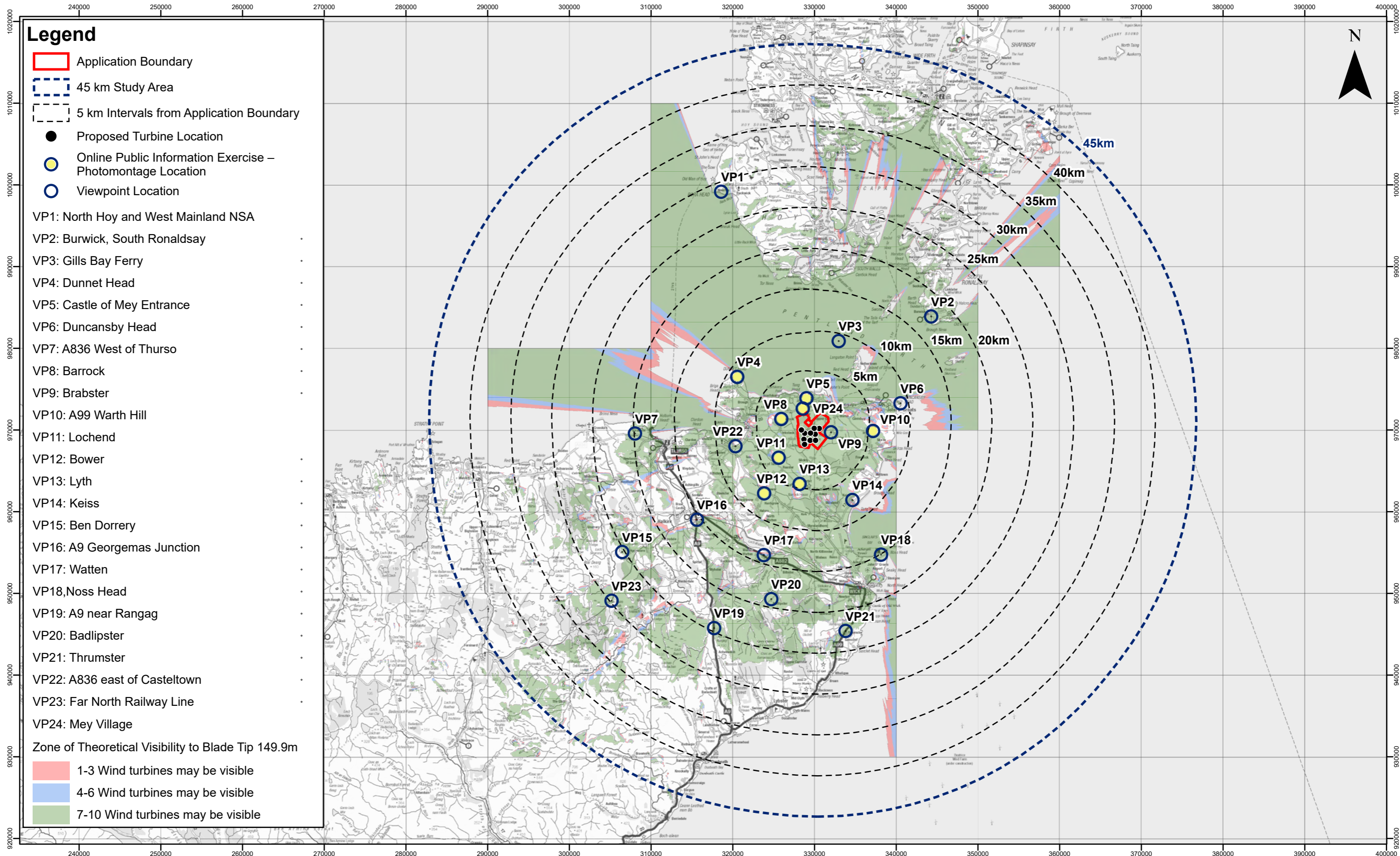
Rev	Date	By	Comment
A	15/12/2020	AJ	First Issue.

1:110,000
Scale @ A3

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Hollandmey Renewable Energy Development Zone of Theoretical Visibility to Blade Tip to 10 km

Drg No	HMY_C_093	
Rev	A	Datum: OSGB36
Date	15/12/2020	Projection: TM
Figure	-	



Legend

- Application Boundary
- 45 km Study Area
- 5 km Intervals from Application Boundary
- Proposed Turbine Location
- Online Public Information Exercise – Photomontage Location
- Viewpoint Location

VP1: North Hoy and West Mainland NSA
 VP2: Burwick, South Ronaldsay
 VP3: Gills Bay Ferry
 VP4: Dunnet Head
 VP5: Castle of Mey Entrance
 VP6: Duncansby Head
 VP7: A836 West of Thurso
 VP8: Barrock
 VP9: Brabster
 VP10: A99 Warth Hill
 VP11: Lochend
 VP12: Bower
 VP13: Lyth
 VP14: Keiss
 VP15: Ben Dorrery
 VP16: A9 Georgemas Junction
 VP17: Watten
 VP18, Noss Head
 VP19: A9 near Rangag
 VP20: Badlipster
 VP21: Thrumster
 VP22: A836 east of Casteltown
 VP23: Far North Railway Line
 VP24: Mey Village

Zone of Theoretical Visibility to Blade Tip 149.9m

- 1-3 Wind turbines may be visible
- 4-6 Wind turbines may be visible
- 7-10 Wind turbines may be visible

					1:425,000 Scale @ A3		Hollandmey Renewable Energy Development Zone of Theoretical Visibility to Blade Tip to 45 km	Drg No	HMY_C_092		
	A	16/12/2020	AJ	First Issue.	© Crown Copyright 2020. All rights reserved. Ordnance Survey Licence 0100031673.	Rev		A	Date	16/12/2020	Datum:
Rev	Date	By	Comment				Figure	-		Projection:	TM



View of the proposed development from Barrock (four turbines to the right of image belong to the operational Lochend Windfarm).

Hollandmey Renewable Energy Development

Online Public Information Event: 20 January – 10 February 2021

Why are we contacting you?

ScottishPower Renewables (SPR) is undertaking further public consultation on the proposal for Hollandmey Renewable Energy Development located approximately 8 km south west of John o' Groats and 16 km east of Thurso, situated within the north-eastern part of the Caithness area of the Highlands. This leaflet provides details on the consultation format and timings, advises how you can engage in the process, and identifies where further information on the proposals may be obtained.

The proposals

The proposed Development is planned to comprise ten wind turbines of around 5 megawatts (MW) each (maximum height to blade tip of 149.9 metres) and a battery energy storage system (BESS) with a capacity of approximately 15 MW, resulting in a combined generating capacity of around 65 MW. A ground mounted solar array is also being proposed, and the Development would potentially generate enough electricity to supply the equivalent of over 37,000 UK homes (excluding contribution from potential solar array). In addition, the BESS will provide energy balancing services and will therefore add resilience and stability to the flow of electricity to the National Grid.

Previous consultation to date

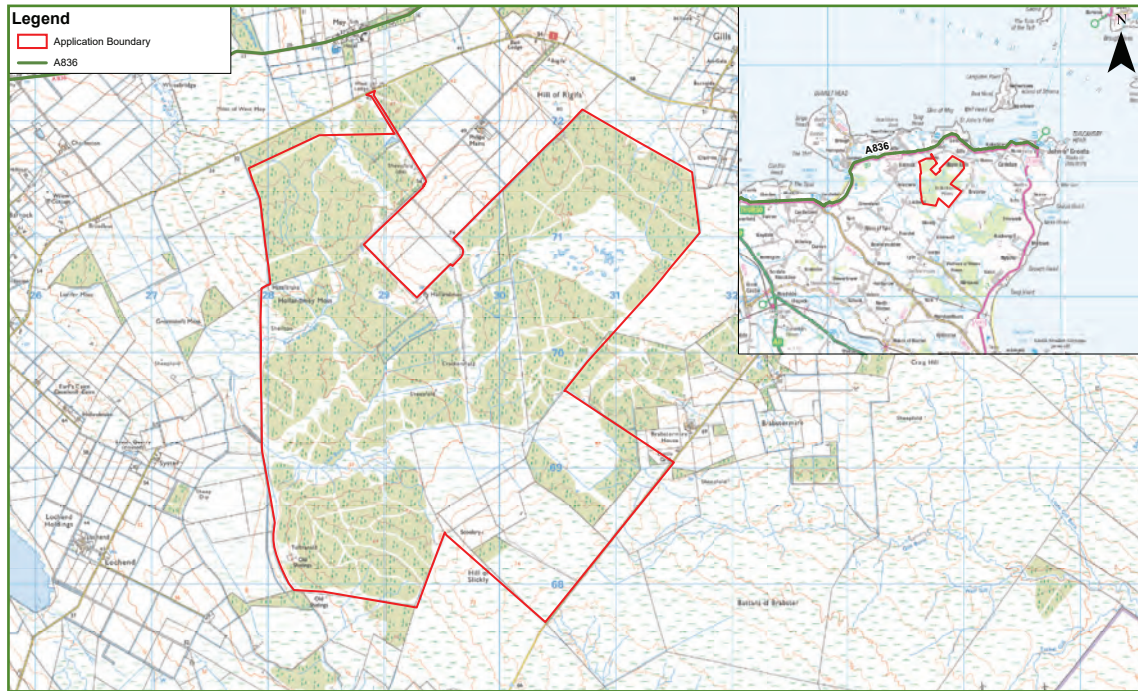
A direct scoping exercise was undertaken in July 2020, during which a range of local and statutory stakeholders were consulted. This also coincided with our first public consultation exercise, whereby we sent out a leaflet to the local area to introduce the proposed Development and provide an opportunity for public feedback through the project email address (below). We then held our first online Public Information Event in October 2020,

where we provided further information about the proposed Development and our progress to date on our website. The valuable feedback received through these public consultations helped us to update the site design that balances social and environmental considerations. A second online Public Information Event will take place between 20 January – 10 February 2021, to provide further information on the progress of the project and highlight the changes since the previous Event. This will provide the public with a further opportunity to provide their feedback directly to the project team.

Project changes since previous public consultation

The following changes have been made to the layout:

- Turbine Micrositing: turbines 5 (25 m east north east) and 8 (80 m west north west) have been moved slightly after reviewing the phase 2 peat survey data, and because of the discovery of a previously unknown watercourse on-site;
- Finalisation of solar array & BESS locations: the solar array and BESS areas were identified after an environmental appraisal of the preferred locations and consulting with relevant stakeholders; and
- Finalisation of ancillary design: the design of ancillary infrastructure, including access tracks, crane hardstandings, construction compounds, substation and borrow pits, was finalised after further environmental surveys, technical studies and consultation with statutory consultees.



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Community benefits

Our nearby Beinn Tharsuinn Windfarm (operational) and Halsary Windfarm (under construction) are projected to deliver more than £2.5 million for the benefit of communities in the local area, and should Hollandmey Renewable Energy Development become operational, SPR will share benefits of the proposal with the local communities.

With established sites nearby, SPR has a history of working positively with communities within the region. We are keen to create employment opportunities during the construction and operation of our developments that can be delivered locally to benefit those who live near our sites.

What further consultation is taking place?

Due to the Government guidance issued as a result of the COVID-19 pandemic, face-to-face consultation is unfortunately not possible at present.

We will therefore be hosting an online Public Information Event to provide more information on our proposed Development. This will contain all of the information that would have been presented in a traditional information day. The Event can be accessed via the Hollandmey Renewable Energy Development project website page below, or by entering Hollandmey Renewable Energy Development in your internet browser's search bar.

www.ScottishPowerRenewables.com/HollandmeyRED

The following information will be made available on the website to view and download from 20 January 2021:

- an introduction to the proposed Development, including; information on the work undertaken to date, the iterative design process and the planning and environmental impact assessment process;
- visualisations of how the proposed turbines will look in the landscape from key viewpoints;
- a map showing the areas where the proposed turbines may potentially be visible from (known as the Zone of Theoretical Visibility, or ZTV);
- a summary of the surveys and studies completed for each technical topic and an outline of the scope of the assessment for each;
- an explanation of the benefits of the proposed Development;

- a section with answers to Frequently Asked Questions (FAQs); and
- an online feedback form to allow you to submit queries or comments regarding the proposed Development.

How can I get involved and make comments?

The online Public Information Event page will include an online feedback form where comments, questions or requests for further information can be sent directly to the project team.

The Event will be live from 20 January 2021, and we ask that you send any questions or comments on the included materials by 17:00 10 February 2021. We will respond to any enquires sent and if you have concerns about the proposals or would like to speak with the project team directly, we can make arrangements to do this via a one-to-one telephone or video call.

Please note that any comments made on the proposals to SPR at this stage are not representations to the Scottish Ministers. When the planning application is subsequently submitted, normal publicity will be undertaken at that time and the public will have the opportunity then to make formal representations.

PROJECT TEAM CONTACT DETAILS

If you require to have any of the documents contained within the online Public Information Event emailed or posted to you, then please contact the project team by email or in writing at the contact details below. These contacts can also be used for requests for any further information, submitting comments or asking questions on the proposed Development at any time.

EMAIL:

hollandmeyred@scottishpower.com

POST:

ScottishPower Renewables
Hollandmey Renewable Energy Development Team
9th Floor ScottishPower Headquarters
320 St Vincent Street
Glasgow
G2 5AD

Hollandmey Renewable Energy Development

Online Public Information Event: 20 January – 10 February 2021

ScottishPower Renewables (SPR) invites you to participate in further public consultation on the draft proposals for the Hollandmey Renewable Energy Development (Hollandmey RED).

SPR is proposing to develop Hollandmey RED, situated approximately 8 km south-west of John o' Groats and 16 km east of Thurso within the north-eastern part of the Caithness area of the Highlands.

The proposed Development is planned to comprise ten wind turbines of around 5 megawatts (MW) each (maximum height to blade tip of 149.9 metres) and a battery energy storage system (BESS) with a capacity of approximately 15 MW, resulting in a combined generating capacity of around 65 MW. A ground mounted solar array area is also being proposed.

Early consultation is key to developing our projects and, throughout the development process, we ensure local communities and stakeholders are given the opportunity to provide feedback and are kept informed of project progress.

Given the restrictions requiring social distancing, instead of holding Public Information Days, we will be hosting a Public Information Event on the proposals online from 20 January until 10 February 2021 on the project website:

www.ScottishPowerRenewables.com/HollandmeyRED

The online Public Information Event will include information banners as well as visualisations to help to give an impression of what the proposed Development could look like from different viewpoints in the area.

www.scottishpowerrenewables.com

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or writing to

ScottishPower Renewables
Hollandmey Renewable Energy Development Team
9th Floor ScottishPower Headquarters
320 St Vincent Street
Glasgow
G2 5AD

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Hollandmey Renewable Energy Development

Online Public Information Event: 20 January – 10 February 2021

The Event will go live on 20 January 2021. Please review and submit your comments and questions on the proposals via the feedback form on the project website by 17:00 on 10 February 2021.

[Click here to find out more](#)



Hollandmey Renewable Energy Development

Online Public Information Event: 20 January - 10 February 2021

ScottishPower Renewables (SPR) invites you to participate in further public consultation on the draft proposals for the Hollandmey Renewable Energy Development (Hollandmey RED).

SPR is proposing to develop Hollandmey RED, situated approximately 8 km south-west of John o' Groats and 16 km east of Thurso within the north-eastern part of the Caithness area of the Highlands.

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www.ScottishPowerRenewables.com/HollandmeyRED

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or writing to

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Hollandmey Renewable Energy Development Team
9th Floor ScottishPower Headquarters
320 St Vincent Street
Glasgow
G2 5AD

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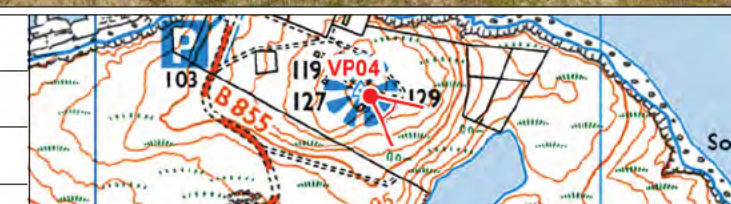
www.scottishpowerrenewables.com



Photomontage

VIEW FLAT AT A COMFORTABLE ARM'S LENGTH
IF VIEWING THIS IMAGE ON A SCREEN, ENLARGE TO FULL SCREEN HEIGHT

Date	By
January 2021	AW
Image Size	QA
820 x 260mm	CF/AP
Paper Size	Rev
840 x 297mm	0
Exhib-53 5deg-Jan2021.indd	



Notes:
 1) This visualisation is a planar projection panorama. View flat at a comfortable arm's length.
 2) This data has been output directly from the skyline model. It ignores screening effects of woodland and other intervening objects.
 3) All directions given as bearings relative to Grid North (GN).
 4) Location map scale: OS 1:25,000 mapping shown at 1:15,000.
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 Service layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus OS, USA, USGS, AeroGRID, IGN, and the GIS User Community

Viewpoint Information
 Grid Reference: 320543E 976503N
 Ground Height: 126m AOD
 Direction of Centre View: 125°
 Horizontal Field of View: 53.5° (Planar Projection)
 Vertical Field of View: 18.2°
 Principal Distance: 812.5mm

Photography Information
 Camera: Nikon D810 36.3 - Full Frame
 Lens: 50mm Fixed Focal Length
 Camera Height: 1.5m
 Photography Date: 31/05/2020
 Photography Time: 17:45

Hollandmey Layout Information (turbine numbers on image)
 Layout: Layout 2.3.WFL
 Hub Height: 82m
 Height to Blade Tip: 149.9m
 Nearest Visible Turbine: T1 @ 10.2km
 Number of sets of Tips Visible: 2
 Number of Hubs Visible: 2



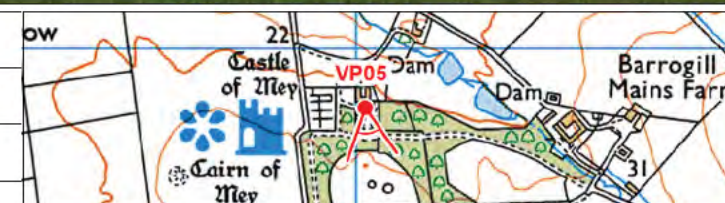
Hollandmey Renewable Energy Development
Viewpoint 4: Dunnet Head
Photomontage Visualisation



Photomontage

VIEW FLAT AT A COMFORTABLE ARM'S LENGTH
IF VIEWING THIS IMAGE ON A SCREEN, ENLARGE TO FULL SCREEN HEIGHT

Date	January 2021	By	AW
Image Size	820 x 260mm	QA	CF/AP
Paper Size	840 x 297mm	Rev	0
Exhib-53 5deg-Jan2021.indd			



Notes:
 1) This visualisation is a planar projection panorama. View flat at a comfortable arm's length.
 2) This data has been output directly from the skyline model. It ignores screening effects of woodland and other intervening objects.
 3) All directions given are bearings relative to Grid North (GN).
 4) Location map scale: OS 1:25,000 mapping shown at 1:15,000.
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Viewpoint Information
 Grid Reference: 329017E 973884N
 Ground Height: 26m AOD
 Direction of Centre View: 172°
 Horizontal Field of View: 53.5° (Planar Projection)
 Vertical Field of View: 18.2°
 Principal Distance: 812.5mm

Photography Information
 Camera: Nikon D810 36.3 - Full Frame
 Lens: 50mm Fixed Focal Length
 Camera Height: 1.5m
 Photography Date: 23/09/2020
 Photography Time: 15:15

Hollandmey Layout Information (turbine numbers on image)
 Layout: Layout 2.3.WFL
 Hub Height: 82m
 Height to Blade Tip: 149.9m
 Nearest Visible Turbine: T7 @ 3.8km
 Number of sets of Tips Visible: 2
 Number of Hubs Visible: 06



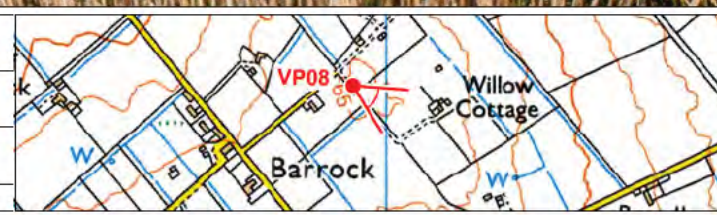
Hollandmey Renewable Energy Development
Viewpoint 5: Castle of Mey South Entrance
Photomontage Visualisation



Photomontage

VIEW FLAT AT A COMFORTABLE ARM'S LENGTH
IF VIEWING THIS IMAGE ON A SCREEN, ENLARGE TO FULL SCREEN HEIGHT

Date	By
January 2021	AW
Image Size	QA
820 x 260mm	CF/AP
Paper Size	Rev
840 x 297mm	0
Exhib-53 5deg-Jan2021.indd	



Notes:
 1) This visualisation is a planar projection panorama. View flat at a comfortable arm's length.
 2) This data has been output directly from the skyline model. It ignores screening effects of woodland and other intervening objects.
 3) All directions given as bearings relative to Grid North (GN).
 4) Location map scale: OS 1:25,000 mapping shown at 1:15,000.
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Viewpoint Information
 Grid Reference: 325933E 971349N
 Ground Height: 65m AOD
 Direction of Centre View: 3 121°
 Horizontal Field of View: 53.5° (Planar Projection)
 Vertical Field of View: 18.2°
 Principal Distance: 812.5mm

Photography Information
 Camera: Nikon D810 36.3 - Full Frame
 Lens: 50mm Fixed Focal Length
 Camera Height: 1.5m
 Photography Date: 31/05/2020
 Photography Time: 16:55

Hollandmey Layout Information (turbine numbers on image)
 Layout: Layout 2.3.WFL
 Hub Height: 82m
 Height to Blade Tip: 149.9m
 Nearest Visible Turbine: T1 @ 2.8km
 Number of sets of Tips Visible: 2 10
 Number of Hubs Visible: 2 10



Hollandmey Renewable Energy Development
Viewpoint 8: Barrock
 Photomontage Visualisation



Photomontage

VIEW FLAT AT A COMFORTABLE ARM'S LENGTH
IF VIEWING THIS IMAGE ON A SCREEN, ENLARGÉ TO FULL SCREEN HEIGHT



Notes:
 1) This visualisation is a planar projection panorama. View flat at a comfortable arm's length.
 2) This data has been output directly from the skyline model. It ignores screening effects of woodland and other intervening objects.
 3) All directions given as bearings relative to Grid North (GN).
 4) Location map scale: OS 1:25,000 mapping shown at 1:15,000.
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Viewpoint Information
 Grid Reference: 337164E 969879N
 Ground Height: 124m AOD
 Direction of Centre View: 3 266°
 Horizontal Field of View: 53.5° (Planar Projection)
 Vertical Field of View: 18.2°
 Principal Distance: 812.5mm

Photography Information
 Camera: Nikon D810 36.3 - Full Frame
 Lens: 50mm Fixed Focal Length
 Camera Height: 1.5m
 Photography Date: 31/05/2020
 Photography Time: 11:10

Hollandmey Layout Information (turbine numbers on image)
 Layout: Layout 2.3.WFL
 Hub Height: 82m
 Height to Blade Tip: 149.9m
 Nearest Visible Turbine: T10 @ 6.6km
 Number of sets of Tips Visible: 2 10
 Number of Hubs Visible: 2 10



Hollandmey Renewable Energy Development
Viewpoint 10: A99 Warth Hill
Photomontage Visualisation



Photomontage

VIEW FLAT AT A COMFORTABLE ARM'S LENGTH
IF VIEWING THIS IMAGE ON A SCREEN, ENLARGE TO FULL SCREEN HEIGHT

Date	January 2021	By	AW
Image Size	820 x 260mm	QA	CFI/AP
Paper Size	840 x 297mm	Rev	0
Exhib-53 5deg-Jan2021.indd			



Notes:
 1) This visualisation is a planar projection panorama. View flat at a comfortable arm's length.
 2) This data has been output directly from the airline model. It ignores screening effects of woodland and other intervening objects.
 3) All directions given as bearings relative to Grid North (GN).
 4) Location map scale: OS 1:25,000 mapping shown at 1:15,000.
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 Service layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus OS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

Viewpoint Information	
Grid Reference:	325611E 966606N
Ground Height:	72m AOD
Direction of Centre View: ³	52°
Horizontal Field of View:	53.5° (Planar Projection)
Vertical Field of View:	18.2°
Principal Distance:	812.5mm

Photography Information	
Camera:	Nikon D810 36.3 - Full Frame
Lens:	50mm Fixed Focal Length
Camera Height:	1.5m
Photography Date:	31/05/2020
Photography Time:	13:45

Hollandmey Layout Information (turbine numbers on image)	
Layout:	Layout 2.3.WFL
Hub Height:	82m
Height to Blade Tip:	149.9m
Nearest Visible Turbine:	T4 @ 3.6km
Number of sets of Tips Visible: ²	10
Number of Hubs Visible: ²	10



Hollandmey Renewable Energy Development
Viewpoint 11: Lochend
Photomontage Visualisation



Photomontage

VIEW FLAT AT A COMFORTABLE ARM'S LENGTH
IF VIEWING THIS IMAGE ON A SCREEN, ENLARGE TO FULL SCREEN HEIGHT



Notes:
 1) This visualisation is a planar projection panorama. View flat at a comfortable arm's length.
 2) This data has been output directly from the skyline model. It ignores screening effects of woodland and other intervening objects.
 3) All directions given as bearings relative to Grid North (GN).
 4) Location map scale: OS 1:25,000 mapping shown at 1:15,000.
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Viewpoint Information
 Grid Reference: 323836E 962244N
 Ground Height: 48m AOD
 Direction of Centre View: 37°
 Horizontal Field of View: 53.5° (Planar Projection)
 Vertical Field of View: 18.2°
 Principal Distance: 812.5mm

Photography Information
 Camera: Nikon D810 36.3 - Full Frame
 Lens: 50mm Fixed Focal Length
 Camera Height: 1.5m
 Photography Date: 31/05/2020
 Photography Time: 14:45

Hollandmey Layout Information (turbine numbers on image)
 Layout: Layout 2.3.WFL
 Hub Height: 82m
 Height to Blade Tip: 149.9m
 Nearest Visible Turbine: T4 @ 7.8km
 Number of sets of Tips Visible: 2
 Number of Hubs Visible: 2



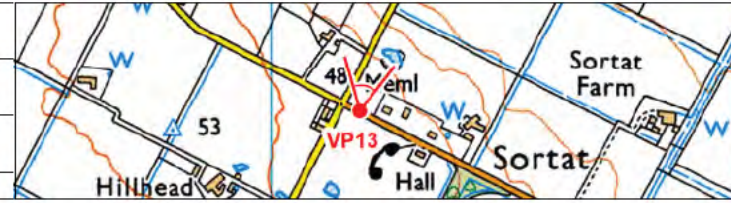
Hollandmey Renewable Energy Development
Viewpoint 12: Bower
Photomontage Visualisation



Photomontage

VIEW FLAT AT A COMFORTABLE ARM'S LENGTH
IF VIEWING THIS IMAGE ON A SCREEN, ENLARGE TO FULL SCREEN HEIGHT

Date	January 2021	By	AW
Image Size	820 x 260mm	QA	CFI/AP
Paper Size	840 x 297mm	Rev	0
Exhib-53 5deg-Jan2021.indd			



Notes:
 1) This visualisation is a planar projection panorama. View flat at a comfortable arm's length.
 2) This data has been output directly from the skyline model. It ignores screening effects of woodland and other intervening objects.
 3) All directions given as bearings relative to Grid North (GN).
 4) Location map scale: OS 1:25,000 mapping shown at 1:15,000.
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Viewpoint Information
 Grid Reference: 328175E 963395N
 Ground Height: 48m AOD
 Direction of Centre View: 3 11°
 Horizontal Field of View: 53.5° (Planar Projection)
 Vertical Field of View: 18.2°
 Principal Distance: 812.5mm

Photography Information
 Camera: Nikon D810 36.3 - Full Frame
 Lens: 50mm Fixed Focal Length
 Camera Height: 1.5m
 Photography Date: 31/05/2020
 Photography Time: 12:35

Hollandmey Layout Information (turbine numbers on image)
 Layout: Layout 2.3.WFL
 Hub Height: 82m
 Height to Blade Tip: 149.9m
 Nearest Visible Turbine: T4 @ 4.9km
 Number of sets of Tips Visible: 2 10
 Number of Hubs Visible: 2 10



Hollandmey Renewable Energy Development
Viewpoint 13: Lyth
Photomontage Visualisation



Photomontage

VIEW FLAT AT A COMFORTABLE ARM'S LENGTH
IF VIEWING THIS IMAGE ON A SCREEN, ENLARGE TO FULL SCREEN HEIGHT

Date January 2021	By AW	
Image Size 820 x 260mm	QA CF/AP	
Paper Size 840 x 297mm	Rev 0	
Exhib-53 5deg-Jan2021.indd		

Notes:
 1) This visualisation is a planar projection panorama. View flat at a comfortable arm's length.
 2) This data has been output directly from the skyline model. It ignores screening effects of woodland and other intervening objects.
 3) All directions given as bearings relative to Grid North (GN).
 4) Location map scale: OS 1:25,000 mapping shown at 1:15,000.
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Viewpoint Information
 Grid Reference: 328813E 972779N
 Ground Height: 35m AOD
 Direction of Centre View: 167°
 Horizontal Field of View: 53.5° (Planar Projection)
 Vertical Field of View: 18.2°
 Principal Distance: 812.5mm

Photography Information
 Camera: Nikon D810 36.3 - Full Frame
 Lens: 50mm Fixed Focal Length
 Camera Height: 1.5m
 Photography Date: 15/12/2020
 Photography Time: 14:50

Hollandmey Layout Information (turbine numbers on image)
 Layout: Layout 2.3.WFL
 Hub Height: 82m
 Height to Blade Tip: 149.9m
 Nearest Visible Turbine: T1 @ 2.8km
 Number of sets of Tips Visible: 2
 Number of Hubs Visible: 2



Hollandmey Renewable Energy Development
Viewpoint 24: Mey Village
Photomontage Visualisation



30/09/2020

Dear [REDACTED]

ScottishPower Renewables Virtual Public Information Event for the Hollandmey Renewable Energy Development Proposal

We refer to the above & previous correspondence to provide an update on the status of the Hollandmey Renewable Energy Development (Hollandmey RED) Proposal and to inform you that ScottishPower Renewables (SPR) is launching a Virtual Public Information Event.

