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This pre-application advice has been specifically prepared for Scottish Southern Energy as the applicant for the proposed development at Gordonbush Wind Farm, Land 3610M NE Of Ascoile, Gordonbush, Brora, Sutherland

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Pre-Application Advice Pack

Reference No: 18/03782/PREAPP

Date Issued: 25/09/2018

Confidentiality Requested: NO

1. Proposed Development

Amendments to S36 consent - 15/02598/S36

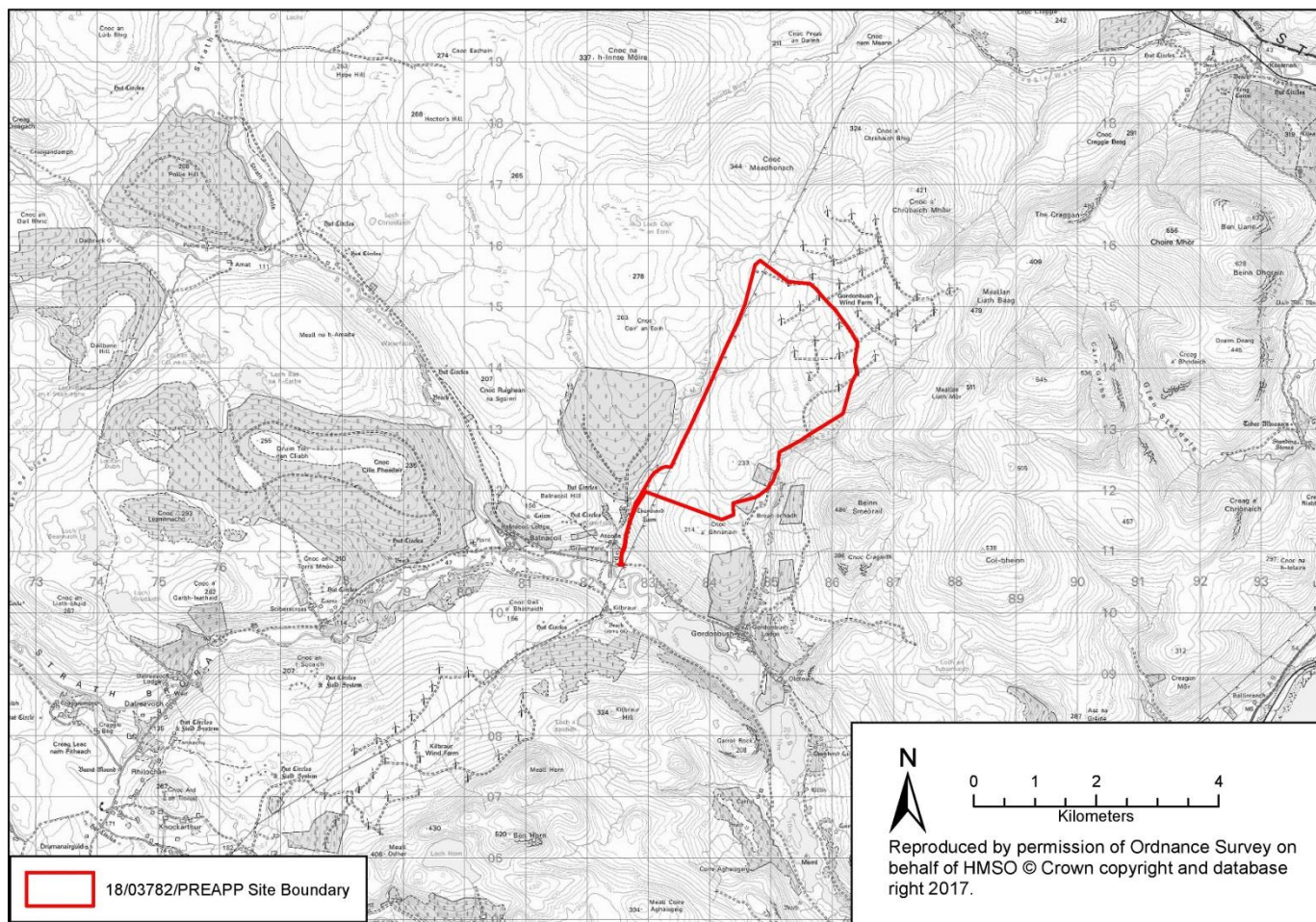
2. Summary of Key Issues

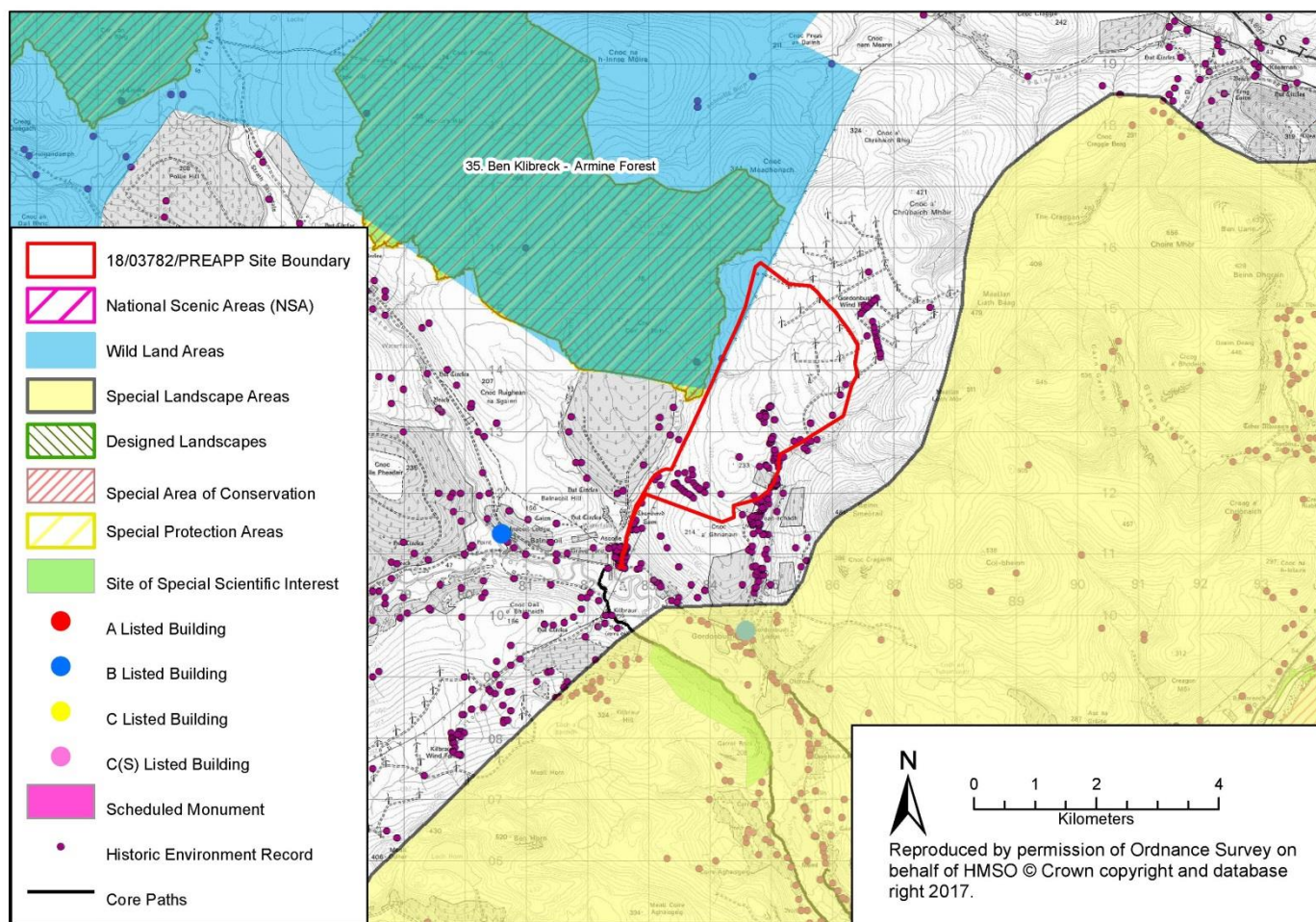
