



Technical Appendix 6.2

Pre-Application Advice 2019

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

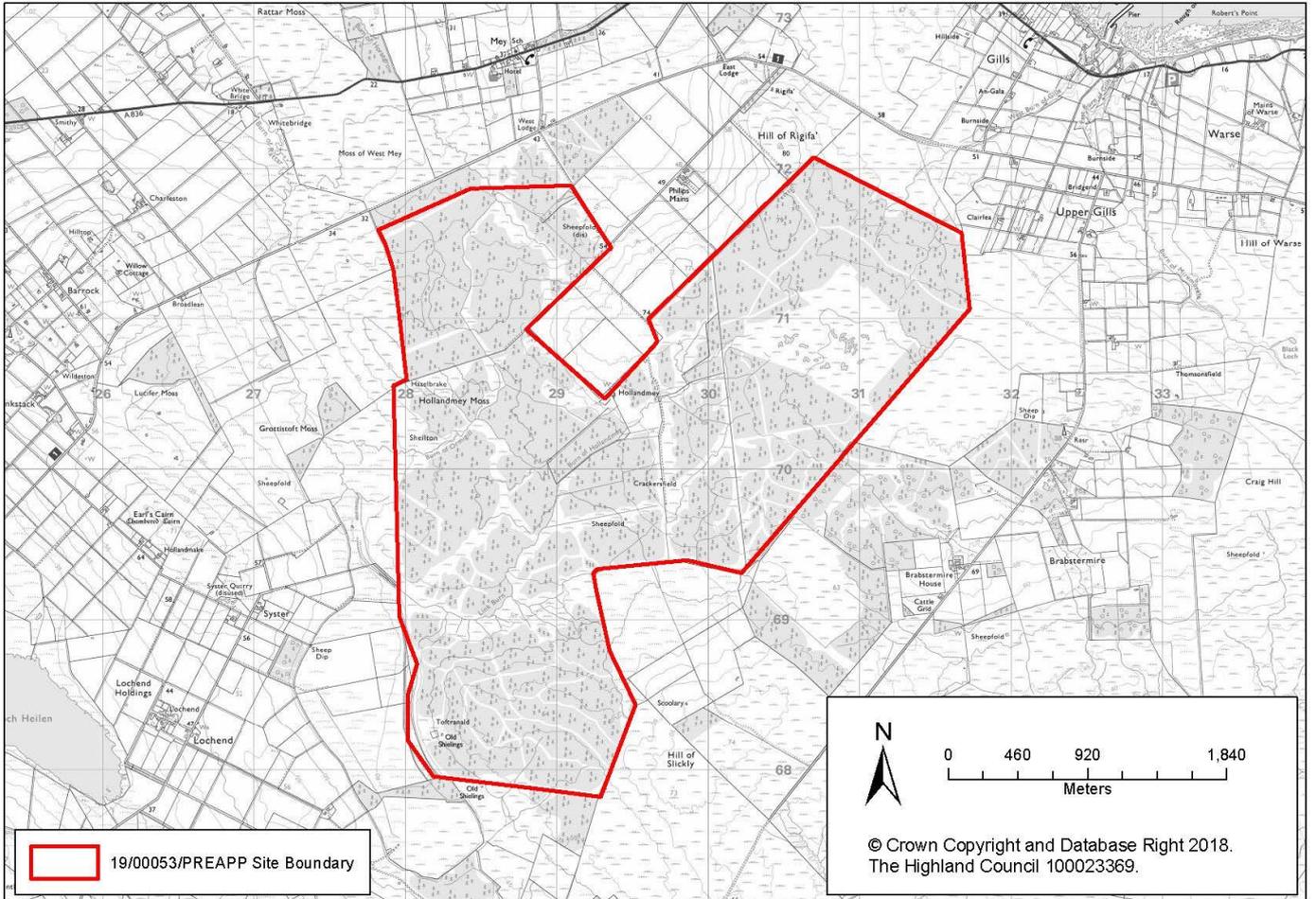
Based on the information submitted to date, the Planning Authority would express significant concerns about the visual and landscape impact of the proposed development including cumulatively in association with existing operational wind farms (Stroupster and Lochend). As such we would advise that it 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:

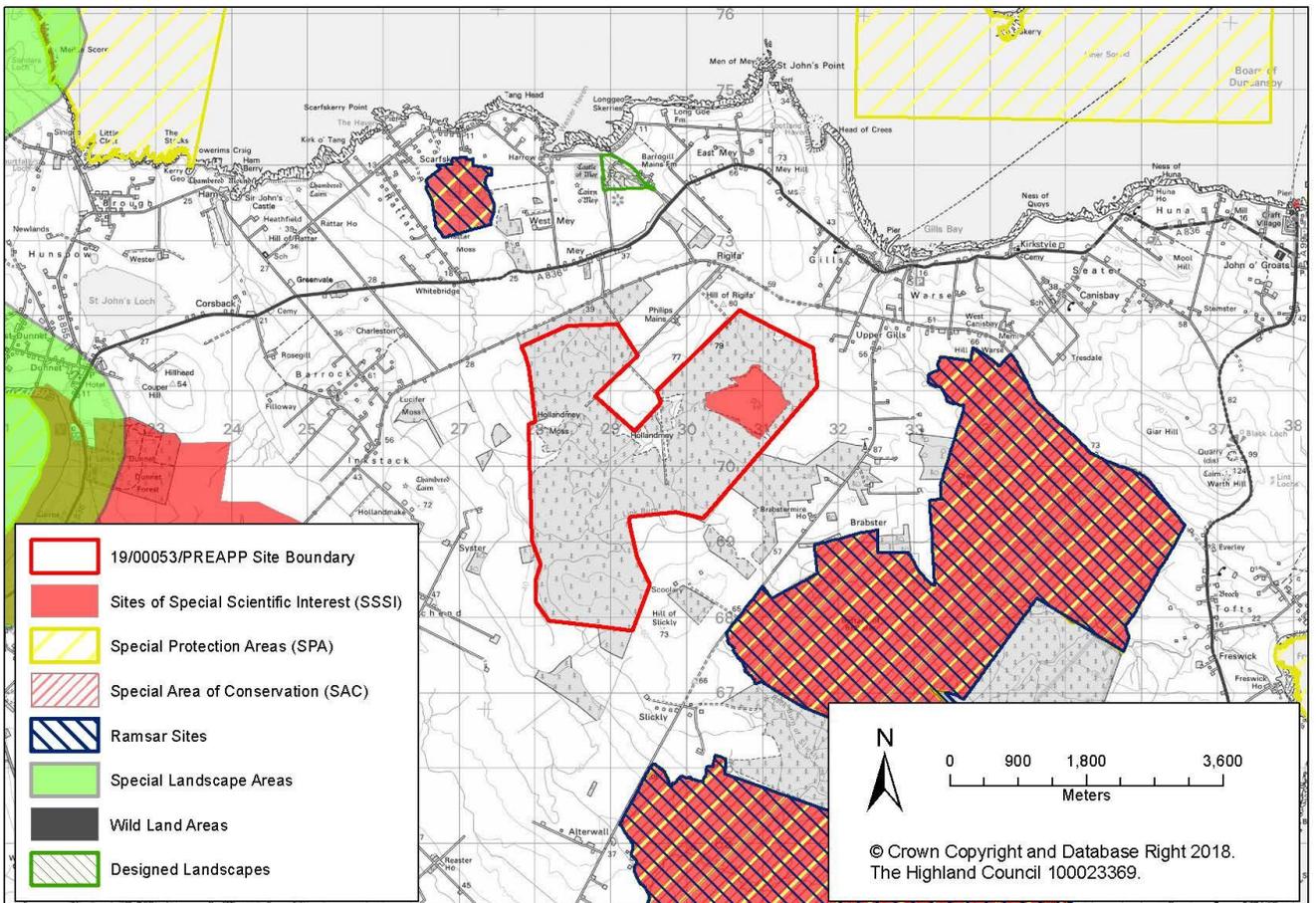
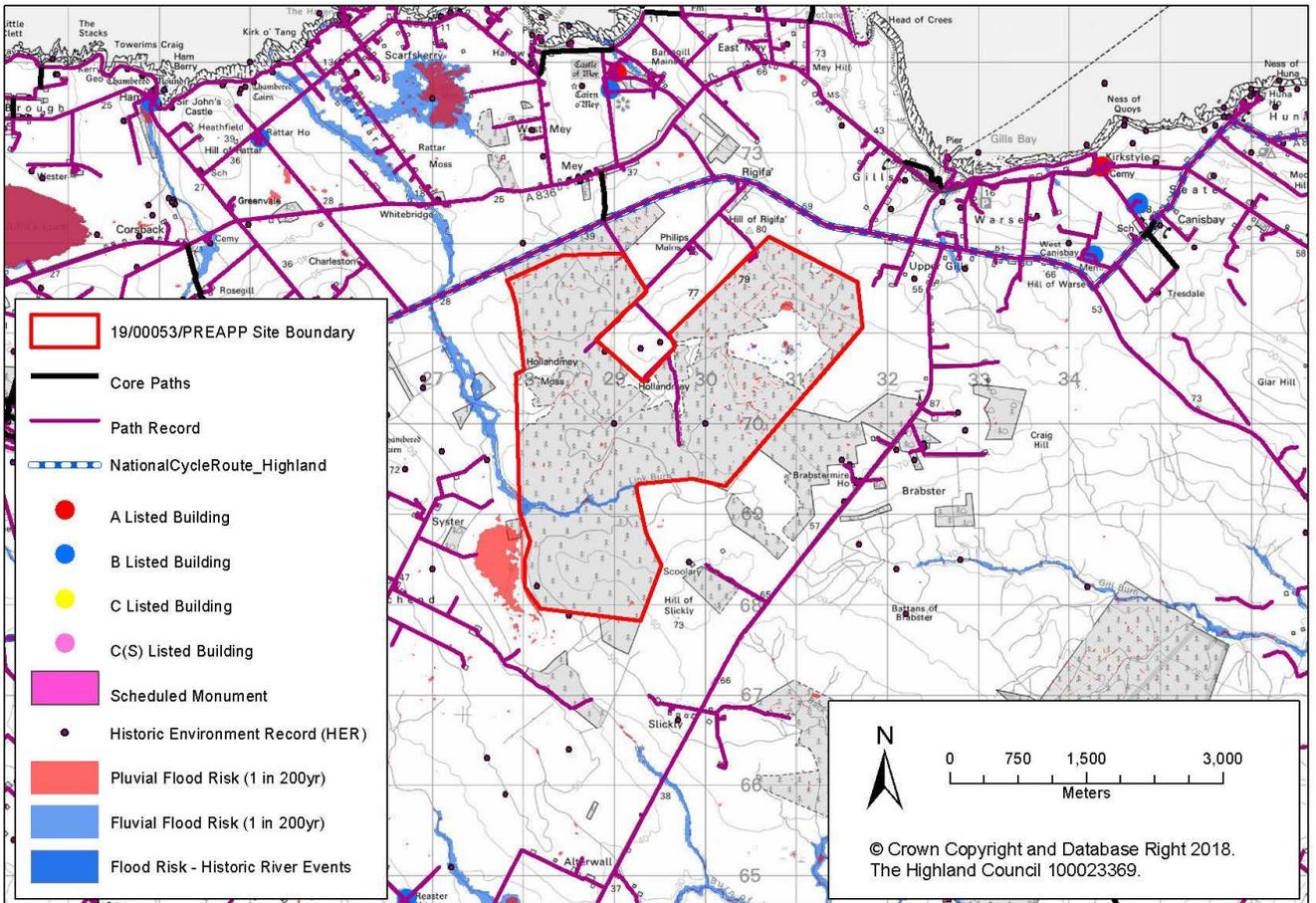
- You will need to overcome the issues which upheld the refusal of the previous application at Lyth Windfarm (planning ref: 13/01832/FUL) and the development will need to demonstrate compliance with The Highland Council's Onshore Wind Energy SG. As noted above, at this stage, it is unlikely that the 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