Following extensive survey work and design workshops, the current layout of the proposed Development consists of 10 turbines with a maximum blade tip height of 149.9m, an energy storage facility and potential for a solar array area. SPR is in the process of completing an Environmental Impact Assessment that includes both environmental and technical surveys such as peat probing, cultural heritage, bird and bat surveys to be submitted as part of the final planning application to the Scottish Government.

Due to the Government guidance issued because of the COVID-19 pandemic, face-to-face consultation is unfortunately not possible at present and may not be permitted for the foreseeable future. SPR is committed to undertaking meaningful and wide-reaching consultation and is therefore hosting a Virtual Public Information Event that is due to launch **on the 02 October 2020**. The event will identify how the design of the proposal has evolved to take on board public and consultee feedback, as well as the findings of the environmental studies and assessments that have been completed. The event can be accessed using the following link via the project website noted below:

www.scottishpowerrenewables.com/hollandmeyred

In addition to the Virtual Public Information Event, we will continue to keep you updated in relation to our development activities at this Site and will continue to engage with you throughout the course of the development phase and beyond. If you would like any further information on the proposal at this stage, we would be very grateful if you could email the project mailbox at: hollandmeyred@scottishpower.com

Yours Faithfully,

[REDACTED]

Ryan McPhee

Project Manager – Hollandmey Renewable Energy Development



14/01/2021

Dear [REDACTED]

ScottishPower Renewables – Second Online Public Information Event for the Hollandmey Renewable Energy Development Proposal

We refer to the above & previous correspondence to provide an update on the status of the Hollandmey Renewable Energy Development (Hollandmey RED) Proposal, and to inform you that ScottishPower Renewables (SPR) is launching a second online Public Information Event.

Following extensive survey work and design workshops, the current layout of the proposed Development consists of 10 turbines with a maximum blade tip height of 149.9m, an energy storage facility and potential for a solar array area. SPR is in the process of completing an Environmental Impact Assessment that includes both environmental and technical surveys such as peat probing, cultural heritage, bird and bat surveys to be submitted as part of the final planning application to the Scottish Government.

Due to the Government guidance issued because of the COVID-19 pandemic, face-to-face consultation is unfortunately not possible at present and may not be permitted for the foreseeable future. SPR is committed to undertaking meaningful and wide-reaching consultation and is therefore hosting a second online Public Information Event that is due to launch **on the 20 January 2021**. The Event will identify how the design of the proposal has evolved to take on board public and consultee feedback from the first Event, as well as the findings of the environmental studies and assessments that have been completed. The Event will be advertised to the local community through a leaflet drop covering a 10km radius around the Site, and we will also advertise in the local newspapers, the John O’Groat Journal and the Caithness Courier. The Event can be accessed using the following link via the project website noted below:

www.scottishpowerrenewables.com/hollandmeyred

In addition to this online Public Information Event, we will continue to keep you updated in relation to our development activities at this Site and will continue to engage with you throughout the course of the development phase and beyond. If you would like any further information on the proposal at this stage, we would be very grateful if you could email the project mailbox at: hollandmeyred@scottishpower.com

Yours Faithfully,

[REDACTED]

Ryan McPhee

Project Manager – Hollandmey Renewable Energy Development



Technical Appendix 6.1

Direct Scoping Documents Issued to
Consultees



PROPOSED HOLLANDMEY RENEWABLE ENERGY DEVELOPMENT

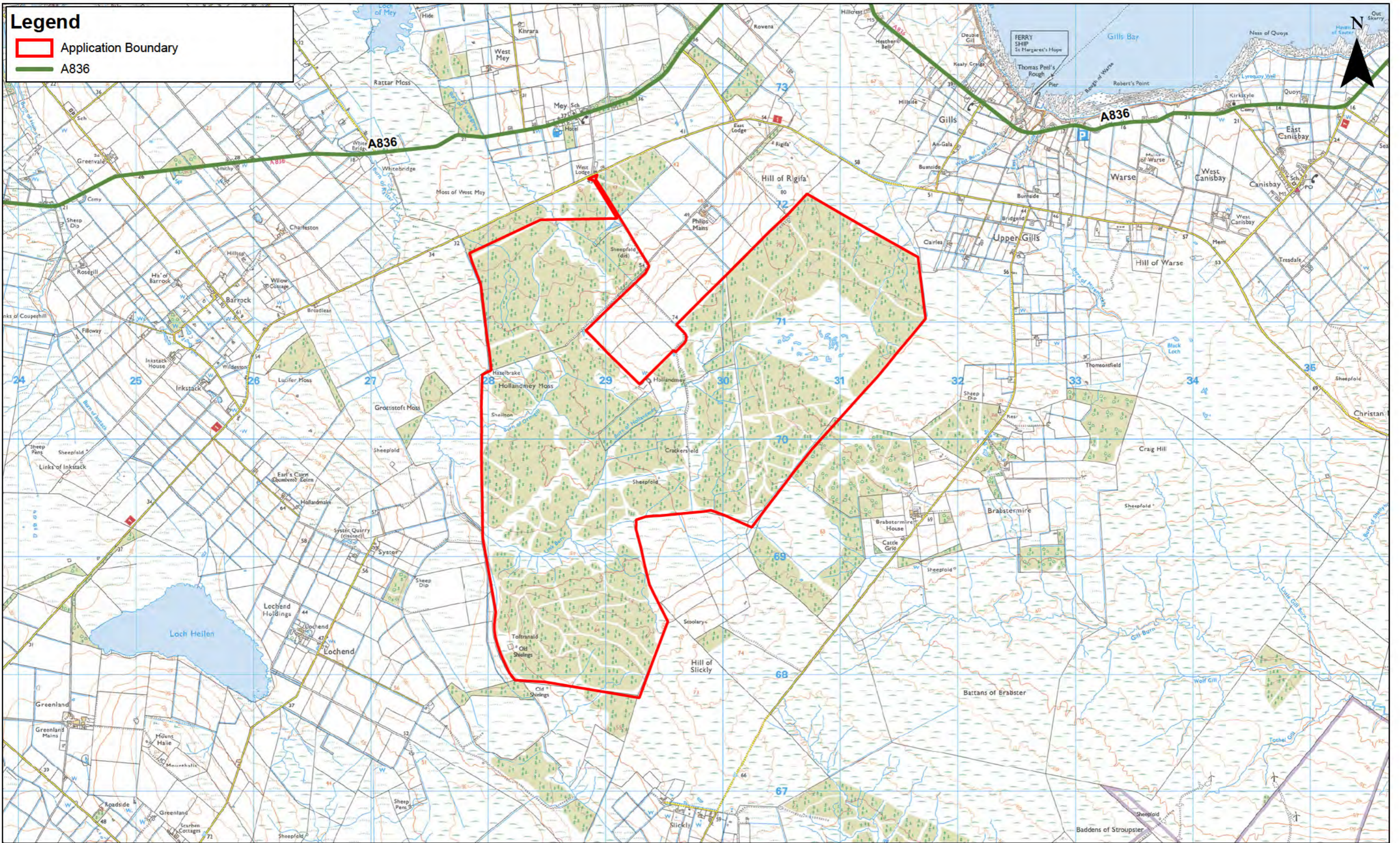
ScottishPower Renewables (SPR) is proposing to develop Hollandmey Renewable Energy Development near John O'Groats in the Highlands. The proposed Development is anticipated to comprise turbines with blade tip heights up to 149.9 metres and may include solar panels and an associated energy storage facility.

Site Location and Description

The Site is located approximately 8 km south west of John o' Groats and 16 km east of Thurso, situated within the north eastern part of the Caithness area of the Highlands. The Site lies within a Sweeping Moorland and Flows Landscape Character Area (LCA), which is described as a flat to gently undulating and smooth landform. The Site contains sections of Coniferous Woodland Plantation and is located within an area of carbon rich soils. The Phillip Mains Mire Site of Special Scientific Interest (SSSI), an area of Class 1 Peatland, is in the north east area of the Site. The current land use is classified as agricultural/moorland/forestry.

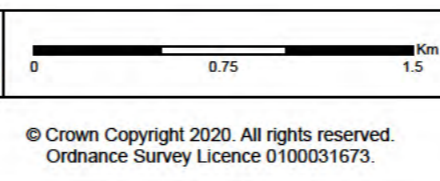
The area around the Site is characterised by small scale settled coastal seaboard and large scale, open and simple moorland.

The location of the proposed Development is within an area which has multiple existing and proposed windfarm developments. These include the operational Lochend Windfarm and Stroupster Windfarm, and the proposed Slickly Windfarm.



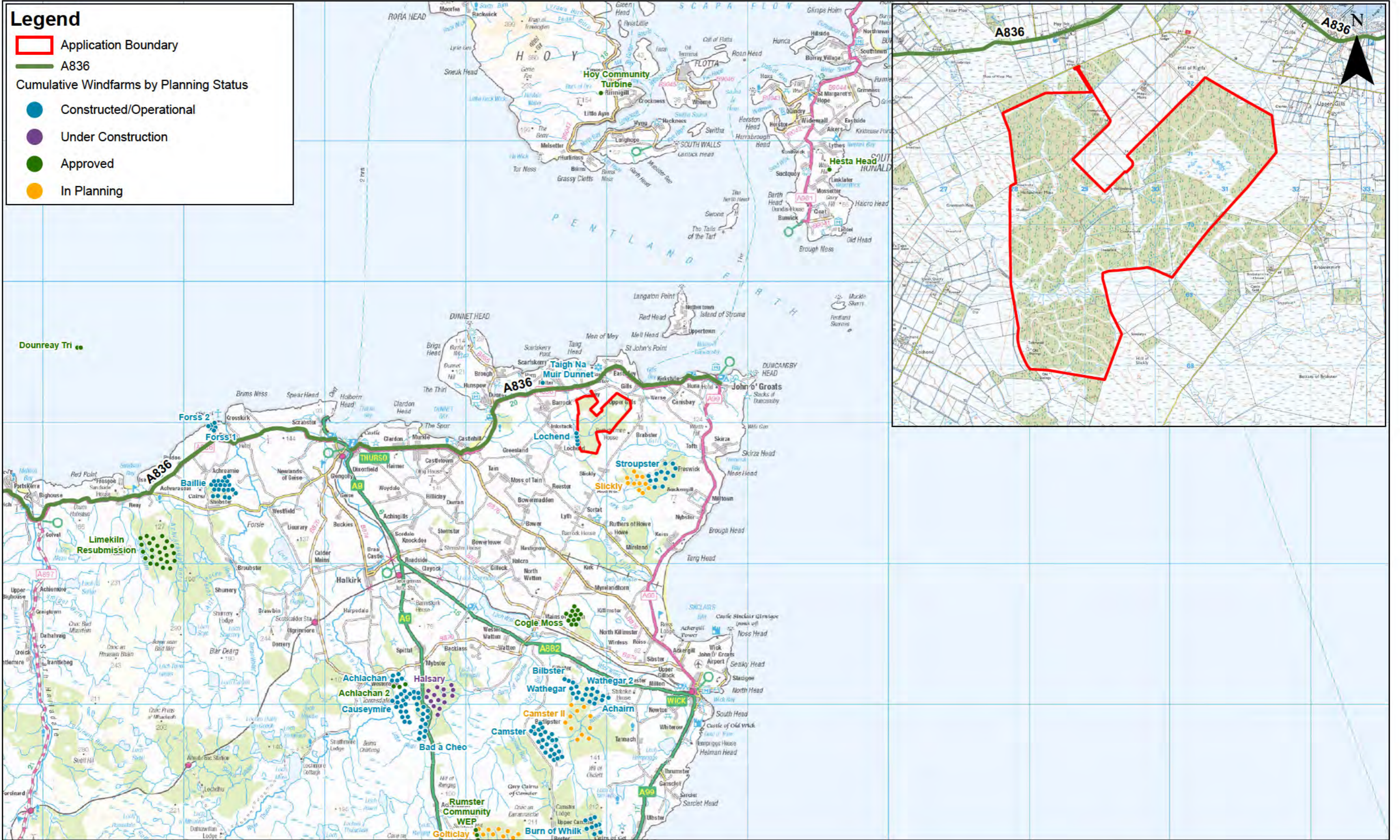
Rev	Date	By	Comment
D	14/07/2020	AJ	RLB changed.
C	01/07/2020	AJ	RLB reverted to original.
B	22/05/2020	AJ	Application boundary updated.

1:30,000
Scale @ A3



Hollandmey Renewable Energy Development Application Boundary

Drg No	HMY_C_016	
Rev	D	Datum: OSGB36
Date	14/07/2020	Projection: TM
Figure	-	



Rev	Date	By	Comment
C	14/07/2020	AJ	RLB updated.
B	01/07/2020	AJ	RLB updated.
A	27/05/2020	AJ	First Issue.

1:250,000
Scale @ A3

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Hollandmey Renewable Energy Development Cumulative Windfarm Developments

Drg No	HMY_C_025	
Rev	C	Datum: OSGB36
Date	14/07/2020	Projection: TM
Figure	-	

Project Description

Initial feasibility and design work indicate that the Site has the potential to accommodate in the region of 11 wind turbines of up to 149.9 metres to blade tip and an associated energy storage facility with solar park. It is anticipated that wind turbines of this scale will be required to ensure the commercial viability of the project.

The design will look to find an appropriate balance between optimising the energy yield and minimising the environmental effects. This will be important to maximise the contribution the proposed Development would make to the Scottish Government's renewable energy and climate change targets, and the response to the climate emergency. The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 set out a legally binding target of net-zero by 2045. The Scottish Climate Change Plan (SCCP) (2018), which is currently being revised to reflect the updated targets of the Climate Change Act, includes a target of 50% of Scotland's energy need to be met by renewable energy in 2030. The SCCP also included a goal for 100% of Scotland's electricity to be generated by renewables by 2020, which has yet to be met so it is important that there is increased investment in renewable energy developments to avoid falling further behind.



In addition to the wind turbines, the proposed Development may include solar panels and an energy storage facility. This will be used to store the green electricity produced by the wind turbines and could be used to smooth out variances between wind resource and electricity demand. It can also be used to provide services to help stabilise the operation of the local electricity network.

At this time, the preferred access route from a suitable port to the A836 has yet to be confirmed. However, a range of potential access route options are being explored and the final route will be selected with regard to transport and environmental constraints and consultation with key stakeholders.

Construction of the proposed Development is anticipated to commence in summer 2022 and will take approximately 22 months.

There is no proposal to limit the lifetime of the proposed Development. Therefore, the assessment of potential effects on all aspects will consider the operational phase of the proposed Development without time limitations. The principle of decommissioning the entire project will therefore not be assessed. Should decommissioning of any of the proposed Development be required, e.g. as a result of failure of a wind turbine beyond economic repair, any effects would be of lesser magnitude than those resulting from the construction phase of the proposed Development and, as such, effects associated with the decommissioning phase have been scoped out of further assessment. Should consent be granted, it is anticipated that there would be a condition which would deal with the requirement to remove turbines if they become non-operational for a defined period of time.

Environmental Impact Assessment

SPR is committed to ensuring that its operations have the minimum adverse effect on the local environment. The Environmental Impact Assessment (EIA) forms a key part of the development of the proposal and is made up of a series of technical studies that consider specific aspects of the proposed Development.

The technical subject areas that are proposed to be scoped into the EIA are:

- hydrology, hydrogeology, geology and soils;
- forestry;
- access, traffic and transport;
- cultural heritage;
- noise;
- ecology and biodiversity;
- landscape and visual;
- ornithology;
- socio-economics;
- shadow flicker;
- solar glint and glare;
- telecommunications;
- aviation; and
- peat and carbon balance.

The EIA process will be used to inform the layout and the design of the proposed Development. The results of the EIA will be presented in an EIA Report that will be submitted with the application for consent.

Consultation

Stakeholder consultation is an important component of the EIA process. To inform the EIA, consultation is being undertaken with statutory and non-statutory consultees to identify relevant baseline information and key issues or concerns that these consultees wish to raise. It is envisaged that consultation will continue throughout the EIA process, for example to discuss proposed mitigation.

SPR acknowledges that there is uncertainty regarding the evolving COVID-19 situation and the impact that it may have. The company recognises that this is a public health issue and is committed to protecting the health and well-being of all involved. SPR will regularly review their processes and make adjustments to reflect the latest advice from the Scottish and UK governments. Given the current restrictions on public events and social gatherings, SPR is adopting innovative ways of engaging with communities and the public to inform them about the Hollandmey Renewable Energy Development.

Feedback provided via the pre-application public consultation will be captured and reported in a statement of community consultation to be provided to the Scottish Government alongside the application for consent.

Section 36 Application

Due to the size of the project, an application for permission to construct and operate the proposed Development will be made to the Scottish Ministers under section 36 of the Electricity Act 1989. We anticipate that this application will be submitted in Winter 2020.

Contact Information

We welcome your comments on the proposed Development. If you have any comments, feedback or would like to find out more information about the project, please contact the project team:

Email: HollandmeyRED@scottishpower.com

Switchboard: +44 (0)141 614 9075

Hydrology, Hydrogeology, Geology & Soils

Background

Pre-application advice for the proposed Development was requested from the Highland Council (THC) and a response provided in March 2019. Key aspects relating to hydrology, hydrogeology, geology and soils are summarised here.

THC identified that the Site (the area within the application boundary) contains areas of blanket bog listed as Class 1 peatland, which have significant protection under Scottish Planning Policy. Proposals will be required to demonstrate that significant effects on Class 1 peatland can be substantially overcome by siting, design and other mitigation. The advice identifies that a peat depth survey, peat management plan and peat slide risk assessment should be undertaken in line with current guidance, and a Construction Environmental Management Plan should be produced. Alternatives to peat excavation, such as floating infrastructure and piled turbine foundations should be considered, and peatland restoration opportunities should be identified. Floating tracks should be considered the preferred option throughout unless proven to be technically infeasible.

Any local private water supplies will require assessment and, if relevant, protection from impact. Groundwater-dependent terrestrial ecosystems will require protecting and an assessment will be expected.

Careful siting of infrastructure could avoid the requirement for a flood risk assessment. Development or land raising within a floodplain area should be avoided. New or upgraded watercourse crossings need to be designed to accommodate the 1-in-200 year flood flow, plus 20% climate change allowance. A drainage impact assessment was requested by THC, including details relating to field drains and management of surface water drainage.

Consultant Experience and Expertise

The technical lead for Hydrology, Hydrogeology, Geology & Soils will be [REDACTED] from RSK. [REDACTED] is a Chartered Geologist with an MA and PhD in Geological Sciences and an MSc in Hydrogeology. She has over 14 years' experience in environmental impact assessment, specialising in hydrology, hydrogeology, geology and soils assessments and the associated specialist assessments, such as peat slide and private water supply risk assessments. During her career, [REDACTED] has worked on over 30 windfarm projects in the UK.

Catherine will be supported by a team of geologists, hydrogeologists and hydrologists with experience in environmental impact assessment within Scotland and the wider UK.

Baseline

The underlying geology identified by the British Geological Survey's online mapping¹ is the Spital Flagstone Formation and the Mey Flagstone Formation, both part of the Upper Caithness Flagstone Subgroup of the Devonian-age Old Red Sandstone. Both formations are described as sandstone, siltstone and mudstone in varying proportions.

There are no faults recorded on the Site, although some faultlines are present east of the application boundary. There are no mining records for the area and the Site is not in an area with identified coal reserves. Two small former quarries have been identified within the application boundary.

The majority of the Site is underlain by peat deposits and glacial diamicton till. Some small areas are identified as having alluvium deposits, mainly in association with the Burn of Rattar in the western part of the Site. Some areas are indicated to have no superficial deposits present.

Much of the Site lies within an area identified as being peatland of national importance (Class 1) on the SNH Carbon and Peatland database, with the remainder of the Site mainly having the potential for peat with a mixture of peat

¹ GeoIndex Onshore, <http://mapapps2.bgs.ac.uk/geoindex/home.html>

soil and mineral soil from Classes 4 and 5. The Soils map of Scotland further identifies that the Site has mainly dystrophic blanket peat soils with some noncalcareous gleys and alluvial soils.

The proposed Development lies within the Thurso and Wick Coastal Catchment Areas, both in the Scotland River Basin District. The main hydrological catchment for the Site is the Link Burn/Burn of Rattar. Subsidiary catchments are the Burn of Mey, West Burn of Gills and Gill Burn. The Link Burn/Burn of Rattar is classified as having 'Good' ecological status and 'High' water quality. The Gill Burn is classified as having 'Good' ecological status and 'Good' water quality. Chemical data are not available for either waterbody.

The groundwater unit located under the hydrological study area is the Caithness groundwater body. This is classified as having 'Good' chemical status and 'Good' quantitative status.

Part of the Site is designated as Phillips Mains Mire Site of Special Scientific Interest. This site has been designated for its nationally important blanket bog habitat, including an extensive system of dubh lochans.

Although much of the Site is anticipated to be underlain by peat and peaty soils, the presence of forestry across much of the Site means that the peatland may be degraded or damaged. An extensive Site-wide peat depth survey is proposed and will be used to inform the emerging site design.

Potentially Significant Effects

Having regard to the nature of the proposed Development, key baseline characteristics and proposed embedded mitigation measures, it is considered that the following aspects have the potential for significant environmental effects during the construction and operation phases of the proposed Development, and will therefore require further consideration through the EIA process:

- changes to water quality, including sediment release and accidental spillage of contaminants, such as fuel or oils;
- changes to water quantity and flow paths, including installation or modification of watercourse crossing structures;
- temporary and long-term drainage infrastructure;
- changes to private water supplies, either quantity or quality;
- changes (particularly increase) in flood risk;
- changes to groundwater quality and flow paths;
- changes to the connection between groundwater and surface water, including potential reduction in baseflow to surface watercourses or groundwater-dependent habitats;
- changes to water supply to Groundwater-Dependent Terrestrial Ecosystems (GWDTE);
- modifications to peatland including peat slide risk, if relevant;
- damage to soils and peat from traffic movements and from handling, transport and storage of excavated material;
- soil and peat erosion; and
- potential cumulative and in-combination impacts during construction.

Proposed Assessment Methodology and Approach

The assessment of likely significant effects will be undertaken through desk-based characterisation of the Site and surrounding area, and of likely effects on identified receptors. The desk study will be supported by a programme of field investigations.

The assessment method will be informed by the project team's experience of undertaking such assessments for renewable energy developments, their knowledge of peatland, geology and the water environment characteristics in Scotland, and knowledge and understanding of good practice. The assessment will be carried out by hydrological, geological and geotechnical specialists, in close liaison with project ecologists and other members of the EIA project team, to ensure that a robust and proportionate impact assessment is presented.

A desk study will be undertaken to determine and confirm the baseline characteristics by reviewing available information relating to hydrology, hydrogeology, geology and soils, such as groundwater resources, licensed and unlicensed private water supply abstractions, any public and private water supplies, surface water flows, flooding, rainfall data, water quality and soil data. This will include a review of published geological mapping, OS maps, aerial photography and site-specific data including site investigation data, geological and hydrogeological reports, digital terrain model data and derived slope information, and geological literature.

A walkover and reconnaissance survey will be undertaken to:

- verify information gathered during the desk study;
- undertake a visual assessment of the main surface watercourses, and any relevant private water supplies and supply sources;
- identify drainage patterns, areas vulnerable to erosion or sediment deposition, and any pollution risks;
- visit any identified potential GWDTE (in consultation with the ecology team) to identify any groundwater linkages;
- prepare a schedule of potential watercourse crossings; and
- allow an understanding of the Site and its setting, including slope variation, any potential borrow pit locations, planned access routes, and variation in ground conditions, and to assess the relative location of the planned components of the proposed Development.

In addition to the walkover and reconnaissance survey, a Phase 1 peat depth survey will be undertaken. This will cover the proposed developable area with survey points on a 100 m grid to determine the area coverage and depth variation of peat deposits within the area. This information will feed into the design process, to allow areas of sensitive and/or deeper peatland to be avoided where possible.

The study area for the hydrology, hydrogeology, geology and soils assessment will include a standard buffer of up to 2 km from the proposed infrastructure. A cumulative assessment will be undertaken, up to an area of 5 km from the proposed Development, as at greater than 5 km any potential changes to hydrology, hydrogeology, geology and soils are not considered to be discernible.

Peat Slide Risk Assessment

Should significant depths of peat be identified on the Site during the Phase 1 peat depth survey, a Peat Slide Risk Assessment (PSRA) will be undertaken in accordance with Scottish Government guidance² and in consultation with relevant statutory and non-statutory consultees.

The PSRA will comprise a detailed analysis of peat coverage and peat condition across the Site, with a detailed assessment of natural and induced peat slide risk for the proposed frozen infrastructure layout. To inform the assessment, a second phase of peat depth surveying will be undertaken on the frozen layout with peat depth measurements at 50 m centres along access tracks and 10 m crosshair probing at turbine locations. The assessment will include a hazard and slope stability assessment, taking account of factors known to influence slope stability, such as peat depth and slope angle. Management and mitigation measures will be set out on a location-specific basis to manage and control peat slide risk at the Site.

The PSRA will be provided as a technical appendix to the EIA Report, with key findings summarised within the hydrology, hydrogeology, geology and soils chapter.

Outline Peat Management Plan

Should significant depths of peat be identified on the Site, an outline Peat Management Plan (PMP) will be prepared in line with current guidance^{3,4}. This plan will include high-level estimation of the volume of peat requiring excavation and the volumes of peat that can be reused within the Development, including options for peatland restoration. The estimation will make use of peat depth data gathered for the PSRA and will be based on the

² Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Generation Developments. Scottish Government, April 2017 (2nd Edition).

³ Developments on Peat and Off-Site Uses of Waste Peat. SEPA Regulatory Position Statement WST-G-052, May 2017.

⁴ Guidance on the Assessment of Peat Volumes, Reuse of Excavated Peat, and the Minimisation of Waste. Scottish Renewables & SEPA, January 2012.

approximate infrastructure dimensions and anticipated peat reuse streams available within the Development area. In addition to identifying volumes of peat to be excavated and reused, the assessment will provide proposed peat management and handling plans for best practice handling, storage and transportation of peat between excavation and reuse or reinstatement.

The PMP will be provided as a technical appendix to the EIA Report, with key findings summarised within the hydrology, hydrogeology, geology and soils chapter.

Issues to be Scoped In or Out

It is considered that the identified aspects listed below have no potential for significant environmental effects and can therefore be scoped out with respect to detailed assessment in the EIA:

- Detailed Flood Risk Assessment: Published mapping confirms that most of the Site is not located in an area identified as being at risk of flooding. It is proposed, therefore, that a high-level screening of potential flooding sources (fluvial, coastal, surface water, groundwater etc.) is presented in the EIA Report, and measures that would be used to control the rate and quality of surface runoff will be specified in the Construction Environmental Management Plan (CEMP).
- Water quality monitoring: As the assessment will be informed by watercourse classification data available from SEPA's website and there are no known sources of potential water pollution at the Site, no additional water quality monitoring is considered necessary at this stage. Recommendations for construction-phase monitoring will be provided in the CEMP.
- Potential effects on geology: There are no protected geological features within or near the Site. In addition, the nature of the activities during construction and operation of the proposed Development would be unlikely to alter the regional geology of the Site.
- Increased flood risk arising from restrictions to flow in watercourses during operation and maintenance of the proposed Development: All watercourse crossings required to be installed for the Development would be subject to a regular inspection and maintenance plan. In addition, flood risk on and downstream of the Site is low, development design would ensure that watercourse crossing structures are designed to a suitable flow capacity and would ensure that no critical infrastructure is located near a watercourse or waterbody.

The identified aspects listed below are considered likely to require detailed assessment in the EIA:

- GWDTE: The presence of a SSSI designated for peatland habitats within the Development area indicates that potential GWDTE are likely to be encountered within the Site. In addition, there are significant open areas within the forestry where potential GWDTE may have developed. It is considered that this aspect will require assessment, based on the findings of the National Vegetation Classification surveys to be carried out.
- Peat Slide Risk and Peat Management: Given the widespread published mapping of peatland and peaty soils across the proposed Development, peat surveys and the associated peat slide risk and peat management are considered to be necessary assessments for the proposed Development.

Consultees

The consultees below will be approached for information to inform the EIA. These consultees may also be contacted by the Scottish Government regarding the scope of the EIA:

- The Highland Council, Flood Risk Management
- SEPA
- Scottish Natural Heritage

Consultee Questions

- Is the spatial extent of the study area considered to be appropriate?
 - Do consultees have any information that would be useful in the preparation of a hydrology, hydrogeology, geology and soils assessment?
 - Do consultees agree that the scope of the flood risk assessment is appropriate, and that a drainage impact assessment can be provided as part of the detailed site design and agreed as part of the site CEMP (noting the principles for control and management of runoff will be presented in the EIA Report)?
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- Please confirm any additional requirements that you consider should be included in this part of the EIA, that have not been covered in this factsheet.

Relevant Policy and Guidance

The assessment will be undertaken in accordance with the following relevant legislation and guidance:

- EC Water Framework Directive (2000/60/EC).
 - Water Environment and Water Services (Scotland) Act 2003.
 - Water Environment (Controlled Activities) (Scotland) Regulations 2011, as amended.
 - The Highland Council, (2012). Highland-wide Local Development Plan (HWLDP)..
 - Scottish Environment Protection Agency, (2017). Land Use Planning System Guidance Note 31: Guidance on Assessing Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems, version 3.
 - Scottish Renewables, Scottish Natural Heritage, Scottish Environment Protection Agency, Forestry Commission Scotland, Historic Environment Scotland, Marine Scotland Science and AEECoW joint publication, (2019). Good Practice during Wind Farm Construction, 4th Edition.
 - CIRIA (2006). Publication C648: Control of water pollution from linear construction projects. Technical Guidance.
 - CIRIA (2015). Publication C741: Environmental good practice on site, 4th Edition.
 - Scottish Government guidance, (2017). Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Generation Developments, 2nd Edition.
 - Scottish Government guidance, (2017). Guidance on Developments on Peatland: Peatland Survey.
 - The Highland Council, (2018). Caithness and Sutherland Local Development Plan (CaSPlan).
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Forestry

Background

Pre-application advice for the proposed Development was requested from the Highland Council (THC) and a response provided in March 2019. Key aspects in relation to forestry are summarised here.