The proposed amendments to the Section 36 consent are broadly supported however, whilst the overall scale and extent of the proposed extension will be reduced, consideration should be given to the effect of the increased height and rotor diameter and its relationship to the existing scheme. Effects on the perceived scale of hills within the Loch Fleet, Loch Brora and Glen Loth Special Landscape in particular should be avoided. This advice pack contains key information from consultees which should be used to inform the Environmental Statement to be submitted with the S35c application to the Energy Consents Unit.

3. Background Information

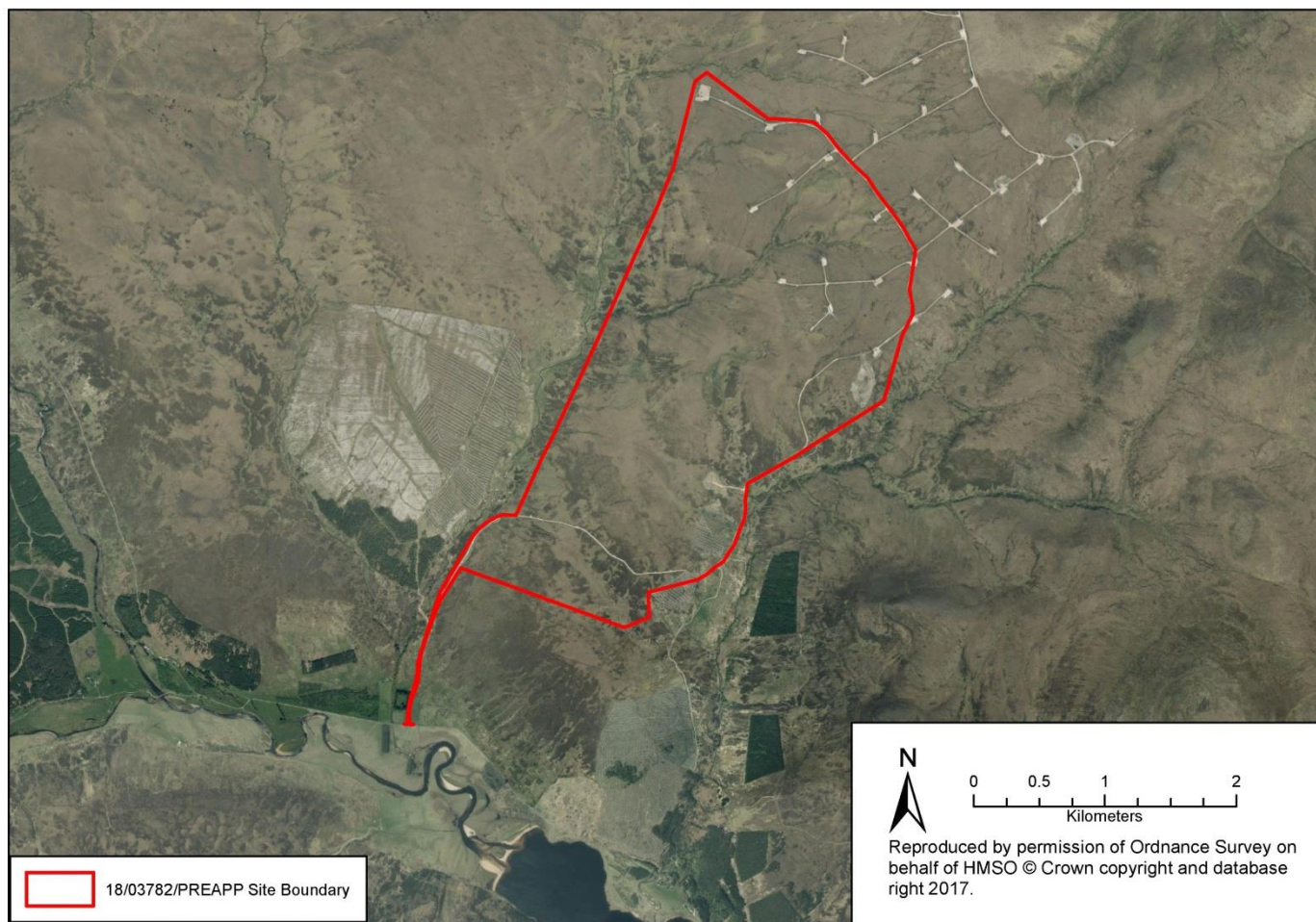
Site area	Approx. 722 hectares	
Land Ownership	Gordonbush Estate	
Existing Land Use(s)	Grazings land	
Grid Reference	X: 284979	Y: 913864

