

Appendix 3.6 Pre-Application Advice Pack

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 SSE Renewables as the applicant and ITP Energised as the agent for the proposed development at Bhlaraidh Extension Glenmoriston Estate North Of Levishe Invermoriston.

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Pre-Application Advice Pack

Reference No: 19/01917/PREMAJ

Date Issued: 25.06.2019

Confidentiality Requested: YES

1. Proposed Development

The proposed development consists of an extension to the operational Bhlaraidh Wind Farm (planning ref. no. 12/02556/S36), located approximately 5 km north of Invermoriston. The extension will comprise approximately 41 turbines with a tip height of 180 metres maximum and blade diameter of 150 metres maximum.

2. Summary of Key Issues

Whilst the Council is supportive of renewable energy developments in principle, this must be balanced against the environmental impact of development. It is considered that this proposal has certain positive aspects.

This is a technically challenging site, however the majority of the challenges have been overcome through the original Bhlaraidh proposal and advice is provided throughout this pack on the impact of the turbines proposed through the extension.

The operational Bhlaraidh Wind Farm does have a visual impact in close proximity (Meal Fuar Mhonaid) and can be seen from elevated positions on the south side of Loch Ness. This is due to the mitigation secured through the design of the scheme. There is concern that the extension as currently proposed would undo the previously secured mitigation, have an impact on the setting of Loch Ness and not accord with the established pattern of wind energy development.

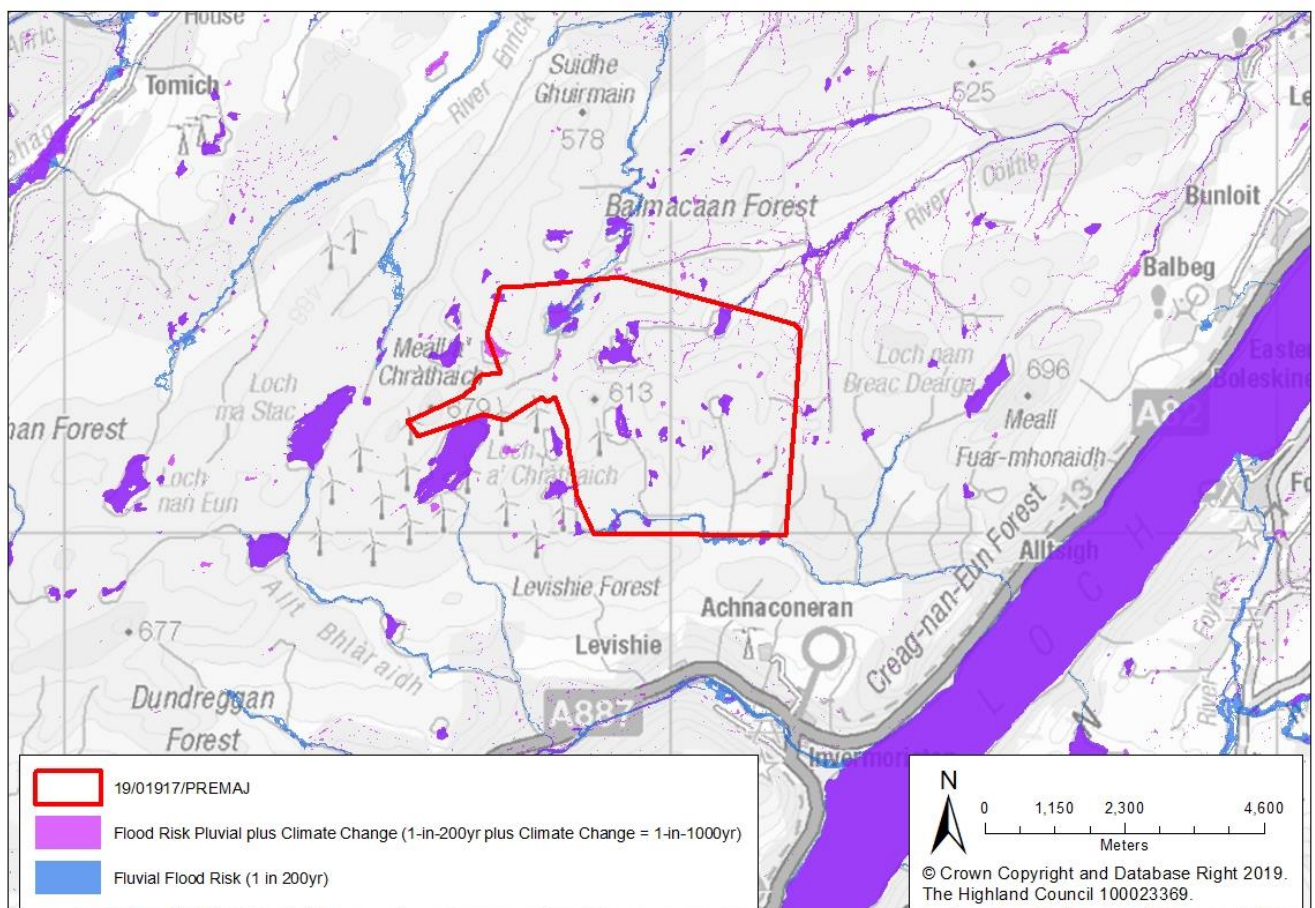
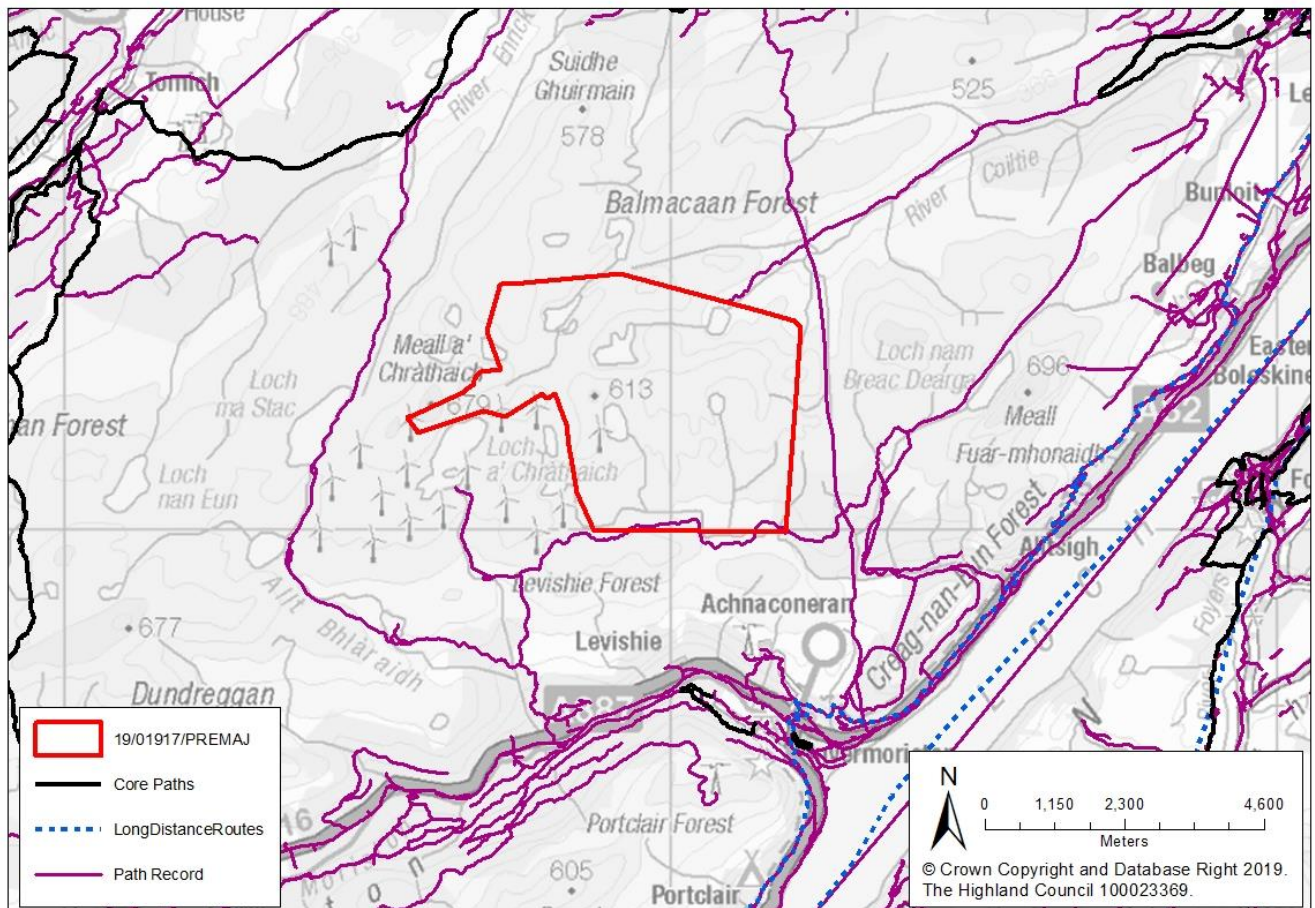
Further the increase in blade tip height and rotor diameter will increase the visual impact of the proposal and potentially have an impact on with qualities of the wild land areas. These matters need to be thoroughly assessed and mitigation identified through the design process. There is concern that turbines of this scale would be out of keeping with the existing pattern of onshore wind energy development based on the proposals submitted to the Planning Authority.