THC has stated that “*key-holing must be used wherever possible as large scale felling can result in large amounts of waste material and in a peak release of nutrients which can affect local water supply*”. They also state that “*clear felling may be acceptable only in cases where planting took place on deep peat and it is proposed through a habitat management plan to reinstate peat-forming habitats*”. The Pre application advice provided by THC also states that “*We would expect forestry removal to enable peatland restoration by reinstating forestry to bog habitat where appropriate*”

THC also identified that the Site contains areas of blanket bog listed as Class 1 peatland. The survey of peat being carried out by RSK will establish how much damage to the peat has been caused by the forestry plantations and how much (if any) of the Site would benefit from reinstating to an area of peatland. Once this is known, it will be possible to calculate the area of the plantations that need to be felled. This will clearly have a direct bearing on the amount of compensation planting that may be needed to comply with the Scottish government’s policy on felling as set out in their publication – ‘Control of Woodland Removal’

This Site is largely stocked with middle aged conifers and the aim will be to carry out keyhole felling to accommodate the turbines wherever possible to avoid adverse environmental impacts; this will also minimise both the amount of felling and the area of Compensation Planting (CP) that may be required. It is thought that keyhole felling as opposed to the alternative of clear felling will not have too great an impact on turbine efficiency.

A complete forestry assessment will be carried out to provide the information required by THC and to provide all the necessary advice and information, including a complete assessment of the growing stock and the volume of timber that would need to be felled, as required for the EIA.

Consultant Experience and Expertise

The technical lead for Forestry will be [REDACTED] from RSK. Roy is a Chartered Forester and is the Director of the arboriculture and forestry team. Before joining the company, [REDACTED] was the Head Forester on a 1,000ha forestry estate on the borders of Devon and Cornwall – The Tavistock Woodlands Estate owned by the Earl of Bradford.

[REDACTED] is a highly experienced forester and nationally recognised consultant in forestry management. With over 50 years’ experience Roy covers all aspects of forestry management. He currently specialises in providing operational and policy advice to electricity Distribution Network Operators including Scottish Power Energy Networks and Scottish and Southern Energy. [REDACTED] also has considerable experience in providing technical forestry support for RSK’s EIAs in relation to windfarms and other renewable energy projects.

Baseline

The Site extends to 9186hectares approximately and is comprised largely of mid rotation commercial forestry plantations. The aerial view shows that there is also a considerable amount of open moorland intermixed with the plantations. In the northern part of the woodland there is also some areas classed as wet woodland, upland birchwood and acid grassland and the Site also includes a Site of Special Scientific Interest (SSSI).

Forestry Scotland’s map viewer shows that Woodland Grant Scheme applications were made in 1993, 1994 and 1995 covering most of the Site. The applications are all now closed and there is very little information other than the information on the two separate WGS2 applications and the WGS3 application:

- WGS2 Application made in 1993 on behalf of Phillips Mains covering the northern section. This application was approved for woodland establishment.
- WGS2 Application made in 1994 on behalf of Phillips Mains (property name) covering the NE section that surrounds the SSSI. This application was for “approved re-stocking and/or management”.

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- WGS3 Application made in 1995 on behalf of Phillips Mains covering the southern section. This application was also for woodland establishment.

Although there is no information on the species planted at present, it is assumed that the species is wholly or mainly Sitka spruce as this is the commercial species most suitable for the Site. If the trees were planted in the year the WGS applications were made, they would now be 25 – 27 years old, which means they are middle aged plantations that are half way through a normal commercial rotation.

In 2019 an application was made to Scottish Forestry to clear fell 52.22 ha of what was presumably mature conifer plantation woodlands in the corner of the woodland between the SSSI and the Hill of Rifiga. This area is now either about to be felled, waiting to be planted or recently planted.

Within the Site there is also the Phillips Mains Mire SSSI designated for its blanket bog habitat.

As regards Scottish Forestry, the Site is within the Highlands and Islands Conservancy, Woodlands, Fodderty Way, Dingwall, IV15 9XB.

Potentially Significant Effects

There are four key effects in relation to the tree felling that would be required to accommodate the wind turbines:

- 1) The tree clearance would involve the felling of trees prematurely. This would result in a loss of Net Present Value for the landowner
- 2) Once the windfarm has been designed and the locations of the turbines is known, it will be possible to establish the area of tree clearance and the volume of timber that would be removed.
- 3) The peat survey is expected to confirm what damage the plantations have caused to the peatland and what opportunity there is to clear-fell trees and reinstate peatland.
- 4) Consideration will need to be given towards what CP is required. The area of CP will depend on:
 - a) Whether the restoration of peatland can form part or all of the CP commitment or
 - b) Whether peatland restoration will not be proposed and the full area of CP is required.

Any felling would affect the structure of the woodland and the landowners forestry management plans including production forecasts which would need to be amended accordingly.

The effect of the felling on the stability of the plantations will also be assessed. This will be carried out using the Forestry Commissions Forest GALES wind risk decision support tool. All opportunities to mitigate the effect of windblow on the retained plantations will be explored and would be adopted wherever possible.

Proposed Assessment Methodology and Approach

A more detailed desk study will be carried out in the first instance. This will include reference to the National Forest Inventory Woodlands. There appears to be no formal management plan that has been submitted to Scottish Forestry, but if any existing forestry management plans are available, the data will be analysed and recorded as necessary.

A full site inspection will be carried out. Part of the assessment will involve the collection of sufficient data to enable calculations to be made on the volume and quality of timber to be removed. This will include noting the tree species present, measuring sufficient top heights of the trees to establish the yield classes of the plantations and taking relascope sweeps within the plantations to establish the stocking density.

Some of the mensuration information will be fed into the Forestry Commission's wind risk support tool along with other information, such as grid reference, soil type, edge effect etc. and this will confirm the level of wind risk, which will have a direct bearing on the felling plans.

The inspection will also investigate whether there are any areas within the Site that could be planted up if compensation planting is required.

Consideration will also be given to the environmental effect of the tree felling including how best to dispose of the residues.

All advice and any subsequent forestry work undertaken will fully comply with the UK Forestry Standard and guidelines and all other relevant legislation.

Discussions will be held with the landowner/landowner's agent, THC Forestry Officer and Forestry Scotland as required.

A forestry appendix or chapter for the EIA will be prepared. In accordance with the Highland Council's requirements, the forestry technical appendix/chapter will include:

- a) A map demarcating the areas to be subject to different felling techniques.
- b) Photography of general timber condition in each of these areas.
- c) A table of approximate volumes of timber that would be removed from site and volumes, sizes of chips or brash and depths that would be re-used onsite.
- d) A plan showing how and where any timber residues would be re-used for ecological benefit within that area, supported by a Habitat Management Plan.

Issues to be Scoped In or Out

If a sub-compartment plan is available, we will make full use of the information. However, if a sub-compartment plan is not available, we do not consider that it is necessary to create one as we will have sufficient information for the EIA from the site survey and other sources of information, such as the Scottish Forestry Map Viewer, the National Forestry Inventory Woodlands, aerial photographs etc.

We will include a full assessment in relation to the forest removal and forest waste, taking into account the following advice from the Highland Council:

- Key-holing must be used wherever possible as large-scale felling can result in large amounts of waste material and in a peak release of nutrients, which can affect local water quality. If clear felling is unavoidable then the potential impact this will have on water quality will be considered in the water quality assessment as part of the hydrology, hydrogeology, geology and soils section of the EIA.
- Clear felling may be acceptable only in cases where planting took place on deep peat and it is proposed through a Habitat Management Plan to reinstate peat-forming habitats.

Consultees

The consultee below will be approached for information to inform the EIA. This consultee may also be contacted by the Scottish Government regarding the scope of the EIA:

- Scottish Forestry
- The Highland Council

Consultee Questions

- Do consultee agree with the proposed methodology and scope of the forestry assessment?
- Do consultees have any information that should be taken into account within the forestry assessment?
- Please confirm any additional requirements that you consider should be included in this element of the EIA, that have not been covered in the fact sheet

Relevant Policy and Guidance

The assessment will be undertaken in accordance with the following relevant legislation and guidance:

- Scottish Executive (2006) Scottish Forestry Strategy
 - The Highland Council (2018) Highland Forest and Woodland Strategy
 - Forestry Commission (1996) Technical Paper 16: Designing Forest Edges to Improve Wind Stability
 - Forestry Commission (2009) The Scottish Government's Policy on Control of Woodland Removal
 - Forestry Commission (2015) Guidance to Forestry Commission Scotland staff on implementing the Scottish Government's Policy on Control of Woodland Removal
 - The Highland Council (2013) Trees, Woodlands and Development supplementary guidance
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- Scottish Environment Protection Agency (2014) Land Use Planning System SEPA Guidance Note LUPS-GU27 – Use of Trees Cleared to Facilitate Development on Afforested Land
 - Forestry Commission (2017) The UK Forestry Standard – The Government’s Approach to Sustainable Forestry
 - Forestry Commission (1981) Yield Models for Forest Management
 - Forestry Commission Scotland. Pers.com. email from Donald MacLeod, Woodland Officer, dated 24/01/19
 - Forestry Commission Scotland. Pers.com. email from Agata Baranska, Regulations & Development Manager, dated 24/01/19
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Access, Traffic and Transport

Background

Pre-application advice for the proposed Development was requested from the Highland Council (THC) and a response provided in March 2019. Key aspects relating to traffic and transport are summarised here.

THC identified that their Transport Planning team's interest will relate largely to the impact of development traffic during the construction phase of the project, which may include the impact on road carriageway, verges and associated structures, and impact on road users and adjacent communities. A Transport Assessment (TA) or a section on traffic and transport within the EIA for the project will be required. This should identify all roads likely to be affected by the various stages and consider in detail the impact of development traffic on these roads. Where necessary, the TA should consider and propose measures to mitigate the impact of the development e.g. the use of onsite borrow pits, concrete batching plant, new or improved infrastructure, road safety measures and traffic management including a framework Construction Traffic Management Plan, and Section 96 'wear and tear' agreement. Justification for the Port of Entry and the preferred route for AIL's shall be clearly demonstrated, including details of alternative routes, swept path assessment and consideration of road structures along the route (which was echoed by Transport Scotland who contributed to the pre-application consultation response). Lastly, the cumulative impact with any other developments in progress or committed should also be considered in the TA.

Consultant Experience and Expertise

The technical lead for Access, Traffic and Transport will be [REDACTED] from RSK. [REDACTED] is an associate director at RSK responsible for transport planning. [REDACTED] graduated with Bachelor of Engineering degree with Honours in Civil & Transportation Engineering. He has 27 years of experience in development transport and transportation engineering, working for both private and public sector clients. [REDACTED] has particular expertise in the preparation of transport related input to EIA for planning and Section 36 applications, preparing development transport statements/assessments, providing assistance in negotiation of planning agreements, carrying out junction and road network assessment and design, access appraisals, and providing master plan advice.

[REDACTED] will be supported by a team of specialists with experience in the preparation of transport related input to EIA for Section 36 applications within Scotland and the wider UK.

Baseline

The Site (area within the application boundary) is located approximately 8 km south west of John o' Groats and 16 km east of Thurso. The predominant land use on the Site is forestry with some agricultural use and Stroupster and Lochend operational windfarms are located within the vicinity of the Site.

Access to the Site is by way of a mixture of trunk, principal local and minor roads. While most of the potential routes to the Site will have been subject to assessments for delivery of abnormal loads for windfarms in the relatively recent past, none have been considered for the transport of blades greater than 55 m in length

A route access study will be undertaken using the Ports of Scrabster and Wick, developing on an initial route options study that has been undertaken.

Potentially Significant Effects

The main potential sources of impact are likely to relate to the transportation of abnormal loads and the impact of construction traffic on residential areas and other amenities along the network. The construction phase of the proposed Development is likely to create the greatest environmental impact. This is because of the number of heavy goods vehicles (HGVs), light goods vehicles (LGVs) and abnormal load deliveries required to transport the materials onto site.

It is anticipated that any effects predicted to result during the operation of the proposed Development would be limited, and certainly lower than the effects expected during the construction phase. During operation the proposed Development would generate a negligible number of vehicle movements. These would predominantly be for maintenance visits by technicians. Abnormal load vehicle access is unlikely but may be needed if a turbine component requires replacement.

Proposed Assessment Methodology and Approach

A traffic, transport and access assessment will be undertaken as part of the EIA for the proposed Development. The assessment will be carried out in accordance with the relevant policy and guidance documents as detailed at the end of this scoping chapter.

The study area for the assessment will focus on the routes to be used for access by construction vehicles and abnormal loads. A full assessment of the access route within the study area will be included within the EIA Transport Chapter, including identification of key pinch points along the route and assessment using swept path analysis. Due to known existing pinch points being found along the public road network, a Blade Lift Adapter vehicle will likely be required to transport blades through these pinch points. Further information will be provided within the EIA Report regarding the logistics and safety protections in relations to this method on the public highway.

It is anticipated that any effects predicted to result during the operation of the proposed Development would be limited, and certainly lower than the effects expected during the construction phase, and therefore scoped out of the access, traffic and transport assessment.

Desk Study

A desk-based review of the impacts arising from the construction of the proposed Development will be undertaken, including the following:

- Collection and analysis of available road traffic accident data over the study area;
- The use of a blade lift adapter will be considered for the transport of the turbine blades on any particularly constrained section of the routes to the Site. Any predicted impacts associated with this type of transport will be included in the access and traffic assessment and within other environmental and technical assessments as required;
- Determination of a construction phase programme and quantification of construction phase trips based on the quantity of material required for the proposed Development and the duration of the construction phase;
- Determination of a traffic baseline, taking account of measured existing traffic flow and other developments that have been identified for inclusion within the cumulative assessment; and
- Quantification of material increases in traffic resulting from the construction phase of the proposed Development.

Field Surveys

A visual inspection of the study area will be completed to ensure a full understanding of the local area and to identify all sensitive receptors, especially regarding abnormal loads. 24-hour automatic traffic counts (ATCs) data will be obtained from the Department for Transport, Transport Scotland or The Highland Council. This data will be supplemented by additional ATC surveys to fill any gaps in the information gleaned from the Roads Authorities.

Assessment of Effects

It is anticipated the collated traffic flow data will confirm existing traffic levels within the study area and will include LGVs and HGVs. These traffic flows will be combined with the forecast levels of proposed Development traffic to identify the likely significant effects within the study area in relation to the IEMA Guidelines.

In accordance with the IEMA Guidelines, the method used for assessing environmental effects of the increased traffic will be based on a comparison in percentage terms between predicted traffic flows on potentially affected roads with and without the proposed Development traffic. The IEMA Guidelines express two 'rules' that should be followed when determining the scale and extent of the assessment, these are:

- Rule 1: include highway links where traffic flows would increase by more than 30 % (or the number of heavy goods vehicles would increase by more than 30%); and
- Rule 2: include any other specifically sensitive areas where traffic flows have increased by 10% or more.

Rules 1 and 2 will be used as a screening tool to determine if a full assessment on routes within the study area is required owing to the level of increase in traffic flows. In the case of construction traffic, where it is anticipated that

traffic volumes do not increase by more than 30% (or 10% in sensitive locations) then a detailed assessment of the effects is not deemed necessary.

Construction

In the event that these thresholds are likely to be exceeded, consideration of the environmental effects of construction traffic would typically be undertaken in relation to the following transport impacts:

- severance;
- driver delay;
- pedestrian delay and amenity
- accidents and safety; and
- hazardous loads.

Where relevant, consideration of noise effects of traffic would be included within the Noise chapter of the EIA Report.

In addition to this, the overall carrying capacity of the road in question will be considered in undertaking the assessment. A quantitative assessment of impact would be undertaken, based on the predicted rise in traffic flows against a measured baseline, considering the temporary nature of the works. The likely 'worst case' scenario will be described for the periods of peak traffic generation, with the daily numbers of vehicle movements predicted.

The assessment will identify the potential traffic and associated environmental impacts on sensitive receptors and mitigation will be proposed where necessary. Traffic flows would increase on routes used for access to the Site and stretches of the local road network may need to be closed to facilitate the delivery of abnormal loads. The construction phasing and vehicle access would be managed to ensure that flows would be controlled during periods of more significant disruption, with mitigation likely to take the form of a construction traffic management plan (CTMP).

Cumulative Effects

The anticipated cumulative effects of the potential for overlapping construction programmes for the proposed Development in addition to other development proposals will be considered. The mechanism for mitigation of any cumulative effects is the implementation of a CTMP. It should be noted that a cumulative assessment in relation to transport and traffic is reliant on the prospect of more than one major development being under construction at the same times as the proposed Development.

Mitigation

Mitigation measures will be proposed following the completion of the impact assessments, as informed by baseline assessments. The purpose of these measures is to remove, minimise or compensate any significant effects where required. These mitigation measures will be agreed with The Highland Council or Transport Scotland as appropriate. These measures will also be incorporated into the framework CTMP that will be submitted with the application.

Issues to be Scoped In or Out

It is considered that operational phase traffic impacts have no potential for significant environmental effects and can therefore be scoped out with respect to detailed assessment in the EIA:

Consultees

The consultees below will be approached for information to inform the EIA. These consultees may also be contacted by the Scottish Government regarding the scope of the EIA:

- Transport Scotland
 - THC Transport Development Officer
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Consultee Questions

- Do consultees agree with the proposed methodology and scope of the access, traffic and transport assessment?
- Are there any planned road works or highway improvement schemes that we need to take account of?
- Is the available Department of Transport, The Highland Council or Transport Scotland Count Data on the road network suitable for the assessment or would we need to plan to undertake traffic surveys?
- Please confirm any additional requirements that you consider should be included in this element of the EIA, that have not been covered in this scoping note.

Relevant Policy and Guidance

The access, traffic and transport assessment will be carried out in accordance with the relevant legislation, guidance and policy documentation including the following:

- The Highland Council, (2012). Highland-wide Local Development Plan (HwLDP)
 - The Highland Council, (2018). Caithness and Sutherland Local Development Plan (CaSPlan)
 - Institute of Environmental Management and Assessment, (1993). The Institute of Environmental Assessment's Guidelines for the Environmental Assessment of Road Traffic
 - Department for Transport, (2008). Design Manual for Roads and Bridges (DMRB), Volume 11, Section 2 (Part 5, LA 104)
 - Scottish Executive, (2005). Planning Advice Note (PAN) 75: Planning for Transport
 - Institution of Highways and Transportation (IHT), (1994). Guidelines for Traffic Impact Assessment
 - Transport Scotland, (2012). Transport Assessment Guidance (TAG)
 - Scottish Government, (2010). Scottish Planning Policy (SPP)
 - The Highland Council, (2013). Guidelines for New Development Roads (GNDR)
 - The Highland Council, (2012). Highland-wide Local Development Plan (HwLDP)
 - The Highland Council, (2018). Caithness and Sutherland Local Development Plan (CaSPlan).
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Cultural Heritage and Archaeology

Background

Pre-application advice for the proposed Development was requested from the Highland Council (THC) and a response provided in March 2019. Key aspects relating to cultural heritage and archaeology are summarised here.

THC Historic Environment Team (HET) identified that the Site (the area within the application boundary) contains some undesignated features of historic interest. These consist of the remains of historic land-use, such as farmsteads, sheepfolds and areas of shieling settlement. Many other sites, including prehistoric settlement are recorded across the wider area and there remains the potential for further features or remains of prehistoric or later date to be present. Overall, direct impacts to cultural heritage are not considered by HET to be a significant constraint in this case.

HET do note that several important historic features in the wider area may have their setting adversely impacted by a development in the location proposed.

HET request that the Cultural Heritage chapter of the EIA Report (EIAR) be undertaken by a professional and competent historic environment consultant. The chapter will follow Highland Council Standards for Archaeological Work, specifically Section 4, which deals with Environmental Statements, and Section 3 which deals with, amongst other topics, desk-based assessment and walkover surveys.

HET stipulate that the assessment includes a walkover survey of the development area (including any land required for any and all associated infrastructure such as access tracks, cable routes, substations, construction compounds and laydown areas). The assessment will consider the potential for direct, indirect, and cumulative impacts to cultural heritage as a result of the proposed Development. Where indirect impacts are predicted, these will be illustrated using photomontage and/or wireline visualisations.

Where impacts are unavoidable, HET expect detailed discussion of the methods proposed to mitigate impacts, including both physical (i.e. re-design) and where appropriate, compensatory/off-setting mitigation.

Historic Environment Scotland (HES) also contributed to the pre-application advice. HES's remit is to comment where proposals might impact upon the fabric and/or setting of designated historic features.

HES confirm that there are no scheduled monuments, category A listed buildings, Inventory gardens & designed landscapes (GDLs) or battlefields within the proposed Development application boundary. Significant direct physical impacts on assets within their remit are therefore unlikely.

HES do note several designated historic environment assets in the surrounding area potentially subject to significant adverse impacts on their setting. These include the scheduled monuments of Earl's Cairn (SM449) and Thomsonfield broch (SM558), the Category A Listed Castle of Mey (LB1797) and its estate and grounds, the Inventory Garden and Designed landscape, Castle of Mey (Barrogill Castle) (GDL96).

HES recommend the use of visualisations to illustrate potential effects upon these assets and recommend that cumulative effects upon these (and other designated heritage assets) be assessed.

Consultant Experience and Expertise

Since 2000, Headland Archaeology (now part of the RSK Group) has developed substantial expertise in the design, management and completion of challenging archaeological projects, including Environmental Impact Assessments.

Headland is a Registered Organisation with the Chartered Institute for Archaeologists (CIfA) and abides by its standards and codes of conduct. Headland has been independently assessed under the Achilles UVDB Verify audit and assessment service, which focuses on risk critical issues and provides demonstrable compliance to Safety, Health, Environment and Quality requirements.

The technical lead for Cultural Heritage is [REDACTED] MA(Hons) MCIfA. [REDACTED] is a consultancy project manager at Headland Archaeology with over 16 years' experience working in cultural heritage consultancy.

[REDACTED] will be supported by a team of specialists with experience in the preparation of heritage related input to EIA for Section 36 applications within Scotland and the wider UK.

Baseline

The Baseline used for this scoping section has been compiled using existing data on the historic environment available online from Historic Environment Scotland (HES) via the Canmore database and the Pastmap website, and designations data available as GIS datasets from the HES website.

Study Area

Two study areas have been used for the identification of heritage assets that may be affected by the proposed Development: The Inner Study Area and the Outer Study Area.

The Inner Study Area (ISA) corresponds to the extent of the Site.

The Outer Study Area (OSA) extends to at least 20 km from the proposed turbines, which is taken as the maximum extent of potentially significant effects on the settings of heritage assets. Heritage assets beyond 20km will be included in the assessment if they are determined (in the opinion of the assessor and/or consultees) to be of particular sensitivity. Within the OSA, assets will be included in the assessment based on the level of importance assigned to the asset (defined in the EIAR Methodology), to ensure that all significant effects are recognised:

- Up to 2 km from proposed turbines: Category C Listed Buildings, and any undesignated asset of local importance that has a wider landscape setting that contributes substantially to its cultural significance.
- Up to 5 km from proposed turbines: all assets of national or regional importance, including Scheduled Monuments, Category A and B Listed Buildings, Conservation Areas, Inventory Gardens and Designed Landscapes, Inventory Historic Battlefields and undesignated assets of more than local importance.
- At least 20 km from proposed turbines: any asset that is considered exceptionally important, and where long-distance views from or towards the asset are thought to be particularly sensitive, in the opinion of the assessor or consultees. Beyond 5 km, the baseline will be screened (and agreed with consultees) to identify any assets of particular sensitivity or importance.

The Inner Study Area

There are no designated heritage assets recorded within the ISA (Figure 4.1). A study of the Pastmap website and the Canmore database has identified at least four undesignated heritage assets recorded within the ISA. These comprise two farmsteads, a fish house and some shieling huts. None of the Canmore entries have been securely dated. The THC Historic Environment Record (HER) as depicted on Pastmap also records some entries within the ISA, but the Pastmap data does not represent the current version of the HER.

The Outer Study Area

There are several designated heritage assets within 5 km of the application boundary (Figure 4.2). These include seven Scheduled Monuments and nine Listed Buildings. The Scheduled Monuments comprise two prehistoric cairns, an Iron Age broch, a prehistoric fort with a later chapel within it, a church, a deserted township and a modern coastal battery. The Listed Buildings comprise two Category A, six Category B and one Category C Listed Buildings.

Between 5 km and 20 km of the Site, there are 95 Scheduled Monuments; 13 Category A Listed Buildings; two Conservation Areas, and four Inventory Garden and Designed Landscapes (IGDL).

There are no Inventory Historic Battlefields or World Heritage Sites in the OSA.

The Scheduled Monuments between 5 km and 20 km from the Site comprise; 45 prehistoric brochs, forts, enclosures and/or settlements; 28 prehistoric ritual or funerary monuments; eight medieval and post-medieval ecclesiastical and ritual sites; eight medieval and post-medieval secular and industrial structures and settlements, and six sites relating to military activity. One of the Scheduled Monuments is also a Property in Care of Scottish Ministers.

The Listed Buildings comprise a mixture of country houses and estate buildings, churches, industrial and maritime buildings, and military structures. Five of the Category A Listed Buildings are within 10 km of the proposed Development.

The Conservation Areas are west and south of the Site and comprise the towns of Thurso and Wick respectively.

The IGDLs comprise the estates and grounds of the Castle of Mey and Melssetter House. Of these, only the Castle of Mey (GDL96, including one Category A and one Category B Listed Building) is within 10 km of the proposed Development, approximately 1.7 km north of the Site.

Potentially Significant Effects

Effects on the historic environment can arise through direct physical impacts, impacts on setting or indirect impacts:

- Direct physical impacts describe those development activities that directly cause damage to the fabric of a heritage asset. Typically, these activities are related to construction works and would only occur within the application boundary.
- An impact on the setting of a heritage asset occurs when the presence of a development changes the surroundings of a heritage asset in such a way that it affects (positively or negatively) the cultural significance of that asset. Visual impacts are most commonly encountered but other environmental factors, such as noise, light or air quality can be relevant in some cases. Impacts may be encountered at all stages in the life cycle of a development from construction to decommissioning but they are only likely to lead to significant effects during the prolonged operational life of the development.
- Indirect impacts describe secondary processes, triggered by the development, that lead to the degradation or preservation of heritage assets. For example, changes to hydrology may affect archaeological preservation; or changes to the setting of a building may affect the viability of its current use and lead to dereliction.

Inner Study Area

There are no designated heritage assets within the ISA, and the known undesignated assets that exist are not considered to be of greater than Low importance. Although some or all of the undesignated heritage assets could be subject to direct impacts such impacts could be mitigated through design, micro-siting or other measures, and no significant direct, indirect or cumulative effects are anticipated within the ISA.

Outer Study Area

No direct impacts are predicted within the OSA.

Within 5km of the turbines, two scheduled monuments (SM449, Earl's Cairn and SM588, Thomsonfield Broch) and the Castle of Mey IGD (GDL96) are considered to be at risk of potentially significant operational effects.

Although there are several other designated heritage assets within 5km of the turbines, they do not, at present, appear to be particularly sensitive to any change in views towards the Site and no significant operational effects are anticipated.

Proposed Assessment Methodology and Approach

This Cultural Heritage and Archaeology Information Sheet is intended to identify potential effects of the proposed Development upon the physical fabric and settings of heritage assets within the Site, and potential effects on the settings of assets within the wider landscape.

The 'cultural heritage' of an area comprises archaeological sites, historic buildings, gardens and designed landscapes, historic battlefields and other sites, features or places in the landscape that have the capacity to provide information about past human activity, or that have cultural relevance due to associations with folklore or historic events. Sites of cultural heritage interest may also derive some, or all, of that interest from their 'setting' within the wider landscape.

Historic landscape is not treated as a heritage asset for the purposes of this assessment except where a defined area of landscape has been designated for its heritage interest (including Conservation Areas and areas included in the Inventory of Gardens and Designed Landscapes). It is recognised that all landscapes have an historic dimension, and this will be considered as part of the assessment of Landscape Character (covered in 05 Landscape and Visual Impact (LVIA), EIA Topic Information Sheet).

It is important to note that, although any effects on the significance of heritage assets due to change in their setting are likely to be visual in nature, the assessment of these visual effects is distinct from the assessment of visual change in the LVIA. The assessment of effects on setting may be informed by visualisations prepared as part of the LVIA but the conclusions reached regarding visual change in the setting of a heritage asset are distinct.

The Cultural Heritage and Archaeology section of the EIAR will characterise the historic environment within the Site and in the wider study area. It will use the results of consultation, desk-based research, walkover surveys and setting visits to define a study area and to assemble a baseline of heritage assets within it, and then to assess the potential effects of the proposed Development on that baseline. Where potential effects are identified, mitigation measures will be suggested.

The baseline of the assessment will be informed by reference to designations data maintained by HES and to the THC HER. A digital extract will be obtained from the HER to ensure that the most up-to-date version of the data is used, and a walkover survey will be undertaken to confirm the presence of known features within the ISA once the layout has progressed and likely infrastructure locations have been identified.

Cultural heritage constraint areas will, where necessary, be defined to include an appropriate buffer around known heritage assets. Constraint areas can be treated as a 'trigger' for the identification of potential direct impacts: they represent areas within which works may lead to direct impacts of more than negligible significance on known heritage assets.

Potential impacts on unknown heritage assets will be discussed in terms of the risk that a significant effect could occur. The level of risk depends on the level of archaeological potential combined with the nature and scale of disturbance associated with construction activities and may vary between high and negligible for different elements or activities associated with a development, or for the development as a whole.