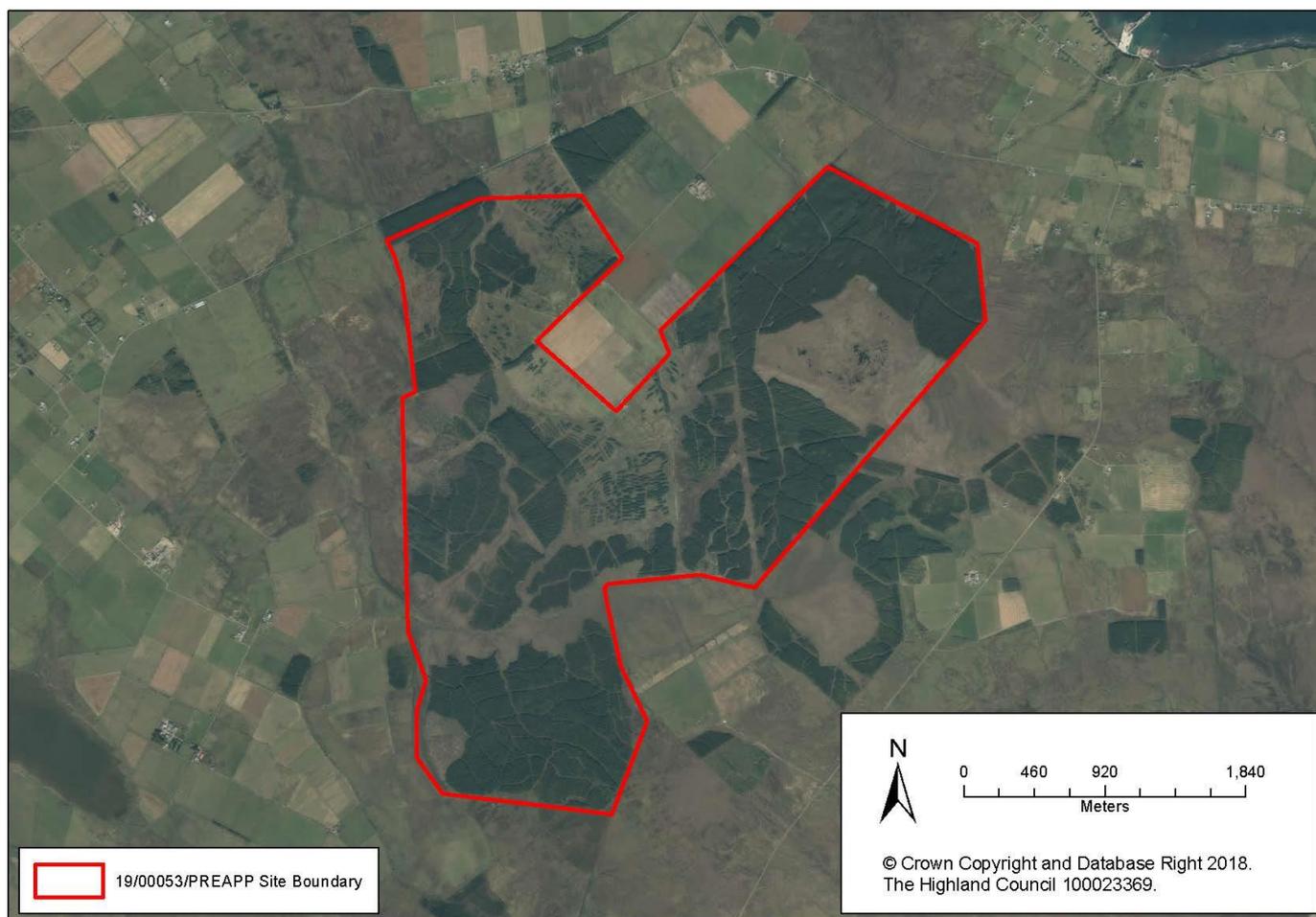
Site area	<i>Approx. 919 hectares</i>	
Land Ownership	Unknown	
Existing Land Use(s)	Agricultural/moorland/woodland	
Grid Reference	X: 329100	Y: 969876