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6. Photographs of site



7. Development Plan Designation and Planning Policy Appraisal

Response from Policy, Peter Atkinson

Policy Background

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

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

- [Highland-wide Local Development Plan \(HwLDP\) \(2012\)](#);
- [Caithness and Sutherland Local Development Plan \(CaSPlan\) \(2018\)](#); and
- relevant Supplementary Guidance, particularly the [Onshore Wind Energy Supplementary Guidance \(2016\)](#).

Policy Appraisal

Highland-wide Local Development Plan

HwLDP was adopted in 2012 and 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 on the review of HwLDP will be undertaken. Applicants are advised to monitor the [development plans newsletter](#) as this provides an up to date timetable of work on the Highland development plan.

Key policies within the adopted HwLDP relating to this proposal include:

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. This includes both individual impacts and cumulative impacts with other renewable energy developments, taking account of the large offshore schemes which are under construction and planned in the Moray Firth. Further detail is set out in the Onshore Wind Energy Supplementary Guidance to this policy discussed below.

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 has recently been updated to January 2018.

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.

Of particular relevance are those landscape and natural, built and cultural heritage features in proximity to the proposal (the following tables are not exhaustive and further information should be sought from the responsible officer or agency on what features are relevant to assessment work):

Natural, built and cultural heritage features within 5 km of the proposed site boundary:

Feature	Name
Ramsar site	Caithness & Sutherland Peatlands
SAC	Caithness & Sutherland Peatlands
SCHEDULED	Ascoile, earthwork 890m SE of
SCHEDULED	Killin, chambered cairn 800m N of Loch Brora
SCHEDULED	Kilbraur, hut circle & clearance cairns 270m SW of
SCHEDULED	Carrol, broch 600m SSW of, Loch Brora
SCHEDULED	Balnacoil Hill, cairn 530m NE of Balnacoil Lodge, Strath Brora
SCHEDULED	Caisteal na Coille, broch on E bank of Blackwater
SPA	Caithness and Sutherland Peatlands
SSSI	Coir' an Eoin
SSSI	Carrol Rock

Policy 61 Landscape requires new development to reflect the landscape characteristics and special qualities identified in the relevant 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 is also undertaking landscape sensitivity appraisal work in this location to help inform decisions on onshore wind energy proposals. More information is provided below.

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.

Landscape features within 40 km of the proposed site boundary:

Feature	Name
DESLAN	Dunbeath Castle
DESLAN	Langwell Lodge
DESLAN	Kildonan Lodge
DESLAN	Dunrobin Castle
DESLAN	Skibo Castle
DESLAN	House of the Geanies
DESLAN	Balnagowan Castle
DESLAN	Tarbat House

NSA	Kyle of Tongue
NSA	Dornoch Firth
SLA	Bens Griam and Loch nan Clar
SLA	Ben Klibreck and Loch Choire
SLA	Loch Fleet, Loch Brora and Glen Loth
SLA	Sutors of Cromarty, Rosemarkie and Fort George
SLA	The Flow Country and Berriedale Coast
WLA	29. Rhiddoroch - Beinn Dearg - Ben Wyvis
WLA	35. Ben Klibreck - Armine Forest
WLA	36. Causeymire - Knockfin Flows
WLA	39. East Halladale Flows
WLA	38. Ben Hope - Ben Loyal
WLA	37. Foinaven - Ben Hee
WLA	34. Reay - Cassley

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

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 and replaced the Sutherland Local Plan (2010) (as continued in force, 2012).

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. Although 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, none of those changes directly effect the proposed windfarm.

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 are not relevant to this application. The [SLA citations webpage](#) provides the most up to date information on the relevant SLAs for this application – Loch Fleet, Loch Brora and Glen Loth SLA and Ben Klibreck and Loch Choire SLA.

Onshore Wind Energy Supplementary Guidance (2016)

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.