Potential impacts on the settings of heritage assets will be identified from an initial desk-based appraisal of data from HES and the HER and consideration of current maps and aerial images available on the internet. Where this initial appraisal identifies the potential for a significant effect, the asset will be visited to define baseline conditions and identify key viewpoints. Visualisations will be prepared to illustrate changes to key views, where potentially significant effects are identified.

Where potentially significant effects are identified, mitigation measures will be proposed. The preferred mitigation option is always to avoid or reduce impacts through design, or through precautionary measures, such as fencing off heritage assets during construction works. Impacts that cannot be eliminated in these ways would lead to residual effects.

Adverse effects may be mitigated by an appropriate level of survey, excavation, recording, analysis and publication of the results, in accordance with a written scheme of investigation (SPP paragraph 150 and PAN2/2011, sections 25-27). Archaeological investigation can have a beneficial effect of increasing knowledge and understanding of an asset, thereby enhancing its archaeological and historical interest and offsetting adverse effects.

Issues to be Scoped in or Out

It is proposed to scope out:

Direct effects - There are no designated heritage assets within the ISA, and the known undesignated assets that exist are not considered to be of greater than Low importance.

Setting effects associated specifically with the construction phase as this will be relatively short-lived and transitory.

Indirect effects – Assets located outside of the zone of theoretical visibility (ZTV) that also have no viewpoint significant to understanding or interpretation of the asset that includes both the asset and the proposed Development.

Operational effects on Category C Listed buildings outside the Site as these are highly unlikely to be significant.

Operational effects on several other designated heritage assets within 5km of the turbines. These assets do not, at present, appear to be particularly sensitive to any change in views towards the Site and no significant operational effects are therefore anticipated.

Consultees

The consultees below will be approached for information to inform the EIA. These consultees may also be contacted by the Scottish Government regarding the scope of the EIA:

- THC Historic Environment Team;
- Historic Environment Scotland; and
- local archaeological interest groups (as appropriate).

Consultee Questions

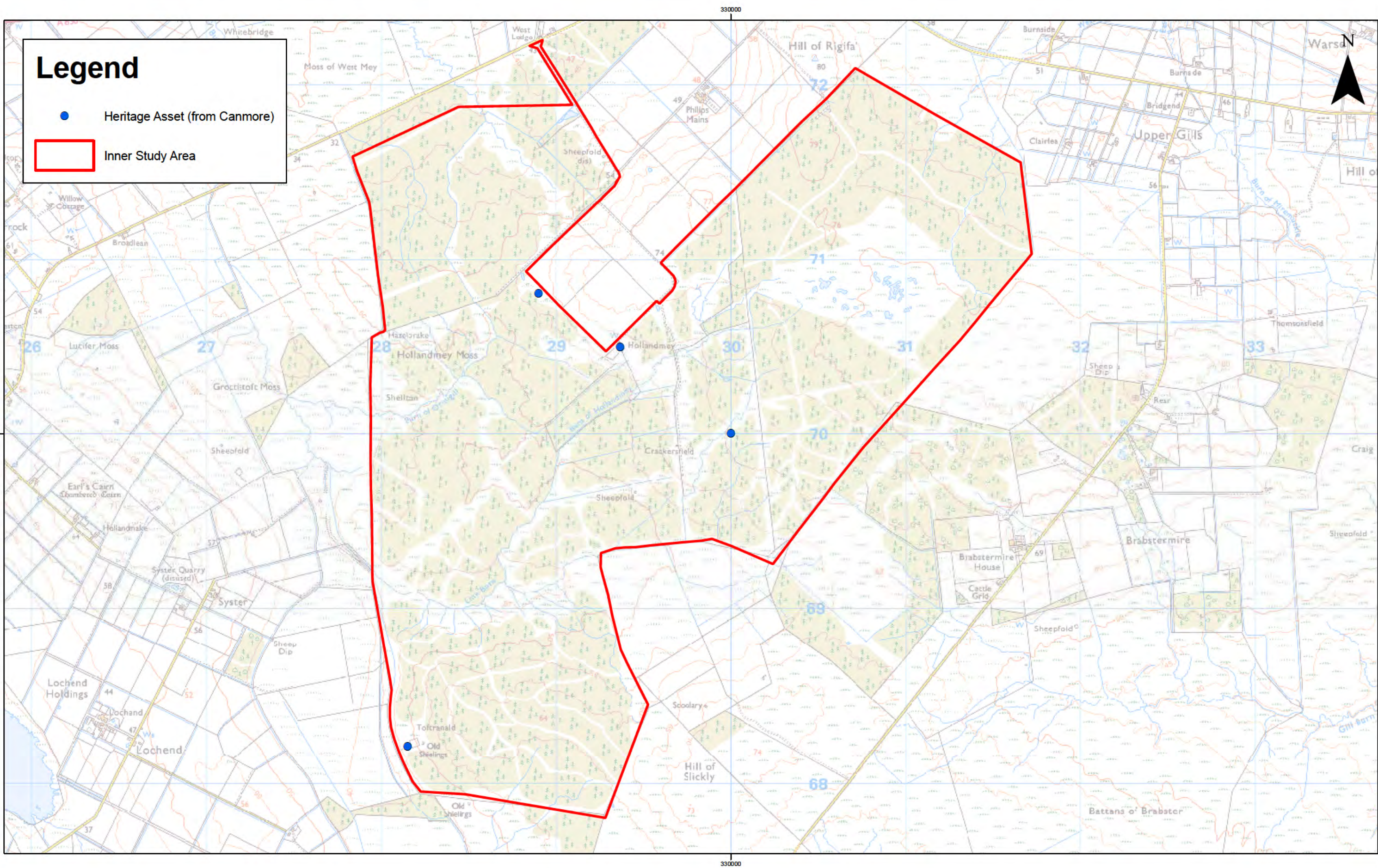
- Are Consultees content with the proposed extent of the Study Areas?
 - Are there any other relevant consultees who should be contacted with respect to the Cultural Heritage and Archaeology assessment?
-

- Do consultees have any particular viewpoints or visualisations that they would like to see included in the assessment?

Relevant Policy and Guidance

The assessment will be carried out with reference to the following legislation, policy and guidance:

- The Ancient Monuments and Archaeological Areas Act 1979
 - The Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997
 - The Historic Environment Scotland Act 2014
 - Statutory Instrument No 101 The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017
 - Planning Advice Note (PAN) 2/2011: Planning and Archaeology;
 - Highland-wide Local Development Plan (THC, 2012);
 - Standards for Archaeological Work (THC, 2012);
 - Scottish Planning Policy (SPP) 2014;
 - Standard and Guidance for Historic Environment Desk-Based Assessment (Chartered Institute for Archaeologists (CIfA 2014);
 - Standard and guidance for commissioning work or providing consultancy advice on archaeology and the historic environment (CIfA 2014);
 - Our Place in Time: The Historic Environment Strategy for Scotland (2015);
 - Managing Change in the Historic Environment: Setting (Historic Environment Scotland (HES) 2016);
 - Onshore Wind Energy Supplementary Guidance (THC, 2016) and Part 2b (THC, 2017);
 - Environmental Impact Assessment Handbook: Guidance for competent authorities, consultation bodies, and others involved in the Environmental Impact Assessment Process in Scotland (SNH and HES, 2018);
 - Caithness and Sutherland Local Development Plan (THC, 2018);
 - Historic Environment Policy Scotland (HES, 2019);
 - Historic Environment Scotland Circular (HES, 2019); and
 - Designation Policy and Selection Guidance (HES 2019)
-



Legend

- Heritage Asset (from Canmore)
- Inner Study Area



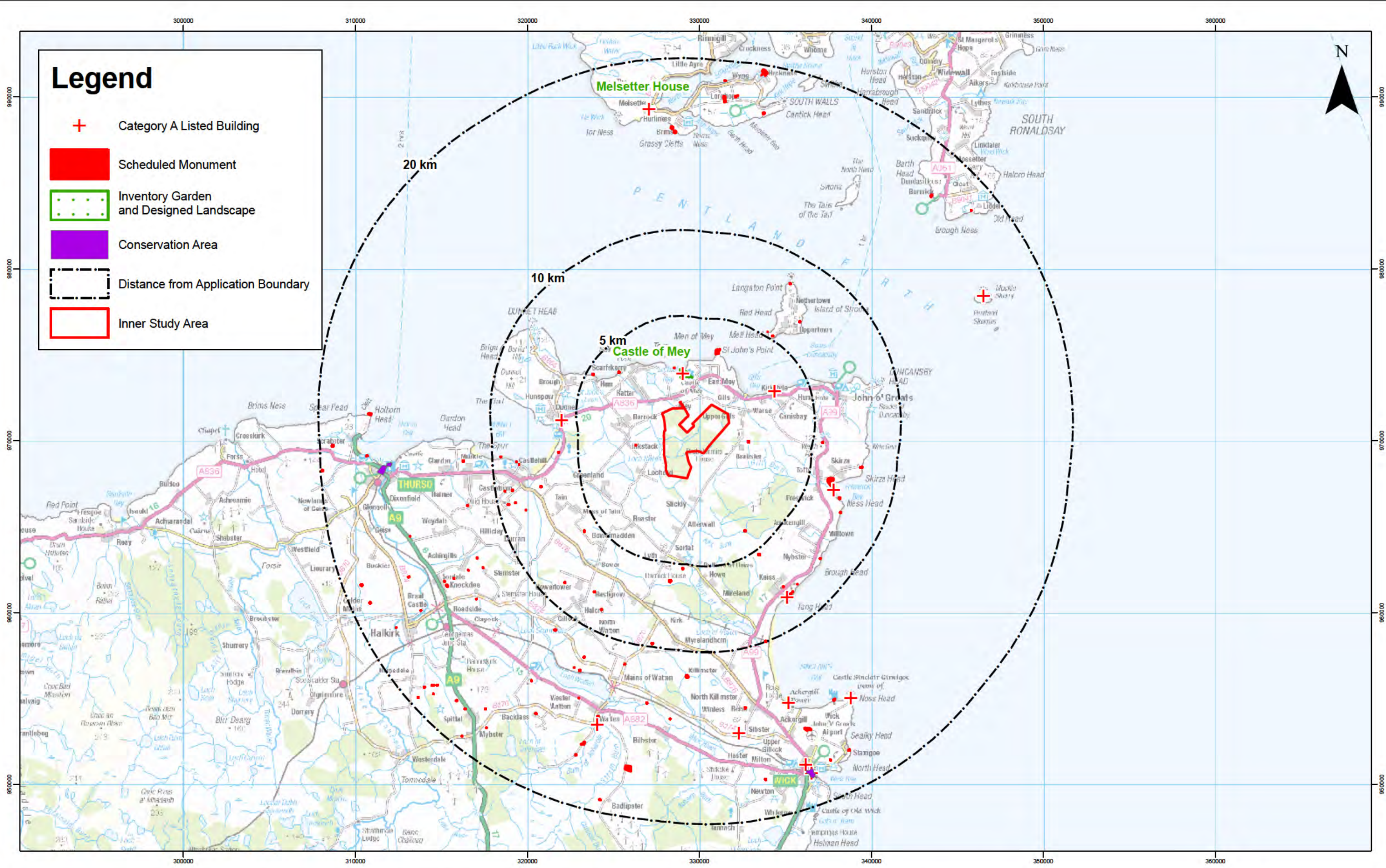
Rev	Date	By	Comment
D	14/07/20	TJ	Revised RLB
C	10/07/20	TJ	Revised RLB & base mapping
B	29/06/20	TJ	Revised red line boundary

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**Hollandmey
Renewable Energy Development
Heritage Assets in the Inner Study Area**

Drg No		
Rev	D	Datum: OSGB36
Date	14/07/20	Projection: TM
Figure	4.1	



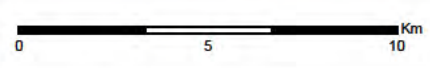
Legend

- + Category A Listed Building
- Scheduled Monument
- Inventory Garden and Designed Landscape
- Conservation Area
- Distance from Application Boundary
- Inner Study Area



D	14/07/20	TJ	Revised RLB & base mapping
C	14/07/20	TJ	Revised RLB & base mapping
B	29/06/20	TJ	Revised red line boundary
Rev	Date	By	Comment

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Scale @ A3



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Hollandmey
Renewable Energy Development
Heritage Assets in the Outer Study Area

Drg No		
Rev	D	Datum: OSGB36
Date	14/07/20	Projection: TM
Figure	4.2	

Noise

Background

Pre-application advice for the proposed Development was requested from the Highland Council (THC) and a response provided in March 2019. The key aspects identified by THC Environmental Health relate to operational noise, cumulative noise, background noise measurements and construction noise and are discussed herein.

Consultant Experience and Expertise

The technical lead for noise will be [REDACTED], Hoare Lea. [REDACTED]'s experience extends to many aspects of environmental noise spanning more than 20 years. [REDACTED] is an expert in the assessment of wind farm noise, having been involved since the earliest days of the industry and the UK's first commercial wind farms. [REDACTED] was a member of the Department of Trade and Industry Wind Turbine Noise Working Group which wrote the ETSU-R-97 guidance now used throughout the UK when assessing wind farm noise. Mark has developed advanced remote noise monitoring systems.

Baseline

An initial review of the baseline data surveyed for other windfarm schemes, and which are publicly available in the assessments for those schemes, suggests that existing baseline levels have been sufficiently defined for the purposes of an assessment of operational noise in accordance with ETSU-R-97 and best practice (see Table 1). Therefore, undertaking additional noise monitoring is not anticipated to be necessary, which in any case may have to be conducted with nearby adjacent operational wind turbines, and could therefore be contrary to best practice.

Potentially Significant Effects

During construction, noise could arise from both onsite activities, such as the construction of onsite access tracks, turbine foundations, the substation/control building etc., and from the movement of construction related traffic both onsite and travelling on public roads to and from the Site.

During operation, wind turbines have the potential to create noise effects through both aerodynamic noise and mechanical noise. Noise emitted from other operational elements of the development are likely to be negligible, and so the operational noise assessment will focus on the noise emitted from the proposed wind turbines.

Proposed Assessment Methodology and Approach

The noise impact assessment will assess the effects of construction (including traffic) of the proposed Development and operational noise of the wind turbines on nearby noise sensitive receptors (including cumulatively with nearby windfarms as necessary). The assessment will identify where significant effects may occur, what mitigation measures may be necessary, what residual effects there may be and what post commissioning monitoring would be undertaken.

The study area for the assessment will comprise the nearest noise sensitive receptors considered to be representative of residential dwellings in the immediate vicinity. These are dwellings that may experience noise effects from construction or operation of the proposed Development based on professional judgement and initial noise modelling. An initial review of those receptor locations nearby and that require to be assessed is shown below in Table 1 and on Figure 5.1. For each receptor, relevant information is discussed, which it is proposed to reference when assessing noise from the proposed Development. The initial review will be updated and list of receptor locations amended prior to the formal assessment being undertaken in order to ensure that the most accurate baseline environment is taken account of.

Table 1-List of receptor locations adjacent to the proposed Development which may require operational noise to be assessed. Included for each receptor is a discussion of sources of information on background noise levels and derived ETSU R 97 noise criteria

Receptor (Easting, Northing)	Assessment of the Proposed Development
Slickly (nearest location of three dwellings) (329472, 966952)	A baseline noise survey was undertaken at Slickly for the Lyth Windfarm ¹ at the dwelling Mooredge (329784, 966792). This baseline data will be used to represent those receptor locations at Slickly that are to the west of the road.
Slickly Croft (330192, 966236)	A baseline noise survey was undertaken at this location for the Slickly Windfarm ² . This baseline data will be used to represent this receptor consistent with the Slickly Windfarm assessment.
Syster (nearest of several dwellings) (327029, 969084) Lochend (nearest of several dwellings) (327495, 967732)	The noise assessment for the Lochend Windfarm ³ utilised baseline noise data from a noise survey undertaken for the Earl's Cairn Windfarm ⁴ at the location Syster (327029, 969084). This baseline data will be utilised for assessment of the Development at receptors at Syster and Lochend, consistent with the Lyth Windfarm assessment.
Ruthers of Howe (330212, 963012) Bramble Cottage (336028, 964989) Caith Cottage (336286, 965396)	Operational noise from the Development may be sufficiently below the ETSU-R-97 noise limits (at least 10 dB(A) below) that assessment would not be required. Should assessment be required, baseline data obtained at Slickly Croft (330192, 966236) for the Slickly Windfarm (see above) were used to represent these locations and would be utilised for assessment of the Development.
All other receptors near to the Development	Baseline noise surveys were undertaken for the Lyth Windfarm at Mooredge (329784, 966792), Greenfields (328640, 964307), Reaster Cottage (327032, 964392) and Moss-side House (325453, 966507). These baseline data were found to be reasonably consistent from location to location with regard to the relationship of background noise levels to wind speed (both day-time and night-time). It is proposed to use an average of these four baseline survey locations (separate for day-time and night-time periods), to represent all additional locations around the Development.

The assessment of construction noise effects will be undertaken in accordance with the guidance contained within BS 5228:2009+A1:2014: Code of Practice for Noise and Vibration Control on Construction and Open sites. Part 1: Noise (BS 5228-1). An assessment of potential impacts arising from any changes in traffic flows as a result of the proposed Development will also be undertaken as part of the construction noise assessment. Where necessary, appropriate levels of mitigation will be identified, in accordance with best practice, to ensure that noise levels are acceptable during the construction phase.

The assessment of operational noise effects will be undertaken using ETSU-R-97 'The Assessment of Rating of Noise from Wind Farms' (The Working Group on Noise from Wind Turbines, 1996). The report defines a procedure for assessing and rating windfarm noise.

ETSU-R-97 recommends that noise limits should be set relative to existing background noise levels at the nearest receptors and that these limits should reflect the variation in background noise with wind speed. Separate noise limits apply for day-time and for night-time periods. Daytime limits are chosen to protect a property's external amenity, and night time limits are chosen to prevent sleep disturbance indoors, with windows open.

Based on the approach set out in Table 1 above and the adopted quiet day and night-time wind varying background noise levels for each identified noise sensitive receptor, noise emission limits will be derived in accordance with the methodology set

1 Lyth Windfarm Environmental Statement, Chapter 10: Noise, Eurowind May 2013.
2 Slickly Windfarm Environmental Statement, Chapter 11: Noise, Statkraft, December 2019.
3 Lochend Windfarm Noise Impact Assessment, Chapter 5, Wind Harvest, July 2013.
4 The Highland Council application 12/00317/SCOP, Eurowind, January 2012.

out in ETSU-R-97. The significance of the predicted scheme noise emission levels will then be determined against these criteria when operating in combination with other wind energy schemes (operating, consented but not yet operational or proposed within the planning system). Consideration of cumulative operational noise effects will be completed in accordance with the IOA Good Practice Guidance (2013).

A representative wind turbine that meets the design requirements for the proposals will be nominated for the assessment of noise from the operational windfarm. A computer model will be constructed and used to predict noise levels resulting from the operation of the proposed Development, based on the methodology detailed in ISO 9613-2:1996, with the specific modelling procedure defined in the IOA Good Practice Guidance (2013).

Issues to be Scoped In or Out

Ground borne vibration resulting from the operation of wind turbines is imperceptible at typical receptor separation distances and is therefore proposed to be scoped out from the noise impact assessment.

Noise associated with the operation of the substation and routine maintenance visits and operational traffic is likely to be negligible, and therefore will be scoped out of the noise impact assessment.

Due to advances in turbine design, low frequency noise and vibration from turbines has been reduced. The Scottish Government references a report for the UK Government and concerning Low Frequency Noise that notes:

“...there is no evidence of health effects arising from infrasound or low frequency noise generated by wind turbines that were tested.”

Therefore, it is proposed that low frequency noise is scoped out from the impact assessment.

Consultees

The consultees below will be approached for information to inform the EIA. These consultees may also be contacted by the Scottish Government regarding the scope of the EIA:

- The Highland Council, Environmental Health

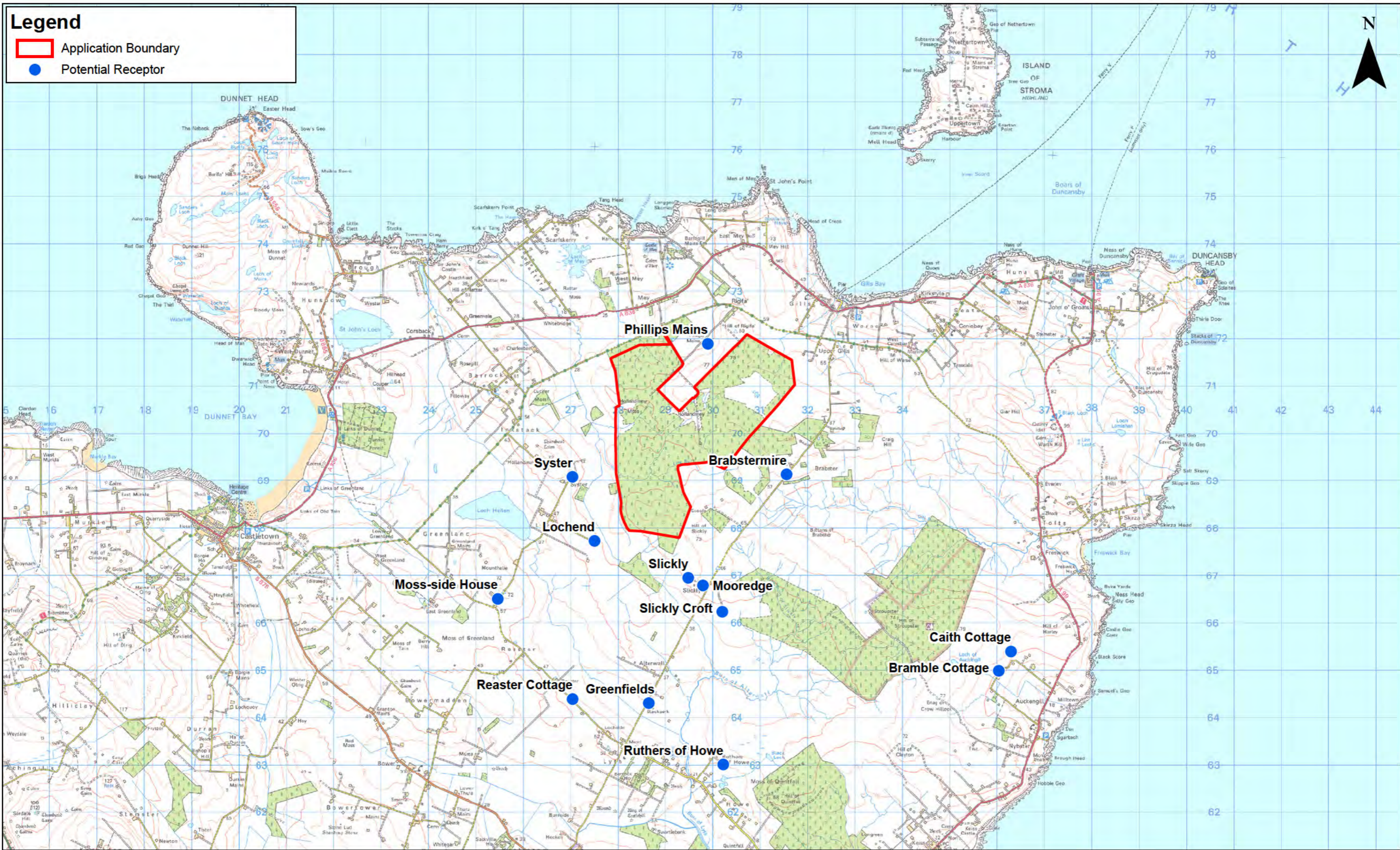
Consultee Questions

- Do consultees agree with the proposed approach to the noise and vibration assessment as set out above?

Relevant Policy and Guidance

The noise assessment will be undertaken with reference to the following documents:

- The Working Group on Noise from Wind Turbines, (1996). ETSU-R-97 The Assessment and Rating of Noise from Wind Farms.
 - Scottish Government, (2011). PAN 01/2011 Planning and Noise and associated Technical Advice Note.
 - Scottish Government, (2014). Onshore Wind Turbines: Planning Advice. Online planning advice.
 - (Institute of Acoustics (IoA), (2013). A Good Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise
 - British Standards Institution, 2014). BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise
 - HMSO Department of Transport (1988). Calculation of Road Traffic Noise
 - The Highways Agency, Transport Scotland, Transport Wales, the Department for Regional Development (Northern Ireland), (2011). Design Manual for Roads and Bridges (DMRB), Volume 11, section 3, Part 7, Traffic Noise and Vibration.
 - The Highland Council, (2018). Caithness and Sutherland Local Development Plan (CaSPlan).
 - The Highland Council, (2012). Highland-wide Local Development Plan (HwLDP).
-



C	14/07/2020	AJ	RLB updated.
B	01/07/2020	AJ	Application boundary updated.
A	20/05/2020	AJ	First Issue.
Rev	Date	By	Comment

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Hollandmey Renewable Energy Development Potential Receptors

Drg No	HMY_C_026	
Rev	C	Datum: OSGB36
Date	14/07/2020	Projection: TM
Figure	5.1	

Ecology

Background

Pre-application advice for the proposed Development was requested from the Highland Council (THC) and a response provided in March 2019. Key issues relating to impacts on the ecology, as provided by Scottish Natural Heritage (SNH) and additional relevant advisory bodies are summarised here.

THC response identifies that the Site is located to the west of the Caithness and Sutherland Peatlands Special Area of Conservation (SAC), designated for its internationally important peatland, habitats, rare plant species and otter *Lutra lutra* interests. As such, the proposal should look to include appropriate mitigation measures to ensure that no direct or indirect impacts upon the SAC will occur and that the integrity of the designation will be maintained. A survey for otter, which are a qualifying feature of the SAC, should also be undertaken to inform the EIA and if otters are present an otter protection plan should be produced.

The Site is noted to contain areas of blanket bog, including that located within the Phillips Main Mire Site of Special Scientific Interest (SSSI). The response acknowledges and advises that while no development infrastructure is proposed to be located within the designation boundary, appropriate mitigation measures should be included to demonstrate that the proposal would not either directly or indirectly impact on the SSSI. It is advised that a National Vegetation Classification (NVC) survey is to be undertaken to inform turbine siting and an assessment upon Ground Water Dependent Terrestrial Ecosystems (GWDTEs). If any proposed turbine locations and access tracks are located on blanket bog then further NVC survey at these locations, and within the micro-siting buffer to determine the condition of habitats.

It is advised that the Site may support a range of European and nationally protected species including; otter, bats, freshwater pearl mussel *Margaritifera margaritifera*, wildcat *Felis silvestris*, badger *Meles meles*, pine marten *Martes martes* and water vole *Arvicola amphibius*. Any planning application should therefore be informed by surveys of the presence of these species on the Site together with an assessment of likely impacts and proposed mitigation, with reference to current guidance.

A HMP should be produced in draft to detail measures necessary to restore habitats subject to disturbance caused by the proposed Development, together with opportunities to enhance habitats as a result of historic impact such as through the re-use of any timber felling and through appropriate deer management.

Consultant Experience and Expertise

The technical lead for Ecology will be [REDACTED] from Avian Ecology Ltd. [REDACTED] is an Associate Member of the Chartered Institute for Ecology and Environmental Management (CIEEM) and holds a BSc in Ecological Sciences from the University of Edinburgh (2009) and an MSc in Ecological Management and Conservation Biology from Queens University Belfast (2010). She has over 10 years' experience in the EIA of renewable energy developments in Scotland and throughout the UK, in relation to ecological and ornithological interests and designated sites for nature conservation.

[REDACTED] is supported by [REDACTED] (Director) of Avian Ecology Ltd. a Full Member of CIEEM, with an MSc in Ecology and Environmental Management (2007) and over 12 years' experience in the EIA of onshore renewable energy developments, in relation to ecological and ornithological interests.

She is also supported by a team of highly skilled ecological field surveyors, with considerable experience in undertaking baseline ecological field surveys for onshore renewable energy developments including habitat and species specialists familiar with working on sites of an upland and remote nature.

Baseline

Designated Sites

Statutory designated sites for nature conservation with ecological features of interests located within 10 km of the Site are summarised in Table 6.1 and shown on Figure 6.1.

Those sites with geological and ornithological features of interest are considered under 'Hydrology, Hydrogeology, Geology & Soils' and 'Ornithology'.

The Phillips Mains Mire SSSI is located in its entirety within the north eastern extent of the Site and is designated by virtue of its nationally important blanket bog habitat interests, with an extensive system of dubh lochans. The latest assessed condition of the Site is Favourable Maintained.

The Site does not form part of any non-statutory designated site for nature conservation.

Table 6.1: Statutory designated sites for nature conservation.

Site Name	Designation	Distance and Direction	Ecological Designated Features
Phillips Mains Mire	SSSI	Onsite	Blanket bog
Stroupster Peatlands	SSSI	1.1 km East	Blanket bog Oligotrophic loch
Caithness and Sutherland Peatlands	SAC	1.14 km East	Acid peat-stained lakes and ponds Blanket bog Clear-water lakes or lochs with aquatic vegetation and poor to moderate nutrient levels Depressions on peat substrates Very wet mires often identified by an unstable 'quaking' surface Wet heathland with cross-leaved heath Marsh saxifrage (<i>Saxifraga hirculus</i>) Otter (<i>Lutra lutra</i>)
Caithness and Sutherland Peatlands	Ramsar	1.14 km East	Blanket bog
Loch of Mey	SSSI	1.7 km North West	Transition grassland
Loch Heilen	SSSI	1.9 km West	Mesotrophic loch
Dunnet Links	SSSI	3 km West	Sand dunes
Duncansby Head	SSSI	3 km East	Maritime cliff
Stroma	SSSI	5.7 km North East	Maritime cliff
Dunnet Head	SSSI	7.1 km North West	Maritime cliff
Loch of Durran	SSSI	7.7 km South West	Transition grasslands Vascular plant assemblage

Site Name	Designation	Distance and Direction	and Ecological Designated Features
Loch of Wester	SAC	8.5 km South	Naturally nutrient-rich lakes or lochs which are often dominated by pondweed
Loch of Wester	SSSI	8.5 km South	Mesotrophic Loch

Habitats and Vegetation

The habitats within the Site are comprised largely of commercial coniferous plantation woodland, the majority of which are mid-rotation but are likely to be of varying heights and maturity, with some areas of felling and restock, open moorland and grassland habitats.