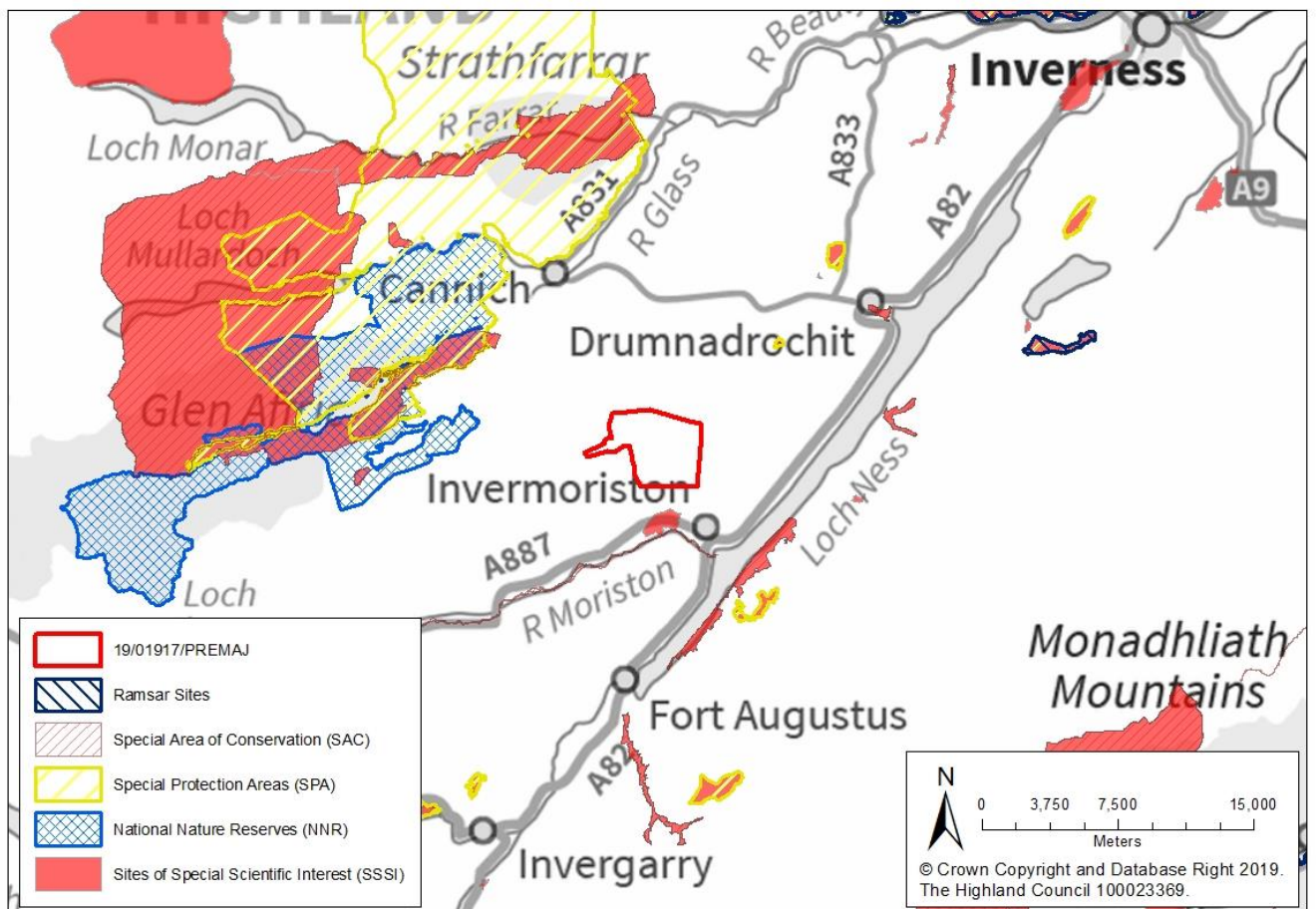
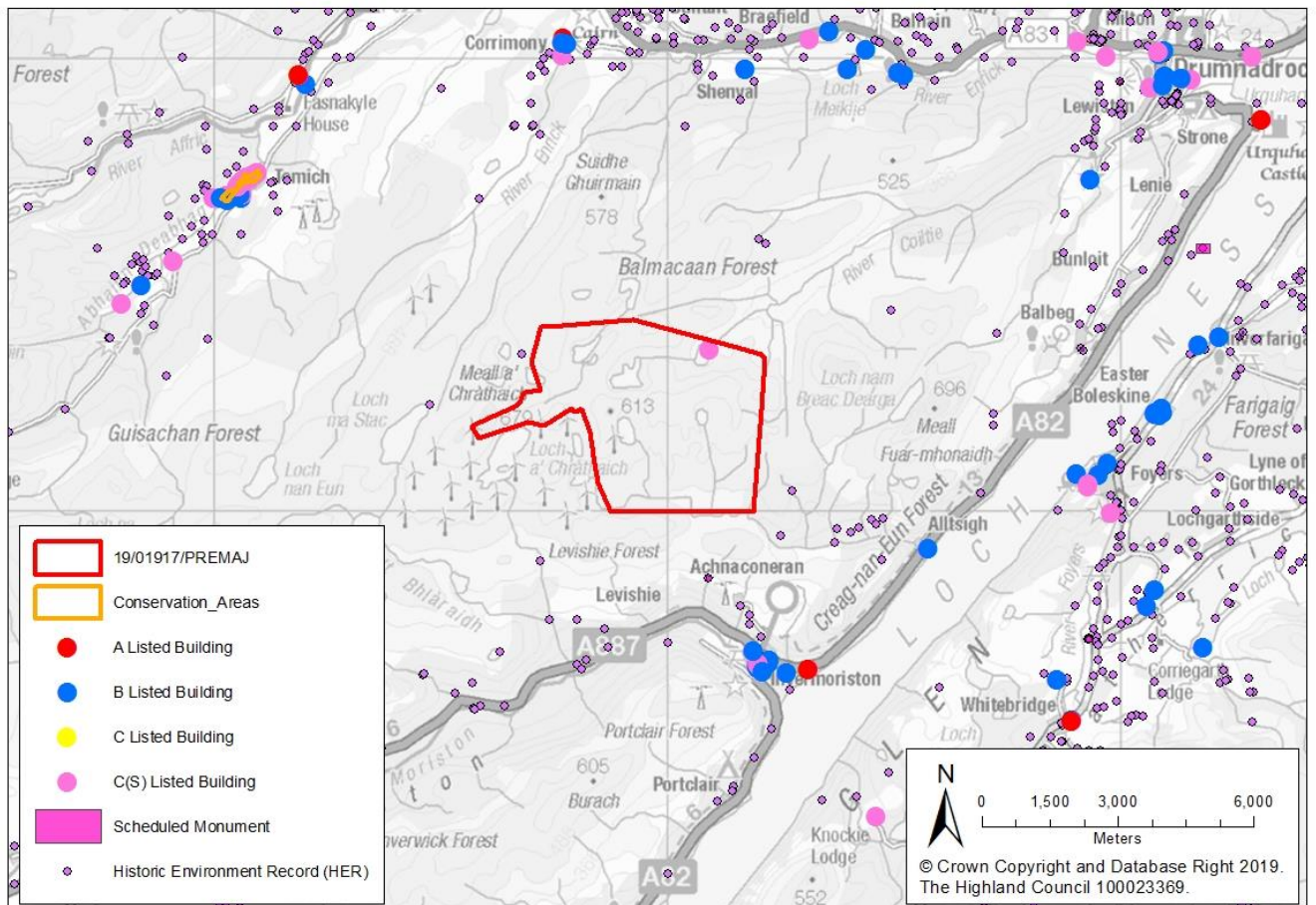
While this would be an extension to an existing wind farm and some of the original supporting information may be used as background information, it must be recognised that a full suite of supporting documentation will be required to facilitate the consideration of any forthcoming application. This should taking into consideration the advice contained within this pre-application advice pack.