Spatial Framework

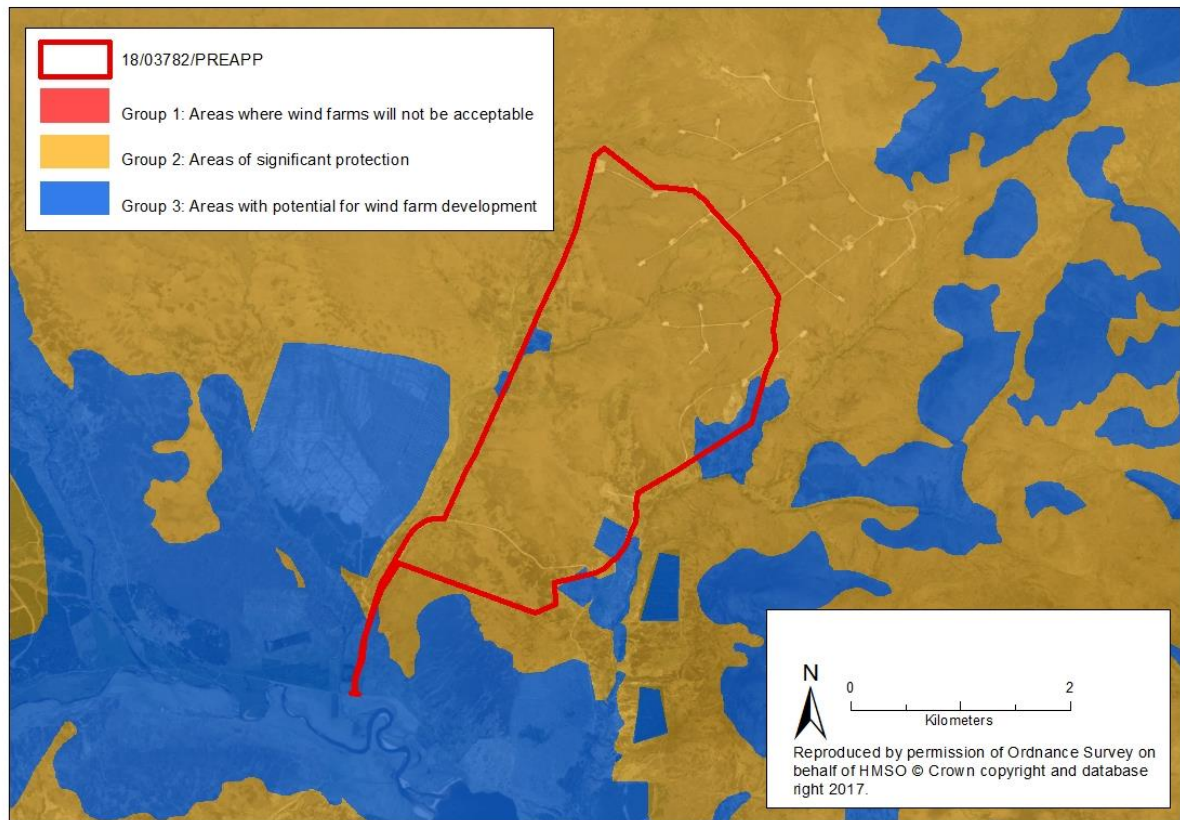
As required by Scottish Planning Policy (SPP) the SG includes the Council's Spatial Framework, which identifies the areas that are likely to be most appropriate for onshore wind energy development. The Spatial Strategy set out in the SG is based on three spatial groupings:

- **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 sustainably 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 predominantly within a Group 2 Area of Significant Protection. This is due to most of it being located within an area of carbon rich soils, deep peat and priority peatland habitat (CPP) which is a Group 2 constraint. Attention is drawn to paragraph 4.34 on page 24 of the SG which outlines the expectations for safeguarding the peat resource. It sets out a list of key factors which need to be taken into account for proposals affecting peatland.



It will be necessary to assess the impacts on all Group 2 features, identify appropriate mitigation, and set out how this mitigation provides sufficient protection to the feature.

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. The most notable in this case includes:

- Criterion 1 - the extent to which the proposal contributes to a perception of settlements/key locations being encircled by wind energy development;
- Criteria 2 and 5 – the impact on transitional experiences of key routes and transport routes;
- Criterion 4 – the impact on amenity of recreational routes, e.g. core paths and views from key hills;
- Criteria 6 and 7 – how the proposal will fit with existing wind farms and in terms of separation and clustering;
- Criterion 8 – how the perception of landscape scale and distance has been respected;
- Criterion 9 – the impact on the landscape setting of nearby wind energy developments.

Given that this application is for a reconfiguration of a consented scheme and involves the reduction in the number of turbines and an increase in the height of some remaining turbines, it would be useful if the applicant outlined whether the new scheme was expected to have a positive or negative impact on each of the relevant criterion compared to the consented scheme.

Generally there is a preference of clustering windfarms rather than having a proliferation of smaller schemes dispersed over a wider area. However, key considerations of proposals which add to or create a cluster will be whether the proposal will undo mitigation of existing schemes and the extent to which the

proposal will utilise existing infrastructure such as access tracks and existing buildings. This proposal is immediately adjacent to existing schemes, and opportunities to share existing infrastructure should be explored and where opportunities are not taken, a reasoned justification should be provided.

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 height of turbines (149.9m to blade tip), in relation to the existing Gordonbush (110m to blade tip) and the neighbouring Kilbraur (125m to blade tip) schemes.

The response from the Council's Landscape Officer is expected to provide further advice on this matter.