A small number of watercourses intersect the Site, including the Link Burn, Burn of Horsegrow, the Burn of Ormigill, Burn of Hollandmey. A small number of waterbodies are also present within the Site, including the dubh lochans of the Phillips Mains Mire SSSI.

Proposed Baseline Survey Methodologies

The following baseline ecological field surveys and desk studies will be undertaken to inform the design and assessment of the proposed Development.

Desk Study

A desk study will be undertaken to identify and review existing ecological information pertaining to the Site and surrounding area. The following key sources will be consulted to obtain existing information for non-statutory designated sites and protected and notable species out to 2 km of the Site (extended to 10 km for information relating to bat species):

- SNH Sitelink;
- SNH;
- Scotland's Environment Map (<https://map.environment.gov.scot/sewebmap/>);
- Highland Biological Recording Group;
- Flow Country Rivers Trust;
- Scottish Wildcat Action; and,
- Saving Scotland's Red Squirrels (Scottish Squirrels).

Publicly available EIA documentation for the following adjacent windfarms will also be reviewed, together with additional peer reviewed literature and publicly available resources where relevant:

- Lochend (Operational) 3/02682/FUL;
- Stroupster (Operational) 05/00273/FULCA;
- Slickly (Application) 19/05624/FUL; and,
- Lyth (Refused) 3/01832/FUL.

Field Surveys

Ecological field surveys proposed for completion in 2020 to inform the design and assessment of the Proposed Development are detailed in Table 6.2.

The commencement of ecological field surveys in April 2020, was compromised as a result of the Covid-19 virus outbreak. Surveys were however, commenced in late-May 2020 where they could be done safely, in accordance with current Scottish Government advice and with social distancing measures in place.

The completion of ecological field surveys through the spring, summer and autumn of 2020, will continue to be undertaken in accordance with current good practice survey guidance in so far as is possible and no essential gaps in surveys are currently anticipated. Should significant limitations to the undertaking of proposed baseline ecological field surveys detailed in Table 6.2 be experienced due to evolving Covid-19 restrictions, the degree to which a precautionary approach can be adopted will be discussed with SNH at the earliest opportunity prior to assessment.

Table 6.2: Proposed ecological field surveys.

Ecological Feature	Overview of Proposed Survey Methodology
Habitats and Vegetation	<p>A Phase 1 habitat survey for all terrestrial habitats likely to be affected by the Proposed Development, will be undertaken following industry standard survey guidance (JNCC, 2010).</p> <p>A NVC survey of potential habitats listed on Annex 1 of the EC Habitats Directive and UKBAP Priority Habitats will also be undertaken following industry standard survey guidance (Rodwell, 2006), complemented by Common Standards Monitoring where required to assess the condition of sensitive upland habitat features (JNCC, 2009).</p> <p>The survey area will comprise habitats within the Site, and accessible areas out to 300 m (maximum ecology survey area as shown on Figure 6.2), to allow for the identification of potential GWDTEs and subsequent hydrological assessment in accordance with Scottish Environmental Protection Agency (SEPA) guidance (SEPA, 2014).</p>
Bats	<p>Bat activity surveys will follow current SNH guidelines 'Bats and Onshore Wind Turbines: Survey, Assessment and Mitigation' (SNH, 2019b), in so far as is possible, and in view of the limitations posed by the locality of the Site with regards appropriate weather conditions for bat activity. Surveys will therefore seek to capture a longer period of monitoring during the spring¹, summer and autumn 2019 activity period (up to 30 nights), to sample a representative range of weather conditions applicable for the Site.</p> <p>Survey effort will be focused in those parts of the Site where turbines are most likely to be located, including at proposed turbine locations where these are confirmed at the time of survey and to ensure a representative sample of baseline bat activity is captured on the basis of habitat types and features. Surveys will employ the use of ground-level static monitoring stations and weather stations, with the number of monitoring stations deployed calculated on the number of proposed turbines in accordance with SNH guidance (2019b). Adopting a precautionary approach, a total of 12 monitoring stations are proposed.</p> <p>Supplementary survey methods including walked transects, vantage point surveys and monitoring at height are not proposed.</p>

¹ The commencement of bat activity surveys was compromised by the outbreak of the Covid-19 virus, with sampling of spring bat activity in 2020 commenced in the late May. The spring survey period defined in current SNH guidance (2019) is April to May and as such partial survey coverage has been completed and is not considered to represent a significant limitation to the baseline data set for the purposes of assessment.

Ecological Feature	Overview of Proposed Survey Methodology
	<p>A ground-level survey for features that could support bat roosts within 200 m, plus rotor radius, of the Site will be undertaken to inform the requirement for further surveys (i.e. presence/absence surveys) in consultation with SNH.</p>
Pine marten	<p>Woodland habitats within the Site may provide suitable opportunities for pine marten, with some use of open moorland habitats also possible.</p> <p>A survey for pine marten will therefore be undertaken in accordance SNH guidance (2019a), with reference to good practice survey methodologies (e.g. Cresswell et al., 2012). The survey will comprise a walkover search for signs of pine marten presence and potential den sites within and out to 250 m of the Site as access allows.</p>
Badger	<p>Badgers are generally considered to be absent or scarce within this locality of Caithness however, opportunities for sett creation may be present, notably within woodland habitats of the Site.</p> <p>A survey for badger will therefore be undertaken in accordance with SNH guidance (SNH, 2019a) with reference to good practice survey methodologies (e.g. Harris et al., 1989; SNH, 2018b). The survey will comprise a walkover search for signs of badger presence and set locations within 100 m of the Site, as access allows.</p>
Otter	<p>The woodland and watercourses of the Site may provide suitable foraging, commuting and holt opportunities for otter.</p> <p>A survey for otter will be undertaken in accordance with SNH guidance (2019a), with reference to good practice survey methodologies (e.g. Channin, 2003). The survey will comprise a walkover search along watercourse sections within 200 m of the proposed Development for signs of otter presence and potential holt locations, as access allows.</p> <p>Observations of possible holt locations made during badger surveys will also be recorded, with further targeted surveys of terrestrial habitats within the Site which may support inland holt locations, undertaken where identified.</p>
Water vole	<p>The watercourses within the Site may provide suitable habitat for water vole. A survey for water voles will therefore be undertaken in accordance with SNH guidance (SNH, 2019a) with reference to good practice survey methodologies (e.g. Dean et al., 2016). The survey will comprise a walkover search of suitable watercourse sections within 50 m of the proposed Development, for signs of water vole presence.</p>
Red squirrel	<p>Red squirrels are considered to remain scarce in this locality of Caithness however, habitats within the Site may provide suitable drey creation and foraging opportunities.</p> <p>A survey for red squirrels, including a search for feeding signs and presence of dreys within suitable habitats of the Site will be undertaken to confirm presence, or likely absence in accordance with SNH guidance (SNH, 2019a).</p>
Fish	<p>A fish habitat assessment will be undertaken of all watercourses intersecting the Site following industry standard guidance (SFCC, 2007) extended to include the suitability of habitats for freshwater pearl mussel in accordance with SNH guidance (SNH, 2019a).</p>

Potentially Significant Effects

The EIA will consider the following main impacts on ecological features and from which potentially significant effects may occur as a result of the construction, operation and decommissioning of the proposed Development:

- designated sites: including direct and indirect impacts to qualifying habitat features;
- terrestrial habitats and vegetation: effects include direct (i.e. derived from land-take from all infrastructure) and indirect (i.e. changes caused by effects to supporting systems such as groundwater or overland flow);
- aquatic habitats: including ecological effects of changes in water conditions through potential pollution effects. Hydrological effects will be considered in the appropriate EIA Report Chapter; and
- protected species, bats and fish: effects considered will include direct (i.e. loss of life as a result of the proposed Development; loss of key habitat; barrier effects preventing movement to/from key habitats; and general disturbance) and indirect (i.e. loss/changes of/to food resources; population fragmentation; degradation of key habitat, e.g. as a result of pollution).

The EIA Report will provide sufficient information to inform a Habitats Regulations Appraisal (HRA) of the proposed Development upon Natura sites, where the potential for likely significant effects upon the qualifying ecological features of such sites is considered.

Proposed Assessment Methodology and Approach

Impact assessment presented within the EIA report for ecological features will be based on current CIEEM guidance (2019).

The assessment of potential effects of bats as a result of the proposed Development will be undertaken in accordance with SNH (2019b) guidelines and include measures of relative bat activity using Ecobat.

The assessment process will include the following stages:

- determination and evaluation of important ecological features;
- identification and characterisation of impacts;
- outline of mitigating measures to avoid and reduce significant impacts;
- assessment of the significance of any residual effects after such measures;
- identification of appropriate compensation measures to offset significant residual effects; and
- identification of opportunities for ecological enhancement.

The assessment within the EIA Report will only assess in detail impacts upon important ecological features i.e. those that are considered important and potentially significantly affected by the proposed Development. A detailed assessment of features that are sufficiently widespread, unthreatened and resilient to project impacts will not be undertaken and justification for 'scoping out' provided.

Relevant European, national and local legislation, policy and guidance will be referred to in order to determine the importance (or 'sensitivity') of ecological features. In addition, importance will also be determined using professional judgement, specialist consultation advice and the results of baseline surveys and the importance of features within the context of the geographical area.

Importance will not necessarily relate solely to the level of legal protection that a feature receives and ecological features may be important for a variety of reasons, such as their connectivity to a designated site and the rarity of species or the geographical location of species relative to their known range.

The importance of an ecological feature will be defined in a geographical context from 'Local' to 'International'.

Impacts will be considered for the construction and operational phases of the proposed Development and will be assessed on the basis that a clearly defined range of avoidance and standard good practice measures are implemented.

Potentially significant effects upon important ecological features identified will be expressed with reference to an appropriate geographic scale. For example, a significant effect on a nationally designated site is likely to be of national significance.

In cases of reasonable doubt, where it is not possible to robustly justify a conclusion of no significant effect, a significant effect will be assumed as a precautionary approach. Where uncertainty exists, this will be acknowledged.

The potential for cumulative impacts with other renewable energy developments proposals will be assessed in accordance with SNH guidance (2012) and include consideration of those such developments located within the same hydrological catchment(s) or within the regular range of mobile species out to a maximum of 10 km from the application boundary for bats, in accordance with current SNH guidance (2019).

The assessment will encompass the effects of the proposal in-combination with existing developments, either built or under construction; approved developments, awaiting implementation; and, proposals awaiting determination within the planning process with design information in the public domain.

Approach to Mitigation

The adoption of embedded mitigation measures to avoid or minimise adverse impacts upon ecological features will be part of the iterative design process for the Proposed Development.

Measures to avoid or otherwise and minimise potentially adverse impacts upon ecological features during scheme design will include:

- Land-take

Development infrastructure will be designed to minimise the requirement for land-take and the number of watercourse crossings;

The scheme design will also seek to minimise the requirements for tree felling, in so far as is possible having regard to other ecological and non-ecological constraints;

- Watercourse crossings

New watercourse crossings required would be designed in accordance with best practice and enable the free passage of fish and other wildlife;

- Watercourse Buffers

A minimum 50 m buffer between scheme infrastructure will be applied around all watercourses in so far as possible having regard to other ecological and non-ecological constraints;

- Construction Environmental Management Plan (CEMP)

A CEMP (or similar) would be in place during the construction, operational and decommissioning phases of the development. The CEMP will include all good practice construction measures, pollution prevention controls and monitoring to be implemented over the course of the development in line with good practice guidance; and

- Bat Habitat Features

A minimum 50 m buffer (from blade tip) will be applied to watercourses and woodland edges in so far as possible having regard to other ecological and non-ecological constraints.

Where the EIA Report proposes additional measures to mitigate potentially significant adverse effects on ecological features, a further assessment of residual ecological effects, taking into account any ecological mitigation recommended, will be undertaken.

Where baseline ecological surveys confirm the presence of protected species within the Site and which may be impacted by the Proposed Development, additional measures shall include those to ensure legislative compliance in the form of species protection plans. Where required draft protection plans will be provided as part of the EIA Report, and will be finalised in consultation with SNH and other relevant consultees.

Approach to Enhancement

Suitable principles for biodiversity enhancement to be delivered as part of the proposed Development will be outlined within the EIA report. The appropriateness and feasibility of principles will be confirmed with SNH and relevant consultees as necessary over the course of the EIA, with a view to prescriptive enhancement measures being detailed post-consent within a HMP or similar.

Opportunities for compensatory woodland planting and/or woodland habitat improvement will be outlined in conjunction with the Forestry section of the EIA report.

Issues to be Scoped in or Out

Within the EIA, impacts will be considered during the construction and operational phases of the proposed Development.

The adoption of embedded measures to avoid or minimise adverse impacts upon ecological features, at each phase, will be part of the iterative design process for the proposed Development.

Designated sites

No infrastructure would be located within the Phillips Mains Mire SSSI and there would be no direct impact upon the ecological qualifying interests of any statutory designated site for nature conservation.

The EIA will consider the potential for significant indirect effects upon the Phillips Mains Mire SSSIs qualifying blanket bog interests and implications for its currently 'Favourable Maintained' conservation status.

The potential for indirect impacts upon the ecological qualifying interests of any such site listed in Table 1, located greater than 5 km from the application boundary is considered highly unlikely; by virtue of the static nature of the qualifying habitats interests, spatial separation and/or absence of clear hydrological pathways of connectivity. The potential for impacts upon the following statutory designated sites are therefore scoped out for detailed assessment within the EIA: Stroma SSSI, Dunnet Heath SSSI, Loch of Durran SSSI, Loch of Wester SAC/SSSI.

Similarly the potential for indirect impacts upon the 'Maritime cliff' qualifying interests of the Duncansby Head SSSI and the 'Sand dunes' qualifying interests of the Dunnet Links SSSI are reasonably precluded on the basis of the nature of development, spatial separation and existing barriers for potential effects including roadways.

The Loch Heilen SSSI, Caithness and Sutherland Peatlands SAC/Ramsar and Stroupster Peatlands SSSI are located within a different hydrological catchment to that occupied by the proposed Development with no obvious pathways for hydrological connectivity however, by virtue of spatial proximity the potential for indirect impacts upon the designations ecological habitat interests will be considered further within the EIA.

In the event otter are recorded within the Site, the potential for likely significant effects upon the Caithness and Sutherland Peatlands SAC will also be considered within the EIA to inform a HRA, if required.

The Site has direct hydrological connectivity with the Loch of Mey SSSI and as such the potential for significant impacts upon the designations transition grassland habitats will be considered within the EIA.

The potential for direct and indirect impacts upon ornithological and geological qualifying interests of designated sites is considered separately under 'Ornithology' and 'Hydrology, Hydrogeology, Geology & Soils'.

Protected species

The use of additional survey techniques (e.g. camera trapping) to further establish the presence of protected species (e.g. occupancy of den sites) and inform mitigation requirements are not currently proposed, but would be discussed with SNH and relevant primary interest groups, should the requirement for such be identified.

It is considered that the requirement for further detailed fish surveys to inform an assessment of effects upon fish need not be required providing the implementation of good practice scheme design and mitigation measures. Mitigation measures would be developed in consultation with SNH and other primary interest groups, to avoid and/or minimise the potential for pollutant impacts upon aquatic habitats and ensure the free passage of fish within the Site is maintained.

In accordance with SNH guidance (2018a) there are some species groups which, providing the implementation of suitable mitigation measures, are unlikely to be subject to significant effects as a result of windfarm developments. As such, they do not require surveys to inform an EIA. This includes invertebrates, reptiles and amphibians but excludes additional European Protected Species (EPS).

The only additional EPS with some potential to be present within the Site is great-crested newt *Triturus cristatus* and wildcat.

Great crested newt is known to be present, but localised in Caithness (McInerny & Minting, 2016). Formal survey is not currently proposed however, in the event suitable breeding water bodies are identified and may be impacted by the proposed Development, the requirement for survey to establish species presence and consideration within the EIA will be discussed in consultation with SNH.

The Site is not located in proximity to any Wildcat Priority Area. The presence of wildcat and potential for impacts is considered unlikely however, consultation will be undertaken with Scottish Wildcat Action to identify any existing species records within proximity to the Site and the requirement for any formal survey and assessment.

Consultees

The consultees below will be approached for information to inform the EIA. These consultees may also be contacted by the Scottish Government regarding the scope of the EIA:

- Scottish Natural Heritage
- Highland Biological Recording Group (HBRG);
- Scottish Wildcat Action;
- Flow Country Rivers Trust; and,
- Scottish Squirrels.

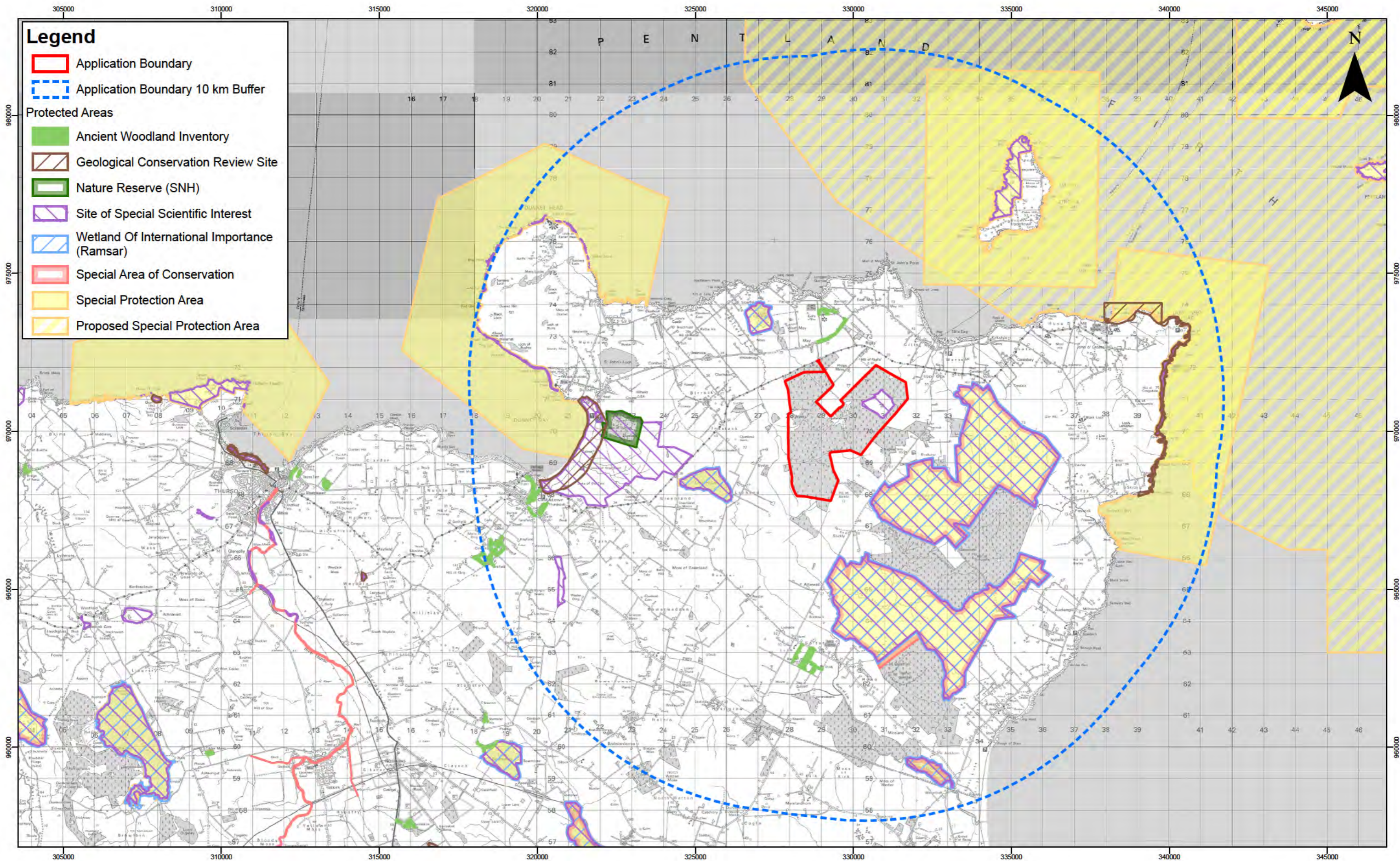
Consultee Questions

- Do consultees agree that the range of surveys proposed is sufficient and appropriate?
 - Do consultees agree with the approach to the proposed surveys to be undertaken?
 - Do consultees agree with those surveys which have been scoped out i.e. in relation to protected species?
 - Are there any other relevant consultees/key sources who should be contacted with respect to baseline ecological information gathering and assessment?
 - Do consultees agree with the proposed assessment of the potential effects as a result of the proposed Development, including the approach to cumulative assessment?
 - Are there any specific non-wind energy developments that consultees believe should be considered for inclusion within the cumulative impact assessment?
 - Do consultees agree that a detailed assessment of impacts upon the ecological qualifying interests of the Stroma SSSI, Dunnet Heath SSSI, Loch of Durran SSSI, Loch of Wester SAC/SSSI is not required?
-

Relevant Policy and Guidance

The following key pieces best practice guidance will be used to inform the scope and approach to baseline ecological information gathering, interpretation and assessment:

- The Highland Council (2016) Onshore Wind Energy Supplementary Guidance. The Highland Council.
 - Chanin P (2003) Monitoring the Otter Lutra lutra. Conserving Natura 2000 Rivers Monitoring Series No 10. English Nature, Peterborough;
 - CIEEM (2019) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Chartered Institute of Ecology and Environmental Management, Winchester;
 - Collins, J. (ed.) (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edition). The Bat Conservation Trust, London;
 - Cresswell, W. J., Birks, J. D. S., Dean, M., Pacheco, M., Trehella, W. J., Wells, D. and Wray, S. (2012) UK BAP Mammals Interim Guidance for Survey Methodologies, Impact Assessment and Mitigations. The Mammal Society, Southampton;
 - Dean, M., Strachan, R., Gow, D. and Andrew, R. (2016) The Water Vole Mitigation Handbook (The Mammal Society Mitigation Guidance Series). Eds Fiona Mathews and Paul Chanin. The Mammal Society, London;
 - Harris S, Cresswell P and Jefferies D (1989) Surveying Badgers, Mammal Society;
 - JNCC (2010) Handbook for Phase 1 habitat survey - a technique for environmental audit: Revised Re-print. Joint Nature Conservation Committee, Peterborough;
 - McInerney, C. & Minting, P. (2016) The Amphibians & Reptiles of Scotland. The Glasgow Natural History Society, Glasgow;
 - Rodwell, J.S. (2006) National Vegetation Classification: Users' Handbook. Joint Nature Conservation Committee, Peterborough;
 - Rodwell, J. S., (1991, 1992, 1998, 2000) British Plant Communities. Vol 1-5. JNCC, Cambridge;
 - SEPA (2017) Land Use Planning System Guidance Note 4: Planning Guidance on On-shore Windfarm Developments. Scottish Environment Protection Agency;
 - SEPA (2014) Land Use Planning System Guidance Note 31: Guidance on Assessing the Impacts of Windfarm Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems. Scottish Environment Protection Agency;
 - SFCC (2007). Habitat Surveys Training Course Manual. Scottish Fisheries Co-ordination Centre, Pitlochry;
 - SNH (2019a) Standard Advice for Planning Consultants: Protected Species. Available at: <https://www.nature.scot/professional-advice/planning-and-development/planning-and-development-advice/planning-and-development-protected-species>;
 - SNH (2019b) Bats and Onshore Wind Turbines: Survey, Assessment and Mitigation. Prepared jointly by Scottish Natural Heritage, Natural England, Natural Resources Wales, RenewableUK, ScottishPower Renewables, Ecotricity Ltd, the University of Exeter and the Bat Conservation Trust (BCT) with input from other key stakeholders;
 - SNH (2018a) SNH General Pre-application/Scoping Advice to Developers of Onshore Wind Farms. Scottish Natural Heritage, Inverness;
 - SNH (2018c) Best Practice Badger Survey Guidance Note. SNH, Inverness;
 - SNH (2012) Assessing the Cumulative Impact of Onshore Wind Energy Developments. Scottish Natural Heritage, Inverness.
 - The Highland Council, (2012). Highland-wide Local Development Plan (HwLDP)..
 - The Highland Council, (2018). Caithness and Sutherland Local Development Plan (CaSPlan).
-



Legend

- Application Boundary
- Application Boundary 10 km Buffer

Protected Areas

- Ancient Woodland Inventory
- Geological Conservation Review Site
- Nature Reserve (SNH)
- Site of Special Scientific Interest
- Wetland Of International Importance (Ramsar)
- Special Area of Conservation
- Special Protection Area
- Proposed Special Protection Area



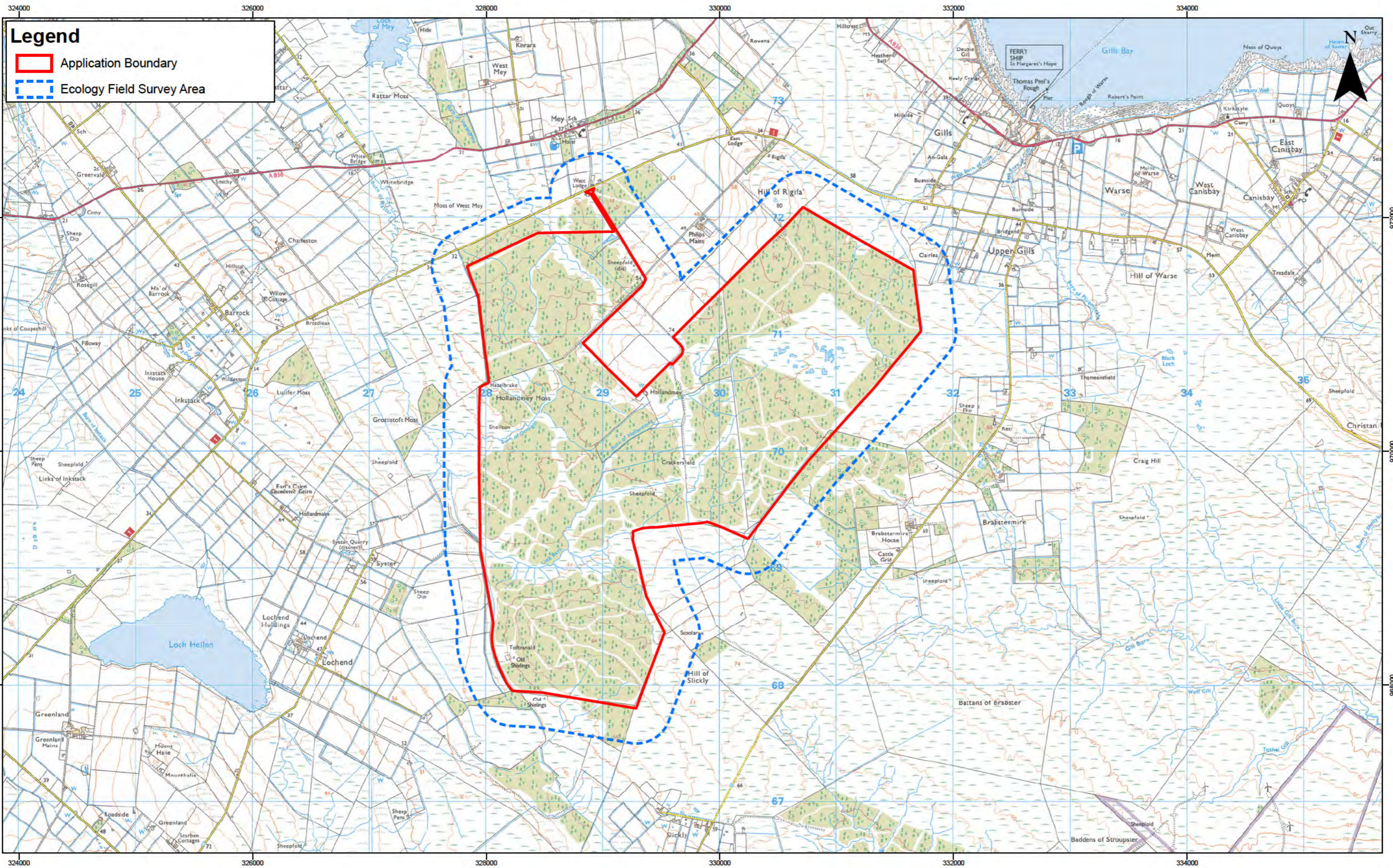
C	14/07/2020	AJ	RLB updated.
B	01/07/2020	AJ	Application boundary updated.
A	29/05/2020	DL	First Issue.
Rev	Date	By	Comment

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**Hollandmey Renewable Energy Development
Ecological Designated Sites**

Drg No	HMY_C_027	
Rev	C	Datum: OSGB36
Date	14/07/2020	Projection: TM
Figure	6.1	



Legend

- Application Boundary
- Ecology Field Survey Area



Rev	Date	By	Comment
C	14/07/2020	AJ	RLB updated.
B	01/07/2020	AJ	Application boundary updated.
A	29/05/2020	DL	First Issue.

1:30,000
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Hollandmey Renewable Energy Development Ecology Field Survey Area Plan

Drg No	HMY_C_028	
Rev	C	Datum: OSGB36
Date	14/07/2020	Projection: TM
Figure	6.2	

Landscape and Visual

Background

Pre-application advice for the proposed Development was requested from the Highland Council (THC) and a response provided in March 2019. Key aspects relating to landscape and visual are summarised here.

THC indicated that development proposals at the Site will need to overcome the issues that upheld the refusal of the planning application for Lyth Wind Farm (planning ref: 13/01832/FUL) and will need to demonstrate compliance with THC's Onshore Wind Energy Supplementary Guidance (OWESG).

THC indicate that the Site lies in a Group 2 Area of Significant Protection as set out in the OWESG. They advise this is mainly due to the Site being located in an area of carbon rich soils.