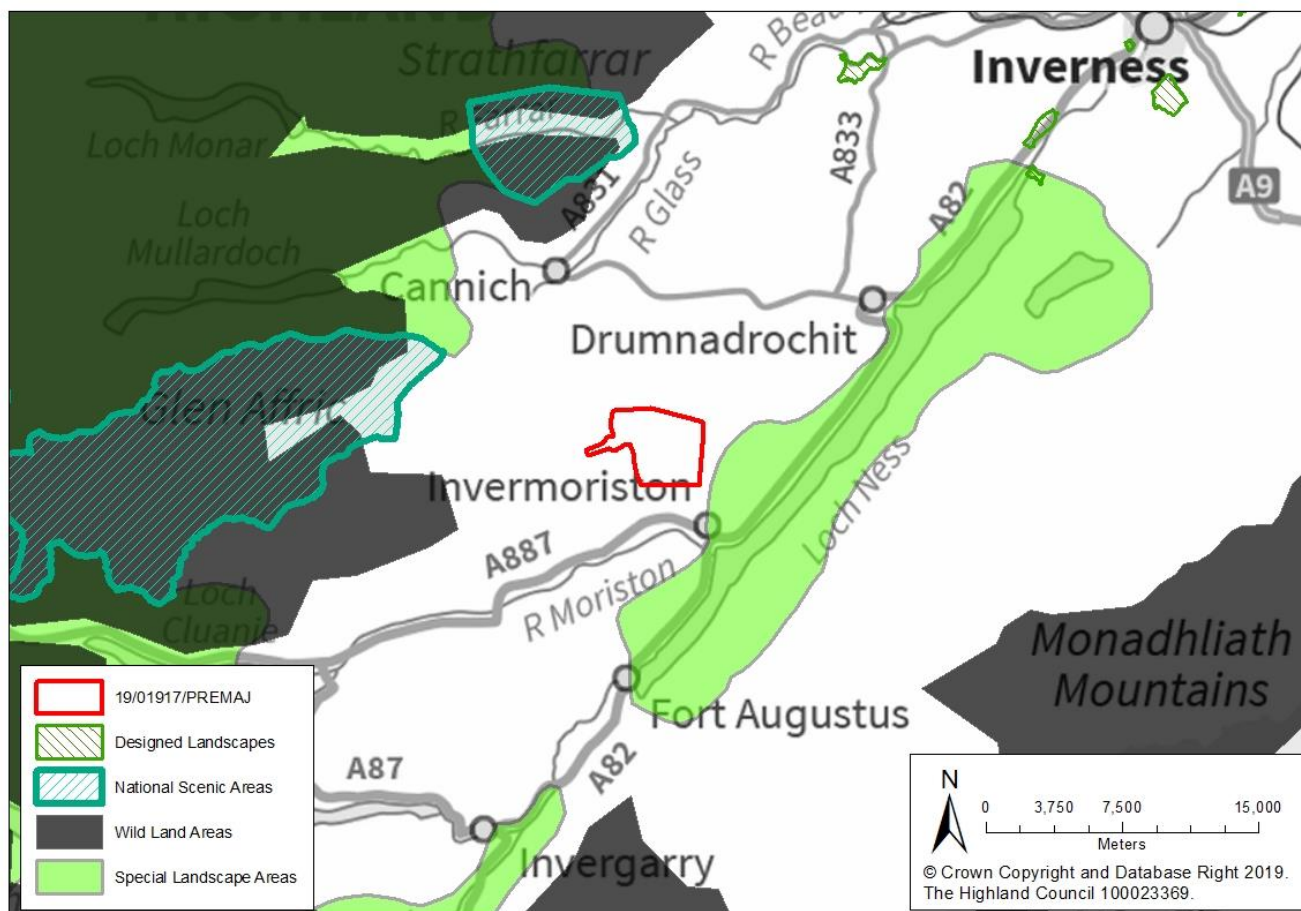
3. Background Information

Site area	1753ha (approx.)	
Land Ownership	Unknown	
Existing Land Use(s)	Estate uses	
Grid Reference	X: 240062	Y: 822163

4. Constraints © Crown Copyright. All Rights Reserved. 100023369 2019







5. Development Plan Designation and Planning Policy Appraisal

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 any future application.

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

- [Highland-wide Local Development Plan \(HwLDP\) \(2012\)](#);
- [Inner Moray Firth Local Development Plan \(IMFLDP\) \(2015\)](#); and
- Relevant Supplementary Guidance, particularly the [Onshore Wind Energy Supplementary Guidance \(2016\)](#).

Highland-wide Local Development Plan

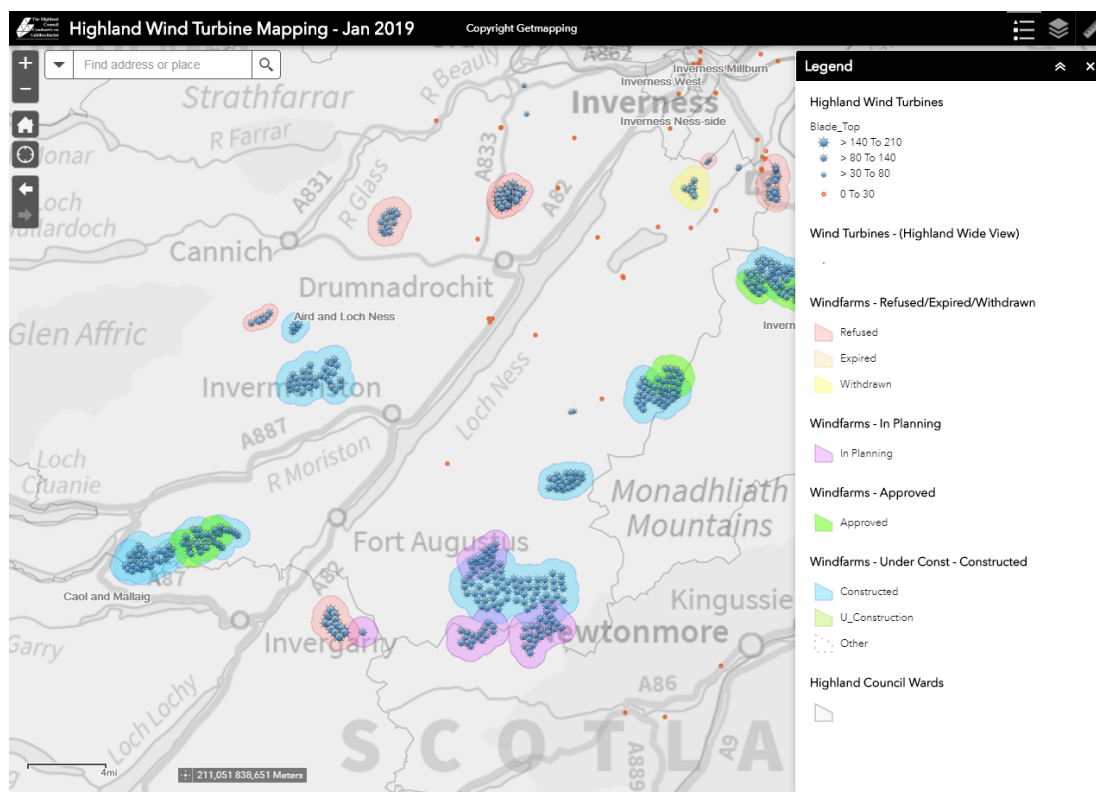
HwLDP was adopted in 2012 and sets out the general planning policies for the Highland Council area. The Council began to undertake a review of HwLDP in 2015 (with the publication of the [REDACTED] and subsequent consideration of comments); however, the review is on hold until the implications of the Scottish Government's review of the Scottish planning system and how it may affect the preparation of the development plan for Highland (including timescales and transitional arrangements) 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 [REDACTED] as this provides a 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. 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 and is currently as at January 2019.