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



6. Photographs of site



7. Development Plan Designation and Planning Policy Appraisal

Response from Policy, Douglas Chisholm

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.

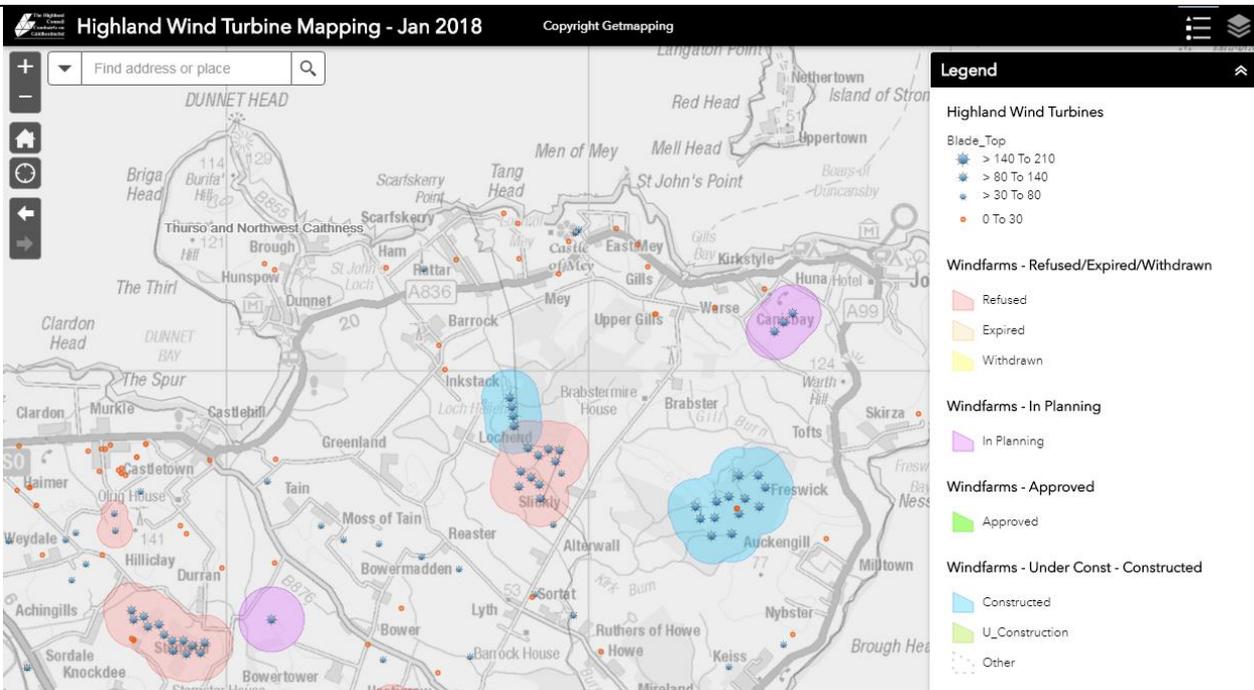
Other key policies from HwLDP include:

- 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)

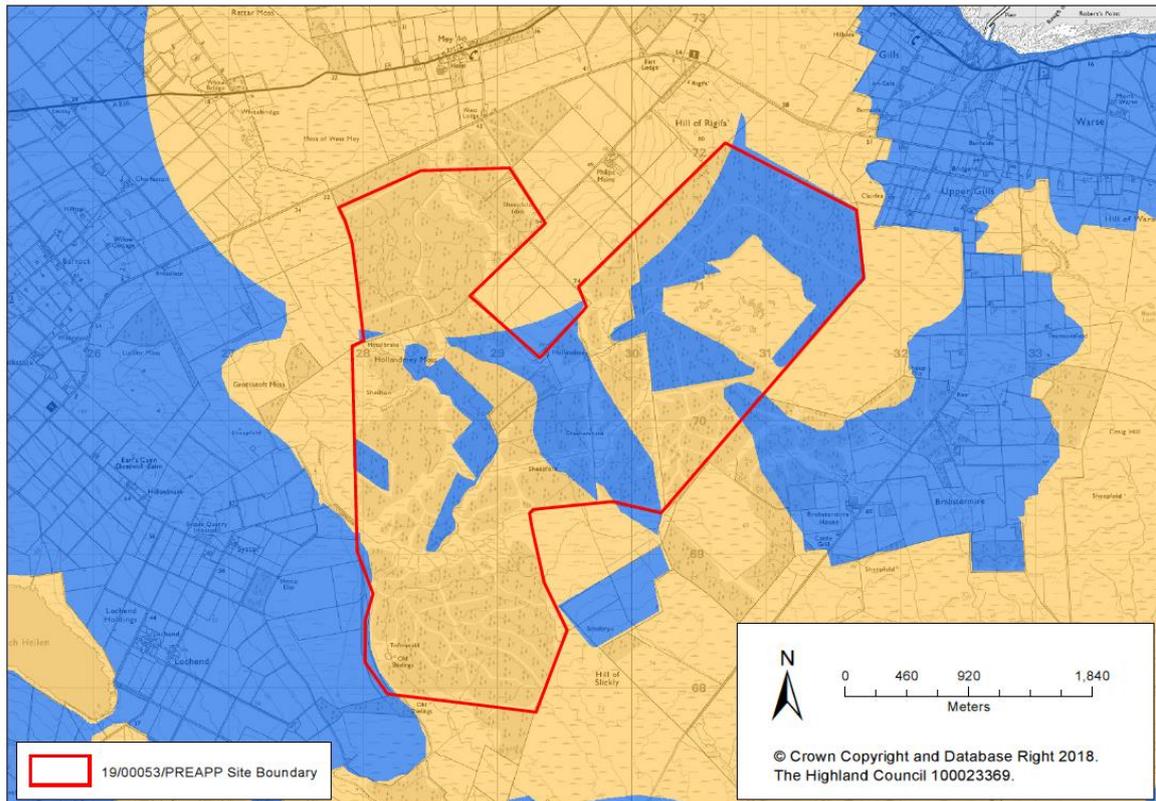
The Council adopted this [Supplementary Guidance](#) (SG) in November 2016 and it forms part of the Development Plan for Highland, setting the main framework for determining onshore wind energy proposals. In December 2017 the Council adopted '[Part 2b](#)' of the [Supplementary Guidance](#), which includes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