THC advise that the Site is in a landscape character area referenced as CT3 in the landscape sensitivity study that is part of the adopted suite of Supplementary Guidance on wind energy development. The assessment of effects of development at the Site should consider the findings of the sensitivity study in relation to CT3 and the guidance therein. THC advise that the sensitivity study indicates there is 'limited scope' for large scale development that should follow guidance set out in the study. In particular THC point to the need for the development to ensure a "proportional relationship between development scale and landscape character and setting is maintained, and avoid significant effects on the adjacent small scale narrow seaboard landscape." Figure 7.1 of this Information Sheet shows SNH Landscape Character Types and Figure 7.2 shows Landscape Designations and Wild Land Areas." Figure 7.1 of this Information Sheet shows SNH Landscape Character Types and Figure 7.2 shows Landscape Designations and Wild Land Areas.

THC advise that the assessment of sensitive receptors will need to include those who reside in the area and those who visit it including settlements, transport routes and visitor and recreational facilities. The assessment will need to demonstrate how any potential impacts on amenity have been mitigated for residential properties within 2 km of the proposed Development. The proposed Development must have regard to the citations of relevant Special Landscape Areas (SLA) as the impacts of the development will be assessed against the description in the citation of SLA that may potentially be affected.

THC indicate that the Flow Country is on the tentative list for World Heritage Status and progress of that work should be followed.

THC provide an appraisal of potential development at the Site against relevant criteria relating to landscape and visual aspects that the Council will use as a framework for assessing development proposals as set out in the OWESG.

A list of suggested viewpoints is provided by SNH and these have been considered in the selection of proposed viewpoint locations shown on Figure 7.3 of this Information Sheet. SNH advise that the applicant should check with the THC for an up-to-date list of cumulative developments to include in the cumulative LVIA. The latest published list has informed the selection of cumulative development shown on Figure 7.4.

Consultant Experience and Expertise

The technical lead for Landscape & Visual will be [REDACTED] from RSK. Ross is a Chartered Landscape Architect with a Postgraduate Diploma in Landscape Management from the University of Sheffield, an MSc in Rural and Regional Resources Planning from the University of Aberdeen and a BSc (Hons) in Geography from the University of Aberdeen. He has over 18 years' experience in environmental impact assessment, specialising in landscape and visual impact assessments (LVIA) and associated technical assessments such as residential visual amenity, seascape and townscape in addition to specifying windfarm photography and visualisations and other supporting documents. During his career [REDACTED] has worked for Scottish Natural Heritage (SNH) as a Landscape and Planning Adviser covering the north west Highlands and Western Isles. He has worked on over 20 windfarm projects in the UK.

[REDACTED] will be supported by a team of landscape architects and visualisations specialists with experience in environmental impact assessment in Scotland and the wider UK.

Baseline

The proposed Development consists of a renewable energy development with wind turbines of 150 m in height to blade tip. The potential for solar panels and energy storage is also being considered. Current guidance recommends a study area of 45 km radius from the outermost wind turbines of the proposed Development where wind turbines are greater than 150 m in height. Given the relatively low-lying topography and pattern of visibility indicated by the Zone of Theoretical Visibility (ZTV) map shown on Figure 7.3 it is proposed that the study area for the LVIA will be a 40 km radius in all directions from the outermost wind turbines of the proposed development.

The Site is moorland with forest plantation and open ground between forested areas. The landform is gently undulating sloping from an altitude of approximately 79 m Above Ordnance Datum (AOD) in the north east of the Site to 36 m AOD in the north west. Several minor watercourses drain the Site including Burn of Ormigill, Burn of Hollandmey and Link Burn in addition to extensive drainage ditches that connect to these watercourses. There are small lochans in the northern part of the Site including a group of lochans in the north east in Phillips Mains Mire Site of Special Scientific Interest.

There are agricultural buildings in the north of the Site and tracks within and on the edges of the Site. There are sheepfolds in the north and south of the Site and a shielding in the south. Lochend Wind Farm comprising of four wind turbines each 99.5 m in height to blade tip is immediately to the west of the Site.

Landscape Character

In 2019 SNH updated its National Landscape Character Assessment¹ and published maps and descriptions of Landscape Character Types (LCT) on its web pages.

The majority of the Site is in LCT 134 Sweeping Moorland and Flows with a small proportion in the north in LCT 143 Farmed Lowland Plain as shown on Figure 7.1. Key Characteristics of LCT 134 Sweeping Moorland and Flows include:

- *“Gently sloping or undulating landform which lies generally below 350 metres.*
- *Pockets of improved grazing, mainly within the outer fringes of sweeping moorland.*
- *Coniferous forest forming a dominant characteristic within some parts of this landscape character type.*
- *Very sparsely settled with dispersed crofts, farms and estate buildings largely found on the outer edges of this landscape or near a strath.*
- *Vehicular tracks within parts of the landscape.*
- *Wind farms, transmission lines, the A9 and a network of minor roads are key features within the more modified outer fringes within Caithness.*
- *Long, low and largely uninterrupted skylines offering extensive views across this landscape and result in a feeling of huge space.*
- *Consistent views to the distant Lone Mountains and Rugged Mountain Massif – Caithness & Sutherland.*
- *Great sense of exposure on areas of flat peatland on upland plateau.*
- *A strong sense of remoteness is associated within the largely uninhabited, inaccessible core flows and moorlands of this landscape.”*

Key Characteristics of LCT 143 Farmed Lowland Plain include:

- *“A generally open, low-lying plain, gently undulating to form shallow broad valleys, which are often filled with lochs and mosses, and subtle low ridges.*
- *Agriculture the predominant land cover.*

¹ Scottish Natural Heritage (SNH) (2019) Scottish Landscape Character Types Map and Descriptions.

- *Larger conifer woodlands located at the transition with the Sweeping Moorland and Flows standing out where they are planted on poorer wetter ground on low ridges.*
- *Farm buildings and houses forming focal points within the landscape.*
- *Occasional loose clusters of croft houses located on more marginal upper slopes and near the coast.*
- *A number of historic environment features, including conspicuous castles, Baronial mansions and tall 'Lairds' houses, usually with broadleaf shelter woods planted around them.*
- *A number of large settlements, including the towns of Thurso and Wick, situated on the coast, as well as several smaller settlements.*
- *Many historic features, including brochs and cairns, dotted across farmland and situated on hills within, or adjacent to, this area.*
- *Small groups of large wind turbines sited on some of the low ridges and hills and prominent visibility of larger wind farms in adjacent Landscape Character Types.*
- *Extensive views due to the openness of the landscape, and the clarity of northern air and light.*
- *Dramatic views from the northern part of this landscape to Dunnet Head and the distant Orkney islands, and views from the A9 on the western edge of this landscape of the Lone Mountains of Movern and Scaraben seen across the low-lying Sweeping Moorland and Flows."*

Designated Landscapes and Wild Land Areas

The Site is not in a designated landscape or Wild Land Area (WLA). Designated landscapes and WLA in the proposed study area are shown on Figure 7.2.

The nearest designated landscape of national importance is Hoy and West Mainland National Scenic Area (NSA) approximately 25 km to the north of the Site in Orkney Islands Council administrative area. There are four locally designated SLAs in the proposed 40 km study area:

- Dunnet Head SLA: 5.3 km to the west;
- Duncansby Head SLA: 7.4 km to the east;
- the Flow Country and Berriedale Coast SLA: 25 km to the south west; and
- Farr Bay, Strathy and Portskerra SLA: 40 km to the west.

There are two Garden and Designed Landscapes (GDL) in the proposed study area, Castle of Mey (Barrogill Castle), which is 1.8 km to the north of the Site; and Melsetter House on the island of Hoy approximately 18 km to the north. These will be considered in the LVIA. The Castle of Mey is also assessed as part of the separate cultural heritage assessment, however Melsetter House is not as it is not anticipated to be subject to impact (see Sheet 04 Cultural Heritage for further information).

WLAs are not a statutory designation. However, National Planning Framework 3 seeks to "...continue our strong protection for our wildest landscapes – wild land is a nationally important asset." Scottish Planning Policy (SPP) requires that Development Plans "...identify and safeguard the character of areas of wild land as identified on the 2014 SNH map of wild land areas." WLA also fall into the category of Group 2: Areas of significant protection with regard to spatial frameworks for wind energy development (SPP, Table 1, page 39).

The nearest WLA to the Site is WLA 41: Hoy, the southern boundary of which is approximately 20 km to the north. WLA 36 Causeymire and Knockfin Flows is 24 km to the south south west and WLA 39: East Halladale Flows is approximately 27 km to the south west.

Visual Receptors

The following visual receptors are present in the study area and would potentially be affected by the proposed Development:

- residents of the locality;
- tourists and visitors to the area including those visiting areas of scenic, cultural or historic value;

- people participating in outdoor recreational activities where their attention may be focussed on the landscape and views including users of long-distance routes, cycle routes, rights of way and core paths;
- hill walkers; and
- people using transport routes (roads, rail and ferry routes).

Potentially Significant Effects

Having regard to the nature of the proposed Development, key baseline characteristics and proposed embedded mitigation measures, it is considered that the following aspects have the potential for significant environmental effects primarily during the operational phase of the proposed Development, and will therefore require further consideration through the EIA process:

- effects on Castle of Mey GDL;
- effects on Hoy and West Mainland NSA;
- effects on LCT 134 Sweeping Moorlands and Flows, LCT 143 Farmed Lowland Plain and LCT 144 Coastal Crofts and Small Farms;
- effects on the special qualities and character of Dunnet Head SLA and Duncansby Head SLA;
- changes to views experienced by people in residential properties and settlements;
- changes to views experienced by people visiting the area including the North Coast 500 route, Dunnet Head and Duncansby Head;
- changes in views experienced by people cycling along National Cycle Network route 1 to the north of the Site;
- changes in views experienced by people walking on core paths in the vicinity of the Site;
- changes in views experienced by motorists travelling on local roads in the vicinity of the Site and on the A836;
- changes in views experienced by people approaching Gills Bay ferry terminal on the St Margaret's Hope to Gills Bay ferry; and
- cumulative effects on residents in the locality and people participating in outdoor recreational activities in the vicinity.

Proposed Assessment Methodology and Approach

The LVIA will be undertaken by Chartered Landscape Architects with considerable experience of siting, design and LVIA, of onshore windfarms. The main source of guidance used will be Guidelines for Landscape and Visual Impact Assessment (GLVIA3)².

The LVIA will assess direct and indirect effects on landscape character and the special qualities of designated landscapes and WLA. The LVIA will also assess the potential effects of the proposed Development on visual amenity and views. Cumulative effects i.e. the effects of the addition of the proposed Development in combination and sequentially with other windfarm developments will be assessed.

The overall approach for the assessment of effects on landscape and visual receptors will broadly follow three stages of desk-based baseline assessment, fieldwork, assessment and reporting with design iteration occurring throughout the LVIA.

The proposed Development would comprise wind turbines up to 150 m in height. SNH guidance advises that a study area of 45 km should be considered for wind turbines greater than 150 m in height. The pattern of visibility shown on the ZTV map (Figure 7.3) and the distribution of designated landscapes and WLAs shown on Figure 7.2 indicates that a 40 km study area will be appropriate.

² Landscape Institute and Institute of Environmental Management and Assessment (2013) Guidelines for Landscape and Visual Impact Assessment, Third Edition (Routledge, London).

Design Iteration

The principle means of landscape and visual mitigation is in the design of the proposed Development. The outcome of the LVIA will be an assessment of the residual effects of the proposed Development on landscape and visual amenity. However, throughout the LVIA there will be iterations of design as the LVIA team provides inputs to the wider windfarm design team to be analysed alongside the other design considerations that need to be addressed.

THC's preapplication advice indicates the need to consider the relationship between landscape character and the scale of the proposed Development including the relationship with the small-scale seaboard landscapes to the north of the Site.

SNH guidance identifies aspects of landscape that should be considered when siting and designing a windfarm. The design of the proposed Development will consider these factors and seek to achieve a coherent and structured layout that responds appropriately to the underlying landscape and visual character of the area. The design of the proposed Development will be appraised against relevant criteria relating to landscape and visual aspects as set out in the OWESG.

Siting and design of ancillary development will also be a design consideration particularly in relation to more sensitive receptors or those likely to be affected most.

The relationship of the proposed Development with other existing and proposed wind energy development will also be an important consideration.

Assessment of Effects on Landscape

Physical changes to landscape features within the Site will be assessed and direct effects on landscape character of the LCT in which the proposed Development would be located will be assessed. Indirect effects on LCTs in the study area from which the ZTV indicates there would be theoretical visibility will also be assessed. The effects on the special qualities and characteristics of designated landscapes as set out in the relevant citation will be assessed.

An assessment of landscape sensitivity will be made through an evaluation of landscape value and susceptibility to change as advised in GLVIA3. Magnitude of effects on landscape will be assessed in terms of the size or scale of change to the baseline, the geographical extent of effects and the duration or reversibility of effects. The assessment of magnitude of effect will consider these aspects in relation to the key characteristics and special qualities of the receiving landscape.

Significance of effect will be assessed by combining judgements about sensitivity and magnitude and a clear distinction between different levels of significance will be described and judgements clearly set out. The assessment will distinguish between significant effects of more importance that are likely to influence decision making and those of effects of lesser importance.

Assessment of Effects on Visual Amenity

The proposed Development has the potential to result in changes to the visual amenity and views experienced by people in the study area. The degree to which people (visual receptors) experience change would depend on whether they are static (e.g. residential locations, viewpoints such as Dunnet Head) or moving (e.g. along footpaths, roads, rail or ferry routes). Visual receptors will be grouped according to the activity being undertaken e.g. residents, outdoor recreation, motorists and public transport users.

The sensitivity of visual receptors will be assessed in accordance with GLVIA3 which advises that this will be a combination of judgements about susceptibility of the receptor to change and the value attached to views.

The visual receptors identified in this Information Sheet have been informed by the Council's pre-application advice and with reference to the Lyth appeal decision.

The assessment of visual effects will be informed by analysis of individual and cumulative ZTV maps, fieldwork and assessment of viewpoints. Proposed viewpoints are shown on Figure 7.3 and listed in Table 7.1 with the reason for selection. The viewpoints shown capture a representative range of visual receptors that would potentially be affected by the proposed Development. The list of viewpoints and their locations will be refined through fieldwork and through consultation with stakeholders and by the scoping process.

Table 7.1: Proposed Viewpoints

VP No.	Viewpoint Title	Easting	Northing	Distance and Direction to Application Boundary	Reason for Inclusion
1	North Hoy and West Mainland NSA	318582	999177	28 km to the south	NSA and footpath to The Old Man of Hoy.
2	Burwick, South Ronaldsay	344278	983904	17.5 km to the south west	SNH requested 2019. Closest visitor destination in Orkney.
3	Gills Bay Ferry	337286	976429	7 km to the south west	Tourists and visitors using the ferry, SNH requested 2019.
4	Dunnet Head Trig Point	320534	976491	8.5 km to the south east	Visitor destination, walkers, SLA.
5	Castle of Mey GDL	329026	973676	2 km to the south	GDL, residents and road users
6	Duncansby Head	340520	973260	9 km to the west	Visitor destination, walkers, SLA.
7	A836 West of Thurso	308641	969419	19 km to the east	North Coast 500, A836.
8	Barrock	325907	971363	2 km to the east	Residents, users of NVN route 1.
9	Brabster	332054	969750	1.5 km to the west	Residents.
10	A99 Warth Hill	337169	969882	5.5 km to the west	Recognised viewpoint on A99, North Coast 500, SNH requested 2019.
11	Lochend	325623	966682	2.6 km to the north east	Residents, users of local roads.
12	Bower	323827	962213	7 km to the north east	Residents, users of local roads, SNH requested 2019.
13	Lyth	328149	963405	4.2 km to the north	Residents, users of local roads.
14	Keiss	334662	961398	8.3 km to the north west	Residents, users of local roads.
15	Ben Dorrey	306463	955068	25 km to the north east	Hill walkers, SNH requested 2019.
16	A9 Georgemas Junction	315682	958684	15.5 km to the north east	Road and rail users.
17	Watton	323802	954680	13.5 km to the north	Road and rail users, SNH requested 2019.
18	Noss Head	338159	954681	16 km to the north west	Visitor destination, walkers, SNH requested 2019.
19	A9 near Rangag	317715	945772	24 km to the north north east	Users of A9, SNH requested 2019.

VP No.	Viewpoint Title	Easting	Northing	Distance and Direction to Application Boundary	Reason for Inclusion
20	Badlipster	324654	949249	19 km to the north	Users of minor road, SNH requested 2019.
21	Thrumster	333801	945388	22.5 km to the north north west	Users of A99, North Coast 500, SNH requested 2019.

Visualisations

Visualisations will comprise wirelines and photomontages from each viewpoint used in the LVIA. Visualisations will be shown with a photograph of the existing view with the exception of Viewpoint 1 North Hoy and West Mainland NSA, Viewpoint 2 Burwick South Ronaldsay and Viewpoint 3 Gills Bay Ferry which will be wirelines only. Photomontages will show a computer generated static model of the proposed Development overlaid onto photographs of the existing view to indicate what it would look like during operation and to inform an assessment of change against baseline. The wirelines for each viewpoint will show other windfarm developments visible from each viewpoint location.

Photomontages for viewpoints within 5 km of the proposed Development will show ancillary development at the Site such as permanent meteorological mast and access tracks, where these elements are visible. At distances of greater than 5 km ancillary development is likely to make a very limited change to views as part of the overall development and therefore will not be shown. Photomontages for viewpoints within 5 km of the proposed Development will also show solar panels and ancillary development associated with the solar array.

Visualisations will be prepared in accordance with SNH's Visual Representation of Wind Farms Version 2.2 (2017) and THCs Visualisation Standards for Wind Energy Development (July 2016).

Cumulative Development

An assessment of the effects of the proposed Development in combination with and sequential with other windfarms within 40 km of the proposed Development will be undertaken. The cumulative LVIA (CLVIA) will include operational windfarms, windfarms under construction, windfarms that are consented but not yet constructed and windfarms for which a valid planning application has been submitted (including those that are the subject of an Appeal). The CLVIA will include single wind turbines within 5km of the proposed Development that are over 20 m in height. Windfarms at scoping stage will not be included.

Combined visibility of the proposed Development with other windfarms will be shown using cumulative ZTV maps and in the wirelines at each viewpoint. Cumulative ZTV maps will be used to identify places where a more detailed assessment of sequential visibility may need to be undertaken e.g. key routes, and wirelines will be used to inform the assessment of effects. Figure 7.4 shows cumulative windfarms within 40 km and the wider area that will be considered in the CLVIA and Table 2 lists those that will be assessed.

The CLVIA will be undertaken in accordance with GLVIA3 and SNH guidance Assessing the Cumulative Impact of Onshore Wind Energy Developments (2012).

Table 7.2: Cumulative Windfarm Developments

Wind Farm	Status	No.Turbines	Tip Height (m)	Approximate Distance from Site Centre (km)
Lochend	Operational	4	99.5	1.5
Slickly	In Planning	11	149.9	4.4
Taigh Na Muir, Dunnet	Operational	1	79.6	4.5
Stroupster	Operational	13	110	5.3
Cogle Moss	Approved	12	100	13.0
Bilbster	Operational	3	93	18.0
Wathegar	Operational	5	100	19.0

Wind Farm	Status	No.Turbines	Tip Height (m)	Approximate Distance from Site Centre (km)
Achairn	Operational	3	100	19.0
Wathegar 2	Operational	9	110	19.4
Camster II	In Planning	11	126.5	19.9
Halsary	Under Construction	15	112	20.9
Hoy Community	Consented	2	74	21.0
Camster	Operational	25	100	21.4
Hesta Head	Consented	5	125	21.5
Achlachan	Operational	5	115	22.4
Achlachan 2	Approved	3	110	22.8
Bad a' Cheo	Operational	13	112	22.8
Causeymire	Operational	21	101	23.3
Baillie	Operational	21	115	25.9
Forss 1	Operational	2	76	26.6
Forss 2	Operational	4	78	27.3
Burn of Whilk	Operational	9	116	28.0
Golticlay	In Planning	19	130	29.4
Rumster Community WEP	Approved	3	75	30.0
Limekiln Resubmission	Approved	24	139	30.9
Buolfruch	Operational	15	75	36.3
Dounreay Tri Offshore	Approved	2	201	37.0
Berriedale and Dunbeath	Approved	3	74	39.6
Strathy Wood	In Planning	16	145	47.5
Strathy North	Operational	33	110	48.2
Strathy South	Approved	39	135	50.9
Bettyhill	Operational	2	119	55.7

Issues to be Scoped In or Out

It is considered that a detailed wild land assessment will not be required due to the separation distance. The CLVIA will exclude large offshore windfarms from the assessment of effects due to separation distance from the proposed Development and their position 15 km offshore to the south south east.

Consultees

The consultees below will be approached for information to inform the EIA. These consultees may also be contacted by the Scottish Government regarding the scope of the EIA:

- The Highland Council
- SNH

Consultee Questions

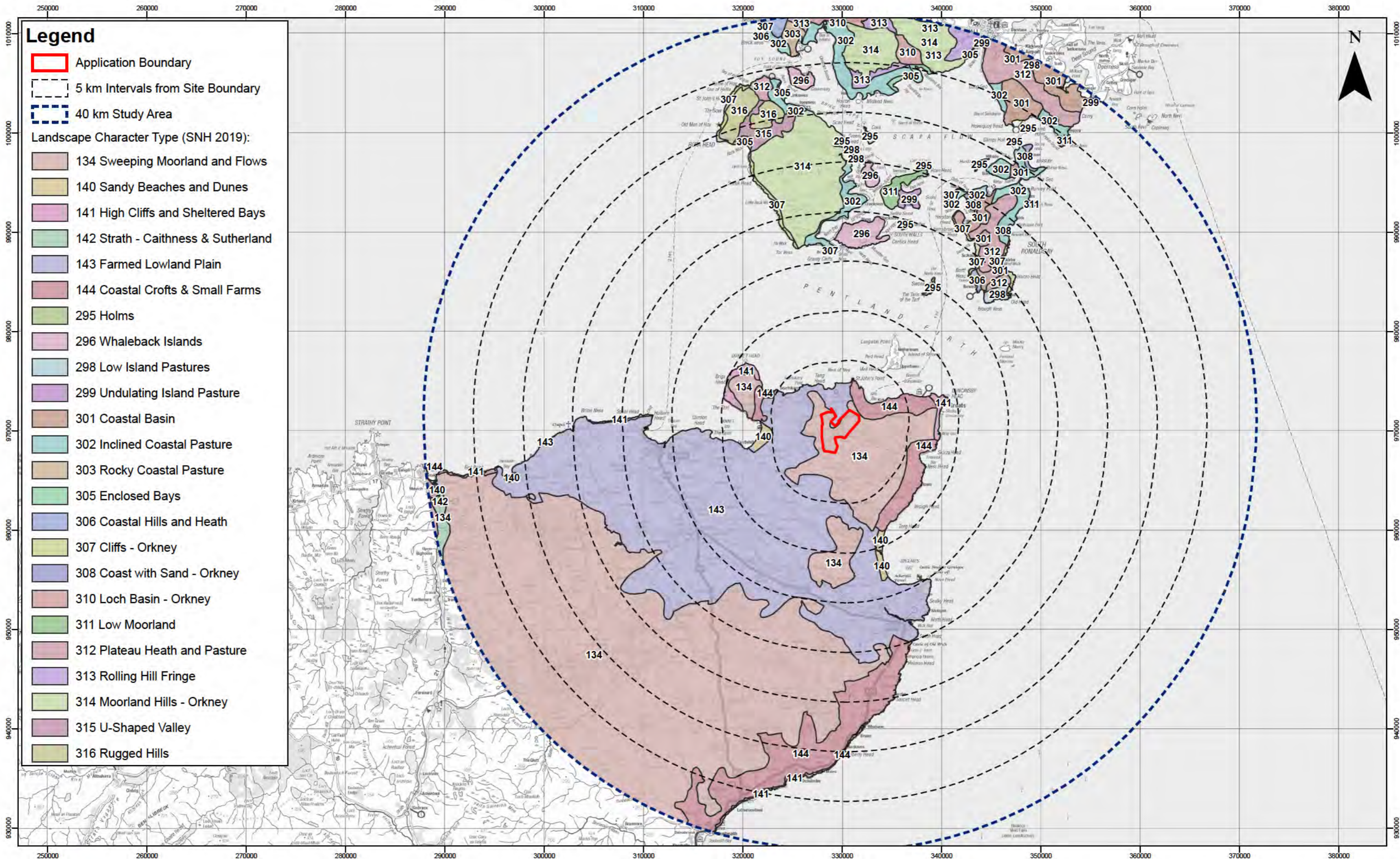
- Is the spatial extent of the study area considered to be appropriate?
- Are the proposed viewpoints considered to be appropriate?
- Do consultees agree that a detailed wild land assessment is not required?
- Is the proposed scope of the assessment of aviation obstruction lighting acceptable?
- Is the list of cumulative windfarms complete?

- Please confirm any additional requirements that you consider should be included in this part of the EIA, that have not been covered in this fact sheet.

Relevant Policy and Guidance

The assessment will be undertaken in accordance with the following relevant legislation and guidance:

- Landscape Institute, (2019). Technical Guidance Note 6/19 Visual Representation of Development Proposals;
 - Landscape Institute, (2019). Technical Guidance Note 2/19 Residential Visual Amenity Assessment;
 - Landscape Institute and Institute of Environmental Management and Assessment (2013) Guidelines for Landscape and Visual Impact Assessment, Third Edition;
 - Natural England, (2019). An Approach to Landscape Sensitivity Assessment;
 - Natural England, (2014). An Approach to Landscape Character Assessment;
 - Scottish Natural Heritage, (2017). Siting and Designing Wind Farms in the Landscape Version 3a;
 - Scottish Natural Heritage, (2017). Visual Representation of Wind Farms Version 2.2;
 - Scottish Natural Heritage, (2012). Assessing the Cumulative Impact of Onshore Wind Energy Developments;
 - The Countryside Agency and Scottish Natural Heritage (2002) Landscape Character Assessment Guidance for England and Scotland;
 - The Highland Council, (2017). Landscape Sensitivity Appraisal: Black Isle, Surrounding Hills, Moray Firth Coast and Caithness;
 - The Highland Council, (2016). Onshore Wind Energy Supplementary Guidance; and
 - The Highland Council, (2016). Visualisation Standards for Wind Energy Development.
 - The Highland Council, (2012). Highland-wide Local Development Plan (HwLDP).
 - The Highland Council, (2018). Caithness and Sutherland Local Development Plan (CaSPlan).
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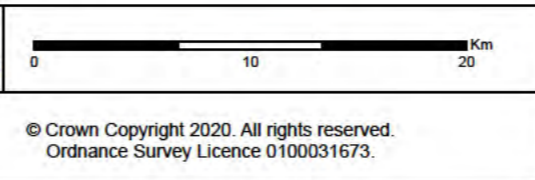


- Legend**
- Application Boundary
 - 5 km Intervals from Site Boundary
 - 40 km Study Area
- Landscape Character Type (SNH 2019):
- 134 Sweeping Moorland and Flows
 - 140 Sandy Beaches and Dunes
 - 141 High Cliffs and Sheltered Bays
 - 142 Strath - Caithness & Sutherland
 - 143 Farmed Lowland Plain
 - 144 Coastal Crofts & Small Farms
 - 295 Holms
 - 296 Whaleback Islands
 - 298 Low Island Pastures
 - 299 Undulating Island Pasture
 - 301 Coastal Basin
 - 302 Inclined Coastal Pasture
 - 303 Rocky Coastal Pasture
 - 305 Enclosed Bays
 - 306 Coastal Hills and Heath
 - 307 Cliffs - Orkney
 - 308 Coast with Sand - Orkney
 - 310 Loch Basin - Orkney
 - 311 Low Moorland
 - 312 Plateau Heath and Pasture
 - 313 Rolling Hill Fringe
 - 314 Moorland Hills - Orkney
 - 315 U-Shaped Valley
 - 316 Rugged Hills



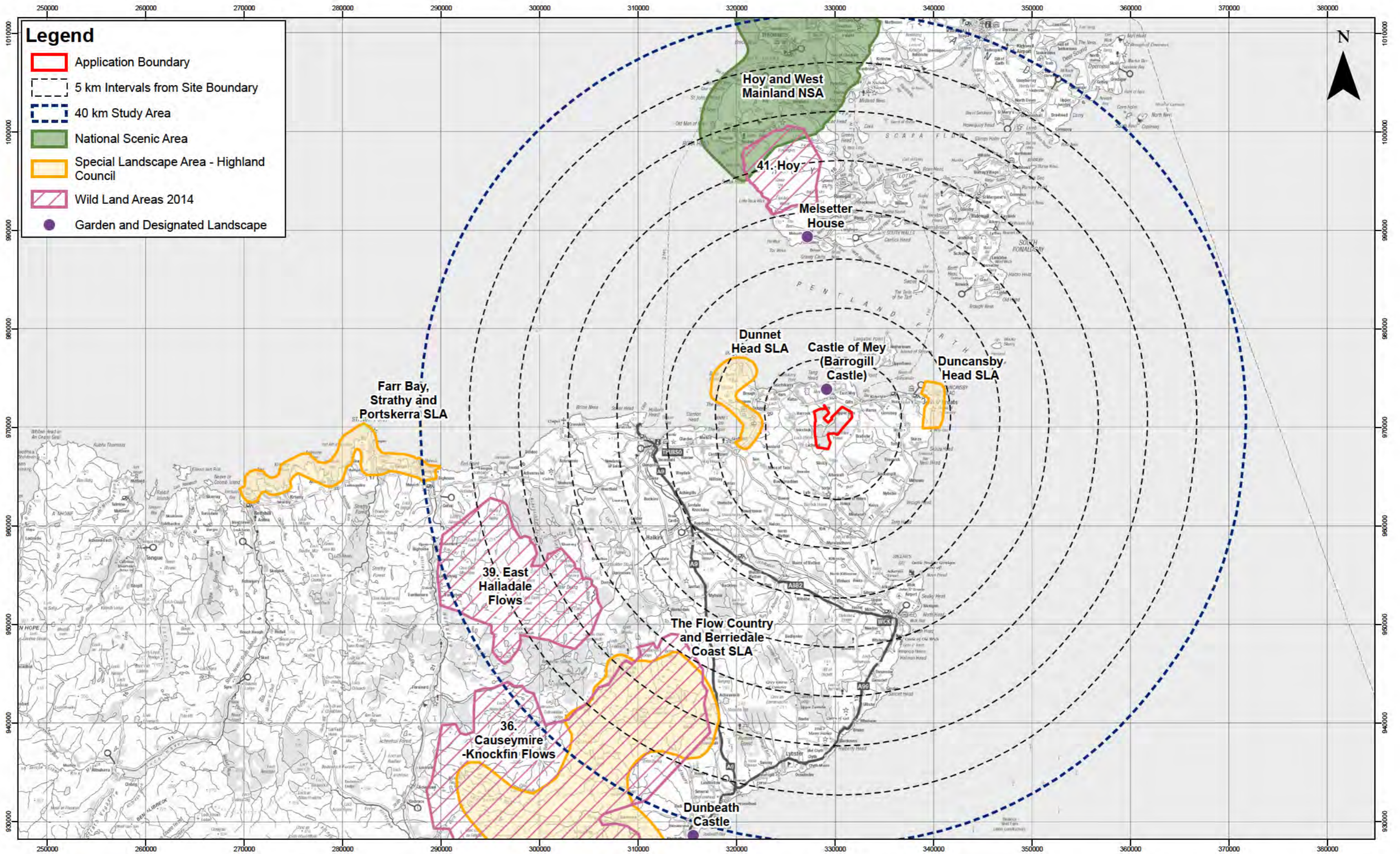
C	14/07/2020	AJ	RLB updated.
B	01/07/2020	AJ	Application boundary updated.
A	29/05/2020	DL	First Issue.
Rev	Date	By	Comment