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 other 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 (non landscape):

Feature	Name
SSSI	Levishie Wood
SSSI	Urquhart Bay Wood
SAC	Urquhart Bay Wood
SAC	River Moriston
SPA	North Inverness Lochs
Scheduled Monument	Levishie Cottage, fort and earthwork 1050m NE of
Listed Building – C(S)	Loch Ashlaich, Shooting Box and Bothy
Listed Building – A	Invermoriston Home Farm
+ other Listed Buildings at Invermoriston	
+ numerous Historic Environment Records (HERs)	

Landscape features:

Feature	Name
NSA	Glen Strathfarrar
NSA	Glen Affric

WLA	24. Central Highlands
WLA	19. Braeroy - Glenshirra - Creag Meagaidh
WLA	20. Monadhliath
WLA	29. Rhiddoroch - Beinn Dearg - Ben Wyvis
WLA	28. Fisherfield - Letterewe - Fannichs
WLA	26. Coulin & Ledgowan Forest
SLA	Loch Ness and Duntelchaig
SLA	Strathconon, Monar and Mullardoch
SLA	Moidart, Morar and Glen Shiel
SLA	Loch Lochy and Loch Oich

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.

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.

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
- Policy 77 – Public Access

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 [Inner Moray Firth Local Development Plan \(2015\)](#) (IMFLDP). It should be noted that the Council has recently commenced a review of the IMFLDP and is currently undertaking a Call for Sites; it is anticipated that Main Issues Report stage will be reached around late 2019/ early 2020.

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.

The IMFLDP also confirmed boundaries (including any refinements) of the Special Landscape Areas (SLAs) within the plan area. [SLA citations webpage](#) provides the most up to date information on the SLAs.

Onshore Wind Energy Supplementary Guidance (2016)

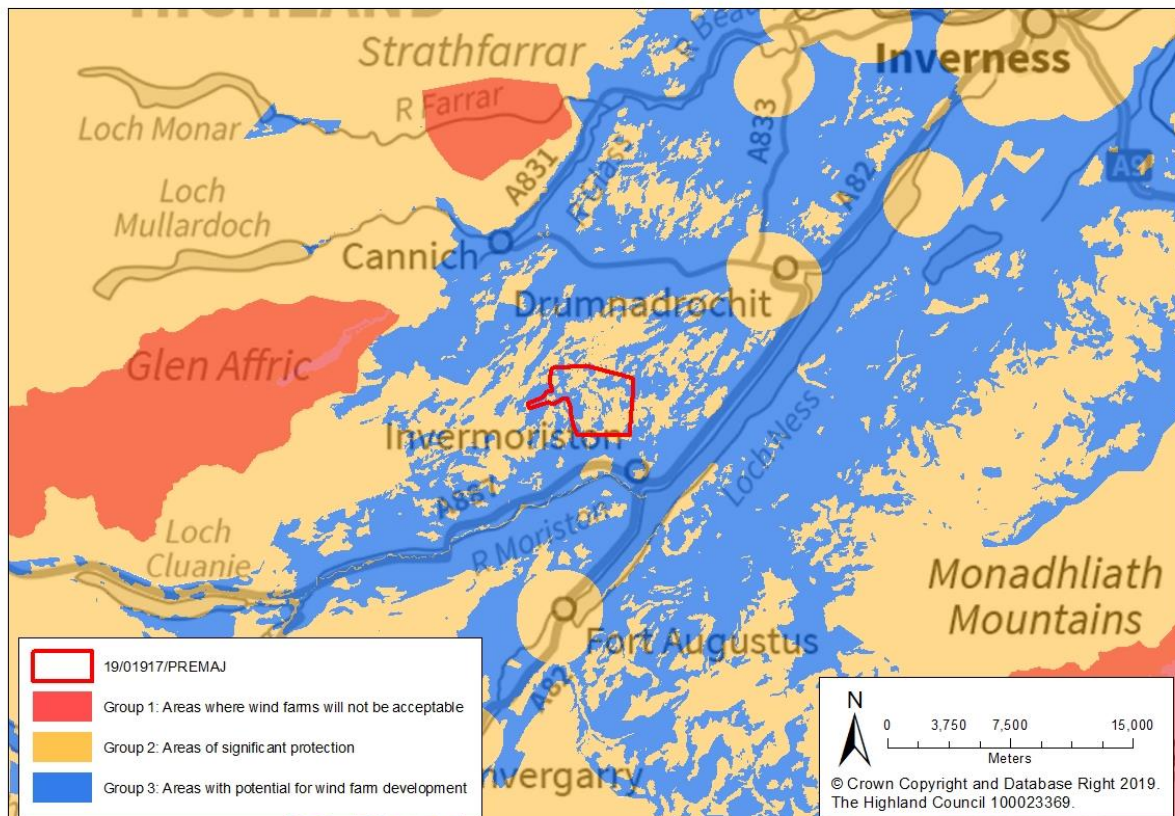
The Council adopted this [Supplementary Guidance](#) (SG) in November 2016 and it forms part of the Development Plan for Highland, setting the main framework for determining onshore wind energy proposals.