Spatial Framework

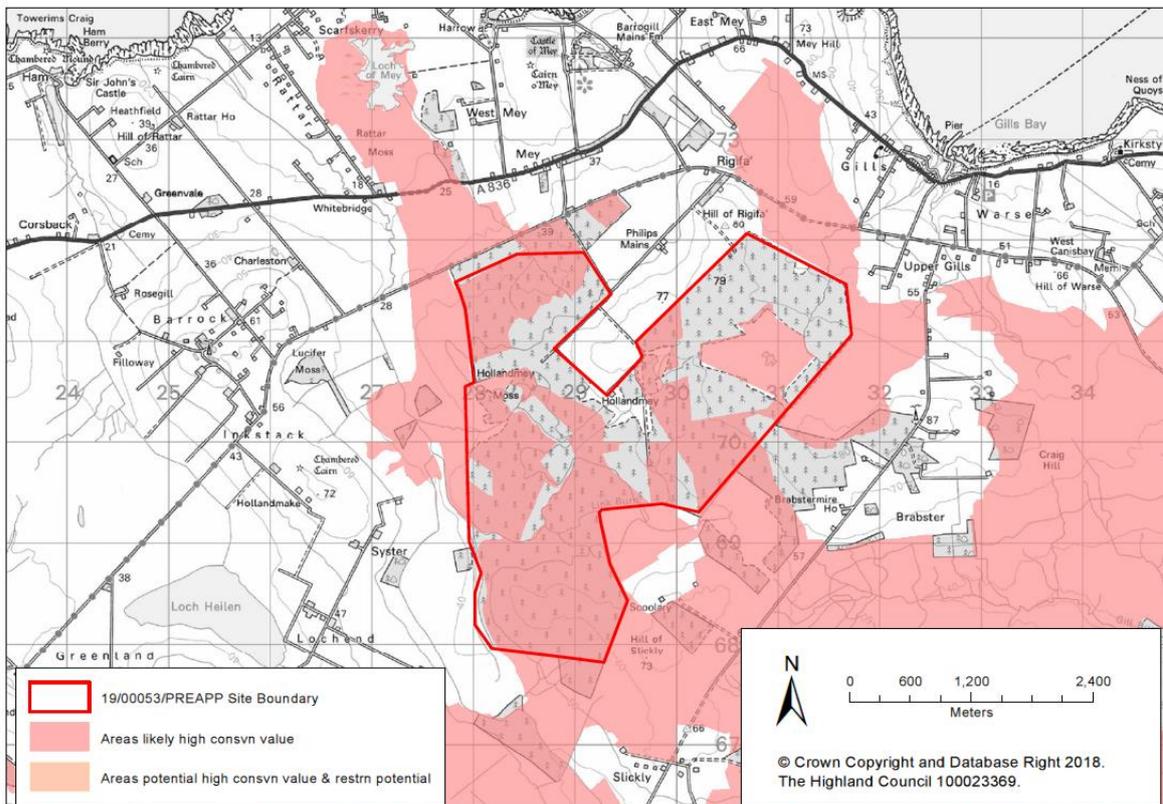
As required by Scottish Planning Policy (SPP) the SG includes the Council's Spatial Framework, which identifies the areas that are likely to be most appropriate for onshore wind energy development. The Spatial Strategy set out in the SG is based on three spatial groupings:

- **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

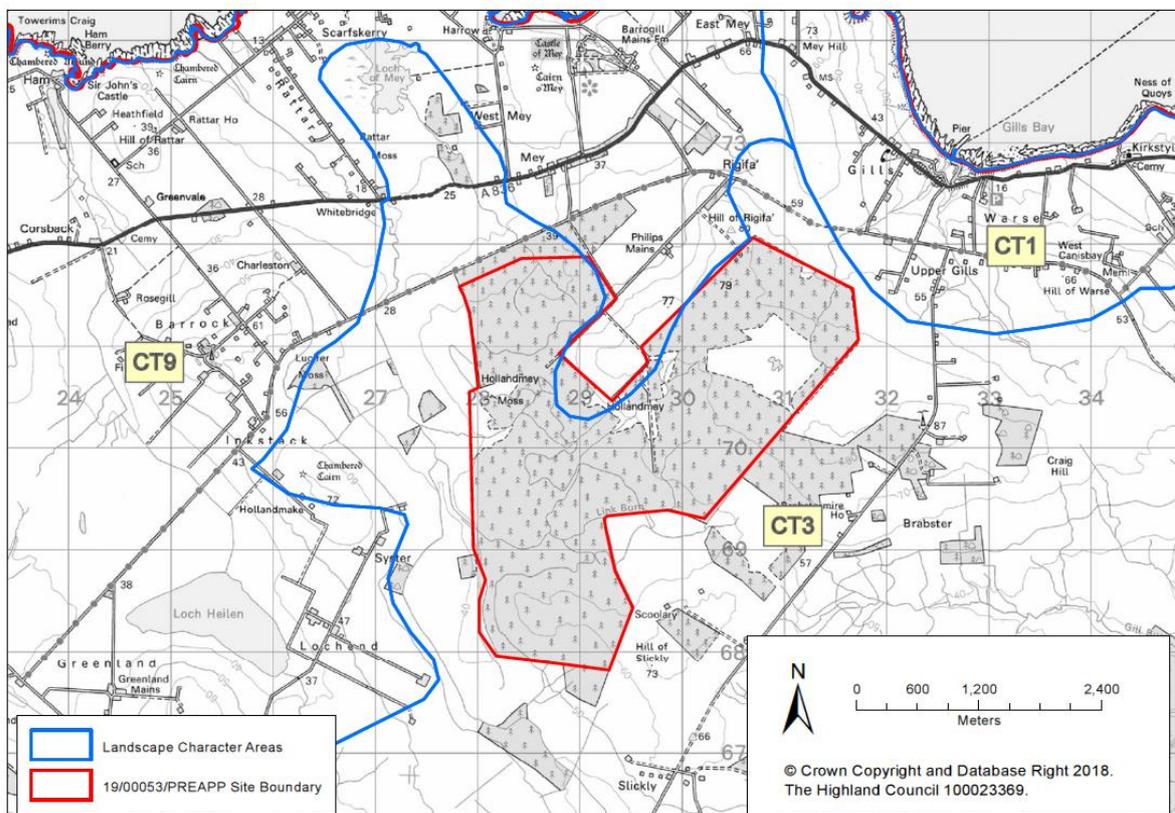
Pages 18-20 of the Supplementary Guidance list ten landscape and visual criteria that the Council will use as a framework for assessing proposals. They are not absolute requirements but set out key considerations of the Council that the developer should be aware of and take account of in progressing 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, Anne Cowling, 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>Peatland</p>	<p>We recommend that the most recent version of our bird survey methods is followed.</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, Shirley Ross, 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, Fred McIntosh, 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.