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Hollandmey Renewable Energy Development Landscape Character

Drg No	HMY_C_029	
Rev	C	Datum: OSGB36
Date	14/07/2020	Projection: TM
Figure	7.1	



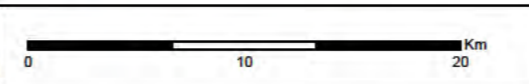
Legend

- Application Boundary
- 5 km Intervals from Site Boundary
- 40 km Study Area
- National Scenic Area
- Special Landscape Area - Highland Council
- Wild Land Areas 2014
- Garden and Designated Landscape



C	14/07/2020	AJ	RLB updated.
B	01/07/2020	AJ	Application boundary updated.
A	29/05/2020	DL	First Issue.
Rev	Date	By	Comment

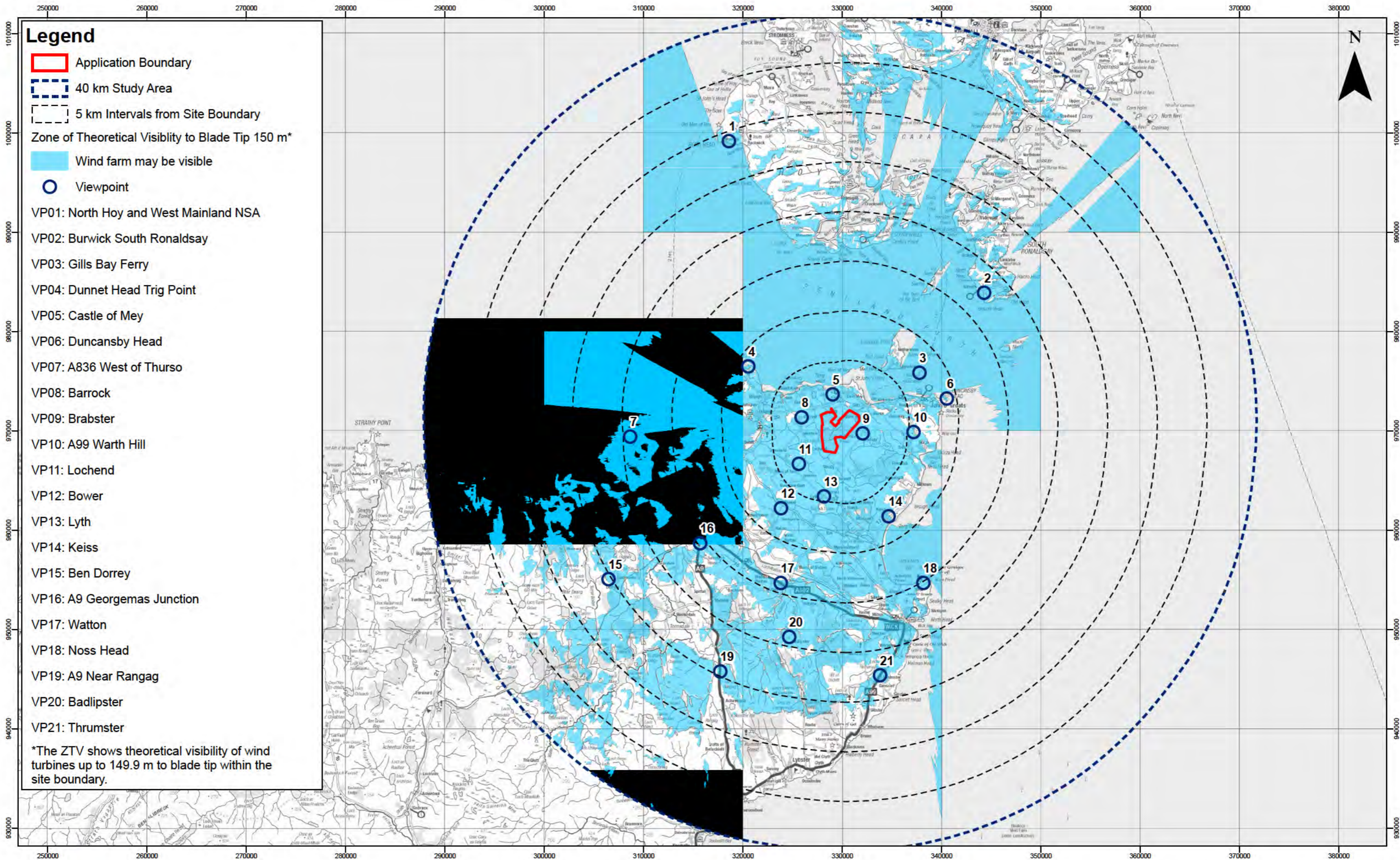
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**Hollandmeay Renewable Energy Development
Designated Landscapes and
Wild Land Areas**

Drg No	HMY_C_030	
Rev	B	Datum: OSGB36
Date	14/07/2020	Projection: TM
Figure	7.2	



Legend

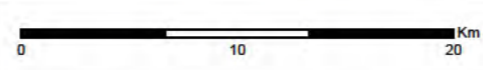
- Application Boundary
 - 40 km Study Area
 - 5 km Intervals from Site Boundary
 - Zone of Theoretical Visibility to Blade Tip 150 m*
 - Wind farm may be visible
 - Viewpoint
- VP01: North Hoy and West Mainland NSA
 VP02: Burwick South Ronaldsay
 VP03: Gills Bay Ferry
 VP04: Dunnet Head Trig Point
 VP05: Castle of Mey
 VP06: Duncansby Head
 VP07: A836 West of Thurso
 VP08: Barrock
 VP09: Brabster
 VP10: A99 Warth Hill
 VP11: Lochend
 VP12: Bower
 VP13: Lyth
 VP14: Keiss
 VP15: Ben Dorrey
 VP16: A9 Georgemas Junction
 VP17: Watton
 VP18: Noss Head
 VP19: A9 Near Rangag
 VP20: Badlipster
 VP21: Thrumster

*The ZTV shows theoretical visibility of wind turbines up to 149.9 m to blade tip within the site boundary.



D	14/07/2020	AJ	RLB changed.
C	01/07/2020	AJ	RLB reverted to original.
B	29/05/2020	DL	Revised Site Boundary
Rev	Date	By	Comment

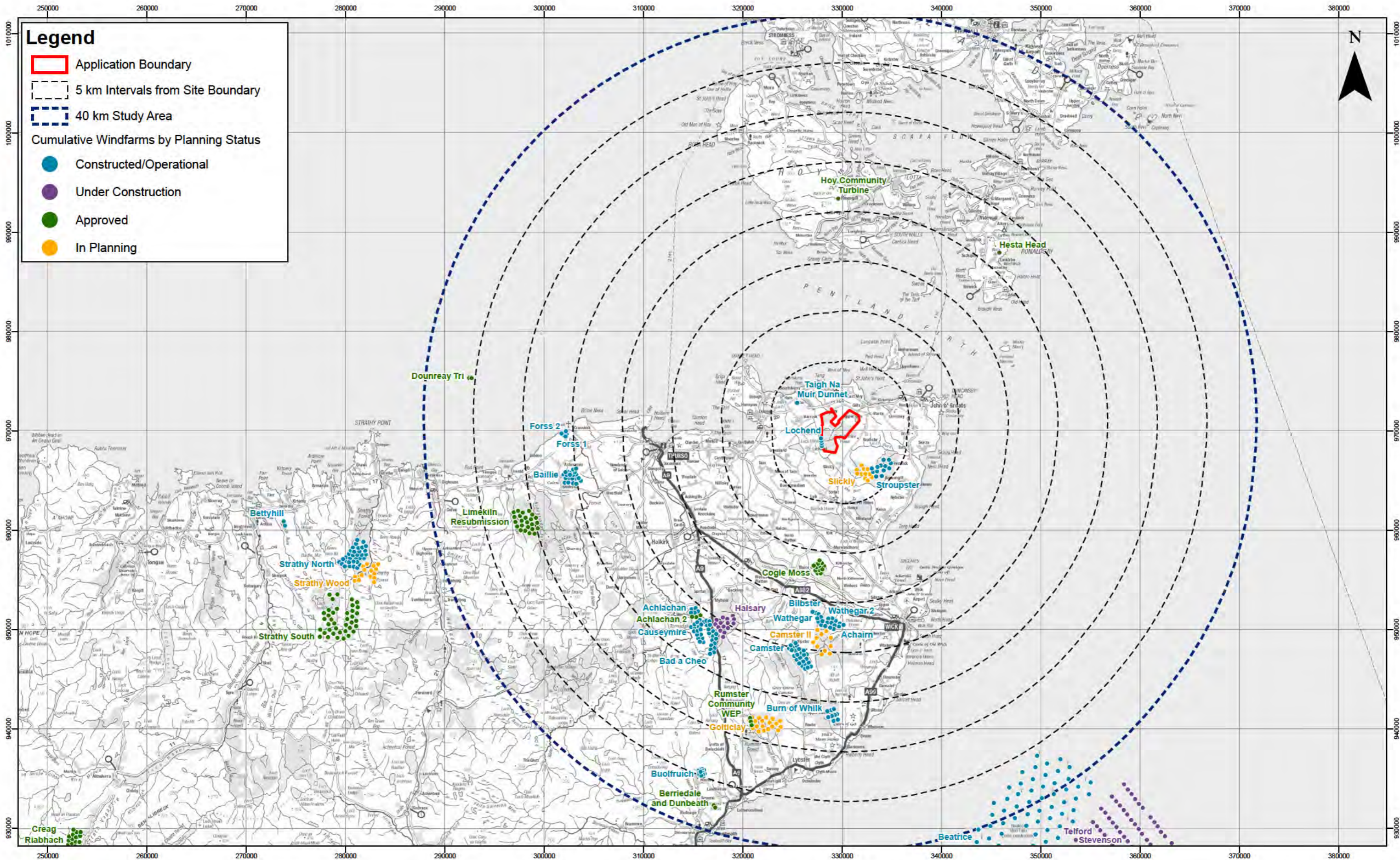
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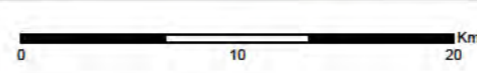
**Hollandmey Renewable Energy Development
Blade Tip Height (150 m) ZTV and
Viewpoint Locations**

Drg No	HMY_C_018	
Rev	D	Datum: OSGB36
Date	14/07/2020	Projection: TM
Figure	7.3	



C	14/07/2020	AJ	RLB updated.
B	30/06/2020	AJ	Application boundary updated.
A	29/05/2020	DL	First Issue.
Rev	Date	By	Comment

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Hollandmey Renewable Energy Development Cumulative Windfarm Developments

Drg No	HMY_C_031	
Rev	C	Datum: OSGB36
Date	14/07/2020	Projection: TM
Figure	7.4	

Ornithology

Background

Pre-application advice for the proposed Development was requested from the Highland Council and a response provided in March 2019. Key issues relating to impacts on the ornithology, as provided by Scottish Natural Heritage (SNH) and additional relevant advisory bodies are summarised here.

Consultant Experience and Expertise

The technical lead for Ornithology will be [REDACTED] from NRP. [REDACTED] has degree in Zoology from Aberdeen University and has over 13 years' experience undertaking fieldwork on a number of proposed and existing windfarm sites in Scotland and Northern Ireland. As a project manager, [REDACTED] writes tenders and cost estimates for projects; liaises with clients, landowners and field surveyors; provides updates on continuing fieldwork; writes the Technical Reports once fieldwork is complete; and peer-reviews other project managers' reports as part of NRPs internal Quality Assurance mechanisms. Fiona is also part of the team which writes the Ornithology Assessment Chapters for Environmental Statements.

Baseline

The proposed Development occupies a site that is a conifer plantation surrounded by improved and rough-grazing and moorland areas (the Site).

The Site is not covered by any statutorily designated nature conservation site. The nearest designated sites include:

- Caithness and Sutherland Peatlands special protection area (SPA) and Ramsar site. This is approximately 1 km from the application boundary at its closest point and the qualifying interests are breeding birds: black-throated diver, red-throated diver, common scoter, wigeon, dunlin, wood sandpiper, golden plover, greenshank, golden eagle, hen harrier, merlin, short-eared owl and greylag goose.
- Caithness Lochs SPA and Ramsar site. Two component lochs (Loch of Mey and Loch Heilan) are nearby (approximately 1.5 km and 2 km at their nearest point respectively); the qualifying interests are the overwintering bird species: Greenland white-fronted goose, greylag goose and whooper swan.
- North Caithness Cliffs SPA. Three components of the SPA (Stroma, Dunnet Head and Duncansby Head) are nearby (approximately 3.5 km, 5 km and 7.5 km at their nearest points respectively), and the qualifying interests are breeding peregrine, fulmar, guillemot, razorbill, puffin, kittiwake, sandwich tern, arctic tern and seabird colony.
- Loch of Wester Site of Special Scientific Interest. This is approximately 8.5 km south of the application boundary and the qualifying interest is whooper swan that is non-breeding.

The following field-based baseline studies have been undertaken:

- Initial walkover surveys to provide an indication of which breeding bird species might be present on the proposed Development were undertaken during June and July 2017 within a 500 m buffer of the application boundary. A total of 22.75 hours of walkover and scans were undertaken on two days in each month.
- Between October 2017 and April 2018 surveys of goose and swan presence and activity around the proposed Development and the nearby SPA lochs were conducted.
- A full suite of field surveys following SNH Guidance (SNH, 2017¹) commenced in April 2018 and continued until March 2020, providing two full years of surveys. These surveys were completed within the relevant buffers from the proposed Development footprint (500 m, 1 km and 2 km, Figure 8.1²) and included:

¹ SNH Guidance: Recommended bird survey methods to inform impact assessment of onshore wind farms.

² The survey area does not cover the entirety of the Site but does cover the extent of the area where any potential turbines might be sited.

- flight activity surveys from two generic vantage point locations (GVP) (Figure 8.2) with at least 36 hours of watches during each of the breeding seasons (April to August 2018 and 2019) and the non-breeding seasons (September 2018 to March 2019 and September 2019 to March 2020), totalling 288 hours over the two years;
- additional flight activity surveys were carried out during the spring and autumn migration periods for 36 hours from one migration watch point location (MWP) in each season (March to May 2018 and 2019 and September to November 2018 and 2019) to gather information on movements of geese, swans and waders, totalling 144 hours over the two years;
- searches for scarce breeding raptors and owls within suitable habitats within a 2 km survey buffer, where access was granted. Where possible areas with no access permission were watched over. Searches focussed on species most likely to occur in the available habitats, including: hen harrier, merlin, short-eared owl and barn owl, totalling 103 hours over the two years;
- surveys for breeding waders were completed within the small amount of open ground within the 500 m buffer of the proposed Development during 2018;
- further searches of nearby lochs and fields for wintering geese and swans were conducted during October 2018 to April 2019 and October 2019 to March 2020 to add to those from 2017/2018;
- watches for signs of winter roosting by hen harriers were carried out over suitable habitats (where possible) within the 2 km survey buffer during the months of October to March in the winters of 2018/2019 and 2019/2020; and
- during the non-breeding period walkovers within the 500 m buffer were completed to complement the breeding season walkovers.

Please note that the results presented here have not been tailored to the proposed Development layout or turbine heights (as the initial design phase is yet to commence), and so may differ slightly when presented in the final assessment.

Field survey results indicate that there are no scarce birds of conservation concern breeding or roosting within the survey buffers of the Site.

Over the two years of survey, a large number of flights by greylag geese and pink-footed geese were recorded. The majority of these appear to be around the improved grazing fields that lie around 1 km to the north of the proposed Development. Further detailed analysis of the flock sizes and flight elevations will be carried out as part of the assessment process (see below).

A small number of flights by hen harrier were also recorded mainly in the open ground areas that occur in the periphery of the 500m buffer. While a small number of flights by whooper swan were recorded, in similar areas to the geese flights. Golden plover, curlew and dunlin were all recorded in flight and appear to favour the open ground areas.

Potential Effects

A full assessment of the results of the field surveys will be undertaken with regards to the potential effects on birds associated with the construction and operation of the proposed Development, which may include:

- a short-term reduction in breeding or wintering bird populations because of construction disturbance;
- a permanent reduction in breeding or wintering bird populations because of the loss of habitat critical for nesting, roosting or feeding;
- a permanent reduction in breeding or wintering populations because of the loss of individuals through collision with the turbines; and
- cumulative effects with other nearby developments that are operational during the same period, and/or with other developments that pose either a potential collision risk or loss of habitat.

Proposed Assessment Methodology and Approach

Baseline

The results of the surveys along with consultations and desk studies will be used to illustrate the current baseline of the Site.

Assessment of Effects

In assessing whether an effect is significant or not, three factors will be considered:

- the Nature Conservation Importance (NCI) of the species involved;
- the magnitude of the likely effects; and
- the conservation status of the species.

Determining Significance

Following the classification of each species' NCI and consideration of each effect, professional judgement will be used to make a reasoned argument of the likely effect on the conservation status of each potentially affected species. In accordance with the EIA Regulations, each likely effect will be evaluated and classified as either significant or not significant, in the context of the status of, and trends within, regional populations, as defined by SNH Natural Heritage Zones (NHZs). In this case NHZ 2: North Caithness and Orkney.

Mitigation

If any effects are deemed to be significant, necessary measures to mitigate the effects will be presented.

Cumulative Assessment

A cumulative assessment will consider development proposals within the relevant NHZ that are operational during the same period, and/or with other development that pose either a potential collision risk or loss of habitat.

Habitats Regulations Appraisal (HRA)

Due to the proximity of the proposed Development to parts of three SPAs (and two corresponding Ramsar sites), and the species observed during the field surveys, a shadow HRA for the Caithness and Sutherland Peatlands SPA and Ramsar and the Caithness Lochs SPA and Ramsar will be produced to aid the competent authority in their decision on whether there would be any effect on the designated sites.

Issues to be Scoped In or Out

Until the results are examined in detail all effects on all species will be scoped in to the assessment. As no species that are qualifying interests for the North Caithness Cliffs SPA were observed within any of the survey boundaries effects on this site can be scoped out.

Consultees

The consultees below will be approached for information to inform the EIA. These consultees may also be contacted by the Scottish Government regarding the scope of the EIA:

- Scottish Natural Heritage
- The Highland Council

Consultee Questions

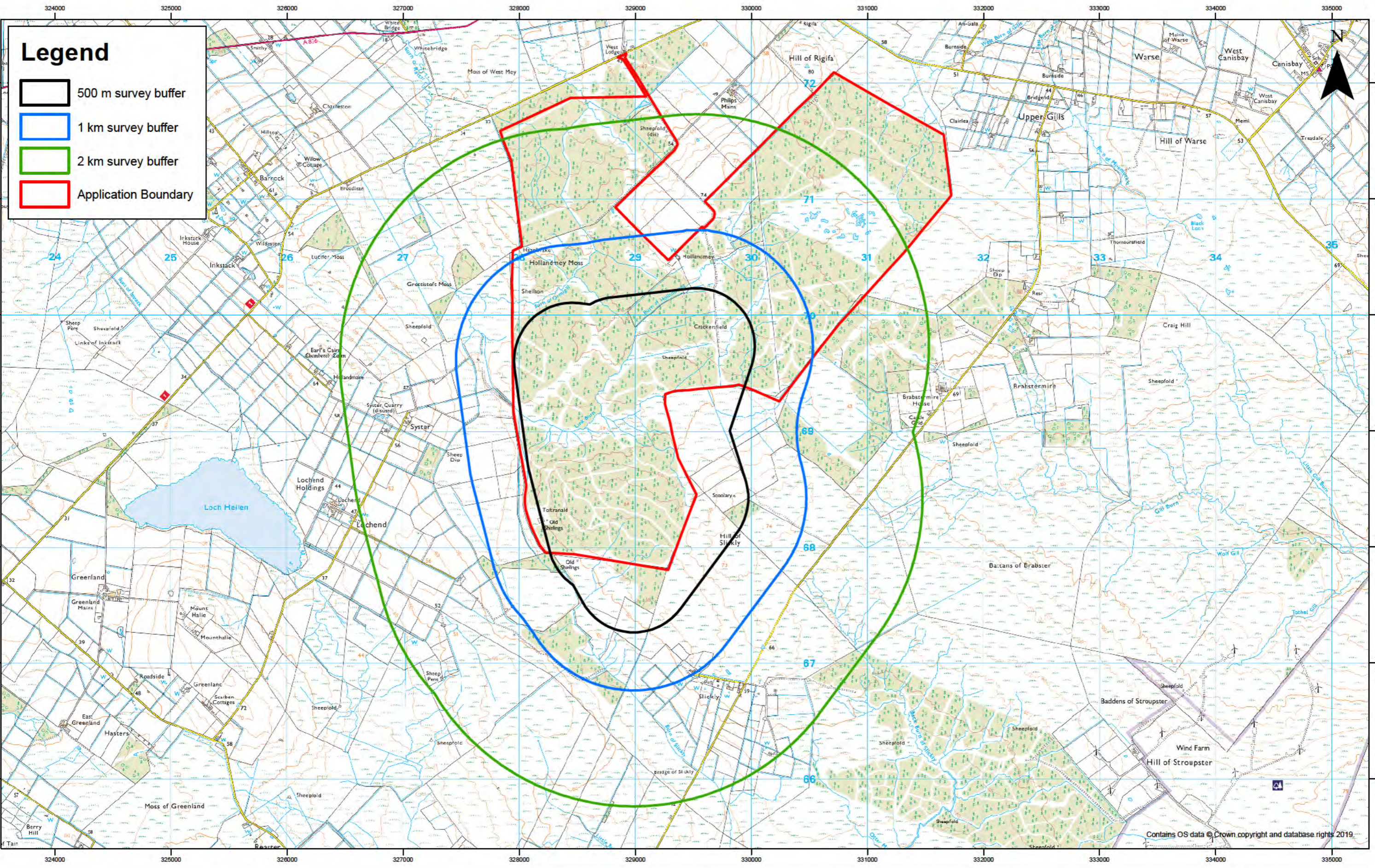
- Do the consultees agree with the proposed approach to the ornithology assessment as set out above?
- Please confirm any additional requirements that you consider should be included in this element of the EIA, which have not been covered in this information note.

Relevant Policy and Guidance

The assessment will be undertaken in line with the following legislation, policy and guidance:

- Environmental Impact Assessment Directive 2014/52/EU.
 - Directive 2009/147/EC on the Conservation of Wild Birds (the Birds Directive).
 - The Conservation (Natural Habitats, &c) Regulations 1994 (as amended) ('the Habitats Regulations').
-

- The Wildlife and Countryside Act (as amended).
 - The Nature Conservation (Scotland) Act 2004 (as amended).
 - The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017.
 - Scottish Natural Heritage, (2017). Recommended bird survey methods to inform impact assessment of onshore wind farms.
 - Scottish Natural Heritage, (2018). Assessing the significance of impacts on bird populations from onshore wind farms that do not affect protected areas.
 - Scottish Natural Heritage, (2016). Assessing Connectivity with Special Protection Areas (SPAs).
 - Scottish Natural Heritage, (2017). Use of avoidance rates in the SNH wind farm collision risk model.
 - The Highland Council, (2012). Highland-wide Local Development Plan (HwLDP).
 - The Highland Council, (2018). Caithness and Sutherland Local Development Plan (CaSPlan).
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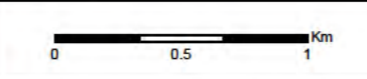


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Rev	Date	By	Comment
B	15/07/20	FL	Application boundary updated
A	20/05/20	FL	First Issue.

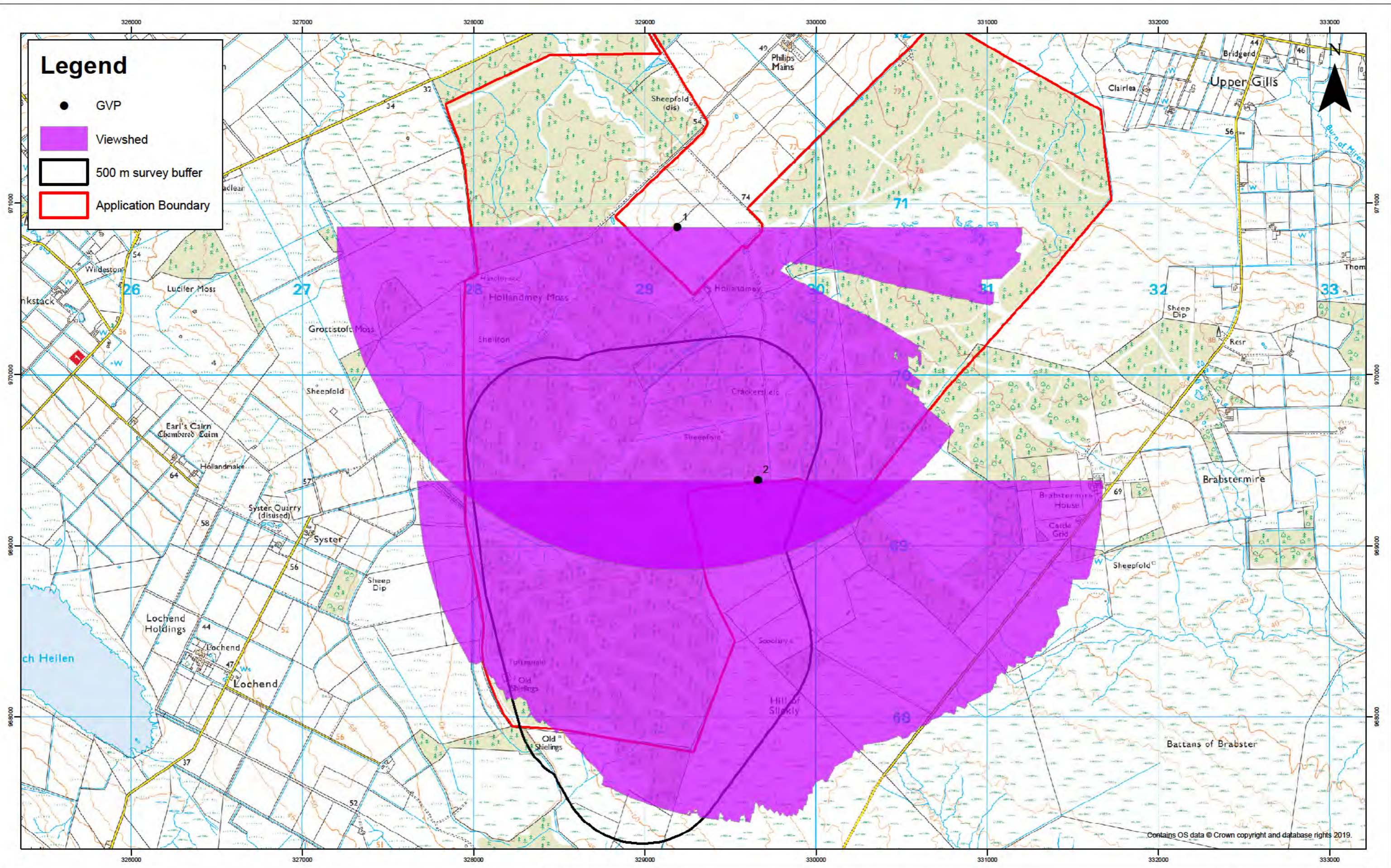
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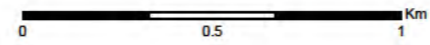
Hollandmey Renewable Energy Development Ornithology Survey Buffers

Drg No		
Rev	B	Datum: OSGB36
Date	15/07/20	Projection: TM
Figure	8.1	



Rev	Date	By	Comment
B	15/07/20	FL	Application boundary updated
A	20/05/20	FL	First Issue.

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Hollandmey Renewable Energy Development Vantage Points and Viewsheds

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Rev	B	Datum: OSGB36
Date	15/07/20	Projection: TM
Figure	8.2	

Other Issues

Background

Pre-application advice for the proposed Development was requested from the Highland Council (THC) and a response provided in March 2019. The key aspects identified by THC Environmental Health relating to other issues are summarised here:

Consultant Experience and Expertise

The other issues section of the Environmental Impact Assessment Report will be compiled by RSK on behalf of Scottish Power Renewables supported by sub-consultants on certain specialist assessment sections. For each topic, the detailed assessment of likely significant effects will be undertaken by organisations with relevant specialist skills, drawing on their qualifications, experience of working on other development projects, good practice in EIA and on relevant published information.