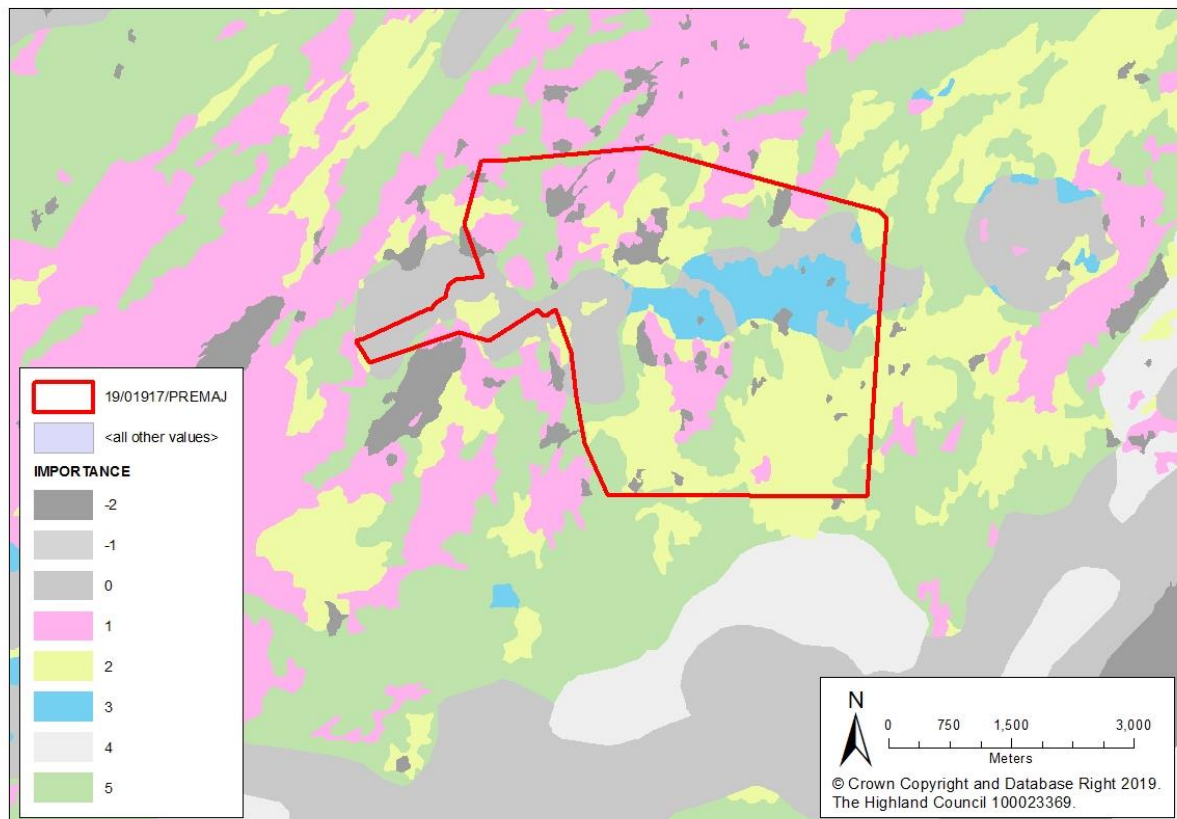
Spatial Framework

As required by Scottish Planning Policy 2014 (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 on the map below, the site lies partly within Group 2 – Areas of significant protection (due to the presence of Carbon Rich Soils, Deep Peat and Priority Peatland Habitat – CPP) and partly within Group 3 – Areas with potential for wind farm development (due to the absence of constraints included in the spatial framework, noting though that there will be other policy considerations). The second map below provides an extract of SNH's Carbon and Peatland Map 2016, being the mapping that should be referred to in order to confirm what land is identified under each of the defined Classes of CPP. (The Spatial Framework map will be updated to fully reflect this version of CPP mapping, specifically Classes 1 and 2, in due course.) The CPP mapping is a starting point, identifying likely presence of nationally important resource; the developer should undertake a specific peat assessment to inform the siting, design or other mitigation in order to at least substantially overcome significant effects on CPP.





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 into account within design and assessment of the proposal. The advice of the Council's Landscape Officer, elsewhere in this pack, provides further information. The developer should take these into consideration; the criteria should influence the proposals and the supporting documents for any application should include the developer's assessment against these criteria.

Generally there is a preference for accommodating further onshore wind energy development by clustering windfarms (be they new windfarms or extensions to existing ones), rather than adding a proliferation of smaller schemes dispersed over a wider area. However, key considerations for proposals will include 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 for an extension to an existing scheme, and opportunities to use existing infrastructure should be explored; where opportunities are not taken and other infrastructure instead proposed, a reasoned justification should be provided.

These aspects will require careful consideration, particularly in light of the indicative height of turbines (180m to blade tip) – significantly taller than those in the existing scheme (135m and some 125m) and having lighting requirements. The existing scheme was reduced in the course of its pre-application design and subsequent consideration of application, to reduce or avoid particular impacts. The proposed extension would likely increase and extend the area of impact.

It is understood that the indicative layout maximises the number of turbine locations shown after taking into account only watercourses and setbacks from them. Having reference to your Figure 2: Proposed and Existing Development Comparative ZTV, it may be noted that the proposed extension may extend visibility into areas including (but not limited to) those along: the lower slopes of Glen Urquhart on the north side of the A831 and including along the A833 as it drops into Glen Urquhart; the A82 and waters of Loch Ness on the north side of Urquhart Bay; the A862 between Muir of Ord and Beaulay; the A96 between Gollanfield and Balloch and then A8082 westwards from the A9; stretches of the B862 and B852 on the south side of Loch Ness. Regard should be had to sensitive receptor locations. The extent of the indicative turbine layout may extend the windfarm significantly closer to the Great Glen 'trough' and ultimately the scheme may need to be reduced significantly in size in response to impacts. Detailed information and assessment will be required in due course if you proceed, in order to establish the significance of any impacts. You are

encouraged throughout the process to explain the design iterations and how they have responded to assessment of impacts.

The Council 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 appraising the sensitivity of the landscape to onshore wind energy development and identifying strategic capacity. Your site falls within the area covered by the Loch Ness study, which is included in the Supplementary Guidance (2016). With reference to the map on page 38 (pdf page 40) of the SG, it may be noted that all of your indicative site boundary is located within the LCA referenced LN10 Separation of Glen Urquhart and Glen Moriston, the landscape character type of which is Rocky Moorland Plateau. You should consider within your assessment the guidance that the appraisal provides for LN10. The advice of the Council's Landscape Officer, elsewhere in this pack, provides further information. You should read and have regard to all relevant parts of the appraisal; this includes for example having regard to what the appraisal says for adjacent LCAs in order that the wider context of the guidance is understood and taken into account.

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 and routes.

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 (HER). The section within the supplementary guidance on Natural and Historic Environment (page 22-24) 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.
- Aviation – You are advised to discuss your proposals with Highlands and Islands Airports Limited in order to ensure consideration of any radar matters.

Developer Contributions

Lease note that under the terms of HwLDP Policy 31 Developer Contributions and the Council's [Developer Contributions Supplementary Guidance \(2018\)](#), industrial (including energy) developments may be required to make contributions towards: transport; green infrastructure; water and waste; public art.

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.

6. 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. A Sustainable Design Statement is required.

The wind farm needs to be considering the provision of energy systems within the holistic demand cycle of the network. The developer could consider storage and potential for generation of alternative fuels as part of the development. The application should include a statement on how the development is likely to contribute to the Scottish Government Energy Efficient Scotland roadmap and provide the Highlands with secure and clean electricity supplies.

Wind farms produce a sustainable form of energy, however the Council will need to be satisfied in reaching a conclusion on any consultation or application that the development proposed by the application is in fact sustainable development. In order for us to do so we recommend that matters related to the three pillars of

sustainable development are fully assessed in the information which supports the application.

7. Natural Heritage

Landscape and Visual Impacts

The proposed development lies within the landscape Character LN10 of the Highland Strategic Capacity study for Loch Ness. The area is defined as Rocky Moorland Plateau which separates Glen Urquhart and Glen Moriston.

Highland Council Onshore Wind Energy Supplementary Guidance: Part 2: Highland Strategic Capacity

The Landscape Character Area LN10 is identified as having limited capacity for 'additional Large turbines within the existing pattern'. And notes that any further development should:

- Be set back from Key Routes
- Preserve mitigation established by current schemes
- Maintain the landscape setting of each existing scheme.
- respect spacing and scale of existing development pattern.
- minimise visual confusion from higher ground to the west and north and with Meall Fuar-mhonaidh

The study highlights several key views which may be pertinent to development in this area and I note that some of those likely to be affected by this particular development are addressed by the selected viewpoints 3, 7 and 17. To further cover such views and outlook from key routes the LVIA should also cover:

- Loch Ness West views, a land-based viewpoint on the A82 should be included, to cover the visibility around the junction of the Great Glen Way with the A82 in the vicinity of Tychat.
- A887 in the general vicinity of Dundreggan
- A833 above Milton

Out with the Supplementary Guidance Study Area there are also areas of sensitivity which may potentially experience impacts from this development. These would include, but not necessarily be limited to:

- A831 approach to Cannich from Struy.
- Elevated viewpoints to the north side of Strathglass on the edge of the Glen Strathfarrar NSA.
- Routes along the north sides of Loch Affric and Loch Beinn a' Mheadhoin within the Glen Affric NSA

Assessment of impacts should specifically address the variety of sizes of turbine which will be visible to receptors at one time and consider the effects of different rotation speeds and consider night time visibility including any additional requirements for lighting.