The Council also expect 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 assessing the strategic landscape capacity for wind energy across Highland. Work commenced on preparing the appraisal for this area, however other work priorities have resulted in the work being placed on hold for the time being. At the earliest a draft appraisal would be available for public consultation at the end of this year. You should therefore follow progress on this work [online](#) to ensure that any future application has due regard to it. In the interim, however, the criteria outlined in the Onshore Wind Energy Supplementary Guidance should in any case be utilised when assessing any likely impact.

Non spatial framework constraints:

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.

- 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.
- Historic environment such as historic environment records. The section within the supplementary guidance on Natural and Historic Environment (page 22-24) is particularly relevant.
- Special Landscape Areas – Loch Fleet, Loch Brora and Glen Loth SLA and Ben Klibreck and Loch Choire SLA. All proposals must have regard to the relevant SLA citation that summarise key characteristics, qualities, sensitivities, and measures for enhancement. These citations will be used to assess impacts of proposals where relevant.

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.

Energy Storage

The proposal includes a possibility for energy storage and this is of interest to the Council as an emerging new aspect of renewable energy developments with considerable potential benefits for energy generation, efficiency and supply and you are encouraged to work up these proposals. As highlighted above, any associated buildings with the wind farm scheme must be designed in a way which is sympathetic to the local area and existing pattern of development. Whilst it is recognised that energy storage facilities may require particular access and maintenance arrangements, a simple shipping container style approach is unlikely to be suitable in this location.

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 Trees, Nick Richards, Forestry Team

The Forestry Team have no comment to make on this proposal.

Impact on Landscape, Anne Cowling, Landscape Officer

The proposal is for an alteration to the design with existing consent, turbines numbers being reduced to 11 and height increased to a maximum of 149.9m rotor diameter between 105 and 136m.

The applicants are specifically looking to confirm the scope of their Environmental Impact Assessment.

Within THC's Adopted Onshore Wind Energy Supplementary Guidance, at para 4.16, are set out key landscape and visual aspects expressed as a series of criteria which the council will use as a framework and focus for assessing proposals, including discussions with applicants. The criteria which are most relevant to this development are set out below, with a brief explanation as to their applicability.

Criteria	
6	<p>The existing pattern of Wind Energy Development is respected.</p> <p>The measure here is the degree to which the proposal fits with the existing pattern of nearby wind energy development, with considerations including:</p> <ul style="list-style-type: none">• Turbine height and proportions• Previously instituted mitigation measures• Planning Authority stated aims for development of the area. <p>The threshold against which this will be considered is whether the proposal contributes positively to the existing pattern or objectives for the development of the area.</p> <p>The council is currently working on Landscape Sensitivity Appraisal for this area, in line with the work already carried out and adopted for Caithness, Loch Ness and Black Isle, Surrounding Hills and Moray Coast. Preliminary work, not yet publically consulted in, identified limited potential for this area within the existing pattern and includes the recommendation that turbines should (be):</p> <ul style="list-style-type: none">• Preserve mitigation established by current schemes• Maintain the landscape setting of each existing scheme.• Respect spacing and scale of existing development pattern. <p>Having reviewed the wireframes and presentation it seems there is some potential for the difference in scale of the proposed turbines to reduce the visual continuity between Gordonbush original development and the extension site, particularly in views where the extension is seen in front of the original development.</p>
8	<p>The perception of landscape scale and distance is respected</p> <p>The measure is the extent to which the proposal maintains or affects receptors' existing perception of landscape scale and distance.</p> <p>The increase in scale for the proposed development risks affecting perception of landscape scale and distance if it appears, in views where the development lies between the viewer and the original that the difference in 'apparent' size of the two sets of turbines is due to distance. This may have an effect on the viewer's understanding of true distance and perspective in the landscape.</p> <p>As stated in SNH Siting and Designing Wind Farms in the Landscape at para 3.33 'Careful consideration is therefore 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'</p> <p>And ' Perception of scale and distance seems distorted due to variable sizes of wind turbines'</p> <p>Effects on the perceived scale of hills within the Loch Fleet, Loch Brora and Glen Loth SLA are particularly to be avoided.</p>
9	<p>Landscape setting of nearby wind energy developments is respected</p>

	In locations where Kilbraur and Gordonbush extension are both visible, consideration should be given to the effect of increased height and rotor diameter on the balance between the two sites.
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This advice should not be taken to rule out the possibility of issues arising under other criteria.

Key Points	Assessments to be carried out and/or submitted with application
Onshore Wind Energy Supplementary Guidance Criteria	Appropriate LVIA

Impact on Natural Environment, David Patterson, Scottish Natural Heritage

1. Protected areas

This proposal abuts part of the Caithness & Sutherland Peatlands Special Area of Conservation (SAC), Special Protection Area (SPA) & Ramsar Site. These sites are protected for otter, peatland habitats and upland birds.

Caithness & Sutherland Peatlands SAC

We note that previous otter surveys (2010 & 2013) show differences in how otters use the development area and watercourses adjacent to it. The most recent survey work (2013) shows an active otter holt approximately 200m from what will be turbine 37. In addition, there are five otter holts within 200m from the proposed works compound, the nearest being c. 75m.

The impacts of this development should be assessed against the SAC as part of a Habitats Regulation Appraisal, see; <https://www.nature.scot/professional-advice/planning-and-development/environmental-assessment/habitats-regulations-appraisal-hra>.

A Species Protection Plan will be required within the EIA Report to ensure that this development can be taken forward with SAC otters living alongside. We also recommend that otter surveys within and adjacent to the development boundary should be updated to inform an appropriate mitigation plan. This is likely to involve only two-three days of survey work.