Socio-Economic, Tourism and Recreation

Access rights, as provided by the Land Reform (Scotland) Act 2003, are exercisable throughout the majority of the Site and would continue to be so during the operation of any development. The use of the area of any proposed turbine locations for such access rights is limited at present though the development would provide an access resource for the public in terms of built tracks.

Public recreational access in the area of the development is focused on the coast, Dunnet Head/Dunnet Bay/Dunnet Forest, Duncansby Head etc. There is use of the A836 which forms part of the National Cycle Network route 1 and the A99 as part of the John O'Groats to Land End route for non-motorised means. There are several core paths within approximately 5km of the proposal, namely the Mey Link (CA05.16), Castle of Mey Coast (CA05.17), St John's Point (CA05.12), Old Road (CA07.4) and Stroupster Hill (CA08.07). The North Coast 500 (NC500) is located approximately 5 km from the Site at its closest point. The NC500 is described as a world-renowned Scottish tourist attraction consisting of approximately 500 miles of scenic route around the north coast of Scotland, starting and finishing in Inverness.

The potential effects on visual amenity of these areas will be fully assessed in the EIA Report as part of the Landscape and Visual Impact Assessment.

In terms of impacts with a social implication, including recreation and tourism interests, there is a catalogue of research and survey that has concluded that there is no evidence to suggest windfarms have a significantly adverse effect on tourism. The most recent of these was produced by independent consultancy Biggar Economics (2017), which analysed the impact of Scottish windfarms on tourism-related employment.

The most comprehensive study of the potential effects of windfarms on tourism was undertaken by the [REDACTED] at Glasgow Caledonian University (2008). The study found that, although there may be minor effects on tourism providers and a small number of visitors may not visit Scotland in the future, the overall effect on tourism expenditure and employment would be very limited. This study is now almost 12 years old and in that time windfarms have become a more common feature in Scotland. A subsequent study by the [REDACTED] Institute (Dinnie 2012) concluded that there is no new evidence to contradict the earlier findings that windfarms have little or no adverse impact on tourism in Scotland.

It is therefore proposed that impacts upon tourism be scoped out of the EIA process.

More specifically relevant to Hollandmey, while in a wider region of Scotland that attracts tourists and recreational users interested in outdoor pursuits, the Site is privately owned and is forested and is not used for recreational purposes.

In terms of the wider area around the Site, the nearest major tourist attractions are:

- Queen Elizabeth Castle of Mey Trust which is located approximately 1.67 km north of the application boundary;
 - RSPB Dunnet Head 9.18 km north west of the application boundary;
 - Mary Anne's Cottage 6.78 km west of the application boundary;
 - Duncansby Head 9.12 km north east of the application boundary;
-

- Castlehill Heritage Centre 8.42 km west of the application boundary;
- the village of John O'Groats 6 km north east of the application boundary;
- Dunnet Bay 6.3 km west of the application boundary;
- Wick Heritage Museum 18.93 km south east of the application boundary;
- Caithness Horizons 16.32 km west of the application boundary; and
- Caithness Broch Centre 8.65 km south east of the application boundary.

There are also a small number of properties affording accommodation in the wider area. While impacts are likely upon these resources to varying degrees, it is not anticipated that any of these effects would be significant.

SPR is also committed to the identification and implementation of access enhancement measures that will help facilitate greater use and enjoyment of the Site and wider access network. Examples that have been adopted for other SPR sites include creating new circular access routes, providing new visitor interpretation facilities at key locations, improving signposting, upgrading parking facilities and provision of bird hides. SPR will seek to identify suitable and proportionate opportunities for the Site through the public consultation and scoping exercise. Such enhancement opportunities have the potential for beneficial effects to the local community.

The proposed Development would also bring the potential for significant beneficial economic effects at a local level in relation to employment opportunities and the use of local services by construction workers. There will also be potential local employment opportunities during operation. Other socio-economic benefits that would arise from the proposed Development will be the establishment of a community benefit fund and the opportunity for local community groups to invest directly in the project. It is expected that these income streams could be used to support community projects within the local area.

Although the above access, recreation and other socio-economic benefits are not expected to be significant at a national or regional level, given their potential importance at a local and community level it is considered that their impacts should be fully assessed and reported in the EIA Report.

Dust and Air Quality

The main source of impact on air quality would be increased traffic flows on local roads during construction and emissions from construction activities including exhaust fumes and dust generated from quarrying activities associated with borrow pits and unmade ground from borrow pits and access tracks in dry conditions.

It is considered that the air emissions associated with these activities would be transient, localised and highly unlikely to have a significant effect upon local air quality given the lack of sensitive receptors close enough to experience these effects. In addition, there are well established best practice measures applied to construction that would form an integral part of the development process e.g. speed control, optimising deliveries to Site, dust control, restrictions on idling plant/vehicles, etc. These controls and measures will form an integral part of the Construction Environmental Management Plan (CEMP) for the development and will be detailed within the relevant parts of the EIA Report.

There would be no emissions to air during operation, with the only source being occasional vehicles accessing the Site for maintenance purposes. For the reasons cited above Air Quality is therefore scoped out from further assessment.

Shadow Flicker

Shadow flicker is an effect caused by the rotation of the turbine blades when the sun is shining, which can create a flickering or strobe like effect. This can be a cause of annoyance at residences near wind developments.

There are no formal guidelines currently available on what exposure would be acceptable in relation to shadow flicker. There is no standard for the assessment of shadow flicker. The Scottish Government's web-based guide relating to onshore wind turbines (Scottish Government 2013) suggests that as a general rule shadow flicker should not pose problems beyond a distance of 10 rotor diameters from a wind turbine, which equates to a maximum of 1500 m in this instance.

Section 2.43 (p20) of The Highland Council Interim Supplementary Guidance: Onshore Wind Energy (March, 2012) states, "*the Council will expect wind energy developments to be located at least a minimum distance equivalent to 10 times the blade diameter from any regularly occupied buildings not associated with the development*".

Department of Environment and Climate Change studies have shown that in northern latitudes shadows from wind turbines can only be cast 130 degrees either side of north relative to the turbine due to the orientation of the earth's axis and the positioning of the sun.

This equates to a region of 50 degrees either side of due south where a wind turbine would never cast a shadow and therefore properties within this region would experience no effects from shadow flicker.

The proposed Development will be designed where possible to avoid turbine placements within the Zone of Potential Shadow Flicker (ZPSF). Should this be achieved, it is proposed that shadow flicker be scoped out of the EIA. If not possible to avoid shadow flicker effects through turbine placement, then the dates, times and durations of shadow flicker events for each property within the ZPSF will be calculated and an assessment of effects at these properties included in the EIA.

Solar Glint and Glare

This section describes the proposed methodology for assessing solar glint and glare from potential solar panels during operation of the proposed Development. The inclusion of solar panels will be confirmed through the design process. If not included in the final design, there would be no requirement to assess these potential effects in the EIA.

Solar panels have varying reflectivity properties; however no solar panel absorbs 100% of incoming light. As a result, solar panels have the potential to produce solar reflection in the form of solar glint (a momentary flash of bright light) and solar glare (a continuous source of bright light). Solar glint will be witnessed by moderate to fast-moving receptors while solar glare will be encountered by static or slow-moving receptors with respect to a solar development.

Guidance states that common receptors of solar glint and glare effects are residents, road users, railway users and aviation operations. In this way, residents who have a view of solar panels may experience solar reflection which could impact upon residential amenity. The possibility of glint and glare effects from a proposed solar development can also lead to concerns with respect to the possible impact upon road and rail safety especially if the solar PV development is to be located next to a road with fast moving and/ or busy traffic or a railway line. In terms of aviation, concerns are most likely for aircraft that are approaching or departing an airport, where solar reflections could be mistaken for aviation lighting.

Based on a review of current studies and consultation responses, the following study areas for the above receptors are proposed:

- Identify the receptors of concern. In this instance the concern is reflections of the sun from the solar panels toward road users, dwellings, public routes and ATC/flight paths, particularly to the south of the solar array;
- Dwellings (also taken to incorporate nearby recreational users) – all properties/public paths within 1km that could have a direct view of the solar panels;
- Road users – all roads within 1km that may have a view of the solar panels;
- Railway users – railway lines within 100m which may have a direct view of the solar panels; and
- Aviation (air traffic controllers and pilots) – Air Traffic Control (ATC) towers and approach paths out to 30km.

In general terms, and based on the above guidance, the broad approach to the assessment will be as follows:

1. Identify the receptors of concern. In this instance the concern is reflections of the sun from the solar panels toward road users, dwellings, public routes and ATC/flight paths, particularly to the south of the solar array;
 2. Choose appropriate receptor locations for the assessed roads, dwellings, routes and ATC/flight paths;
 3. Define the proposed solar farm area and choose an appropriate assessment resolution;
 4. Undertake geometric calculations to determine whether a solar reflection may occur at each receptor, and if so, when it will occur;
 5. If a reflection will occur, determine whether the reflecting panels will be visible from the identified receptor locations or whether site topography or screening will limit visibility;
-

6. If it is calculated that a reflection will occur, consider the location of the solar reflection with respect to the location of the sun in the sky, its angle above the horizontal and the time of day at which a reflection could occur;
7. Determine whether the solar reflection is likely to be a significant hazard to safety; and
8. Consider mitigation such as shielding of the Site.

In relation to the guidance, a major effect is one where a solar reflection is geometrically possible and visible under conditions that will produce a significant impact.

Telecommunications

Wind turbines can potentially cause interference to telecommunication system signals such as terrestrial fixed microwave links, terrestrial radio telemetry links and television broadcasts through reflecting and shadowing telecommunication signals between transmitters and receivers.

The study area will comprise the Site and the wind turbine locations. Only telecommunication links which travel across the Site and close to the wind turbine locations have the potential to be impacted by the proposed Development and therefore there is no need to widen the study area.

Initial consultation has been undertaken with Ofgem who confirmed that there are two telecommunications links across the Site. The location of these links, and appropriate buffers, will be factored into the windfarm design to embed mitigation and avoid potential impacts. Further consultation will be undertaken through the EIA to update this baseline information and inform the assessment.

The potential effects on telecommunications assets arising from the proposed Development will be undertaken as part of the EIA. This will identify any issues requiring mitigation or detailed assessment, in consultation with telecommunications asset owners.

TV interference is now considered to be low risk due to analogue TV signals no longer being in use and so this aspect is proposed to be scoped out of the assessment. In the unlikely instance that TV interference occurs, it is considered that this can be appropriately covered by a suitably worded planning condition and complaints procedure to implement any necessary mitigation.

Aviation and Radar

The development of wind turbines has the potential to cause a variety of adverse effects on aviation during turbine operation. These include but are not limited to:

- Physical obstructions;
- Generation of unwanted returns on Primary Surveillance Radar (PSR); and
- Adverse effects on overall performance of Communication, Navigation and Surveillance (CNS) equipment.

Where line of sight exists between turbines and air traffic control radars it is possible that the turbines may be detected by the radar, dependent on atmospheric conditions, and appear as clutter on controllers' screens. Such clutter may have an adverse impact on air traffic control operations.

The proposed Development is in an area remote from military aviation infrastructure, approximately 13.5 km to the north of Wick Airport. The Site is outside the Aerodrome Traffic Zone, but underneath or close to several of the instrument approach procedures published for the airport that lie outside the protection of regulated airspace. It is immediately adjacent to the Operational Lochend Wind Farm.

An assessment of civil and military aviation issues will be undertaken. Input will be obtained from the specialist consultants should any issues be identified that require mitigation or detailed technical assessment, including line-of-sight assessments.

Carbon Balance

The proposed Development once operational would generate zero carbon energy, which would help to offset the release of greenhouse gas emissions by fossil fuel-dependent energy generation. During their construction and decommissioning, however, renewable energy developments can themselves result in GHG emissions, for example from turbine manufacture and site preparation. This is particularly the case where natural carbon stores such as forestry or peat are present and potentially impacted by the development.

Peat surveys will be conducted to establish the depth and quality of peat on the Site. It is known that the Site contains areas of blanket bog listed as Class 1 peatland, these are areas considered to be nationally important carbon-rich soil and are afforded significant protection under Scottish Planning Policy.

During the design process, the wind turbines will be sited to avoid the areas of deepest peat as far as practicable and measures to minimise disturbance to peat especially during excavation will be considered. To minimise peat disturbance during construction and decommissioning Best Practicable Measures will also be considered that will be provided as part of the CEMP.

The resulting Carbon Balance Assessment will be prepared in accordance with IEMA's guidance document Assessing Greenhouse Gas Emissions and Evaluating their Significance in EIA (2017) and presented in the Other Issues chapter of the EIA report.

The prediction of future natural baselines is required under the EIA regulations to compare with future baselines that incorporate the proposed Development. Climate change will be considered in the prediction of future natural baselines based on the best available climate modelling, such as the UK Climate Projections project.

Population and Human Health

As per the 2017 EIA Regulations, an assessment of population and human health should be considered during the EIA process. It is proposed that this requirement will be covered through the findings of other assessments undertaken as part of the EIA process and so no dedicated EIA chapter will be produced.

Limited interactions with human health are possible, and consideration will be given to the findings of the following assessments in the EIA Report:

- Noise;
- Residential Amenity;
- Traffic and Transportation;
- Telecommunications;
- Aviation and Radar;
- Health and Safety at Work including best practice;
- Ice build-up on turbine blades and risk of ice throw;
- Lightning strike; and
- Risk of turbine failure and consideration of in-built emergency procedures and best practice.

Properly designed and maintained wind turbines are a safe technology. The site design and inbuilt buffers from sensitive receptors would minimise any risk to human health resulting from the operation of the turbines.

As the potential for risks associated with ice build-up and lightning strike are removed or reduced through inbuilt turbine mechanisms in modern machines it is proposed that this can be scoped out of the further assessment.

Effects on Traffic and Transportation; Noise; and Residential Amenity will be assessed in full elsewhere within the EIA Report.

Potentially significant effects are not anticipated from ice, lightning strike, or structural failures due to Health and safety best practice and a sensitive approach to layout design.

All other potential interactions with Human Health, building in Health and Safety best practice, and a sensitive approach to layout design, resulting from ice, lightning strike and structural failures are unlikely to occur and as a result potentially significant effects are not anticipated.

Vulnerability of the development to risks of major accidents and/or disasters (including climate change)

None of the following climate trends identified in UKCP18¹ could affect the proposed Development:

- increased temperature;

¹ <https://www.metoffice.gov.uk/pub/data/weather/uk/ukcp18/science-reports/UKCP18-Overview-report.pdf>

- changes in the frequency, intensity, and distribution of rainfall events (e.g. an increase in the contribution to winter rainfall from heavy precipitation events and decreases in summer rainfall); and
- sea level rise and associated coastal flood risk.

The possibility that the proposed Development would be exposed to windstorms could represent a risk; however, braking mechanisms installed on turbines allow them to be operated only under specific wind speeds and should severe windstorms be experienced, then the turbines would be shut down. As published mapping confirms that most of the Site is not located in an area identified as being at risk of flooding it is considered unlikely that flooding will pose a significant risk to the operation of the windfarm nor would the construction of the proposed Development contribute to flooding elsewhere. Therefore, it is considered unlikely that significant effects would arise as a result of the proposed Development, and this topic can be scoped out of the further assessment.

Consultees

The consultees below will be approached for information to inform the EIA. These consultees may also be contacted by the Scottish Government regarding the scope of the EIA:

- Scottish Environment Protection Agency
- The Highland Council
- Telecommunications asset owners
- MoD Defence Infrastructure Organisation (DIO)
- NATS Safeguarding
- Highlands and Islands Airports Limited

Consultee Questions

- Are the scopes of the proposed assessments appropriate?
- Are Consultees aware of any key sensitive receptors that should be considered?
- Are Consultees aware of any additional relevant consultees?
- Do consultees have any initial comments to make in relation to potential effects arising from solar glint and glare?
- Do consultees agree that air quality can be scoped out of the EIA?
- Do consultees agree with the proposed design mitigation approach to avoid potential shadow flicker effects?
- Do consultees agree with the proposed assessment methodology for calculating carbon balance?
- Do consultees agree that population and human health can be scoped out of the EIA?
- Do the consultees agree that vulnerability of the development to risks of major accidents and/or disasters (including climate change) can be scoped out of the EIA?
- Please confirm additional requirements, which have not been covered in this information sheet, that you believe should be included in this element of the EIA.

Relevant Policy and Guidance

- The Highland Council, (2012). Interim Supplementary Guidance: Onshore Wind Energy.
 - Scottish Government, (2014). Onshore wind turbines: planning advice.
 - IEMA, (2017). Assessing Greenhouse Gas Emissions and Evaluating their Significance in EIA (2017).
 - Met Office, (2019) UKCP18 Science Overview Report (2019).
 - Scottish Government, (2013). The Scottish Government's web-based guide relating to onshore wind turbines.
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Hollandmey Windfarm Project Team

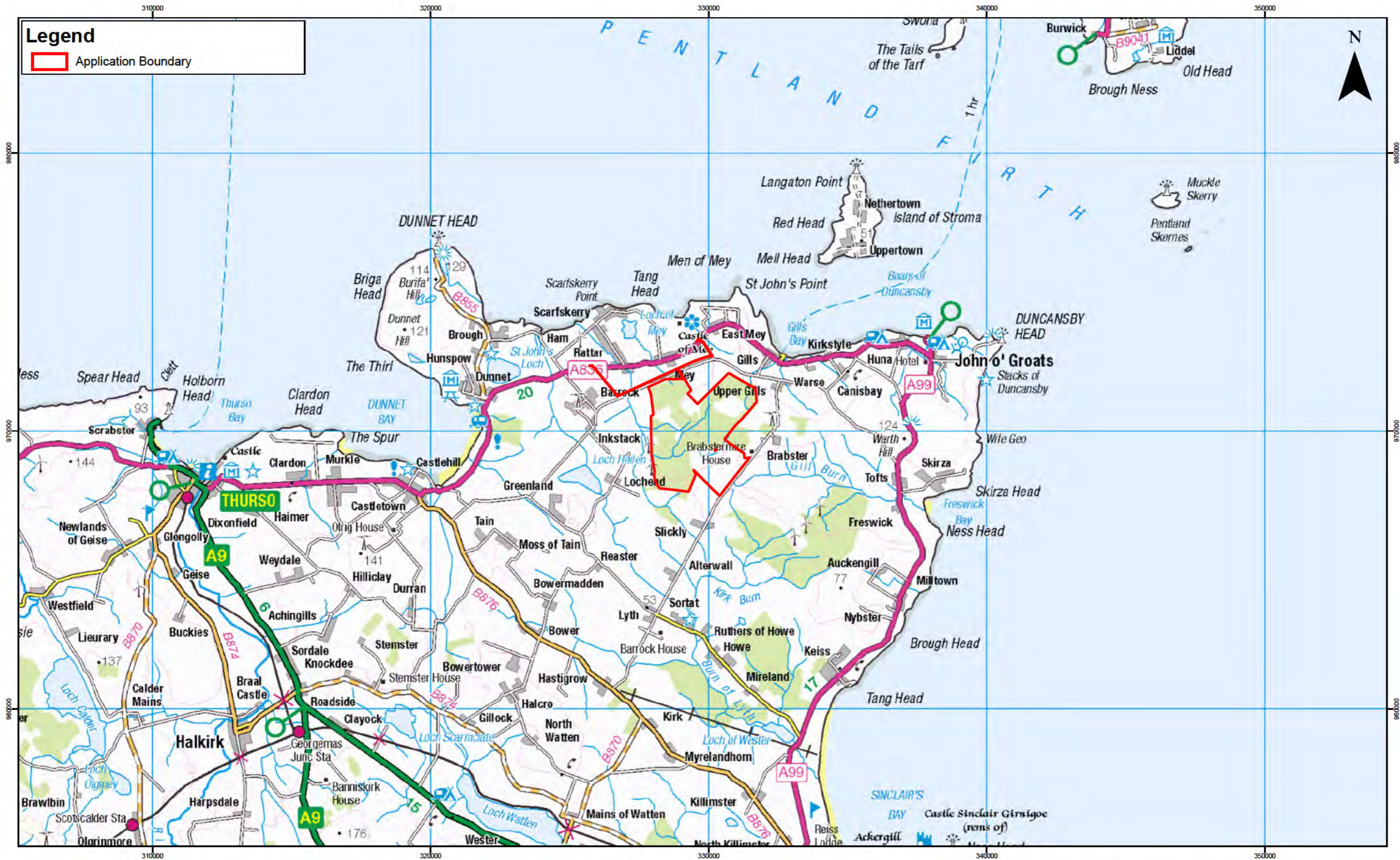
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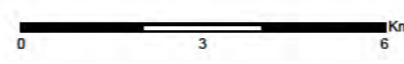


FIGURES



Rev	Date	By	Comment
E	10/11/2021	DL	Revised Title Block.
D	20/10/2021	DL	RLB Updated.
C	04/08/2021	DL	Revised Title.

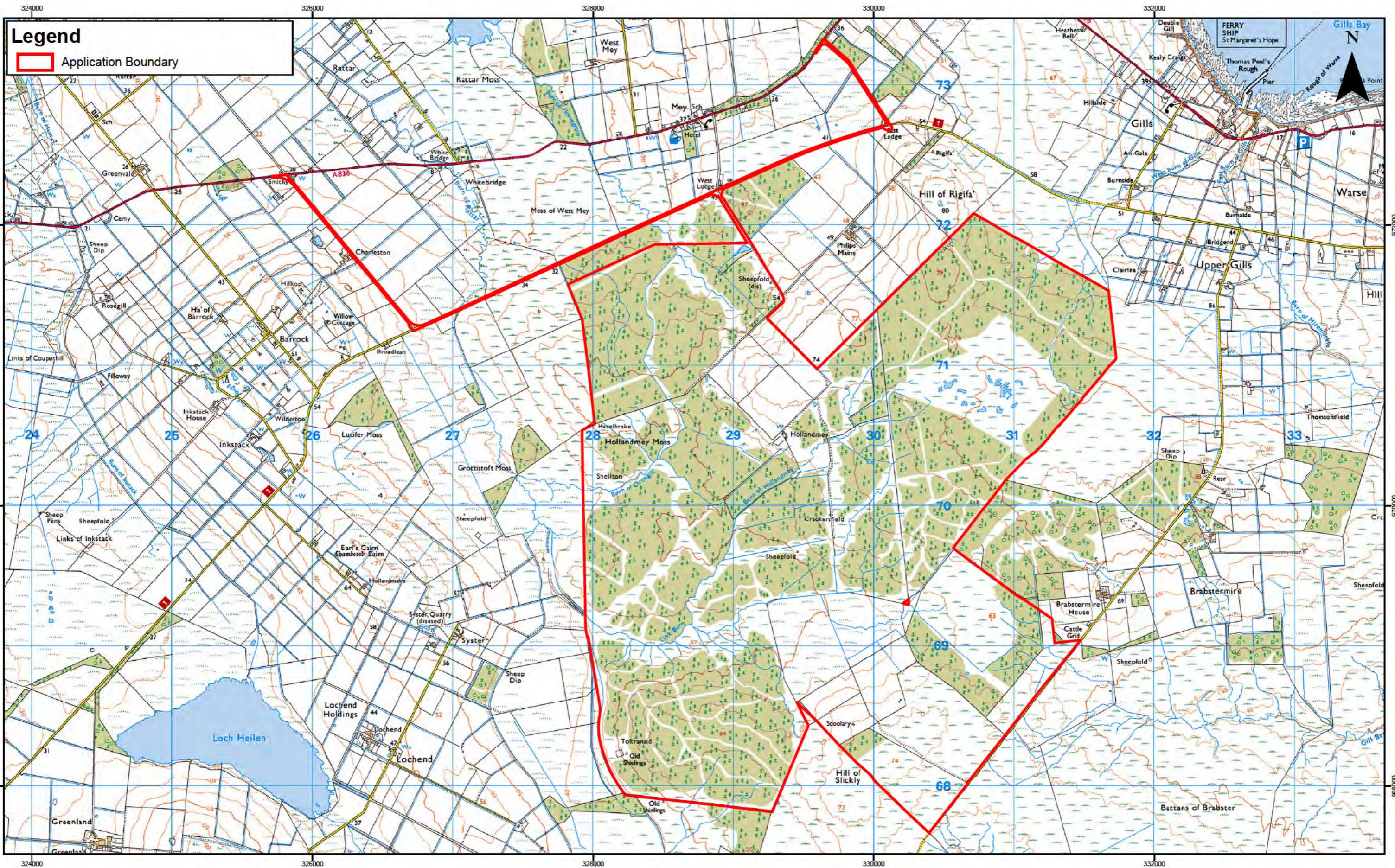
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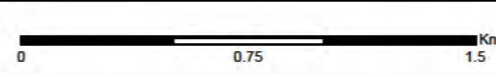
Hollandmeay Renewable Energy Development Figure 1.1: Site Location Plan

Drg No	HMY_C_074	
Rev	E	Datum: OSGB36
Date	10/11/2021	Projection: TM
Figure	1.1	



Rev	Date	By	Comment
E	10/11/2021	DL	Title Block Updated.
D	27/10/2021	DL	RLB Updated.
C	04/08/2021	DL	RLB Updated.

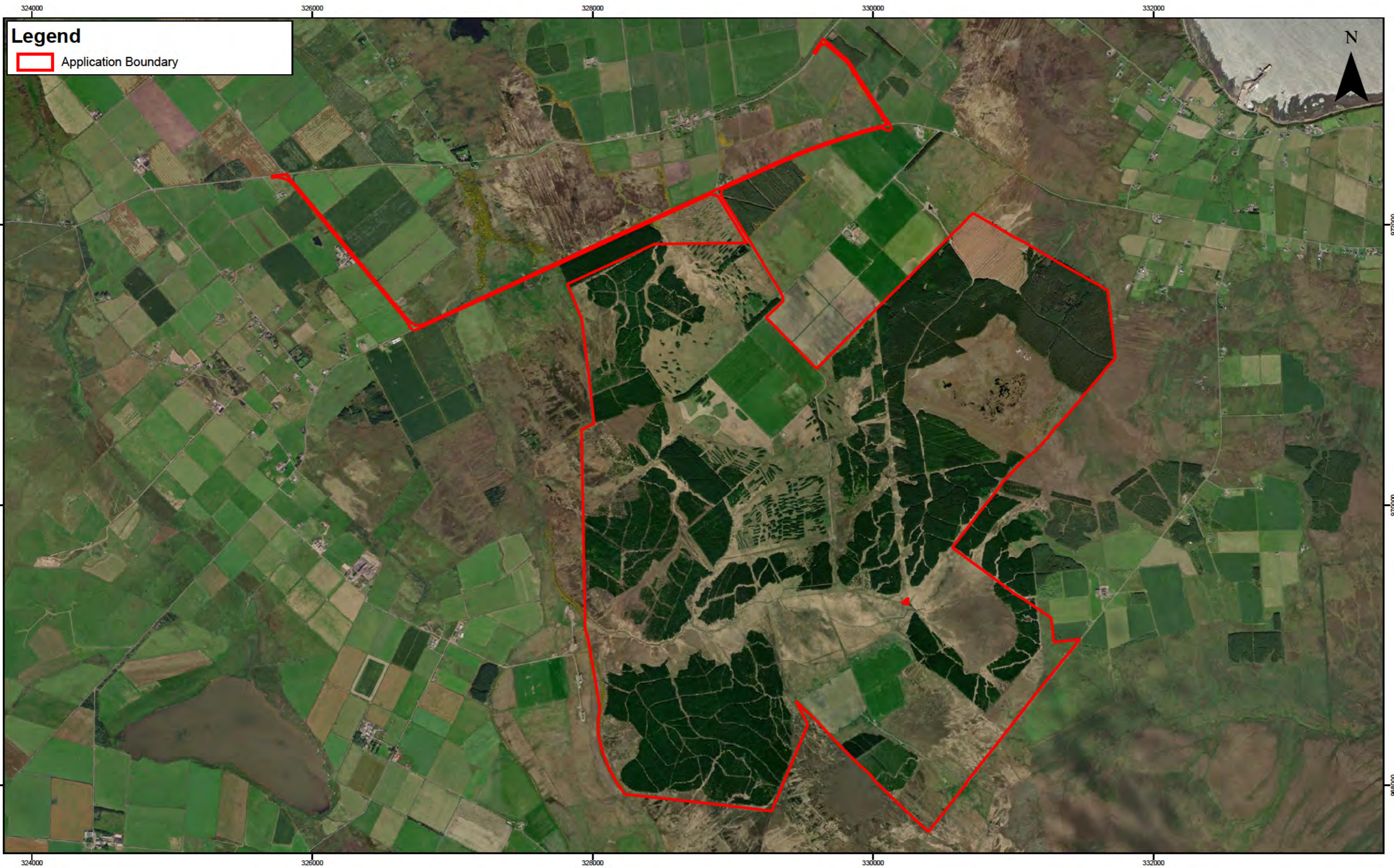
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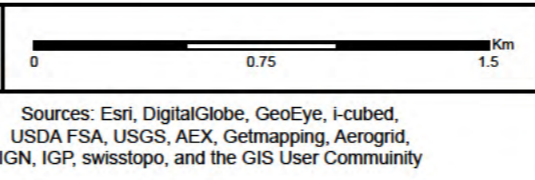
Hollandmey Renewable Energy Development Figure 1.2: Application Boundary

Drg No	HMY_C_075	
Rev	E	Datum: OSGB36
Date	10/11/2021	Projection: TM
Figure	1.2	



Rev	Date	By	Comment
F	10/11/2021	DL	Title Block Updated.
E	27/10/2021	DL	RLB Updated.
D	25/08/2021	CW	Basemap Reference Updated.

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Hollandmey Renewable Energy Development

Figure 1.3: Site Aerial Context

Drg No	HMY_C_076	
Rev	F	Datum: OSGB36
Date	10/11/2021	Projection: TM
Figure	1.3	

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