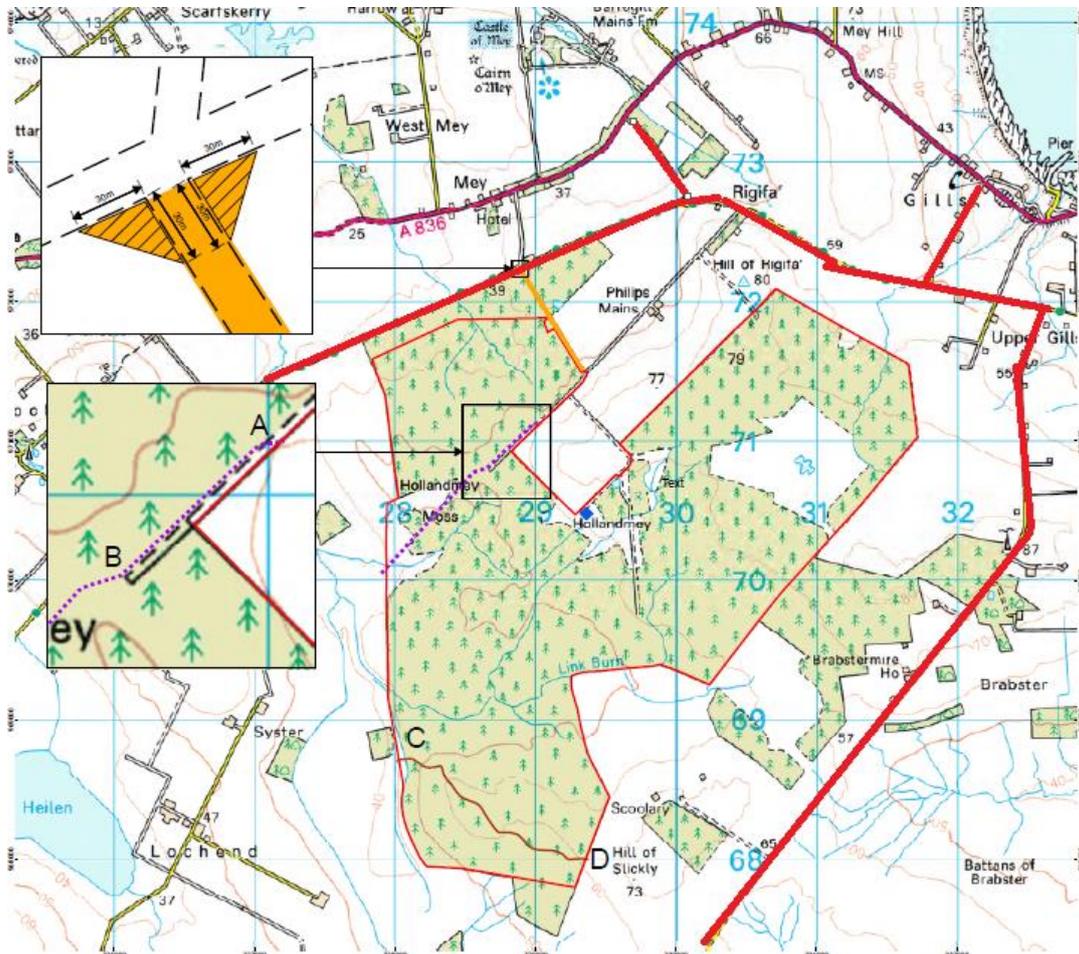
Within the TA justification for the chosen Port of Entry and the preferred route for AIL's shall be clearly demonstrated. This shall include details of alternative routes that have been considered and an explanation as to why these were discounted in favour of the preferred route. A detailed review of 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, Matt Dent, 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, John McDonald, 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, Aden McCorkell, 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> <ul style="list-style-type: none">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;b) Map and assessment of impacts upon Groundwater Dependent Terrestrial Ecosystems and buffers;c) Map and assessment of impacts upon groundwater abstractions and buffers;d) Peat depth survey and table detailing re-use proposals;	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, Kirsty Cameron, 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.cnaq.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

██████████ Acting Principal
Planner

Email

██████████@highland.gov.uk

Phone

██████████

██████████, Scientific Officer,
Contaminated Land

██████████@highland.gov.uk

██████████

██████████, Access Officer

██████████@highland.gov.uk

██████████

██████████, Archaeologist, Historic Environment	██████████@highland.gov.uk	██████████
██████████ Transport Development Officer	Fred.mcIntosh@highland.gov.uk	██████████
██████████ Flood Risk Management	██████████@highland.gov.uk	██████████
██████████ Policy	██████████@highland.gov.uk	██████████
██████████ Environmental Health	██████████@highland.gov.uk	██████████
Outside Agencies		
██████████ Transport Scotland	██████████ transportscotland.gov.uk	██████████
██████████ Planning Officer, SEPA	██████████@sepa.org.uk	██████████
██████████ Operations Officer, Scottish Natural Heritage	██████████@nature.scot	██████████
██████████ Senior Heritage Management Officer, Historic Environment Scotland	██████████@hes.scot	██████████

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.	✓

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