Caithness & Sutherland Peatlands SPA & Ramsar

We do not consider that additional bird survey work will be required to inform the impacts of this proposal, despite it being five years old. The original bird vantage point survey work covered the whole of the new swept area; therefore collision risk can be recalculated using the new turbine dimensions. In addition, the original survey work only recorded a single flight of an SPA qualifying species (i.e. golden plover). We therefore do not think it is reasonable to request additional bird survey work in this specific instance. However, the recalculated impacts of this development should be assessed as part of a Habitats Regulation Appraisal within the EIA Report.

As mentioned at this meeting, we are in the process of assessing responses to our draft wind farm repowering guidance, which will inform the final publication. For more information on this, see: <https://www.nature.scot/guidance-assessing-impact-repowered-wind-farms-nature-consultation-draft-june-2018>.

2. Wild Land

The wireframe view-points clearly indicate that the proposed scheme will reduce the visual spread of turbines from the consented layout. This is especially welcomed from the highly sensitive location of VP11 which is within the interior of the adjacent Wild Land Area (WLA). The loss of the four turbines and the increase in height of the remaining 12 are considered to result in an overall improvement in the layout and a slight reduction in the landscape and visual impact. This is likely to be especially the case for impacts identified on the qualities of the WLA. However, we continue to advise that there will be additional adverse landscape and visual effects as a result of this proposal, but these are not considered to exceed those of the original consented scheme.

The above comments are based on the information provided at this pre-application meeting, which related to a ZVI showing wire-frames from specific view-points. We have not had time to assess the additional information forwarded by the landscape consultant (dated 6 September) to inform this response. However, we will endeavour to respond to this in due course as part of our pre-application advice.

3. Protected species

Bats

Even though the previous bat survey found a healthy representation of animals using this upland site, we do not think completing another bat survey will necessarily make any difference to the layout. However, we do advise that turbine stand-off distances from bat features (e.g. minor water courses) should be re-assessed in relation to the wider rotor sweep of the larger turbines, taken from turbine tip.

Water vole

Additional surveys will be required to ensure that water voles are safeguarded during construction works. We advise that pre-construction surveys should take place to help inform a Species Protection Plan, if one is required, see: <https://www.nature.scot/sites/default/files/2017-07/A1959339%20-%20Species%20Planning%20Advice%20Project%20-%20water%20vole%20-%20FINAL.pdf>. If a licence is required to facilitate construction, application information can be found on our website: <https://www.nature.scot/professional-advice/safeguarding-protected-areas-and-species/licensing/licensing-process>.

4. General advice

Since this original extension went to planning much of our guidance on wind farms has since been updated. For example, there is updated guidance on peatland and carbon-rich soils, see; <https://www.nature.scot/professional-advice/planning-and-development/renewable-energy-development/types-renewable-technologies/onshore-wind-energy/general-advice-wind-farm>.

Key Points	Assessments to be carried out and/or submitted with application
SAC Otters Otters linked to this protected area will require detailed consideration within the EIA Report. This is likely to require updated survey work.	For advice on otter surveys see: https://www.nature.scot/sites/default/files/2017-07/A1959316%20-%20Species%20Planning%20Advice%20Project%20-%20otter%20-%20FINAL.pdf .
Wild Land This proposal is likely to result in additional adverse effects, but these are not considered to exceed that of the existing wind farm scheme.	If the applicant wishes to deviate from any best practice guidance, they should provide justification for doing so well in advance of final submission.

10. Design

Although not strictly relevant to this proposal, 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.

11. Amenity

Contaminated Land, Shirley Ross, Contaminated Land Team

Contaminated Land have no comment to make on this proposal.

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 in order to demonstrate any change in predicted noise levels as a result of the proposed amendment. 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.

The existing consent already has noise limits attached and the expectation is that noise levels will be lower due to the reduction in turbines and the increase in separation distances. If there have been any other wind turbine developments consented since the original Gordonbush Extension application obtained consent any cumulative noise would need to be addressed by the assessment.

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.

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

The application should include updated information on the presence of any private water supplies that could be affected by the development.

Dust

Any application should include a scheme for the suppression of dust.

Key Points	Assessments to be carried out and/or submitted with application
<ul style="list-style-type: none">• Noise• Private water supplies• Dust	<ul style="list-style-type: none">• Assessment of noise from wind turbines• Assessment of noise from construction activities• Investigation into private water supplies• Assessment of potential of dust nuisance

12. Transport and Wider Access

Impacts on Public Access, Matt Dent, Access Officer

The Access team have no comment to make on this proposal.

Traffic and Transportation Impacts, Jane Bridge, Transport Planning Team

Application

The pre-application advice request is for an extension to Gordonbush Wind Farm in Sutherland (03/00236/S36SU) this is in operation; the 35 turbines have a diameter of 82m. Permission was given for an extension under 15/02598/S36 with a rotor diameter of up to 105m; the applicant is now proposing an amended scheme of up to 12 turbines with a maximum rotor diameter of 136m.

Access onto the public road and visibility

The access is the same as for the existing windfarm and the permitted extension. Revised swept paths will be required to be submitted with any application for the larger turbines. This may show that works are

required at the junction.