The Supplementary Guidance sets out a number of criteria which highlight potential impacts which may affect decision making, below the most significant of these are highlighted with a brief note of potential impacts to consider.

1	Relationship between Settlements/Key locations and wider landscape respected.	Potential for turbines to be visually prominent from Key Views and settlements, including Drumnadrochit, Invermoriston and Dores.
2	Key Gateway locations and routes are respected	Impacts on A877 as approach to Cannich and Gateway to Glen Affric
3	Valued natural and cultural landmarks are respected	Meall Fuar-mhonaidh provides a unique perspective of the Great Glen, accessible to both tourists and locals, and is a popular climb. There may be potential for further encroachment of turbines towards the hill to compromise its relationship with its setting.
4	The amenity of key recreational routes and ways is respected.	Potential impacts on perception of character of landscape as perceived from the Great Glen Way.
6	The existing pattern of Wind Energy Development is respected.	Impacts from the proposal on the existing pattern of nearby wind energy including the existing Bhlaraidh development, considerations include: <ul style="list-style-type: none"> • Turbine height, proportions and rotation speed, • density and spacing of developments,

		<ul style="list-style-type: none"> • typical relationship of development to the landscape: e.g. would the development overwhelm this Landscape Character area such that the entire unit becomes dominated by turbines? • previously instituted mitigation measures • Planning Authority stated aims for development of area
8	The perception of landscape scale and distance is respected	Potential for such extensive spread of larger turbines to diminish the apparent scale of the plateau to the detriment of the setting of Loch Ness.
9	Landscape setting of nearby wind energy developments is respected	Potential for cumulative effects drawing greater attention to those turbines which are already visible from the Bhlaraidh development in the surrounding area.
10	Distinctiveness of Landscape character is respected	Potential reduction in perceived variety of Landscape Character Areas as LN10 becomes visually overwhelmed by or subservient to, turbines.

The scale of the turbines would need a strong justification in landscape and visual terms. These would be the tallest onshore turbines in Highland and significantly taller than any of the other schemes currently in operation or proposed around Loch Ness. It is unclear whether turbines of the scale proposed can be accommodated within this landscape without significant adverse visual impact or whether they would fit with the existing design pattern of on shore wind energy development.

The previous scheme was subject to a number of modifications which reduced the visual impact of the scheme, particularly in the vicinity of Loch Ness. There is a concern that this mitigation will be undone through the location and height of the proposed turbines. Of particular concern is the overall pattern of development around Loch Ness which tends to be significantly set back from the visual envelope of Loch Ness and therefore is not seen. The proposed layout would bring large scale turbines onto the hills at the side of Loch Ness. It is recognised that there is scope for an extension of Bhlaraidh Wind farm but bringing larger turbines closer to the loch would not be supported. Further given the height of the proposed turbines it is considered that there would be an impact on the perception of scale of the landscape around Loch Ness in particular where it is viewed from the south side of Loch Ness and from Loch Ness itself which is part of an outward looking Special Landscape Area.

Impact on Natural Environment (Scottish Natural Heritage)

Please refer to the guidance on the SNH website for details on the range of survey work and methodologies

The key issues which will inform our position in relation to this proposal are:

- Landscape and visual – impacts on the surrounding NSA's and Wild Land Areas, including an assessment of the impact of aviation lighting. Cumulative effects of the proposal should be assessed in particular the consented Bhlaraidh wind farm which is made up from turbines with different heights and dimensions to those proposed. A layout and design should be presented which is in keeping with the existing design and pattern of development.
- Designated sites – impacts on designated sites in particular River Moriston SAC and North Inverness-shire Lochs SPA which both have connectivity to this proposal.
- Peat, priority peatland habitats and carbon rich soils - The proposed development site includes these areas, the importance of which has been identified in SPP. An assessment of the impact of this proposal on this resource should be made and the EIA Report should contain details of any mitigation measures which have been incorporated to ensure the protection of the carbon rich soils, deep peat and priority peatland habitats. The assessment should consider and if necessary quantify any loss of this resource and any impacts on the functioning of the habitats associated with it.

In addition an assessment of the impacts should be made using a carbon calculator details of which can be found on Scottish Government website at <http://www.scotland.gov.uk/Topics/Business-Industry/Energy/Energy-sources/19185/17852-1/CSavings> .

We also expect the applicant to carry out a peat depth survey and peat stability assessment to determine

the location of infrastructure, the risk to habitats and species, and for this information to be presented in the ES.

We advise the developer to include as much detail of the survey work undertaken at the scoping stage so we can provide specific rather than generic comment at that stage.

Guidance for undertaking Landscape and Visual Impact Assessment and cumulative impact assessments can be found at: <http://www.snh.gov.uk/planning-and-development/renewable-energy/onshore-wind/landscape-impacts-guidance/>

Wild land assessment guidance can be found at the following:

<http://www.snh.gov.uk/protecting-scotlands-nature/looking-after-landscapes/landscape-policy-and-guidance/wild-land/>

Information regarding the status and qualifying features of the site can be found at:

<http://www.snh.org.uk/snhi/> and information on assessing the connectivity distances for SPA's can be found at: <http://www.snh.gov.uk/docs/A994842.pdf>

Information on what to include in Deer management Plans can be found at: <http://www.snh.gov.uk/land-and-sea/managing-wildlife/managing-deer/>

Surveys of European and nationally protected species and proposals for mitigation/enhancement. Further information on methods etc. can be found on our website at:

<http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/>

Bird survey work guidance can be found at: <http://www.snh.gov.uk/planning-and-development/renewable-energy/onshore-wind/windfarm-impacts-on-birds-guidance/>

Our map and supporting guidance on Carbon rich soils, deep peat and priority peatland habitats

<http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/soils-and-development/cpp/>

8. 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.

This policy is equally applicable to wind farm layout and design as well as the design of any supporting infrastructure.

A thorough chapter in the ER on design evolution of the wind farm will be required. This should identify what the key design drivers were for the wind farm and also where the wind farm is designed to be viewed from. This section of the ER should also consider the design implications of aviation lighting.

The candidate turbines should be clearly set out in the ER and there should be consistency through each of the chapters with the same candidate turbine used for all chapters. If there are alternatives they should be identified in the ER.

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](#).

9. Amenity

Contaminated Land

There is no requirement to submit site investigation information regarding potential land contamination at this site.

Noise Impacts

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.

The target noise levels are 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. The night time lower limit of 43dB LA90 as suggested in ETSU is not considered acceptable in many areas of the highlands due to very low background levels. These limits would apply to cumulative noise levels from more than one development.

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 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 such developments. The good practice guide offers guidance on how to deal with cumulative issues. Where existing development has consented limits higher than suggested above, the applicant should agree appropriate limits with the Council's Environmental Health Officer.

The assessment should include a map showing all wind farm developments which may have a cumulative impact and all noise sensitive properties including any for which a financial involvement relaxation is being claimed.

The assessment should include a table of figures which includes the following:

The predicted levels from this development based at each noise sensitive location (NSL) at wind speeds up to 12m/s

The maximum levels based on consented limits from each existing or consented wind farm development at each NSL. If any reduction is made for controlling property or another reason, this should be made clear.

The predicted levels from each existing or consented wind farm development at each NSL.

The cumulative levels based on consented and predicted levels at each NSL.

The assessment should also include an outline for a mitigation scheme to be implemented should noise levels from the development be subsequently found to exceed consented levels.