For your information attached is a link below to the Council's Roads and Transport Guidelines for New Developments). http://www.highland.gov.uk/downloads/file/527/road_guidelines_for_new_developments

Transport Assessment

The EIA shall include a Transport Assessment. This shall be a stand-alone chapter and shall consider in detail the impact of development traffic on the Council maintained roads affected. It shall consider and propose measures necessary to mitigate the impact of the development. These measures may include; new or improved infrastructure, road safety measures and traffic management. The attached guidance document provides further information on the required content. It is acknowledged that a reduced scope may be applicable due to the extant permissions. The applicant should contact the Transport Planning Team and Transport Scotland to agree the detailed contents of the TA which shall include;

Abnormal Load and Construction Traffic Routes

The port of entry shall be identified for the abnormal loads (it was previously Invergordon). Routes for goods vehicles as well as the abnormal loads shall be confirmed and where additional traffic or larger loads are proposed then the suitability of the routes for the additional traffic shall be assessed. The threshold value for significance on the Council Network is generally taken as 10% of the existing volumes. The HGV construction traffic generated by this scheme will be significant on the Council roads as was the traffic for the previous extension. It appears that the original TA did not include ready mix concrete or import of stone for the access routes any assumptions regarding on site quarries or batching should be stated. The volume of construction traffic for the revised proposals should be submitted and any assumptions should be confirmed or a conservative approach taken.

Upgrading works were carried out for the original windfarm on the road network including the A9 trunk road junction with the Clynelish Distillery road and widening of the distillery and the Strath Brora Roads. A new assessment of the suitability of the routes will be required as these proposals are for larger turbines. Therefore an assessment of the capacity of any existing bridges and other structures along the construction routes may be required. A swept path analysis of the route will be required. Early discussion with the Council's abnormal loads team (the contact is Greg Otreba Grzegorz.Otreba@highland.gov.uk) and the Council's structures team (the contact is Norman Smart Norman.Smart@highland.gov.uk) is recommended once the nature of the loads and the delivery routes are known. A trial run to demonstrate the suitability of the route may be required.

Schedule of Mitigation

The site is well situated for access to principal routes and it is not anticipated that significant improvement work on these routes will be required on the local road network. However some mitigation may be required to enable them to support the construction and abnormal load traffic required and remain in a serviceable condition.

Where these works are outside the current road boundary then the red line boundary of the application will need to cover these items or separate planning permission will be required. The scope of any mitigation works and control of the land required for them should therefore be demonstrated at the planning application stage.

All works on the Council maintained public road will require the approval of the Council as Roads Authority through a Road Construction Consent together with any necessary Technical Approval for works on structures. Therefore detailed and dimensioned plans showing any mitigation proposals on and adjacent to the public road will be required to be agreed prior to any works commencing on site.

Construction Traffic Management Plan (CTMP)

The TA should include a framework CTMP aimed at minimising the impact of the construction traffic. It shall include measures to ensure development traffic adheres to the approved routes and to prevent platooning during heavier flows such as any ready mix concrete pours. Consultation with the local community and the Local Area Roads Office will be required for the detailed content and implementation of the CTMP.

Maintenance Agreement and Bond

Notwithstanding the above requirements, there may 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 - including the provision of an appropriate Road Bond or similar security (known as a Wear and Tear Agreement) may be required. Construction should not run concurrently with other projects generating a significant increase in HGV traffic, alternatively a joint CTMP and Wear and Tear Agreement for the schemes to run concurrently would be required.

Key Points	Assessments to be carried out and/or submitted with application
Agree scoping report for Transport Assessment	<p>Transport Assessment</p> <p>Swept paths and structural assessments</p> <p>Construction Phase Traffic Management Plan including maintenance agreement and bond.</p> <p>Schedule of mitigation</p>

Impact on the Trunk Road Network, John McDonald, for Transport Scotland

We understand that SSE wish to seek amendments to the 2017 S36 consent and deemed planning permission granted for the proposed Gordonbush Wind Farm Extension. The proposed extension is located approximately 9.5km to the north west of Brora, Sutherland. The site is to the south of the operational Gordonbush Wind Farm and to the north of the C6 Strath Brora Road. This road provides access to the A9 (T) which is the nearest trunk road to the site, approximately 9km to the south east of the site.

The changes proposed include a reduction in the number of turbines from 16 to between 9-12, increase in blade rotor diameter from 105m to 136m with a maximum tip height range of 130m-150m. The applicant deems that proportionally, the change in effects for the Environmental Impact Assessment (EIA) originally undertaken for the S36 will be limited. Therefore, it is sought to undertake the EIA for the following subject matters, to quantify the potential difference in impact between the consented development and the proposed:

- Landscape & Visual
- Noise
- Transport
- Ornithology
- Ecology

Transport Scotland is in agreement with this approach, with the proviso that an Abnormal Indivisible Load Assessment be provided to confirm that the proposed route is capable of accommodating the increased size in turbine components. The details required will include a swept path analysis and identification of potential mitigation measures 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.

Key Points	Assessments to be carried out and/or submitted with application
Amendments to the existing S36 consent.	Abnormal Indivisible 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 sources can be avoided. Should any infrastructure be located

within close proximity to a watercourse, 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 landraising within any flood plain should be avoided. If this cannot be achieved, further consultation with the Flood Risk Management Team will be required.

The access route to the site may need to cross 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) 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 50m 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">• 50m 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.

1 Site specific comments

- It is our understanding that consent and deemed planning permission was granted in 2017 for this development and that the applicant seeks an amendment to reduce the number of turbines and increase the maximum rotor diameter of the turbines.
- We would ask that the planning conditions that we previously requested, dated 12 August 2015 (PCS/141196), are adopted with any grant of consent.
- We note that in our response of 12 August 2015 (PCS/141196) we requested a condition be applied requiring all new tracks on peat of greater than 1m to be of a floating style of construction. In review of the conditions listed within the consent under section 36, we note that this condition has not been attached, and we ask that this be adopted.
- We expect that there will be amendments regarding the amount of peat disturbed from the reduction in turbines and their associated tracks and the increase of rotor diameters and their associated increase in footprint. We are therefore satisfied that, as stated in our previous response, dated 12 August 2015, that the amount of disturbed peat will be able to be appropriately utilised on site. However, we expect this to be clearly updated and accounted for in the conditioned peat management plan.
- Since our last response in 2015, we now have [SEPA Guidance on the life extension and decommissioning of onshore wind farms](#) that must now be taken into account.
- 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 outwith a 100m radius of all excavations shallower than 1m and outwith 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 outwith a 100m radius of all excavations shallower than 1m and outwith 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](#).