In addition to quantifying cumulative noise levels, the assessment must also consider any increase in noise exposure, for example where there is an existing house with a wind farm to the east and a new wind farm is proposed to the west. If the householder is likely to be subjected to wind turbine noise in all wind conditions with little or no respite then the development may be inappropriate even if recommended noise limits are met.

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. Where a monitoring location is to be used as a proxy location for another property, particular care must be taken to ensure it is not affected by other noise sources such as boiler flues, wind chimes, etc. which are not present at that other property.

Difficulties can arise where a location is already subject to noise from an existing wind turbine development. ETSU states that background noise must not include noise from an existing wind farm. The GPG offers advice on how to approach this problem and in some cases, it may be possible to utilise the results from historical background surveys.

It is recommended that the developer's noise consultant liaises with Environmental Health at an early stage to discuss any issues regarding the proposed methodology.

Amplitude Modulation

Research has been carried out in recent years on the phenomenon of amplitude modulation arising from some wind turbine developments. However at this time, the Good Practice guide does not provide definitive Planning guidance on this subject. That being the case, any complaints linked to amplitude modulation would be investigated in terms of the Statutory Nuisance provisions of the Environmental Protection Act 1990.

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 applicant will 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. Highland Council has some information on known supplies but it is not definitive. An on-site survey will be required.

Dust

Depending on the proximity of the working area to houses etc. the applicant may require to submit a scheme for the suppression of dust during construction. Particular attention should be paid to construction traffic movements.

Key Points Assessments to be carried out and/or submitted with application

Noise

Private water supplies

Dust - Assessment of noise from wind turbines

Assessment of noise from construction activities

Investigation into private water supplies

Assessment of potential of dust nuisance

10. Transport and Wider Access

Traffic and Transportation Impacts

Construction Traffic Management Plan

The proposed development is an extension to an existing windfarm and therefore the construction delivery route has already been established, which comprised the Port of Inverness, Inverness local road, A887 and the A82 trunk roads. The proposed blades for this extension are likely to arrive from the port of Kyle of Lochalsh and be delivered to site via the Kyle of Lochalsh local roads and the A87, A887 / A82 trunk roads.

It is recommended that the CTMP shall relate to all construction traffic and that agreement on its content be reached with the Police, Transport Scotland, Highland Council and appropriate local community representatives before development commences.

The CTMP shall include the following:-

- A risk assessment for transportation during daylight hours and hours of darkness.
- Proposed traffic management and mitigation measures within any settlements along the access routes, as required. Measures such as temporary speed limits, suitable temporary signage, road markings and the use of speed activated signs should be considered.
- A contingency plan prepared by the abnormal load haulier. The plan shall be adopted only after consultation and agreement with the Police and the respective roads authorities. It shall include measures to deal with any haulage incidents that may result in public roads becoming temporarily closed or restricted.
- A procedure for the regular monitoring of road conditions and the implementation of any remedial works required during the construction period.
- A detailed protocol for the delivery of abnormal loads/vehicles, prepared in consultation and agreement with interested parties. The protocol shall identify any requirement for convoy working and/or escorting of vehicles and include arrangements to provide advance notice of abnormal load movements in the local media. Temporary signage, in the form of demountable signs or similar approved, shall be established, when required, to alert road users and local residents of expected abnormal load movements. All such movements on Council maintained roads shall take place out with peak times on the network, including school travel times, and shall avoid local community events.
- A detailed delivery programme for abnormal load movements, which shall be made available to Highland Council and community representatives.
- Details of the new proposed site accesses. Such details should include suitable drainage measures, geometry and construction, measures to protect the public road and the provision and maintenance of appropriate visibility splays.
- Details of appropriate traffic management which shall be established and maintained at the site access for the duration of the construction period. Full details shall be submitted for the prior approval of Highland Council, as roads authority.
- Measures to ensure that all affected public roads are kept free of mud and debris arising from the development.
- Measures to ensure that construction traffic adheres to agreed routes.

In addition to the CTMP we recommended the applicant establish an 'Access Liaison Group' before construction starts. The group should include representatives of the local communities directly affected by the works. During the construction phase of the development the applicant should meet at regular intervals with this group to review the impact of the works and agree measures to address any issues that arise.

No works relating to the development shall commence until the full details of the CTMP have been agreed in consultation with the relevant interested parties.

Wind Farm Maintenance

Ongoing maintenance will be required throughout the lifetime of the development. This may give rise to significant transport issues which will require further consultation with interested parties. A condition should therefore be included requiring notification and approval of the Planning Authority in consultation with the respective Roads Authorities, and community councils for any significant HGV or Abnormal Load

movement required during this period. This is purely from the perspective of managing construction traffic on the public roads and should in no way hinder or obstruct any required maintenance of the Wind Farm.

Wind Farm Decommissioning

The majority of requirements raised are linked to the construction phase of the development. However, similar issues will arise during decommissioning with such issues needing consultation and approval to reflect changing circumstances years hence. For example the CTMP agreed for construction is not expected to be appropriate for the decommissioning stage, albeit similar issues will arise. This will require an appropriate condition.

Wear and Tear Agreement

There is a significant risk of damage to Council maintained roads, from the movement of large and heavy construction vehicles. Structural failure of carriageway construction is a possibility, as is verge and carriageway edge damage due to vehicle overrun.

A wear and tear agreement in accordance with Section 96 of the Roads (Scotland) Act: 1984 shall be required under which the developer is responsible for the repair of any damage to the Council's road network that can be attributed to construction related traffic. The developer shall lodge a Road Bond or similar financial security to protect the interest of the Council.

As part of this agreement, pre-start and post construction road condition surveys shall be carried out by the developer at his expense to the satisfaction of the Roads Authority. To protect the interest of the Council the condition surveys shall be witnessed by a Council member of staff.

This agreement will require an appropriate condition.

Impacts on Public Access

The Access Team recommend that public access be considered as part of a scoping exercise. Advice on how to do that can be found in Appendix 6 of version 5 of SNH's Environmental Impact Assessment Handbook.

Following that advice will mean considering the physical impacts of the development during and after construction and how to mitigate them; the visual impacts are addressed by SNH and other officers in the Highland Council.

In turn that will inform an access management plan. In common with previous plans produced by SSE we expect that public access is accommodated on the existing paths and tracks whether or not they are used for construction traffic. Any existing or new fences or gates should incorporate pass gates beside them to accommodate walkers, cyclists and horse riders. That means hatch or self-closing gates with an internal diameter of at least 1.5m.

The format of previous SSE access management plans could be followed here. Considering the few existing paths and tracks that will be physically affected it need not be onerous.

Ideally that plan would be submitted with an application and dealt with during that process. The less attractive alternative is a suspensive condition that requires a plan to be submitted and approved before construction starts. That can hold things up.

Principal Visual Receptors might include the Graham partnering Meall Fuar Mhonaidh - Glas Bheinn Mhor [651m]. It should include both high and low level routes of the Great Glen Way, the Great Glen Canoe Trail and the newly completed South Loch Ness Trail. The latter will be promoted as part of Loch Ness 360 - a route circumnavigating loch.

The route up Meall Fuar Mhonaidh should qualify as one of your "Popular Mountain Routes". Counts from over 10 years ago averaged around 5000 ascents a year. It is likely that number is considerably more now.

You have shown Scottish Hill Tracks but not routes shown on Scotways catalogue of Rights of Way. That shows parts of the wider paths network [including one that will form part of construction access] along with a nearby right of way east of the site.

In short we recommend that:

1. You assess the impact on public access according the SNH handbook and use that information to inform an
2. Access Management Plan that is submitted with an application, that mitigates any negative impact on public access during and after construction and which makes a positive contribution to the accessibility of the area for walkers, cyclists and horse riders during the operational phase.

Impact on the Trunk Road Network, Transport Scotland

The nearest trunk roads to the site are the A887 (T) and the A82 (T), both located at Invermoriston.

No information is provided with regard to the likely port of entry or the turbine delivery route, however, given its location, it is clear that the trunk road network will be utilised during delivery. While we note that the proposal is an extension to an operational windfarm, and therefore the delivery route has already been established, we note that the tip height is up to 180m and the proposed blades are likely to be 75m in length. Transport Scotland will require to be satisfied that the increased size of turbines proposed can negotiate the selected route and that transportation will not have any detrimental effect on structures within the trunk road route path. An Abnormal Load Assessment (ALA) of the proposed route for turbine component delivery will, therefore, be required. The ALA should identify key pinch points on the trunk road network. Swept path analysis should be undertaken and details provided with regard to any required changes to street furniture or structures along the route.

11. Water

Impact of Flooding (THC)

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.

Impacts on the Water Environment and Peat, SEPA

Site and application specific advice

- Enough baseline information must be collected to full inform the layout of the development to ensure that what comes forward in the application is what will be built on site.
- The development should make use of as much existing infrastructure – access tracks, laydown areas, construction compounds, borrow pits etc. – as possible.
- Welcome the fact that indicates layout includes buffers to watercourses and water features. We presume the standard 50 m has been applied. Note a further buffer may be required (1) above lochs, as impacts on lochs from sedimentation, should it reach them, are likely to be significant, and (2) where there are steep slopes adjacent to the watercourse.
- SEPA would welcome consultation on the proposed peat probing strategy.
- Please include any peatland and habitat information already collected within the scoping report. This allows us to provide more specific and helpful advice.
- SEPA would welcome engagement throughout the pre-application process.

Detailed generic scoping requirements

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 must be re-used or upgraded wherever possible. The layout should be designed to minimise the extent of new works on 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 or other engineering activities in or impacting on the water environment cannot be avoided then the submission must include justification of this and a map showing:

- a) All proposed temporary or permanent infrastructure overlain with all lochs and watercourses.
- b) A minimum buffer of 50m 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 and drawings of what is proposed in terms of engineering works.
- c) Detailed layout of all proposed mitigation including all cut off drains, location, number and size of settlement ponds.

If water abstractions or dewatering are proposed, a table of volumes and timings of groundwater abstractions and related mitigation measures must be provided.

Further advice and our best practice guidance are 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](#).

Refer to Appendix 2 of our [Standing Advice](#) for advice on flood risk. Watercourse crossings must be designed to accommodate the 0.5% Annual Exceedance Probability (AEP) flows, 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 states (Paragraph 205) that "Where peat and other carbon rich soils are present, applicants must 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 must aim to minimise this release."

The planning submission must 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 peat to be re-used and how it will be kept wet permanently 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 except where requested to by Scottish Government in exceptional circumstances. Our advice on the minimisation of peat disturbance and peatland restoration may need to be taken into account when you consider such assessments.

Disruption to Groundwater Dependent 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 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 minimum buffers above 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.

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 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 minimum buffers above 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. The supporting information should refer to the current Forest Plan if one exists and measures should comply with the Plan where possible.

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 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 must 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. 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, limiting 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 proposals for a planning monitoring enforcement officer. Please refer to [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 advice for the applicant

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 862021.

12. Built and Cultural Heritage

Impact on the Historic Environment, THC Historic Environment Team (HET)

A few features of historic interest are currently recorded within the boundary of the proposal area; these mostly consist of the remains of historic land-use such as shielings and bothies in addition to a possible crannog site. There remains only limited potential for further features or remains 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 targeted 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.

Impact on the Historic Environment, Historic Environment Scotland

There are no scheduled monuments, category A listed buildings, inventory gardens and designed landscapes, or inventory battlefields within the development site, but there are some assets with potential to be affected within the surrounding area.

In terms of scheduled monuments, of most relevance due to proximity is the archaeological site known as 'SM 4567 Levishie Cottage, fort and earthwork 1050m NE of', which is located on south-facing slopes on the northern side of Strath Moriston, about 1.5km south of the development site. The monument comprises a fort of likely Iron Age date that was likely to have been carefully sited in a defensible location within a landscape over which it exerted control, so a key element of its setting is views towards it made when moving through the strath. Whilst topography may reduce the visibility of turbines in outward views from the fort this should be verified and assessed. It is not possible at this stage to have certainty over the severity of impacts on the fort's setting, and we therefore recommend that further consideration is given to assessing these impacts within the planning/EIA process. As part of this process we would expect to see visualisations that assess the impact of the turbines on the setting of the monument and inform mitigation if appropriate.

Further afield, there is potential for the development to impact on views of Urquhart Castle from Loch Ness, especially when it is approached from the north by boat. Urquhart Castle is a scheduled monument and also a Property in Care of Historic Environment Scotland. We recommend that the viewpoints utilised when assessing the original Bhlaraidh scheme are used again (VP 7 and VP 17) in order to robustly assess these impacts and inform mitigation if appropriate.

This application should be determined in accordance with national and local policy on development affecting the historic environment, together with related policy guidance. 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. Technical advice is available on our Technical Conservation website at www.engineshed.scot/.

Given the distance between the development site and historic assets within our remit that have particularly sensitive settings, it is likely that any impact on the setting of these assets will not raise issues of national significance. However, we expect a thorough consideration of the impacts on the two scheduled monuments noted in our response.

13. Developer Contributions

No developer contributions are anticipated at this time, however a further assessment will be undertaken at the time of the application.

14. 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 however we understand that this will be a tri-party agreement with the Energy Consents Unit. Contact details are provided in section 18 towards the end of this pack.

Community Councils

In terms of the appropriate Community Councils to consult, the proposal is located within the *Strathly and Armadale* 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/>

Community Councils

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

Access

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

- Inverness Access Committee, c/o Shopmobility, Falcon Gallery Car Park, Inverness, IV2 3PR

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 [REDACTED]

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](#).

15. Any other appropriate information

Gaelic

In line with the Council's ongoing commitment to promote the increased use of Gaelic in developments

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

[REDACTED]	[REDACTED]	[REDACTED]
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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. This is not comprehensive and should be used as a guide only. All matters in this pre-applications advice pack should be addressed in the supporting information associated with your application. 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.		
Natural Heritage	Landscape and Visual Impact Assessment (addressing the matters set out in this report and accompanied by appropriate visualisations and wirelines)	X
	Landscape Plan	
	Landscape Maintenance/Management Plan	
	Protected Habitat Survey	X
	Protected Species Survey	X
	Assessment of the Impact of Tree Felling and Compensatory Planting Plan	X
Design	Design Brief and/or Master Plan	
	Design and Access Statement	X
	Sustainable Design Statement	X
Amenity	Contaminated Land Report	
	Dust Survey	X
	Noise Assessment (including cumulative)	X
	Waste Strategy	X
Transport and Wider Access	Recreational Access Management Plan	X
	Scottish Transport Appraisal Guidance (STAG)	
	Transport Assessment	X
Water	Flood Risk Assessment	X
	Drainage Impact Assessment	X
Built and Cultural Heritage	Archaeology watching brief/Site investigations	X
	Assessment of Impact on Historic Environment	X
	Structural Survey	
Public Consultations	Pre-application Consultation Report	X
Miscellaneous	Minerals (mitigation and restoration management plan)	
	Retail Assessment	
Any other appropriate document	<ul style="list-style-type: none"> Construction Noise Assessment Assessment of impact on private water supplies Framework Construction Environment Management Document Framework Construction Traffic Management Plan Abnormal Load Assessment Swept Path Analysis Peat Management Plan Details of Battery Storage Facility Habitat Management Plan Peat probing information Carbon Balance Assessment Assessment of impact on peat Borrowpit Management Plan Schedule of Mitigation 	X

Environmental Impact Assessment

Where a proposal has been determined to require an EIA, and therefore will require the production of an Environmental Impact Assessment Report, 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 we await the consultation for the Scottish Government	X