18 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:

Graesser House, Fodderty Way, Dingwall Business Park, Dingwall IV15 9XB Tel: 01349 862 021.

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> <ol style="list-style-type: none"> 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; Map and assessment of impacts upon Groundwater Dependent Terrestrial Ecosystems and buffers; Map and assessment of impacts upon groundwater abstractions and buffers; Peat depth survey and table detailing re-use proposals; Map and table detailing forest removal; Map and site layout of borrow pits; Schedule of mitigation including pollution prevention measures; Quarry or Borrow Pit Site Management Plan of pollution prevention measures; Map of proposed waste water drainage layout; Map of proposed surface water drainage layout; Map of proposed water abstractions including details of the proposed operating regime; Decommissioning statement. 	See above for details

14. Built and Cultural Heritage

Impact on the Historic Environment, Kirsty Cameron, Historic Environment Team

Extensive archaeological; and historic features are recorded within this proposed development area. Some of these were identified during survey work in advance of the existing Gordonbush Wind Farm. This survey was not comprehensive over the proposed extension area. In addition, the presentation notes that at least two significant indirect impacts to scheduled monuments are predicted. For these reasons, the Cultural Heritage should be assessed as part of an Environmental Statement and 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) to assess the survival of any upstanding features. 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
Ideally, direct impacts to the historic	Cultural heritage will be assessed as part of

<p>environment can be avoided by careful design and micro-siting.</p> <p>Indirect impacts must be assessed and illustrated.</p>	<p>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>
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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-scotland.gov.uk/>

Key Points	Assessments to be carried out and/or submitted with application
<p>We understand that the proposal is for a variation to an existing Section 36 consent for an extension to Gordonbush wind farm. The existing consent is for 15 turbines, 3 turbines to 115m blade tip height and 12 turbines to 130m blade tip height. The variation being sought proposes to remove the 3 smaller turbines from the scheme and increase the height of the other turbines (between 9 and 12 in number) to a maximum blade tip height of 130-150m. The location of the individual turbines and ancillary infrastructure is not proposed to change.</p> <p>We note that although limited information has been supplied so far, that the presentation submitted proposes to scope out cultural heritage in the subjects proposed for re-evaluation of effects from this variation.</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 adverse impacts to their setting from the proposed development.</p> <p>We note that the applicants in their presentation consider that it is unlikely that the increased height of the proposed turbines will increase the already significant individual and cumulative effects identified at two scheduled monuments. However, it is not clear to us at this stage from the information provided so far, that the proposed increase in height of the turbines will not increase the potential effects on other historic environment assets in the surrounding area. We note that the LVIA section of the presentation identifies the potential for new or increased visibility and therefore the potential for increased effects. It is not clear to us at this stage why this would not also be the case for the historic environment.</p> <p>We would therefore recommend that some further work is carried out to identify if there is increased potential for the increased height of the turbines to have impacts on the</p>	

<p>setting of historic environment assets which were previously outside the ZTV or if there will be increased levels of effect on assets already identified.</p> <p>We would also recommend that cumulative effects on the setting of historic environment assets are re-assessed given the number and proximity of other operational, consented and proposed wind developments in the surrounding area, including the proposed South Kilbraur wind farm.</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>	
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15. Developer Contributions

The need for any developer contributions would be informed through the assessment process.

16. Pre-application Procedures/Guidance

The application concerns alterations to a Section 36 consent however it would be advisable to have 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=EEED 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>.

Environmental Impact Assessment Scoping - to be carried through the Energy Consents Unit

Community Councils

In terms of the appropriate Community Councils to consult, the proposal is located within the Brora 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 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/>

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 majorpreapps@highland.gov.uk	Phone 01463 702506
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Highland Council

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Outside Agencies		
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Aden McCorkell, Planning Officer, SEPA	Planning.dingwall@sepa.org.uk	01349 860353
Victoria Clements Senior Heritage Management Officer, Historic Environment Scotland	Victoria.clements@hes.scot	0131 668 8730
David Patterson, Operations Officer, Scottish Natural Heritage	David.patterson@snh.gov.uk	0300 0673108

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	✓
	Landscape Plan	
	Landscape Maintenance/Management Plan	
	Protected Habitat Survey	
	Protected Species Survey - Otter	✓
	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 - construction and operational noise	✓
	Investigation of Private Water Supplies	✓
	Waste Strategy	
Transport and Wider Access	Green Travel Framework	
	Scottish Transport Appraisal Guidance (STAG)	
	Swept Paths and Structural Assessments	✓
	Construction Traffic Management Plan	✓
	Schedule of Mitigation	✓
	Abnormal Indivisible Load Assessment	✓
	Transport Assessment	✓
Water	Flood Risk Assessment	
	Drainage Impact Assessment	✓
	Sustainable Urban Drainage System Plan	
Built and Cultural Heritage	Archaeology Survey	✓
	Conservation Statement	
	Structural Survey	
Public Consultations	Pre-application Consultation Report	
Miscellaneous	Minerals (mitigation and restoration management plan)	
	Retail Assessment	
Any other appropriate document		

Environmental Impact Assessment

Scoping

To be arranged through the Energy Consents Unit